

A1 in Northumberland: Morpeth to Ellingham

Scheme Number: TR010059

7.22 Applicant's Response to Deadline 4 Submissions

Rule 8(1)(c)

Infrastructure Planning (Examination Procedure) Rules 2010

Planning Act 2008

April 2021

Infrastructure Planning

Planning Act 2008

**The Infrastructure Planning
(Examination Procedure) Rules
2010**

**The A1 in Northumberland: Morpeth to
Ellingham**

Development Consent Order 20[xx]

Applicant's Response to Deadline 4 Submissions

Rule Reference:	8(1)(c)
Planning Inspectorate Scheme Reference:	TR010059
Document Reference:	7.22
Author:	A1 in Northumberland: Morpeth to Ellingham Project Team, Highways England

Version	Date	Status of Version
Rev 0	April 2021	Deadline 5

CONTENTS

1 **APPLICANT'S RESPONSE TO DEADLINE 4 SUBMISSIONS** **1**

1.1 **INTRODUCTION** **1**

TABLES

Table 1-1 – Northumberland County Council	2
Table 1-2 – Northumberland County Council - Any post-Hearing Notes Requested at the Hearings	3
Table 1-3 – Northumberland County Council - Any post-Hearing Notes Requested at the Hearings - Response to Point 36	6
Table 1-4 – Environment Agency	16
Table 1-5 – Brockthorpe Consultancy on behalf of ME Beal and Sons	42
Table 1-6 – Gareth Moor and Colin Moor	43
Table 1-7 - Mark Hawes - Deadline 4 Submission - Comments on responses submitted for Deadline 3 - Part 1	50
Table 1-8 - Mark Hawes - Deadline 4 Submission - Comments on responses submitted for Deadline 3 - Part 2	80

1 APPLICANT'S RESPONSE TO DEADLINE 4 SUBMISSIONS

1.1 INTRODUCTION

- 1.1.1. This document relates to an application for a Development Consent Order (DCO) made on 7 July 2020 by Highways England (the 'Applicant') to the Secretary of State for Transport via the Planning Inspectorate (the 'Inspectorate') under section 37 of the Planning Act 2008 (the '2008 Act'). If made, the DCO would grant consent for the A1 in Northumberland: Morpeth to Ellingham (the 'Scheme').
- 1.1.2. The Scheme comprises two sections known as Part A: Morpeth to Felton (Part A) and Part B: Alnwick to Ellingham (Part B), a detailed description of which can be found in Chapter 2: The Scheme, Volume 1 of the Environmental Statement (ES) [APP-037].
- 1.1.3. The purpose of this document is to set out the Applicant's response to submissions made at Deadline 4. The Applicant notes that Historic England made a submission at Deadline 4 but confirmed that they had no comments.

Table 1-1 – Northumberland County Council

Ref. No.	Response:	Applicant's Response:
Comments on the Accompanied Site Visit		
1	We are broadly in agreement with the itinerary proposed, however feel that it is a little too focussed on the line of the route and we think it is important to provide a better overview of the landscape context at the start of the visit for each section to aid a wider appreciation before focussing in on the detail of the route itself. We would suggest the following additional stops to be incorporated into the itinerary.	1. It is correct that the route of the Scheme set out in the Itinerary for Accompanied Site Inspection (ASI) [REP2-023] is limited in scope, since it is for others to draw attention to matters, they wish to be considered in relation to its rural setting. The specific issues raised are addressed below.
2	Part A – add a visit to viewpoint 6 in between stops 1 and 2. To appreciate the presence of Coronation Avenue as a landscape feature and to view the route in its landscape setting.	<ol style="list-style-type: none"> 1. The Applicant is content with the suggestion that the ExA should consider Viewpoint 6. However, the walk to viewpoint 6 and return leg, is likely to take up to 1 hour, and parking of numerous vehicles for a prolonged period of time on Hebron Road may be unsuitable. It considers that it may be more appropriate for an unaccompanied site visit to attend this location. The unaccompanied visit to Beacon Hill, suggested between stops 3 and 4, would be accessed on foot from Hebron village along PRow 407/018. 2. The effect of the Coronation Avenue on the wider landscape will be appreciated in driving along the existing A1. Location 1 on High Highlaws Road, with views to the north-east would also provide an opportunity to appreciate the regularly spaced nature of the avenue's trees without requiring extensive walking routes.
3	Part A – it is important to visit the west side of the A1 at stop 11 (West Moor). It may be better to find suitable parking on the west side if possible, to avoid crossing the road.	<ol style="list-style-type: none"> 1. The Applicant is content with the suggestion of an additional stop on West Moor Road and a suitable parking space for several cars exists on the former road surface on the most easterly bend in the road which would provide an opportunity to understand the relationship between the junction, adjacent dwellings and the open landscape to the north. 2. An updated itinerary for the ASI is submitted as Appendix ii at Deadline 5 to include an additional stopping point No.12.
4	Part B – We'd suggest that the site visit to Part B starts with a drive up the B6341, with a specific note (or stop) to consider views and the landscape context from the vicinity of viewpoint 20. The remainder of the site visit could then be reversed	<ol style="list-style-type: none"> 1. The Applicant agrees that a drive north or south along the B6341 would provide an opportunity to appreciate the existing landform, the context of views and direction of travel whereby views of the A1 would be achieved. A stop along the B6341 is considered appropriate and there is a layby approximately 400m north of Heckley Cottage with views north-east towards the proposed Heckley Fence overbridge. This could be undertaken as suggested by NCC or alternatively undertaken at the end of the site visit. 2. An updated itinerary for the ASI is submitted as Appendix ii at Deadline 5 to include an additional stopping point No. 20.
5	In addition, we would request that the practicalities of the site visit to be considered under the current restrictions and the location of some of the scheduled stops in respect of suitable parking provision. The need for individuals to travel separately may lead to large numbers of vehicles being involved in the site visit. Consideration into the safe parking of cars at each stop and the potential for damage to the highway verge if large numbers of cars are in attendance at the visit.	1. Section 1.2.2 of the ASI [REP2-023] states that a risk assessment will be undertaken once the Government guidance on Covid-19 is confirmed for the new date of the site inspection. The assessment included as part of ASI [REP2-023] is based on full knowledge of the area, with safe stopping points for a traditional ASI with a minibus, which may require changes to the stopping locations, as NCC have suggested if restrictions are still in place.

Ref. No.	Response:	Applicant's Response:
Comments on Documents submitted at Deadline 3		
6	The Construction Traffic Management Plan remains under discussion with the applicant and therefore comments are not provided at this deadline. The Council has no other comments at this time on documents submitted as most issues are either agreed or remain under discussion.	The Applicant confirms that discussions on the Construction Traffic Management Plan [REP3-015 and 016] took place with the NCC Streetworks and Highways teams on 15/02/2021. The minutes from the meeting with suggested close out of issues has been accepted by NCC and reflected in the Statement of Common Ground with NCC [REP4-018] to be updated and submitted at Deadline 5. Any minor amendments to the CTMP will be submitted at Deadline 6.

Table 1-2 – Northumberland County Council - Any post-Hearing Notes Requested at the Hearings

Ref. No.	Action Point:	Response:	Applicant's Response:
6	Confirmation that Northumberland County Council (NCC) are satisfied with text in Art 7(b)(ix).	From a highways perspective, we are satisfied with the text as set out in Art 7(b)(ix)	1. The Applicant notes that NCC are satisfied on this point.
7	NCC to respond to the Applicant's response to ExQ1 DCO.1.39 and DCO.1.40, in relation to Art 11.	The applicant's response to ExQ1 DCO.1.39 confirms that the revised DCO has consistency in notifying the Street Authority at 6 weeks and, as such, have no comments to make. (Noting DCO.1.40 is linked more to Article 12 so comments have been made on this under Point 8)	1. The Applicant notes that NCC have not comments on this point.
8	Applicant and NCC to consider Art 12 and identify any matters of disagreement.	Following on from our meeting with the applicant on 15th February, the applicant's consultant has shared notes of the meeting on 10th March, which have provided clarity in relation to Article 12, along with the points of clarity made in the Hearing Sessions. It is understood that these notes will form subsequent iterations of the Statements of Common Ground to which we will comment and confirm.	1. The Applicant has shared the meeting notes with NCC following the meeting with NCC Streetworks team on 15/02/21. It was agreed that a follow up meeting with this team was not required and the Applicant is working with NCC to close out the issues noted during the meeting. The Applicant confirms to the ExA that these aspects will be captured in subsequent iterations of the SoCG with NCC with any required revisions being made to the relevant Schedules of the dDCO.
9	NCC to provide answer to Applicant's answers to ExQ1 DCO.1.41 and DCO.1.42.	DCO.1.41 – The rationale for these powers in Article 14 as set out in the applicant's response and the revised Explanatory Memorandum are acceptable to NCC and information is to be supplied in relation to the Road Classifications of the current and potential future Local Road Network for inclusion in the next draft DCO.	1. The Applicant notes that NCC are satisfied with the explanation given for the powers in Article 14 and understand that there is nothing outstanding in that regard. The Applicant is working with NCC to agree the classification of roads within the DCO schedules.
		DCO.1.42 – We acknowledge the applicant's response to the question and have no detailed comments to make to this regard. As stated above, we continue to supply information relation to the Road Classifications of the	1. The Applicant notes that NCC are satisfied with the explanation given for the powers in Article 14 and understand that there is nothing outstanding in that regard. The Applicant is working with

Ref. No.	Action Point:	Response:	Applicant's Response:
		current and potential future Local Road Network for inclusion in the next draft DCO.	NCC to agree the classification of roads within the DCO schedules.
12	Confirmation from NCC that no further clarification is required in relation to the precise nature of the Stopping Up and the resultant status/ownership of the stopped up highway, as per NCC's comments on the Applicant's response to DCO.1.44.	<p>As discussed in the Hearing Sessions, a meeting was held with the applicant on 2nd March to go through these matters in relation to the Stopping Up and subsequent status and ownership of the Stopped Up highway. The Proposed Highway Adoption & Maintenance Responsibilities Plans (ref REP3-003) was used to facilitate this meeting although it should be noted that these plans only consider the future carriageway elements of the scheme and not the full extents of the highway associated with these sections of carriageway. Whilst the Maintenance Boundary Technical Note (ref REP1-049) indicates this additional information for the new grade separated junctions and the new local roads within Part B of the proposals, we would seek this level of detail for all elements of the scheme to ensure clarity over future maintenance liabilities for the network that would form the Local Highway Network. This exercise will also allow for clearer definitions of Stopped Up highway to be defined within the Rights of Way and Access Plans.</p> <p>During this meeting it was identified that the extent of the new Local Highway Network forming the East Linkhall Road (Works Package 29i) may require amendment in relation to the future designation of Local Highway Network and the location of the subsequent Private Access rights at location PA16/4 on the Public Rights of Way and Access Plans. A design solution similar to that proposed at the southern end of the de-trunked section of the A1 to the north of Priests Bridge (around location PA3/3 on the Public Rights of Way and Access Plans) may be required although we await revised proposals in this respect from the applicant as part of their review of the East Linkhall Road and the revised General Arrangement plans showing the two-lane carriageway as discussed in the Hearing Sessions.</p> <p>Further in the meeting comments in relation to drainage on the East Linkhall, West Linkhall and Rock South Farm Access Roads was discussed. From further examination of the documents and in particular the drainage strategy for Part B (APP-314 - 6.8 Environmental Statement -</p>	<ol style="list-style-type: none"> 1. The Applicant confirms that a meeting was held with NCC Officers on 02/03/2021, at which the Stopping Up and highway ownership was discussed. The elements previously annotated in the Proposed Highway Adoption & Maintenance Responsibilities Plans [REP3-003] and the Maintenance Boundary Technical Note [REP1-049] are agreed. 2. Further clarification on elements of soft estate in Part A are to be confirmed with NCC following which the plans and Technical Note for Part A will be updated and submitted at Deadline 6. 3. A date for a meeting with NCC Officers is planned for 09/04/2021. <ol style="list-style-type: none"> 1. At the meeting on 02/03/2021, it was clarified with NCC that the strategic road network currently includes the layby at West Lodge. The Applicant confirms that it is proposing a similar solution to that at Priests Bridge and will discuss this further with the NCC Officers at the next meeting on 09/04/2021. 2. If an update to the Rights of Way and Access Plans [REP2-003] is required, this will be submitted at Deadline 6 <ol style="list-style-type: none"> 1. The Applicant had previously shared the Drainage Strategy for Part B [APP-314] to the NCC Water and Drainage Officer. At the meeting between the Applicant and NCC Officers on 02/03/2021 it was confirmed that, as Local Highway Authority, NCC would require positive drainage on the new roads to be adopted.

Ref. No.	Action Point:	Response:	Applicant's Response:
		<p>Appendix 10.4 Drainage Strategy Report Part B.) by the Council as Local Highway Authority, it has become evident that the current proposals for these roads do not include positive drainage of the road to an outfall (although it is noted and accepted that the West Linkhall drainage proposals do partially utilise the existing A1 drainage). The lack of drainage provision for these roads would mean that they were not acceptable to the County Council for adoption. This is to be looked into by the applicant as an action from this meeting and discussions are on-going with the Applicant and their consultants to resolve this matter. The adoption of SuDs basins also forms part of these ongoing discussions</p>	<p>2. The Applicant is undertaking a review to the road alignments for both East Linkhall Road and Rock South Farm to consider the incorporation of a positive drainage network within the Order limits. An environmental assessment of any changes outside the Limits of Deviation described in the ES Chapter 2: The Scheme [APP-037] and the draft DCO [REP4-004 and 005] would be submitted at Deadline 6, once the details have been discussed and – it is anticipated - agreed with the NCC Officers at a meeting to be held on 09/04/2021.</p>
		<p>Therefore, whilst the principles of the Stopping Up and resulting status are better understood we cannot confirm that no further clarification is required until the actions from the meeting on 2nd March have been tabled and reviewed.</p>	<p>1. The Applicant continues to liaise with the NCC Officers to resolve the Stopping Up and highway ownership and will report the outputs from these discussions through updates to the Statement of Common Ground [REP4-016] and further amendments to the plans if required.</p>
17	Written update with progress between Applicant and NCC in relation to Article 16	<p>As stated in the response to Point 12, a meeting was held in relation to Stopping Up elements and resultant status/ownership of the Stopped Up highway and the future highway on 2nd March. This process is ongoing and we await the further clarifications and revised plans as stated in the response to Point 12. This work will feed into any amendments to Article 16 and associated Schedules.</p>	<p>1. The Applicant continues to liaise with the NCC Officers to resolve the Stopping Up and highway ownership. Further to the meeting on 02/03/2021 a further meeting is scheduled for 09/04/2021. Once the issues are resolved at this meeting, the Schedules associated with Article 16 will be updated at a future deadline.</p>
25	NCC will confirm in writing position on Requirement 9.	<p>We are satisfied that the requirement provides for archaeological remains to be identified and recorded. However, we recognise that there may be alternative wording which could make the requirement clearer, easier to follow and more explicit. This also applies to requirement 4 in general where there is potentially multiple cross-referencing between documents.</p>	<p>1. The Applicant notes the response from NCC and awaits further proposed wording from NCC.</p>
33	Confirmation from NCC of agreement with the Applicant's proposed Transport Management Plan – Construction.	<p>Following on from our meeting with the applicant on 15th February, the applicant's consultant has shared notes of the meeting on 10th March, which have provided clarity in relation to our initial comments. It has not been possible to provide formal confirmation of these notes in time for this Deadline; however, it is understood that the agreements will form subsequent iterations of the Statement of</p>	<p>1. The Applicant confirms to the ExA that it has shared the meeting notes with NCC following the meeting with NCC Streetworks team on 15/02/21. It was agreed at that meeting that a follow up meeting with this team was not required and the Applicant is working with NCC to close out the issues noted during the meeting.</p>

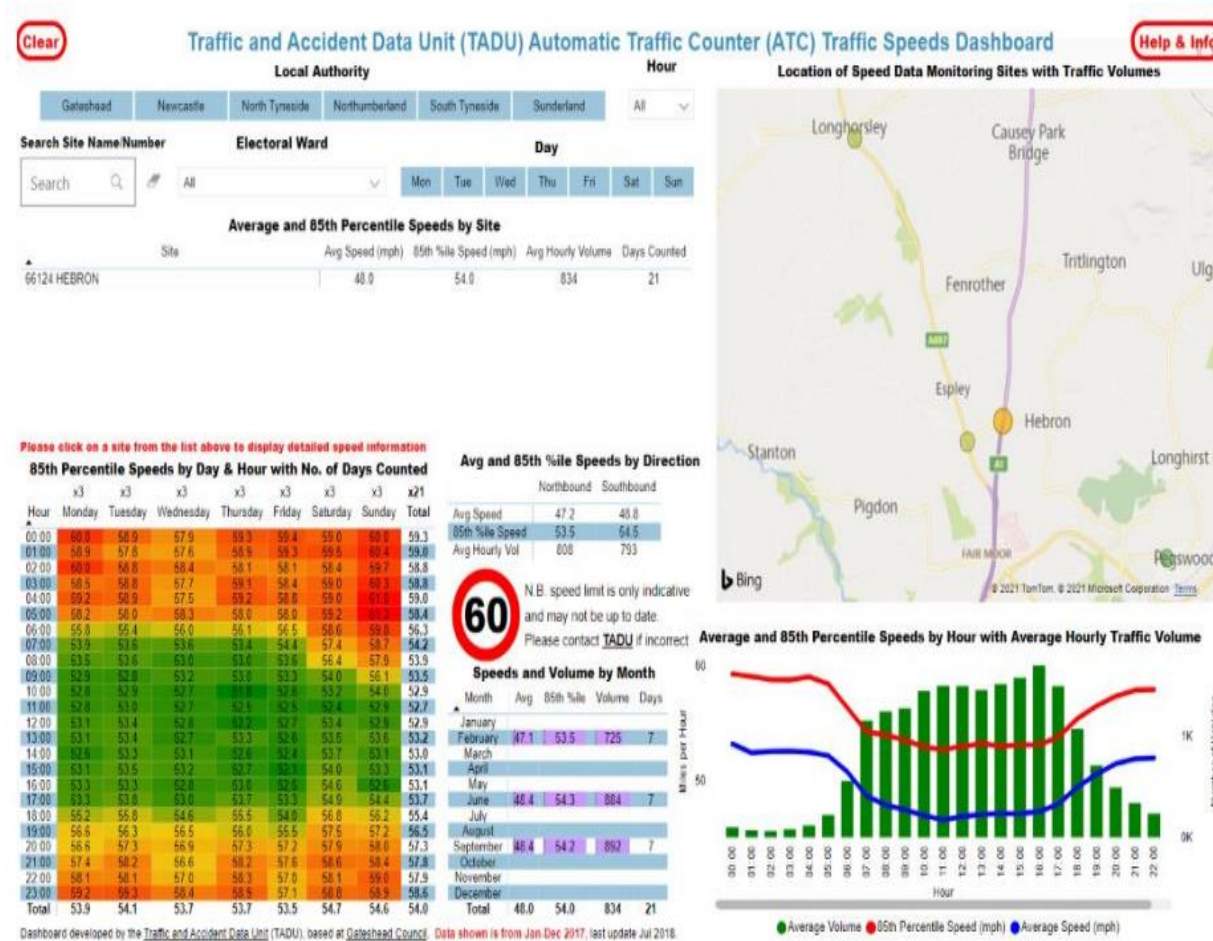
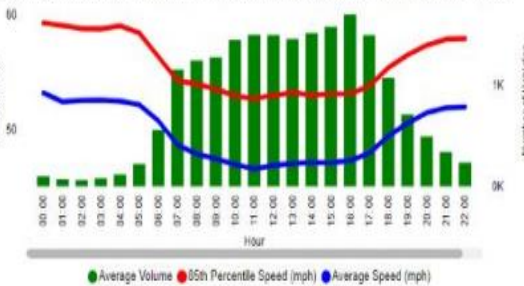
Ref. No.	Action Point:	Response:	Applicant's Response:
		Common Ground and the Outline Construction Environmental Management Plan and Construction Traffic Management Plan. The most recent submission of this Outline construction Environmental Management Plan (REP3-013 & REP3-014) includes clarity in relation to consultation with NCC as requested as well as confirmation of working practices. Some amendments in relation to the Construction Traffic Management Plan (REP3-015 & REP3-016) have been included in the most recent submission of this document. Whilst we cannot confirm NCC agreement in relation to these documents at this time, we are actively working with the applicant to ensure points of agreement are contained within subsequent versions of the documents and the Statement of Common Ground.	
36	Applicant and NCC summarise position on non-motorised transport.	See response below	1. See response below

Table 1-3 – Northumberland County Council - Any post-Hearing Notes Requested at the Hearings - Response to Point 36

Ref. No.	Response:	Applicant's Response:
1	NCC's position in relation to the provision for non-motorised transport has been set out in previous responses and during the Hearing Sessions. It is considered that the scheme has the potential to provide a new north-south connection that is currently not used due to the traffic flows and presence of the existing A1, particularly in relation to Part A of the scheme.	<ol style="list-style-type: none">1. As stated previously in the Applicant's Responses to Deadline 2 Submissions [REP3-024], the intent of the project is to create two lengths of dual carriageway to address the known issues on the existing single carriageway sections of the A1 at this location. With regard to the offline section, the intent is that all the through traffic remains on the new length of dual carriageway, with the existing length of the A1 de-trunked to only service the local community. It is expected, therefore, that this local road would be suitable for cyclists to use the carriageway as the vast majority of the existing traffic using the A1 will be removed from the de-trunked section.2. The creation of a new north-south connection for non-motorised transport, therefore, is not a requirement of the project, but is facilitated by the de-trunking of parts of the existing A1.
2	It is recognised that the provision of grade separated junctions and Public Rights of Way diversions has addressed east-west severance for non-motorised road users retaining and improving this connectivity for these users. This acceptance is based upon the premise that footways shown at grade separated junctions and bridges are connected to infrastructure provided on the de-trunked A1.	<ol style="list-style-type: none">1. The Applicant welcomes the confirmation that the east-west severance on the Scheme has been addressed.2. As stated previously in the Applicant's Response to Relevant Representations [REP1-064], Table 1-1, if there is a desire to create additional lengths of footways beyond the newly constructed dualled trunk road, then that would be over and above the Scope of the Scheme, so other funding routes, such as alternative funding mechanisms would have to be explored.

Ref. No.	Response:	Applicant's Response:
3	It is considered, however, that north-south severance for non-motorised transport in Part A is not considered in the scheme. North-south movements are significantly impacted upon by the current A1 and the disconnected provision of footways along the Part A element. With the removal of traffic from the A1 this constraint is partially addressed but the resultant legacy layout does not fully address this severance.	<ol style="list-style-type: none"> 1. The statement by NCC proceeds on a false premise, namely that the Scheme will cause severance. This is incorrect; because the existing A1 trunk road already functions in this location, the Scheme neither causes nor exacerbates north-south severance. Hence, there is no requirement for the Applicant to address it. 2. The Scheme does not create new north-south severance for non-motorised users. NCC may have an ambition to improve north-south links for non-motorised transport but this is not something which arises as a result of the impact of the Scheme. Hence, it is not the responsibility of the Scheme or the Applicant to address it. 3. Indeed, as NCC acknowledges, the Scheme assists in addressing north-south links for non-motorised users. There will be a dramatic drop in use of the de-trunked section of the A1 by motor vehicles with at least a 90% reduction in traffic levels and a significant reduction in HGVs. 4. The Scheme also provides a new section of footway from West Moor Junction to Brockenfield Caravan park, where a new link road will be constructed, in line with DMRB standards. The existing section of footway from Tritlington School to Causey Park will be retained. The Scheme therefore assists in NMU provision along the de-trunked A1, reducing the length of road which does not have footway provision. The provision of footway and cycleway provision along the full length of the de-trunked A1, however, is not justified in order to mitigate the impact of the Scheme, 5. The Applicant liaised directly with NCC on 28/01/2021 to clearly state that funding for a separate cycleway along the section of the A1 to be de-trunked is not part of the scope of the Scheme. This is because the Scheme Objectives were determined as a result of the A1 North of Newcastle Feasibility Study and to align with the Roads Investment Strategy (RIS). The intent of the project is to create two lengths of dual carriageway to address the known issues on the single carriageway. The provision of a segregated cycle track on the de-trunked A1 is not a specific requirement of the project and is not required on the basis of traffic flows.
4	In addressing our concerns in relation to the standard of the de-trunked A1 in relation to its cross section, along with the proposals to provide a footway/cycleway between West Moor and Brockenfield Bridge, there is the potential to provide a complete non-motorised transport link from Morpeth to Felton and address the north-south severance.	<ol style="list-style-type: none"> 1. The Applicant is working with NCC to try and secure alternative funding. However, such provision would be separate to the Scheme. The Scheme is not dependent on such funding being available as the creation of a new north-south which is sought by NCC is not required in order to mitigate the impacts of the Scheme.
5	This is linked to the acceptability of the cross section of the de-trunked A1 and some initial analysis has been undertaken in relation to this cross section and why we consider the current cross section is not suitable for the future flows thus allowing for the re-allocation of highway space for non-motorised transport.	<ol style="list-style-type: none"> 1. The Scheme is not proposing works to the section of the existing A1 referred to by NCC which would become local highway for which NCC will be responsible. 2. The Applicant will continue to work with NCC to look at what options may be available provided that alternative funding can be successfully obtained.
6	The A1 within Part A is currently WS2 standard (approximately 10m wide) with a 60mph speed limit. The latest data available to us reports the 85th percentile speed as 54mph (Tyne and Wear Accident and Traffic Data Unit (TADU) 2018) with the annual average daily flow as shown in Table 36.1	<ol style="list-style-type: none"> 1. The existing A1 carriageway width is 7.3m + 1.0m hard strips, therefore an S2 carriageway (Cat 3A under the previous category reference used in TD 9/93). 2. The Applicant does not have access to the TADU dashboard, so cannot verify the information provided by NCC.

Ref. No.	Response:	Applicant's Response:																																								
7	<p>Table 36.1 - Annual Average daily flow (Source: Highways England's publicly available database. Counter located at Burgham Park - site location 9755/1 and 9755/2)</p> <table><tr><th>Year</th><th>Northbound</th><th>Southbound</th><th>2-way</th></tr><tr><td>2019</td><td>9,836</td><td>10,005</td><td>19,841</td></tr><tr><td>2020*</td><td>7,587</td><td>7,755</td><td>15,342</td></tr></table> <p>*The 2020 figures show the effects of COVID lockdown on traffic levels.</p>	Year	Northbound	Southbound	2-way	2019	9,836	10,005	19,841	2020*	7,587	7,755	15,342	<p>1. The Applicant confirms that the figures shown in Table 36.1 provided by NCC are consistent with the published Highways England WebTRIS data from the Burgham Park sites (references 9755/1 and 9755/2).</p>																												
Year	Northbound	Southbound	2-way																																							
2019	9,836	10,005	19,841																																							
2020*	7,587	7,755	15,342																																							
8	<p>The forecast traffic flows after de-trunking are shown in Table 36.2.</p> <p>Table 36.2 – Forecast Traffic Flows on De-Trunked A1 within Part A (Source: Traffic flows from SATURN model of scheme as supplied by WSP)</p> <table><tr><th>Year</th><th>Northbound</th><th>Southbound</th><th>2-way</th></tr><tr><td>2019</td><td>9,836</td><td>10,005</td><td>19,841</td></tr><tr><td>2020*</td><td>7,587</td><td>7,755</td><td>15,342</td></tr></table> <p>*Figures based upon Environmental Statement version of the Model as advised by WSP.</p> <p>Analysis of these flows indicate an 83% reduction on the 2020 figures and 87% reduction on the 2019 figures on the busiest section (Fenrother to Earsdon). The reduction in traffic flows will lead to an increase in traffic speeds.</p>	Year	Northbound	Southbound	2-way	2019	9,836	10,005	19,841	2020*	7,587	7,755	15,342	<p>1. The figures provided in Table 36.2 are identical to those in Figure 36.1 and assumes that these have been provided in error. The Applicant emailed the Highways Officer at NCC to obtain the correct information, which were supplied by email on 24th March 2021 and are shown below:</p> <p>Table 36.2 – Forecast Traffic Flows on De-Trunked A1 within Part A (Source: Traffic flows from SATURN model of scheme as supplied by WSP direct to NCC)</p> <table><tr><th>Section</th><th>AM Peak (2-way)</th><th>PM Peak (2-way)</th><th>Annual Average Daily Traffic (AADT)*</th></tr><tr><td>South of Fenrother</td><td></td><td></td><td>152</td></tr><tr><td>Fenrother to Earsdon</td><td>192</td><td>213</td><td>2,525</td></tr><tr><td>Earsdon to Causey Park</td><td>168</td><td>201</td><td>2,436</td></tr><tr><td>Causey Park to Eshott</td><td>50</td><td>75</td><td>1,241</td></tr><tr><td>Eshott to Burgham Park</td><td>21</td><td>42</td><td>547</td></tr><tr><td>Burgham Park to West Moor</td><td>31</td><td>58</td><td>723</td></tr></table> <p>2. The Applicant agrees that the forecast AADT flows on the section from Fenrother to Earsden indicate an 83% reduction compared with the 2020 figures and an 87% reduction compared with the 2019 figures in Table 36.1.</p> <p>3. Vehicle speeds are influenced by many factors including speed limits, geometry, visibility, levels of traffic, street activity, frequency of junctions and PMAs, lining and signage, location of speed cameras and individual behaviour. The Applicant is not proposing to change the speed limit on the de-trunked section as part of the Scheme but notes that NCC may choose to do so and it could propose such a provision in the DCO if sought by NCC (although its position is that this is not needed). The Applicant</p>	Section	AM Peak (2-way)	PM Peak (2-way)	Annual Average Daily Traffic (AADT)*	South of Fenrother			152	Fenrother to Earsdon	192	213	2,525	Earsdon to Causey Park	168	201	2,436	Causey Park to Eshott	50	75	1,241	Eshott to Burgham Park	21	42	547	Burgham Park to West Moor	31	58	723
Year	Northbound	Southbound	2-way																																							
2019	9,836	10,005	19,841																																							
2020*	7,587	7,755	15,342																																							
Section	AM Peak (2-way)	PM Peak (2-way)	Annual Average Daily Traffic (AADT)*																																							
South of Fenrother			152																																							
Fenrother to Earsdon	192	213	2,525																																							
Earsdon to Causey Park	168	201	2,436																																							
Causey Park to Eshott	50	75	1,241																																							
Eshott to Burgham Park	21	42	547																																							
Burgham Park to West Moor	31	58	723																																							

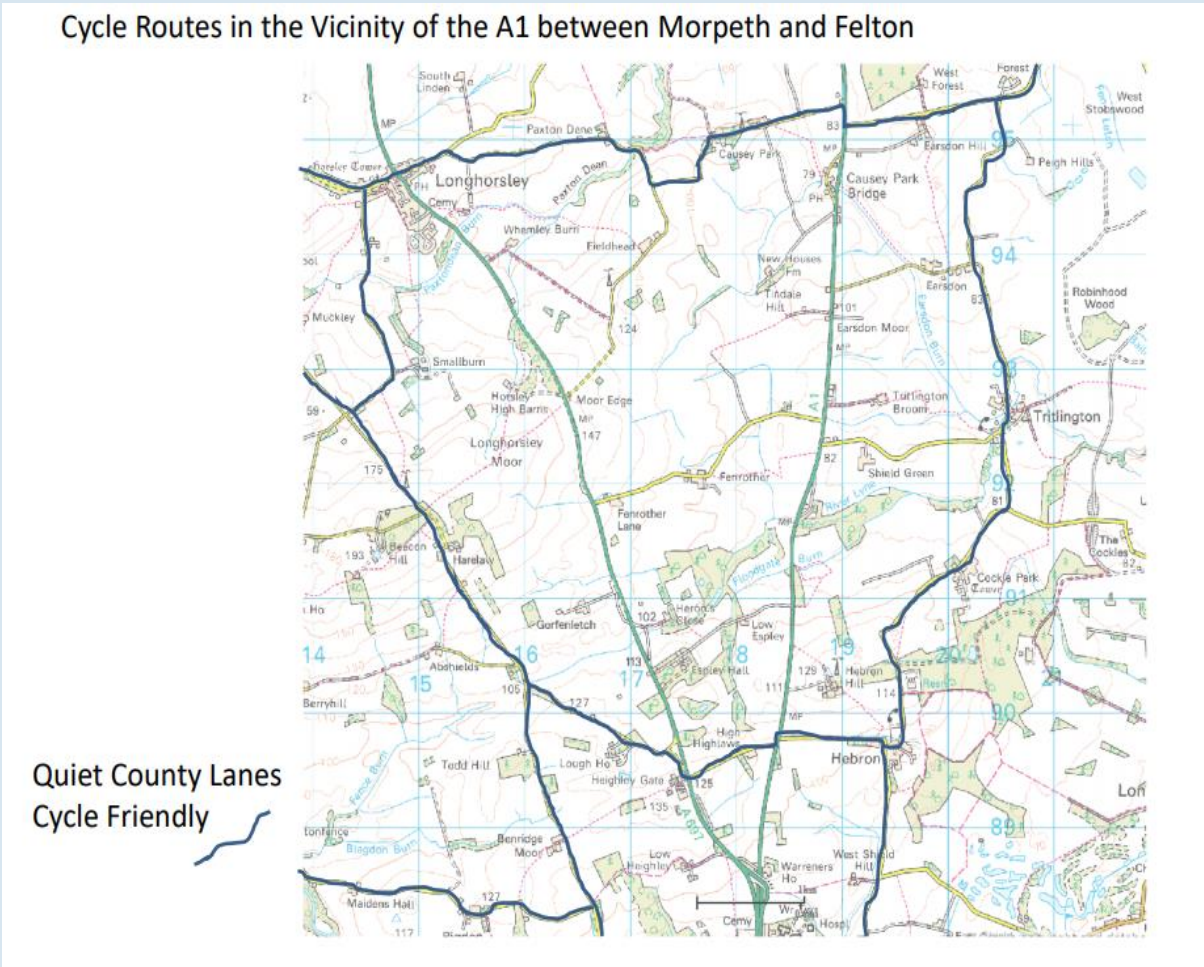
Ref. No.	Response:	Applicant's Response:																																																																																																																																																																																																																																																																																																																																	
		<p>continues to work collaboratively with NCC to discuss potential works to the de-trunked section and the possibility of these being secured through alternative funding. Until these discussions are concluded, it is not possible to accurately forecast how traffic speeds may change on the de-trunked A1.</p>																																																																																																																																																																																																																																																																																																																																	
9	<p>Figure 36.1 below shows the 2017 traffic speeds at Hebron on the A1. Although showing hourly figures for volume of traffic, the graph (bottom right) shows how speed increases as traffic flows drop. Based on this we would predict at least a 5mph increase in the 85th percentile speed on the de-trunked section as a result of the reduction in traffic flows.</p> <p>Figure 36.1 Extract from TADU ATC Traffic Speeds Dashboard (Source: TADU 2018)</p>  <p>The dashboard displays the following data for site 66124 HEBRON:</p> <table><tr><th>Site</th><th>Avg Speed (mph)</th><th>85th %ile Speed (mph)</th><th>Avg Hourly Volume</th><th>Days Counted</th></tr><tr><td>66124 HEBRON</td><td>48.9</td><td>54.8</td><td>834</td><td>21</td></tr></table> <p>85th Percentile Speeds by Day & Hour with No. of Days Counted</p> <table><tr><th>Hour</th><th>Monday</th><th>Tuesday</th><th>Wednesday</th><th>Thursday</th><th>Friday</th><th>Saturday</th><th>Sunday</th><th>Total</th></tr><tr><td>00:00</td><td>58.9</td><td>58.9</td><td>57.9</td><td>59.3</td><td>59.4</td><td>59.0</td><td>59.3</td><td>59.3</td></tr><tr><td>01:00</td><td>52.9</td><td>57.6</td><td>57.6</td><td>58.5</td><td>58.3</td><td>59.6</td><td>60.4</td><td>58.8</td></tr><tr><td>02:00</td><td>62.0</td><td>58.8</td><td>58.4</td><td>58.1</td><td>58.1</td><td>58.4</td><td>59.7</td><td>58.8</td></tr><tr><td>03:00</td><td>58.5</td><td>58.8</td><td>57.7</td><td>58.1</td><td>58.4</td><td>59.0</td><td>60.3</td><td>58.8</td></tr><tr><td>04:00</td><td>59.2</td><td>58.9</td><td>57.5</td><td>59.2</td><td>58.8</td><td>59.0</td><td>61.2</td><td>59.0</td></tr><tr><td>05:00</td><td>58.2</td><td>58.0</td><td>58.3</td><td>58.0</td><td>58.0</td><td>59.2</td><td>60.3</td><td>58.4</td></tr><tr><td>06:00</td><td>55.8</td><td>55.4</td><td>56.0</td><td>56.1</td><td>56.5</td><td>56.6</td><td>59.8</td><td>56.3</td></tr><tr><td>07:00</td><td>53.9</td><td>53.6</td><td>53.6</td><td>53.4</td><td>54.4</td><td>57.4</td><td>58.7</td><td>54.2</td></tr><tr><td>08:00</td><td>53.5</td><td>53.6</td><td>53.0</td><td>53.6</td><td>53.6</td><td>56.4</td><td>57.9</td><td>53.9</td></tr><tr><td>09:00</td><td>52.9</td><td>52.8</td><td>53.2</td><td>53.6</td><td>53.3</td><td>54.0</td><td>56.1</td><td>53.5</td></tr><tr><td>10:00</td><td>52.6</td><td>52.9</td><td>52.7</td><td>53.8</td><td>52.8</td><td>53.7</td><td>54.0</td><td>52.9</td></tr><tr><td>11:00</td><td>52.8</td><td>53.5</td><td>52.7</td><td>52.5</td><td>52.9</td><td>52.4</td><td>52.8</td><td>52.7</td></tr><tr><td>12:00</td><td>53.1</td><td>53.4</td><td>52.8</td><td>52.2</td><td>52.7</td><td>53.4</td><td>52.9</td><td>52.9</td></tr><tr><td>13:00</td><td>53.1</td><td>53.4</td><td>52.7</td><td>53.3</td><td>52.6</td><td>53.6</td><td>53.6</td><td>53.2</td></tr><tr><td>14:00</td><td>52.6</td><td>53.3</td><td>53.1</td><td>52.6</td><td>52.4</td><td>53.7</td><td>53.1</td><td>53.0</td></tr><tr><td>15:00</td><td>53.1</td><td>53.5</td><td>53.2</td><td>52.7</td><td>52.1</td><td>54.0</td><td>53.3</td><td>53.1</td></tr><tr><td>16:00</td><td>53.3</td><td>53.3</td><td>52.8</td><td>53.0</td><td>52.6</td><td>54.6</td><td>52.6</td><td>53.1</td></tr><tr><td>17:00</td><td>53.3</td><td>53.8</td><td>53.0</td><td>53.7</td><td>53.3</td><td>54.0</td><td>54.4</td><td>53.7</td></tr><tr><td>18:00</td><td>55.2</td><td>55.8</td><td>54.6</td><td>55.5</td><td>54.0</td><td>56.8</td><td>56.2</td><td>55.4</td></tr><tr><td>19:00</td><td>56.6</td><td>56.3</td><td>56.5</td><td>56.0</td><td>55.5</td><td>57.5</td><td>57.2</td><td>56.5</td></tr><tr><td>20:00</td><td>56.6</td><td>57.3</td><td>56.9</td><td>57.3</td><td>57.2</td><td>57.9</td><td>58.0</td><td>57.3</td></tr><tr><td>21:00</td><td>57.4</td><td>58.2</td><td>56.6</td><td>58.2</td><td>57.6</td><td>58.6</td><td>58.4</td><td>57.8</td></tr><tr><td>22:00</td><td>58.1</td><td>58.1</td><td>57.0</td><td>58.3</td><td>57.9</td><td>58.1</td><td>59.0</td><td>57.9</td></tr><tr><td>23:00</td><td>55.2</td><td>56.3</td><td>58.4</td><td>58.8</td><td>57.1</td><td>58.6</td><td>58.5</td><td>58.6</td></tr><tr><td>Total</td><td>53.9</td><td>54.1</td><td>53.7</td><td>53.7</td><td>53.5</td><td>54.7</td><td>54.6</td><td>54.0</td></tr></table> <p>Avg and 85th %ile Speeds by Direction</p> <table><tr><th></th><th>Northbound</th><th>Southbound</th></tr><tr><td>Avg Speed</td><td>47.2</td><td>48.8</td></tr><tr><td>85th %ile Speed</td><td>53.5</td><td>54.5</td></tr><tr><td>Avg Hourly Vol</td><td>808</td><td>793</td></tr></table> <p>Speeds and Volume by Month</p> <table><tr><th>Month</th><th>Avg</th><th>85th %ile</th><th>Volume</th><th>Days</th></tr><tr><td>January</td><td>47.1</td><td>53.5</td><td>725</td><td>7</td></tr><tr><td>February</td><td>47.1</td><td>53.5</td><td>725</td><td>7</td></tr><tr><td>March</td><td>47.1</td><td>53.5</td><td>725</td><td>7</td></tr><tr><td>April</td><td>47.1</td><td>53.5</td><td>725</td><td>7</td></tr><tr><td>May</td><td>47.1</td><td>53.5</td><td>725</td><td>7</td></tr><tr><td>June</td><td>48.4</td><td>54.3</td><td>864</td><td>7</td></tr><tr><td>July</td><td>48.4</td><td>54.3</td><td>864</td><td>7</td></tr><tr><td>August</td><td>48.4</td><td>54.3</td><td>864</td><td>7</td></tr><tr><td>September</td><td>48.4</td><td>54.3</td><td>864</td><td>7</td></tr><tr><td>October</td><td>48.4</td><td>54.3</td><td>864</td><td>7</td></tr><tr><td>November</td><td>48.4</td><td>54.3</td><td>864</td><td>7</td></tr><tr><td>December</td><td>48.4</td><td>54.3</td><td>864</td><td>7</td></tr></table> <p>Average and 85th Percentile Speeds by Hour with Average Hourly Traffic Volume</p>  <p>Dashboard developed by the Traffic and Accident Data Unit (TADU), based at Gateshead Council. Data shown is from Jan Dec 2017, last update Jul 2018.</p>	Site	Avg Speed (mph)	85th %ile Speed (mph)	Avg Hourly Volume	Days Counted	66124 HEBRON	48.9	54.8	834	21	Hour	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	Total	00:00	58.9	58.9	57.9	59.3	59.4	59.0	59.3	59.3	01:00	52.9	57.6	57.6	58.5	58.3	59.6	60.4	58.8	02:00	62.0	58.8	58.4	58.1	58.1	58.4	59.7	58.8	03:00	58.5	58.8	57.7	58.1	58.4	59.0	60.3	58.8	04:00	59.2	58.9	57.5	59.2	58.8	59.0	61.2	59.0	05:00	58.2	58.0	58.3	58.0	58.0	59.2	60.3	58.4	06:00	55.8	55.4	56.0	56.1	56.5	56.6	59.8	56.3	07:00	53.9	53.6	53.6	53.4	54.4	57.4	58.7	54.2	08:00	53.5	53.6	53.0	53.6	53.6	56.4	57.9	53.9	09:00	52.9	52.8	53.2	53.6	53.3	54.0	56.1	53.5	10:00	52.6	52.9	52.7	53.8	52.8	53.7	54.0	52.9	11:00	52.8	53.5	52.7	52.5	52.9	52.4	52.8	52.7	12:00	53.1	53.4	52.8	52.2	52.7	53.4	52.9	52.9	13:00	53.1	53.4	52.7	53.3	52.6	53.6	53.6	53.2	14:00	52.6	53.3	53.1	52.6	52.4	53.7	53.1	53.0	15:00	53.1	53.5	53.2	52.7	52.1	54.0	53.3	53.1	16:00	53.3	53.3	52.8	53.0	52.6	54.6	52.6	53.1	17:00	53.3	53.8	53.0	53.7	53.3	54.0	54.4	53.7	18:00	55.2	55.8	54.6	55.5	54.0	56.8	56.2	55.4	19:00	56.6	56.3	56.5	56.0	55.5	57.5	57.2	56.5	20:00	56.6	57.3	56.9	57.3	57.2	57.9	58.0	57.3	21:00	57.4	58.2	56.6	58.2	57.6	58.6	58.4	57.8	22:00	58.1	58.1	57.0	58.3	57.9	58.1	59.0	57.9	23:00	55.2	56.3	58.4	58.8	57.1	58.6	58.5	58.6	Total	53.9	54.1	53.7	53.7	53.5	54.7	54.6	54.0		Northbound	Southbound	Avg Speed	47.2	48.8	85th %ile Speed	53.5	54.5	Avg Hourly Vol	808	793	Month	Avg	85th %ile	Volume	Days	January	47.1	53.5	725	7	February	47.1	53.5	725	7	March	47.1	53.5	725	7	April	47.1	53.5	725	7	May	47.1	53.5	725	7	June	48.4	54.3	864	7	July	48.4	54.3	864	7	August	48.4	54.3	864	7	September	48.4	54.3	864	7	October	48.4	54.3	864	7	November	48.4	54.3	864	7	December	48.4	54.3	864	7	<ol style="list-style-type: none">The Applicant does not have access to the TADU dashboard, so cannot verify the information provided by NCC.The Applicant has not undertaken detailed modelling of the forecast change in speeds on the de-trunked section of the A1, so cannot verify if the assertion that 85th percentile speeds will increase to at least 5mph is accurate.The Applicant notes that the published directional 85th percentile speeds from the TADU database outputs supplied are 53.5 and 54.5 mph and that around midnight 85th percentile speeds reach 59.3mph, almost the current speed limit of 60mph.Vehicle speeds are influenced by many factors including speed limits, geometry, visibility, levels of traffic, street activity, frequency of junctions and PMAs, lining and signage, location of speed cameras and individual behaviour. The Applicant is not proposing to change the speed limit on the de-trunked section as part of the Scheme, but notes that NCC may choose to do so. The Applicant continues to work collaboratively with NCC to discuss potential works to the de-trunked section and the possibility of these being secured through Designated Funds.
Site	Avg Speed (mph)	85th %ile Speed (mph)	Avg Hourly Volume	Days Counted																																																																																																																																																																																																																																																																																																																															
66124 HEBRON	48.9	54.8	834	21																																																																																																																																																																																																																																																																																																																															
Hour	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	Total																																																																																																																																																																																																																																																																																																																											
00:00	58.9	58.9	57.9	59.3	59.4	59.0	59.3	59.3																																																																																																																																																																																																																																																																																																																											
01:00	52.9	57.6	57.6	58.5	58.3	59.6	60.4	58.8																																																																																																																																																																																																																																																																																																																											
02:00	62.0	58.8	58.4	58.1	58.1	58.4	59.7	58.8																																																																																																																																																																																																																																																																																																																											
03:00	58.5	58.8	57.7	58.1	58.4	59.0	60.3	58.8																																																																																																																																																																																																																																																																																																																											
04:00	59.2	58.9	57.5	59.2	58.8	59.0	61.2	59.0																																																																																																																																																																																																																																																																																																																											
05:00	58.2	58.0	58.3	58.0	58.0	59.2	60.3	58.4																																																																																																																																																																																																																																																																																																																											
06:00	55.8	55.4	56.0	56.1	56.5	56.6	59.8	56.3																																																																																																																																																																																																																																																																																																																											
07:00	53.9	53.6	53.6	53.4	54.4	57.4	58.7	54.2																																																																																																																																																																																																																																																																																																																											
08:00	53.5	53.6	53.0	53.6	53.6	56.4	57.9	53.9																																																																																																																																																																																																																																																																																																																											
09:00	52.9	52.8	53.2	53.6	53.3	54.0	56.1	53.5																																																																																																																																																																																																																																																																																																																											
10:00	52.6	52.9	52.7	53.8	52.8	53.7	54.0	52.9																																																																																																																																																																																																																																																																																																																											
11:00	52.8	53.5	52.7	52.5	52.9	52.4	52.8	52.7																																																																																																																																																																																																																																																																																																																											
12:00	53.1	53.4	52.8	52.2	52.7	53.4	52.9	52.9																																																																																																																																																																																																																																																																																																																											
13:00	53.1	53.4	52.7	53.3	52.6	53.6	53.6	53.2																																																																																																																																																																																																																																																																																																																											
14:00	52.6	53.3	53.1	52.6	52.4	53.7	53.1	53.0																																																																																																																																																																																																																																																																																																																											
15:00	53.1	53.5	53.2	52.7	52.1	54.0	53.3	53.1																																																																																																																																																																																																																																																																																																																											
16:00	53.3	53.3	52.8	53.0	52.6	54.6	52.6	53.1																																																																																																																																																																																																																																																																																																																											
17:00	53.3	53.8	53.0	53.7	53.3	54.0	54.4	53.7																																																																																																																																																																																																																																																																																																																											
18:00	55.2	55.8	54.6	55.5	54.0	56.8	56.2	55.4																																																																																																																																																																																																																																																																																																																											
19:00	56.6	56.3	56.5	56.0	55.5	57.5	57.2	56.5																																																																																																																																																																																																																																																																																																																											
20:00	56.6	57.3	56.9	57.3	57.2	57.9	58.0	57.3																																																																																																																																																																																																																																																																																																																											
21:00	57.4	58.2	56.6	58.2	57.6	58.6	58.4	57.8																																																																																																																																																																																																																																																																																																																											
22:00	58.1	58.1	57.0	58.3	57.9	58.1	59.0	57.9																																																																																																																																																																																																																																																																																																																											
23:00	55.2	56.3	58.4	58.8	57.1	58.6	58.5	58.6																																																																																																																																																																																																																																																																																																																											
Total	53.9	54.1	53.7	53.7	53.5	54.7	54.6	54.0																																																																																																																																																																																																																																																																																																																											
	Northbound	Southbound																																																																																																																																																																																																																																																																																																																																	
Avg Speed	47.2	48.8																																																																																																																																																																																																																																																																																																																																	
85th %ile Speed	53.5	54.5																																																																																																																																																																																																																																																																																																																																	
Avg Hourly Vol	808	793																																																																																																																																																																																																																																																																																																																																	
Month	Avg	85th %ile	Volume	Days																																																																																																																																																																																																																																																																																																																															
January	47.1	53.5	725	7																																																																																																																																																																																																																																																																																																																															
February	47.1	53.5	725	7																																																																																																																																																																																																																																																																																																																															
March	47.1	53.5	725	7																																																																																																																																																																																																																																																																																																																															
April	47.1	53.5	725	7																																																																																																																																																																																																																																																																																																																															
May	47.1	53.5	725	7																																																																																																																																																																																																																																																																																																																															
June	48.4	54.3	864	7																																																																																																																																																																																																																																																																																																																															
July	48.4	54.3	864	7																																																																																																																																																																																																																																																																																																																															
August	48.4	54.3	864	7																																																																																																																																																																																																																																																																																																																															
September	48.4	54.3	864	7																																																																																																																																																																																																																																																																																																																															
October	48.4	54.3	864	7																																																																																																																																																																																																																																																																																																																															
November	48.4	54.3	864	7																																																																																																																																																																																																																																																																																																																															
December	48.4	54.3	864	7																																																																																																																																																																																																																																																																																																																															
10	The current WS2 standard road width combined with a good horizontal and vertical alignment and good forward visibility will also contribute to potential further increases in traffic speeds.	<ol style="list-style-type: none">The Applicant confirms to the ExA that vehicle speeds are influenced by many factors including speed limits, geometry, visibility, levels of traffic, street activity, frequency of junctions and PMAs, lining and signage, location of speed cameras and individual behaviour.																																																																																																																																																																																																																																																																																																																																	

Ref. No.	Response:	Applicant's Response:											
11	Previous design guidance (Design Manual for Roads and Bridge (DMRB) TA 46/97, now withdrawn) would suggest that for the forecast traffic flows (approx. 2,500 AADT) an S2 carriageway (7.3m wide) would be all that was required, and a WS2 carriageway would be an over provision as shown in Table 36.3.	1. The Applicant confirms to the ExA that the information provided by NCC is consistent with the withdrawn DMRB advice note.											
12	<p><i>Table 36.3 DMRB TA46/97 Table 2.1 (extract)</i></p> <table border="1"> <thead> <tr> <th rowspan="2">Carriageway Standard</th><th colspan="2">Opening Year AADT</th></tr> <tr> <th>Minimum</th><th>Maximum</th></tr> </thead> <tbody> <tr> <td>S2</td><td colspan="2">Up to 13,000</td></tr> <tr> <td>WS2</td><td>6,000</td><td>21,000</td></tr> </tbody> </table>	Carriageway Standard	Opening Year AADT		Minimum	Maximum	S2	Up to 13,000		WS2	6,000	21,000	1. The Applicant confirms to the ExA that the figures shown in Table 36.3 provided by NCC are consistent with the withdrawn DMRB advice note.
Carriageway Standard	Opening Year AADT												
	Minimum	Maximum											
S2	Up to 13,000												
WS2	6,000	21,000											
13	Narrowing the carriageway, physically or visually, is a standard traffic calming technique to encourage lower speeds. In this instance we consider that a visual narrowing, using road markings, would not have a significant impact on reducing traffic speeds due to the existing road layout and wide verges.	1. The Applicant agrees that, in accordance with design standards, narrowing the carriageway by physical or virtual means is a standard technique to reduce traffic speeds. On that basis, the Applicant considers that the provision of road markings to reduce the carriageway width, through for example the use of centre line hatching, would lead to a reduction in traffic speeds regardless of the existing verge widths.											
14	<p>It is understood that a Stage 1 Road Safety Report prepared by WSP in September 2018 in accordance with DMRB HD19/15 (now superseded by DMRB GG119) indicated that the de-trunked A1 may be subject to high vehicle speeds if it was left in its current state.</p> <p>The recommendation to this was that the A1 should be subject to appropriate highway alterations to effectively manage traffic speeds. The Designer's Response to this identified problem was that the Designer accepted the problem and recommendation and that details of the section of the de-trunked A1 should be determined and agreed with the applicant and NCC, with a view to be developed and confirmed during detailed design.</p> <p>The currently submitted design does not address this and therefore we can see no evidence that indicates this identified Road Safety Problem has been "closed out" in accordance with the standards.</p>	<p>1. The Stage 1 Road Safety Audit (RSA) highlighted in 2018 the potential for increasing vehicle speeds on the de-trunked A1. The recommendation from the RSA report confirmed that the details of the de-trunked A1 were still to be agreed between the Applicant and NCC. However, although the RSA noted the potential for increased traffic speed, it does not state, and it is not the case that it concludes that the provision of a segregated cycle track is required in order to address this potential issue.</p> <p>2. An issue reported within a Stage 1 RSA does not automatically generate a requirement to change the Scheme design. The normal course of action is for the relevant highway authority to review the recommendations from the RSA and determine what mitigation measures, if any, are required. The designer's response to the RSA finding suggests changes to the speed limit on the de-trunked section. The Applicant has confirmed to NCC that no works would be undertaken on the de-trunked section which would become local highway for which NCC will be responsible.</p>											
15	<p>In our early discussions with WSP, during the development of the scheme, we were asked to provide a typical section showing what we considered to be a suitable cross section for the de-trunked section of the A1, incorporating facilities for pedestrians and cyclists (Dwg No. HC179511-00-A1-01-01 A1 DUALLING TYPICAL X-SECTIONS A3 SHEET – attached as Appendix A). This showed a segregated cycleway and footway in the east verge of the de-trunked section of the A1, with the carriageway width reduced to 7.3m.</p>	1. The Applicant confirms to the ExA that a typical cross section was shared by NCC in 2018. The purpose of this request related to the preliminary design of the new section of link road to connect the de-trunked section of the existing A1 at Bockenfield to West Moor grade separated junction. The opportunity to improve/increase cycle and pedestrian provision was clarified by the Applicant to be outside the scope of the Scheme for the de-trunked section.											

Ref. No.	Response:	Applicant's Response:
16	This would be an improvement on the existing footway running along the eastern verge of the de-trunked A1 between Morpeth and Felton. It would also provide a safe segregated cycleway linking a number of well used east-west routes on quiet country roads already catered for in the proposals to address east-west severance	1. The Applicant liaised directly with NCC on 28/01/2021 to clearly state that funding for a separate cycleway along the section of the A1 to be de-trunked is not part of the scope of the Scheme. This is because the Scheme Objectives were determined as a result of the A1 North of Newcastle Feasibility Study and to align with the Roads Investment Strategy (RIS). The provision of a segregated cycle track on the de-trunked A1 is not a specific requirement of the project.
17	Local Transport Note (LTN) 1/20 Cycle Infrastructure Design (DfT, July 2020) sets out the core design principles, one of which is that 'consideration of the opportunities to improve provision for cycling will be an expectation of any future local highway schemes funded by Government'. It also recognises the economic benefits of cycling as well as those relating to health and wellbeing.	1. The Applicant acknowledges this design guidance, which was published after the current Scheme design was completed for the purposes of the DCO and after the DCO application was submitted. The opening paragraph of LTN1/20 states: <i>"Local authorities are responsible for setting design standards for their roads. This national guidance provides a recommended basis for those standards based on five overarching design principles and 22 summary principles. There will be an expectation that local authorities will demonstrate that they have given due consideration to this guidance when designing new cycling schemes and, in particular, when applying for Government funding that includes cycle infrastructure."</i> Section 1.3 of LTN 1/20 titled Application states that the guidance should be applied <i>"to all changes associated with highway improvements, new highway construction and new or improved cycle facilities."</i> 2. LTN 1/20 is appropriate for new local highway schemes or changes to local highway schemes and will be used in the detailed design of the footway provision being created on the new section of link road from West Moor Junction to Brockenfield Caravan park. However, as no changes to the de-trunked section are required as part of the Scheme, the guidance does not apply for the hand over of an existing asset from the strategic road to local highway network. Once de-trunked, a future scheme on this section of the road would consider LTN 1/20 for new cycling provision.
18	LTN 1/20 Section 4.4.1 states that 'Motor traffic is the main deterrent to cycling for many people with 62% of UK adults feeling that the roads are too unsafe for them to cycle on.'	1. The Applicant agrees this section of LTN 1/20 has been correctly quoted. As noted in Table 36.2 above, NCC and the Applicant agree that the Scheme is forecast to significantly reduce traffic flow on the de-trunked A1.
19	Figure 36.2 forms an extract from LTN 1/20 in relation to the appropriate protection from motor traffic on highways and demonstrates that a segregated fully kerbed cycle track is the recommended solution for the de-trunked section of the A1, based on speed limit and traffic flows. The same level of provision is recommended in DMRB CD 195 Rev1, Designing for cycle traffic, in Table E/1.1.	1. The Applicant agrees this section of LTN 1/20 and CD 195 Rev 1 has been correctly quoted. If a new road was being constructed then, based on forecast traffic flows and assuming that the speed limit remains at 60mph a segregated fully kerbed cycle track would be the recommended provision. 2. However, as set out in the response to point 17 above the Applicant does not consider that handing over of an existing asset from the strategic road to local highway network would trigger the application of LTN 1/20 as no improvements or changes to the de-trunked section of the A1 are proposed. . Once, de-trunked, NCC would need to consider LTN 1/20 in the design of any future scheme relating to cycle provision on this section of the road.

Ref. No.	Response:	Applicant's Response:																																																																										
		<div>3. As set out in the response to 17 above the opening paragraph of LTN1/20 states that its scope is applicable to new <i>local</i> highway schemes. LTN1/20 does not specifically apply to the handover of an existing asset from the strategic road to local highway network.</div>																																																																										
20	<div><p><i>Figure 36.2 LTN 1/20 Figure 4.1: Appropriate Protection from Motor Traffic on Highways</i></p><table><tr><th rowspan="2">Speed Limit¹</th><th rowspan="2">Motor Traffic Flow (pcu/24 hour)²</th><th colspan="3">Protected Space for Cycling</th><th rowspan="2">Cycle Lane (mandatory/ advisory)</th><th rowspan="2">Mixed Traffic</th></tr><tr><th>Fully Kerbed Cycle Track</th><th>Stepped Cycle Track</th><th>Light Segregation</th></tr><tr><td rowspan="4">20 mph³</td><td>0</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>2000</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>4000</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>6000+</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td rowspan="4">30 mph</td><td>0</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>2000</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>4000</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>6000+</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>40 mph</td><td>Any</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>50+ mph</td><td>Any</td><td></td><td></td><td></td><td></td><td></td></tr></table><div><div></div> Provision suitable for most people</div><div></div> Provision not suitable for all people and will exclude some potential users and/or have safety concerns</div> <div></div> Provision suitable for few people and will exclude most potential users and/or have safety concerns <div>Notes:<div>1. If the 85th percentile speed is more than 10% above the speed limit the next highest speed limit should be applied</div><div>2. The recommended provision assumes that the peak hour motor traffic flow is no more than 10% of the 24 hour flow</div><div>3. In rural areas achieving speeds of 20mph may be difficult, and so shared routes with speeds of up to 30mph will be generally acceptable with motor vehicle flows of up to 1,000 pcu per day</div></div>	Speed Limit ¹	Motor Traffic Flow (pcu/24 hour) ²	Protected Space for Cycling			Cycle Lane (mandatory/ advisory)	Mixed Traffic	Fully Kerbed Cycle Track	Stepped Cycle Track	Light Segregation	20 mph ³	0						2000						4000						6000+						30 mph	0						2000						4000						6000+						40 mph	Any						50+ mph	Any						<div>1. N/A</div>
Speed Limit ¹	Motor Traffic Flow (pcu/24 hour) ²			Protected Space for Cycling					Cycle Lane (mandatory/ advisory)	Mixed Traffic																																																																		
		Fully Kerbed Cycle Track	Stepped Cycle Track	Light Segregation																																																																								
20 mph ³	0																																																																											
	2000																																																																											
	4000																																																																											
	6000+																																																																											
30 mph	0																																																																											
	2000																																																																											
	4000																																																																											
	6000+																																																																											
40 mph	Any																																																																											
50+ mph	Any																																																																											
21	<div>In respect to the above assessment, the scheme will result in a reduction in traffic flows on the de-trunked A1 meaning that the existing cross section of the carriageway will be unsuitable and unsafe as highlighted in the Stage 1 Road Safety Audit. In amending the cross section of the de-trunked A1 to better reflect traffic volume and reduce speed, the opportunity arises to provide non-motorised transport links in a northsouth direction connecting the east-west routes that have been mitigated through the scheme as it currently stands. It is considered that there is sufficient space within the cross section to provide an LTN 1/20 compliant scheme on the de-trunked section.</div>	<div><div>1. The Stage 1 RSA highlighted the potential for increasing vehicle speeds on the de-trunked A1. The RSA did not state that the carriageway will be unsuitable and unsafe as suggested by NCC. The RSA report goes on to state that, once de-trunked, the road should be subject to appropriate highway alterations to effectively manage traffic speeds. As set out in the response to point 14 above the normal course of action is for the relevant highway authority to review the recommendations from the RSA and determine what mitigation measures, if any, are required. The designers' response to the RSA finding suggests changes to the speed limit.</div><div>2. The Applicant would support NCC if they chose to reduce the speed limit on the de-trunked section of the A1.</div><div>3. This particular RSA problem made no recommendation on the specific provision of any particular measure for walkers, cyclists or horse riders.</div></div>																																																																										

Ref. No.	Response:	Applicant's Response:
		<ol style="list-style-type: none"> The Applicant liaised directly with NCC on 28/01/2021 to clearly state that funding for a separate cycleway along the section of the A1 to be de-trunked is not considered as part of the scope of the Scheme. The finding of the Stage 1 Road Safety Audit relates to potential increases in vehicle speed rather than a need for the separate provision of cycle facilities. The Applicant has explained to NCC that if there is a desire to create a separate cycle track then that would be over and above the requirements of the project, so other funding routes would have to be explored. From the Applicant's perspective, the only funding option would be through Designated Funds, which the Applicant is currently pursuing. The delivery of any designated funds scheme sits outside of the Applicant's DCO application and such works are not required to mitigate the impacts of the proposed Scheme.
22	Accepting that this treatment of the de-trunked A1 and the new link from West Moor to Brockenfield Bridge is to be delivered, there will remain a further section of north-south severance from the end of the de-trunked A1 at Priest's Bridge to the current cycle and pedestrian infrastructure in Morpeth. It is considered that this severance can be addressed within the land under the DCO subject to some minor amendments in relation to the designation of the diverted Public Rights of Way and the improvement of the existing footway on the eastern side of the A1 that is currently shown as being retained.	<ol style="list-style-type: none"> The Applicant does not agree that the Scheme creates a new North-South severance for non-motorised users and such works are not required to mitigate the impacts of the proposed Scheme. The severance is reported by NCC as a current issue on this part of the network. The Applicant does not accept NCC's proposal for the Scheme to deliver new cycleway/ footway provision along the section of the A1 from Priests Bridge to Morpeth as this is outside the established scope of the Scheme. The Applicant will continue to work with NCC to look at what options may be available provided that alternative funding can be successfully obtained for these local opportunities.
23	Working south from Priest's Bridge (referencing points in the Rights of Way and Access Plans) this would require the re-designation of the proposed New Public Footpath from points PR3/3 to PR3/2 and PR3/1 to PR2/1 and the section of existing Public Footpath PROW407/002 between PR3/2 and PR3/1 to Public Bridleway with changes to surfacing to accommodate cycle based trips accordingly as part of the detailed design. Alternatively, there may be the opportunity to allow this link to continue adjacent to the widened A1 to the east of the on-line alignment but an alternative route is possible if this is not deliverable adjacent to the new dual carriageway. South of Hebron Road at Highlaws Junction, the current intention is for the existing footway to be retained and therefore this could be upgraded to footway/cycleway to connect with the new Public Bridleway to the south of Warreners House to connect with West View. This connection can be delivered within the scheme extents potentially within the assumed limits of highway adoption around the A697 southbound on-slip embankment. There would be potential highway safety and severance concerns if this link was not aligned to avoid at at-grade crossing the A697 southbound on-slip at the location of the existing footway crossing located to the south of 1/g on the Rights of Way and Access Plans.	<ol style="list-style-type: none"> The Applicant does not agree that the Scheme creates a new North-South severance for non-motorised users and such works are not required to mitigate the impacts of the proposed Scheme. The existing footway along Works No. 1B on the eastern edge of the A1, at the southern end of Part A which continues south towards the A192, is proposed to be retained by the scheme. The Scheme proposals will not change the A697 configuration, there are no recorded safety issues with the current arrangements and the Scheme traffic model suggests this link is forecast to experience a reduction in peak hour traffic with the Scheme in place, as generally trips are removed from A697 and stay on A1. Therefore, a footway/cycleway connection is not necessary to mitigate the impacts of the Scheme.
24	It is considered that this connectivity addresses north-south severance of the A1 in its current status and utilises the safety improvements that need to be made to the de-trunked section of the A1 in relation to its cross section thus providing mitigation to both east-west and north-south severance from the scheme	<ol style="list-style-type: none"> The Scheme does not create a new north-south severance for non-motorised users. The Scheme is not proposing works to the section of the existing A1 referred to by NCC which would become local highway for which NCC will be responsible.

Ref. No.	Response:	Applicant's Response:
25	<p>In relation to the Designated Funding details as discussed in the Hearing Sessions we can confirm attendance at a meeting with the applicant to discuss this on 18th March where we will continue to engage with the applicant to provide means of securing non-motorised transport connectivity as part of the scheme and we will actively engage with the applicant in this process.</p>	<p>1. The Applicant will continue to work with NCC to build the best-case possible to bid for and secure alternative funding although the Applicant has been clear that this funding is not guaranteed. It is noted that the delivery of any designated funds scheme sits outside of the DCO application and such works are not required to mitigate the impacts of the proposed Scheme.</p>
26	<p>Cycle Routes in the Vicinity of the A1 between Morpeth and Felton</p>  <p>Quiet County Lanes Cycle Friendly</p>	<p>1. N/A</p>

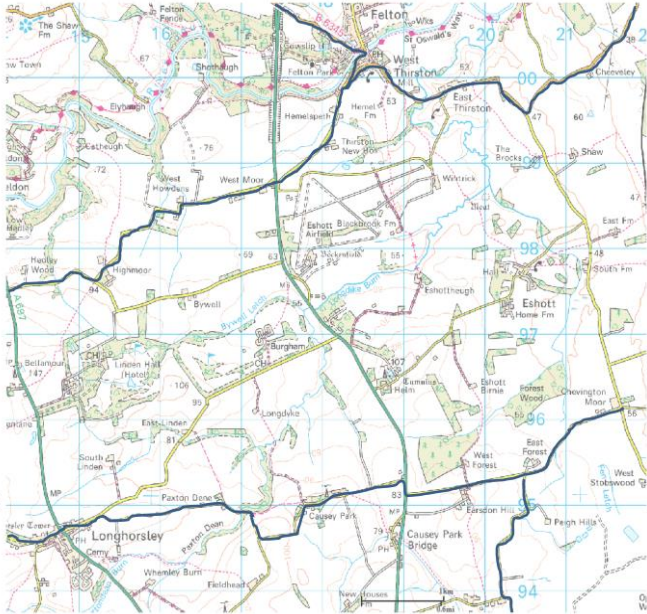
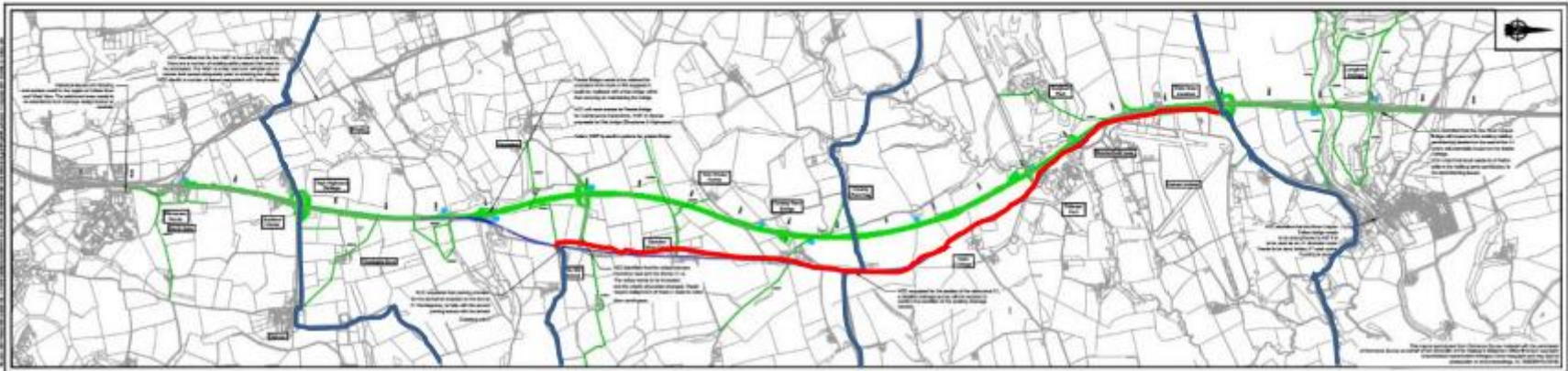


Ref. No.	Response:	Applicant's Response:
27	<div></div> <p>Quiet Country Lanes Cycle Friendly</p>	1. N/A
28	<div></div> <p> Cycle Links Crossing or Joining A1</p> <p> Section of De-Trunked A1 and New Link Road to West Moor Junction to be cycle friendly</p>	

Table 1-4 – Environment Agency

Ref. No.	Response:	Applicant's Response:
SUMMARY OF WRITTEN REPRESENTATIONS		
6.29 Annex A - Approach to the Assessment of Losses and Gains of Watercourses [REP2-010]		
1	<p>We would welcome clarity regarding the definition of 'watercourse' that has been used for this assessment. Section 1.1.1 of this assessment refers to a watercourse as running water. 7.9.1 Appendix A Response to RR-04 Environment Agency - Rev 0 [REP1-065], section A.75 states all watercourses within the DCO order limits have been identified as Habitats of Principal Importance. However, page 7 of 3.1 Draft Development Consent Order - Rev 3a [REP3-005], states that a watercourse includes 'all rivers, streams, ditches, drains, canals, cuts, culverts, dykes, sluices, sewers and passages through which water flows except a public sewer or drain'. The Water Framework Directive (WFD) seeks to manage, protect and improve the water environment and applies to all rivers (including drains and ditches), lakes, estuaries, coastal waters and groundwater. With this in mind, we would welcome clarity regarding why and how have the Cotting Burn, tributary of the Earsdon Burn, unnamed ditch (north of Longdike Burn) and tributary of Thirsdon Burn have been reassigned as dry ditches within this assessment.</p>	<ol style="list-style-type: none">1. It is important to realise that the definition of "watercourse" in the Draft DCO is entirely separate from the definition of the same word for the purposes of assessment. The Draft DCO contains a power (<i>inter alia</i>) to discharge water into "watercourses" as defined but is not an assessment tool.2. In relation to assessment, all habitats were classified and mapped following standard Phase 1 habitat survey methodology (Joint Nature Conservation Committee (JNCC) Phase 1 Handbook) following a Phase 1 habitat survey. For the purpose of the habitat assessment of losses and gains, the term "watercourse" has been used to represent running water (habitat code G2) (as per paragraph 1.1.1, Annex A Approach to the Assessment of Losses and Gains of Watercourses [REP2-010]), which represents a Habitat of Principal Importance (HPI). Those habitats mapped as standing water (habitat code G1) or ditches (habitat code J2.6) are not included within the term "watercourse" within the biodiversity assessment. As per the definition for ditch (J2.6) of the JNCC Phase 1 Handbook, "<i>only ditches which appear to be dry for most of the year should be included in this category. Wet ditches are mapped as standing water (G1) or possibly swamp (F1)</i>". The status of running water or ditches has also been verified during other surveys, such as aquatic and otter/water vole surveys.3. The definition of watercourse within the Draft DCO [REP4-004 and 005] (and as updated at Deadline 5) is specific to that document. This definition includes additional features (such as drains and sluices), which are relevant to the defined term "watercourse" for the requirements and powers that the Draft DCO secures.4. Annex A - Approach to the Assessment of Losses and Gains for Watercourses [REP2-010] provides an explanation for why Cotting Burn, tributary of the Earsdon Burn, unnamed ditch (north of Longdike Burn) and tributary of Thirsdon Burn were reassigned as dry ditches. This was undertaken to correct a transcription error within the Global Information System (GIS) software in the Phase 1 habitat data for Part A. The error had led to several existing dry channels/ditches being incorrectly mapped on Figure 9.1: Final Phase 1 Plan Part A [APP-105] as running water.5. The below provides a summary of how these features are identified as dry ditches, rather than running water habitat:<ul style="list-style-type: none">- Cotting Burn: the channel was recorded as dry with septic input during the aquatic macroinvertebrate surveys in May and October 2017, dry during a Phase 1 walkover survey in July 2018 and no flow with small stagnant pools during an assessment of trees in September 2018. In conclusion, the evidence collected during the various site assessments classifies the feature as a ditch.

Ref. No.	Response:	Applicant's Response:
		<ul style="list-style-type: none">- Tributary of Earsdon Burn: the channel was recorded as dry during the aquatic River Habitat Survey in August 2017 and a Phase 1 walkover survey in March 2018. A walkover survey in November 2019 recorded a shallow flow of water within the channel, although this followed a period of wet weather. In conclusion, the evidence collected during the various site assessments determined the feature was only seasonally wet and remained dry for most of the year. In accordance with the JNCC Phase 1 handbook, the feature is classified as a ditch.- Unnamed ditch (north of Longdike Burn): the features are located along the boundaries of arable fields and represent field drains. The features were not identified as suitable habitat for survey during aquatic surveys in 2017 and otter/water vole surveys in 2016/17. The drains were also dry during a Phase 1 walkover survey in March 2018. In conclusion, the evidence collected during the various site assessments classifies the features as ditches.- Tributary of Thirston Burn: the channel was recorded as dry during a Phase 1 walkover survey in March 2018. The aquatic macroinvertebrate surveys in May and October 2017 recorded very little water with lots of terrestrial grasses in the channel. In conclusion, the evidence collected during the various site assessments determined the feature was only seasonally wet and remained dry for most of the year. In accordance with the JNCC Phase 1 handbook, the feature is classified as a ditch. <p>6. The Water Framework Directive Assessment (WFDa) [APP-255 and APP-312] assesses the potential impacts from the Scheme upon all watercourses and channel features (those which have permanent waterflow and those which are ephemeral, i.e. those which only flow during and immediately after rainfall events) which are crossed or impacted upon during the construction and operational phases. The WFDa includes all watercourses defined by the biodiversity assessment (running water) as well as the other ditches and channels which do not have running water, but only flow during times of rainfall. The Applicant therefore considers that an appropriate assessment has been undertaken for all water features impacted upon the scheme.</p>
2	<p>There appears to be a heavy reliance on the planting of woodland as mitigation or compensation for the loss of watercourse. Tree planting is not like for like compensation. This tree planting is often described as 'wet woodland' creation, which we believe is an incorrect definition of the habitat created and should be reclassified as riparian woodland unless it can be clearly demonstrated that wet woodland is being created. We would welcome a package of works that would prove meaningful compensation for the loss of watercourse. We note an updated net loss of 11.69% of watercourse and a gain of 7.21% of area based units and as such, we would encourage opportunities to compensate for this loss with equivalent river based units. Where river units or length are lost, common compensation measures that we encourage often include the re-naturalising and re-meandering of heavily modified and straightened watercourses.</p>	<p>1. The Applicant can confirm that woodland planting is not recognised or proposed as like-for-like compensation for the loss of watercourse and acknowledges that it is not possible to compensate for loss of watercourse with a different habitat type. Proposed woodland planting along watercourses and channels has been identified as one of the measures that could improve the watercourses by providing bank strength, sediment capture and shading (for aquatic life) and also improving the linear connectivity of the watercourse for wildlife. Additional improvement measures identified that collectively form the current package of compensatory works include design of realigned watercourse channels (138m, Part A) to be better (in terms of environmental condition and biodiversity value) than that lost, retrospective installation of fish baffles on</p>

Ref. No.	Response:	Applicant's Response:
		<p>the existing culvert of the River Lyne (Part A), replacement of the wooden baffles within an existing culvert of Longdike Burn (Part A) to increase the life span of this feature and improvements to the 850m of Longdike Burn that falls within the Order limits.</p> <ol style="list-style-type: none"> The Applicant agrees that the term “wet woodland” does not accurately represent the habitat types that are proposed. As discussed during a meeting with the Environment Agency on 19/03/2021, it was agreed that such woodland creation should more accurately be described as “riparian woodland.” This is acknowledged within Item 4.16 of the Applicant’s Written Summary of Oral Submissions to Hearings [REP4-025]. The Applicant confirms that the updated biodiversity no net loss assessment [REP4-058 and -059] (and updated at Deadline 5) calculates a net loss of 11.69% of watercourse (running water) biodiversity units (although this equates to an approximate net loss in linear length of watercourse channel of 8.9%). The loss of watercourse as a result of the Scheme was discussed with the Environment Agency during a meeting on 19/03/2021. Both the Applicant and the Environment Agency agree that it is not viable to create new lengths of watercourse as compensation for loss of watercourse channel (as detailed in Item 54 below). The Applicant considers the package of improvements detailed within the first paragraph of this response to be sufficient to mitigate and/or offset the impacts of the Scheme with regard to loss of watercourse channel. However, in addition to the current package of works, the Applicant is exploring opportunities to improve lengths of other existing watercourses that fall within the Order limits to further compensate for the loss of watercourse channel. This may involve the re-naturalising and re-meandering of historically heavily modified and straightened channels. This forms part of the ongoing discussions with the Environment Agency, with the next meeting scheduled for 23/04/21.
3	<p>We disagree with the statement ‘otters are assessed as likely absent from the order limits of Part B’. The applicant has not taken into account historical records and as such has not taken a precautionary or full informed approach to their assessment, despite an acknowledgement that ‘the desk study recorded 13 records of otter within the 2km search area’. We expect the assessment to be revised to acknowledge the likelihood of otters within Part B and the increased risk the widened road and longer culverts are likely to pose on commuting otters.</p> <p>We also encourage as part of the assessment, that a form of connectivity assessment is undertaken to inform the mitigation required.</p>	<ol style="list-style-type: none"> The Applicant disagrees with the Environment Agency’s assertion that the assessment has discounted records of otter from its assessment for Part B. On the contrary, the Applicant’s approach has taken specific account of historical records. The desk study exercise completed as part of the assessment process utilised relevant records from local records centres to assist in identifying the needs for additional practical survey effort with which to inform the impact assessment. Otter records were returned for the preceding 10-year period, with the most recent record returned from 2015 approximately 1km to the east of the A1 carriageway. Otter surveys for Part B were undertaken along watercourses spanning either side of the existing A1 carriageway in 2016, 2017, 2018 and 2019, with no evidence of otter activity or presence recorded along any watercourses or riparian habitat within the Survey Areas. It is on the basis of the negative field survey results over a number of years and presence of predominantly suboptimal habitats to support the species, which have informed a “likely absent” classification for otter within the Order limits

Ref. No.	Response:	Applicant's Response:
		<p>and Survey Areas. The Applicant therefore does not agree that the assessment needs to be revised in this regard.</p> <ol style="list-style-type: none"> Given the baseline presence of the existing carriageway (i.e. the barrier effect it already represents to movement of animals either side of the carriageway), an extension of the carriageway and associated culvert structures is not considered to significantly increase impacts to otter. Features currently used for passage will continue to be present post construction and whilst extended, will remain suitable for otter passage. This is further discussed in response to Item 26 below. To address the Environment Agency's concerns, the Applicant is willing to undertake a period of post-construction monitoring for a period of three years, identifying any events of otter fatalities along the extended Part B carriageway. Further detail is presented in Item 25 below.
7.9.1.1 Annex A - Culvert Mitigation Strategy - Rev 0 [REP1-066]		
4	<p>The applicant needs to provide compensation for the loss of watercourses and habitats, which is not evident in the culvert mitigation strategy or the Outline Construction Environmental Management Plan (CEMP) - Rev 2 [REP3-013].</p> <p>The mitigation strategy states large areas of wet woodland will be created which we believe is an incorrect definition of the habitat created and should be reclassified as riparian woodland, unless it can be clearly demonstrated that wet woodland is being created. We are unable to see the evidence of this and would recommended that these proposals are included in the Landscape Mitigation Masterplan or similar plan.</p>	<ol style="list-style-type: none"> A response regarding compensation for the loss of watercourse is detailed within Item 2 above. With regards to proposed woodland habitat detailed within the Culvert Mitigation Strategy [REP1-066] (and as updated at Deadline 5), as outlined in the response for Item 2 above, the Applicant agrees with the Environment Agency that the term riparian woodland does accurately represent the habitat types being proposed. Notwithstanding terminology adopted, the proposed woodland remains an appropriate measure within the package of improvements (as detailed in Item 2) to offset the loss of watercourse channel by improving the adjacent and connected habitat. The Applicant remains in on-going discussions with the Environment Agency over the need and type of compensation to be provided as part of the Scheme. This was discussed with the Environment Agency on 04/03/21 and 19/03/21 as detailed in the Environment Agency SoCG submitted at Deadline 5 (document reference 7.6C).
4a	<p>We welcome the intention to improve 850m of Longdyke Burn as a result of the 79.2m increased culverting of this watercourse. We request that further details and clarity are provided on this proposal.</p>	<ol style="list-style-type: none"> Following the discussions with the Environment Agency on 04/03/21 and 19/03/21 the Applicant is now in a better position to understand the Environment Agency's request for further information on Longdike Burn and further details are provided in Item 31 and further details / clarity will be submitted at Deadline 7 regarding the mitigation / enhancement proposals for Longdike Burn.
7.3 Outline Construction Environmental Management Plan (CEMP) - Rev 2 [REP3-013]		

Ref. No.	Response:	Applicant's Response:
5	We request that a number of the actions set out in the outline CEMP are updated to reflect best practice and that further information is provided. In particular, we welcome further information regarding the provision of 38ha of 'wet woodland' and 12ha of 'marginal planting'.	<ol style="list-style-type: none"> Given that the information requested by the Environment Agency with regard to the 'wet woodland' / riparian woodland and marginal planting remains under discussion with the Environment Agency, it is premature to update the Outline Construction Environmental Management Plan (Outline CEMP) [REP4-013 and 014] (and as updated at Deadline 5) at this stage. It is proposed that an update is undertaken following agreement of the measures, noting however, that the Applicant's position is that the existing measures are ample to address the effects of the Scheme. The Culvert Mitigation Strategy [REP1-066] has been updated at Deadline 5.
6	The culvert mitigation strategy indicates a loss of 543.3m of riparian and river habitat whereas Annex A – Approach to the Assessment of Losses and Gains of Watercourses [REP2-010] suggests the total length to be 427m. This is a discrepancy of 116.3m. We would welcome clarification on the total length of riparian and river habitat that will be lost due to the culverting of watercourses.	<ol style="list-style-type: none"> The Culvert Mitigation Strategy [REP1-066] does not identify the loss by length of riparian and river habitat. The Applicant is also unable to identify how the Environment Agency have derived a value of 543.3m. Nevertheless, the Culvert Mitigation Strategy principally relates to the Water Frameworks Directive (WFD) assessments (Part A [APP-255] and Part B [APP-312]) and contains all culverts/bridge structures across the Scheme including those that occur along watercourses (running water) and those that occur along other channels (ditches or drains or surface water features). The Culvert Mitigation Strategy documents existing and proposed structures, and summarises the actions proposed (for example culvert extension, culvert replacement or new culvert). The document also provides a commentary associated with each watercourse/channel, including any proposed mitigation or compensation. Annex A Approach to the Assessment of Losses and Gains of Watercourses [REP2-010] provides the correct calculation for the loss of watercourse (running water) (referred to in the Environment Agency's response as "riparian and river habitat"). As detailed in the Applicant's written summary of oral submissions at hearings [REP4-026], the Scheme would result in a loss of approximately 427m of watercourse (running water) (approximately 271m for Part A and 156m for Part B). Approximately 138m of new flowing watercourse channel would be created along Part A in relation to the realignment of watercourses impacted by the Scheme. The proposed design of the sections of realigned channel would introduce features within the channel to provide greater variation to flow and habitat form, aiming to create environmental conditions that are better in comparison to the channels lost to the Scheme. Taking into consideration the channel creation as part of proposed watercourse realignment, the Scheme would result in an overall net loss of approximately 289m of watercourse.
7	The Environment Agency must be consulted on the detailed CEMP. We request the inclusion of a requirement stating that the detailed CEMP will be approved by the Secretary of State following consultation with Northumberland County Council and the Environment Agency.	<ol style="list-style-type: none"> Requirement 4 of the dDCO [REP4-004 and 005] has been updated to include consultation with the Environment Agency with regard to the detailed CEMP. The updated dDCO is submitted at Deadline 5. A statement has been added into the Outline CEMP [REP4-013 and 014] (paragraph 1.1.8) to confirm that "the CEMP will be approved by the Secretary of State following consultation with Northumberland County Council and other relevant bodies comprising the Environment Agency,

Ref. No.	Response:	Applicant's Response:
		Natural England and Historic England, to the extent that it relates to matters relevant to its function." The updated Outline CEMP is issued at Deadline 5.
6.32 Environmental Impact Assessment - River Coquet Geomorphology Modelling Assessment [REP3-009]		
8	The revised Geomorphology assessment has acknowledged our concerns and demonstrates that the proposals will not lead to any deterioration in the River Coquet.	1. The Applicant notes that the Environment Agency acknowledges that the revised geomorphology assessment for the River Coquet [REP3-009] addresses their concerns. This is documented within the SoCG, as submitted at Deadline 5 (document reference 7.6C).
7.9.1.3 Annex C - Figure 11.7 Potential Contamination Sources - Rev 0 [REP1-068]		
9	Developments on or adjacent to Foot and Mouth burial or disinfectant sites require authorisation/permission from the Animal Health Protection Agency (APHA).	<ol style="list-style-type: none"> 1. Initial discussions with APHA in Jun-18 confirmed the site is not official. Parameter 2 is described in 2.12.4b of Chapter 2: The Scheme [APP-037] to allow flexibility within the Order limits and Limits of Deviation for Highlaws junction to be moved north in detailed design to completely avoid the burial site. 2. As the Scheme is intending to be adjacent to an unofficial site, there is no requirement to seek authorisation/permission from APHA, but their guidance is to be followed if animal remains are found. This was confirmed in recent correspondence with APHA in Mar-21.
6.5 Environmental Statement - Figure 11.2 Superficial Geology Part [A APP-114]		
10	The superficial map provided still identifies peat in two of the most southerly borrow pits whilst the borehole logs do not corroborate this. There is no assessment/discussion as to the presence or not of peat, and what its relevance is in terms of impacts from dewatering. Dewatering these could impact the deposits on the east side of the carriageways (excluded from the scheme). The sand and gravel deposits and limestone formations potentially link scheme to licenced abstraction and private water supplies. Dewatering activities should assess risk to these.	<ol style="list-style-type: none"> 1. The Applicant believes this question relates to the change request as submitted at Deadline 4 Environmental Statement Addendum: Earthworks Amendments - Rev 1 [REP4 -061]. 2. There is no peat shown on Figure 11.2 Superficial Geology Part A [APP-114] and it is believed that this response relates to Figure 11.1 Superficial Geology Part B [APP-176] which shows peat in the area of borrow pit 4 and borrow pit 5. Figure 11.1 is based on British Geological Survey (BGS) mapping. 3. As part of the ground investigation completed in 2018, reported in Appendix 11.3 Ground Investigation Report Part B [APP-318], four exploratory holes were located within the area shown on BGS mapping (replicated on Figure 11.1 [APP-114]) to be underlain by superficial deposits comprising peat. Peat was not encountered in any of the exploratory holes located in this area. Localised areas of peat are reported to have been encountered in historical ground investigations (pre 2018) at Ch 56180, however only in thin layers (2-4mm). The presence of peat has also historically (pre 2018) been reported within Alluvial deposits between Ch 54600 and 55000, however only recorded as 'peat traces'. Based on the ground investigation data there is limited evidence to suggest that there are significant peat deposits in the area of borrow pit 4 and borrow pit 5.

Ref. No.	Response:	Applicant's Response:
		<p>4. As peat deposits are absent at the borrow pit locations it is assumed that lateral connectivity with water bearing deposits is also limited and therefore any dewatering is unlikely to impact sensitive receptors (i.e. abstractions). The Applicant previously consulted with NCC (Lead Local Flood Authority) to ascertain private water supply information, and this was not available at this time. NCC would be further consulted at detailed design stage to identify any further information that could assist with the dewatering appraisal. As detailed in commitment EA-W1 of Table D-1 of the Environmental Statement Addendum: Earthworks Amendments [REP4-061], a dewatering appraisal will be undertaken at detailed design stage to support a water resources abstraction licence application if required. In the event that the change request is accepted by the ExA then this commitment will be incorporated into the Outline CEMP. A dewatering strategy will be developed preconstruction and implemented during construction if needed. The Environment Agency will be consulted regarding the need for a water resources abstraction licence.</p>
WRITTEN REPRESENTATIONS		
6.29 Annex A - Approach to the Assessment of Losses and Gains of Watercourses [REP2-010]		
11	<p>With respect to section 2.1, we are concerned that the dry channels/ditches identified in Part A have been removed from the phase 1 habitat plans as running water, and hence from the habitat loss and gain calculations for watercourses.</p> <p>We would therefore welcome clarity regarding the definition of 'watercourse' that has been used for this assessment.</p>	<p>1. This comment is a replicate of the Summary of Written Representations section above. A response is provided against Item 1 in relation to definitions of "watercourse".</p>
12	<p>It is noted that section 1.1.1 of this assessment refers to a watercourse as running water. 7.9.1 Appendix A Response to RR-04 Environment Agency - Rev0 [REP1-065] and section A.75 states all watercourses within the DCO order limits have been identified as Habitats of Principal Importance. However, page 7 of 3.1 Draft Development Consent Order - Rev 3a [REP3-005] states that a watercourse includes 'all rivers, streams, ditches, drains, canals, cuts, culverts, dykes, sluices, sewers and passages through which water flows except a public sewer or drain'. The Water Framework Directive (WFD) aims to manage, protect and improve the water environment, and applies to all rivers (including drains and ditches), lakes, estuaries, coastal waters and groundwater. With this in mind, we would welcome clarity regarding why and how have the Cotting Burn, tributary of the Earsdon Burn, unnamed ditch (north of Longdike Burn) and tributary of Thirsdon Burn have been reassigned as dry ditches within this assessment.</p>	<p>1. This comment is a replicate of the Summary of Written Representations section above. A response is provided against Item 1.</p>
13	<p>We understand that a number of these watercourses may be degraded, and of reduced ecological value. However, they still play a role, both in terms of habitat and connectivity. Placing these waterbodies in a culvert prevents any future opportunities for improvements, and it may break the corridor these watercourses provide. It also needs to be recognised that the status of these "dry channels" has been determined following a short field survey window that may or may not be</p>	<p>1. As detailed in the response to Item 1, the term "watercourses" represents running water habitat (habitat code G2, JNCC Phase 1 Handbook) within the biodiversity assessment, including the calculation of habitat losses and gains.</p> <p>The Applicant acknowledges that features recorded as ditches (including those detailed in Item 1; Cotting Burn, tributary of the Earsdon Burn, unnamed</p>

Ref. No.	Response:	Applicant's Response:
	representative of average conditions. For example, 6.7 Environmental Statement - Appendix 10.2 Water Framework Directive Assessment Part A [APP-255] for the unnamed tributary of the Thirston Burn appears to show a flow through the culvert (figure 11-1). Redefining these features as channels rather than watercourses is a reasonable alternative approach. However, it must acknowledge that they have value, though not to the same degree as the permanent waterbodies, and that their loss will result in a reduction in biodiversity.	<p>ditch (north of Longdike Burn) and tributary of Thirston Burn) were classified following a Phase 1 habitat survey, which represents a short field window. However, the classification of these features as ditches is also supported by repeat visits undertaken as part of other surveys on site, including aquatic surveys, otter and water vole surveys and surveys undertaken as part of the WFD assessments. With regards to the tributary of Thirston Burn, it is noted that Figure 11-1 of the Appendix 10.2 Water Framework Directive Assessment Part A [APP-255] shows a shallow depth of water within the culvert at the time of the survey. However, as detailed in the response to Item 1, the channel was recorded as dry during a Phase 1 walkover survey in March 2018. Aquatic macroinvertebrate surveys in May and October 2017 recorded very little water with lots of terrestrial grasses in the channel. This is evidenced by the image of Thirston Burn Tributary in Appendix B of Appendix 9.3 Aquatic Ecology Survey Report Part A [APP-229]. Evidence collected during the various site assessments determined the feature was only seasonally wet. In accordance with the JNCC Phase 1 handbook, the feature is classified as a ditch and not running water. Overall, the habitat classification of running water and ditches across the Scheme is considered accurate.</p> <p>The Applicant recognises that the ditch features can be defined as channels. However, it remains that these features are ditches and not watercourses (running water). Unlike running water, ditches are not a Habitat of Principal Importance (HPI) and therefore there is no policy or legislation requiring their replacement or compensation for their loss. The ditches recorded across the Scheme are primarily located along the boundaries of fields and represent features for water run-off and balancing. As channels that are only seasonally or temporarily wet (following periods of rain), the ditches do not provide connectivity for aquatic wildlife (such as fish).</p>
14	With respect to table 3-1, treating newly re-aligned watercourses as a net gain, against the lengths of watercourses lost to culverting is not an appropriate means of assessing net gain and loss. It fails to acknowledge that in re-aligning a watercourse, the original channel is lost. Any net gain would come from the newly aligned channel being longer than the original. This needs to be addressed as it provides a false impression on the overall impact of the scheme on the watercourses within the development corridor.	<ol style="list-style-type: none">1. The Applicant confirms that Annex A - Approach to the Assessment of Losses and Gains of Watercourses [REP2-010] does not identify changes in biodiversity (net loss, no net loss or net gain) and this is presented within the Biodiversity No Net Loss Assessment for the Scheme [REP4-058 and -059] (updated at Deadline 5, although with no change to the calculation pertaining to watercourses).2. Table 3-1 of Annex A - Approach to the Assessment of Losses and Gains of Watercourses [REP2-010] does not treat the newly re-aligned watercourses for Part A as a "net gain". Table 3-1 identifies that Part A would result in the permanent loss of 271m of watercourse and the creation of 138m of watercourse associated with the realignment of channels. As a result, Part A would result in an overall loss of watercourse of approximately 133m (as detailed in paragraph 3.1.5 [REP2-010]), calculated as loss minus creation.
Biodiversity No Net Loss		

Ref. No.	Response:	Applicant's Response:
15	<p>We are pleased to see a re-evaluation and drastic reduction in the reported loss of watercourses associated with Parts A and B of the scheme. We also recognise that Biodiversity Net Gain (BNG) is not in current planning law and is not applicable to Nationally Significant Infrastructure Projects. However, we believe that it should be used as a guide to provide the best possible outcomes, direct the mitigation and compensation designs, and achieve biodiversity betterment where feasible. This is reflected in the Government's 25 Year Environment Plan, which advocates an 'environmental net gain' principle for development, including housing and infrastructure. Furthermore, the applicant's 'Our plan to protect and increase biodiversity Strategy, 2015' (We acknowledge that this runs from 2015-2020. However, work on the DCO submission documents took place during the lifetime of this strategy) states that 'network improvement projects will mitigate and compensate their biodiversity impacts in order achieve no net loss of biodiversity, as far as the projects are reasonably able'. In addition, 'projects will identify biodiversity opportunities and deliver actions that will achieve biodiversity betterment wherever possible'. The following outcomes from this strategy are relevant to this scheme.</p> <ul style="list-style-type: none"> • Outcome 3. We have delivered biodiversity enhancements whilst implementing a capital programme of network improvement. • Outcome 4. We have addressed the legacy of biodiversity problems on our network via a targeted programme of investment. 	<ol style="list-style-type: none"> 1. The Applicant notes that the Environment Agency acknowledge the reduction in the reported loss of watercourse for the Scheme. 2. The Applicant also notes that the Environment Agency recognises that biodiversity net gain is not a legal requirement under current planning law and is not prospectively applicable to Nationally Significant Infrastructure Projects (NSIPs) even under the Environment Bill. Whilst not a requirement for a NSIP, a biodiversity no net loss report has been produced for the Scheme in order to meet the Applicant's own internal biodiversity plan (Highways England Biodiversity Plan), as referenced by the Environment Agency. A detailed analysis of how the Scheme achieves the outcomes of the Highways England Biodiversity Plan, including Outcome 3 and Outcome 4, is presented in the Applicant's response to BIO.1.3 of the ExAs first written questions [REP1-032]. 3. As confirmed in the Applicant's Written Summary of Oral Submissions at Hearings [REP4-026], the Applicant looks to consider biodiversity impacts across its whole network on a national scale as opposed to considering it on a scheme by scheme basis. The biodiversity no net loss report which has been produced will therefore be used to inform biodiversity changes at a national level.
16	<p>There appears to be a heavy reliance on the planting of woodland as mitigation or compensation for the loss of watercourse. Tree planting is not like for like compensation This is often described as 'wet woodland' creation, which we believe is an incorrect definition of the habitat created and should be reclassified as riparian woodland, unless it can be clearly demonstrated that wet woodland is being created.</p>	<ol style="list-style-type: none"> 1. This comment is a replicate of the Summary of Written Representations section above. A response is provided against Item 2.
17	<p>We would welcome a package of works that would provide meaningful compensation for the loss of watercourses. We note an updated net loss of 11.69% of watercourse and a gain of 7.21% of area based units. Therefore, we would encourage opportunities to compensate for this loss with equivalent river based units. Where river units or length are lost, common compensation measures could include the re-naturalising and re-meandering of heavily modified and straightened watercourses. Re-naturalising of watercourses that are found to be highly modified and historically straightened will in the long term provide a benefit to ecology and river health, whilst potentially providing gains in river length lost by the scheme.</p>	<ol style="list-style-type: none"> 1. This comment is a replicate of the Summary of Written Representations section above. A response is provided against Item 2.
18	<p>The applicant appears opposed to this due to the impression this would cause larger environmental impacts. Although there may be some short term impacts, it is considered that the majority of short term impacts can be mitigated for through appropriate design and mitigation measures, following best practice, such as those found in the Manual of River Restoration Techniques by the River Restoration Centre. Any mitigation and compensation should also support the attainment of Good Ecological Status by 2027 in the waterbodies within the Order Limits and those connected waterbodies.</p>	<ol style="list-style-type: none"> 1. The Applicant did not explore re-meandering of heavily modified and straightened watercourses because this would result in additional impacts (albeit short-term) and because, as outlined in the response to Item 2, the Applicant considers the package of improvements (detailed within Item 2) to be satisfactory to mitigate and offset the impacts of the Scheme with regards to loss of watercourse channel. However, in addition to the current package of works, the Applicant remains in discussions with the Environment Agency, over the need for further mitigation and/or compensation, and if required what form this will take.

Ref. No.	Response:	Applicant's Response:
		<ol style="list-style-type: none"> The detailed design stage of the Scheme will use best practise such as those found within the Manual of River Restoration Techniques by the River Restoration Centre to support the detailed design of the Scheme, where this is relevant to any mitigation being proposed.
19	<p>We do not provide exact examples and the advice given is aimed to support the scheme achieving no net loss which it current does not do. We also note that this may require looking beyond the DCO. It is noted that National Policy Statement for National Networks (2014), paragraph 5.25 states that the applicant may also wish to make use of biodiversity offsetting in devising compensation proposals to counteract any impacts on biodiversity which cannot be avoided or mitigated. Where significant harm cannot be avoided or mitigated, as a last resort, appropriate compensation measures should be sought.</p>	<ol style="list-style-type: none"> As detailed in reference 4.10 of the Applicant's Written Summary of Oral Submissions to hearings [REP4-025], there is currently no legal requirement for an NSIP, such as the Scheme, to achieve biodiversity no net loss or net gain. Nevertheless, a biodiversity no net loss assessment for the Scheme has been undertaken in order to meet the Applicant's own internal biodiversity plan and the National Policy Statement for National Networks (NPS NN). The Applicant looks to consider biodiversity impacts across its whole network on a national scale as opposed to considering it on a scheme by scheme basis. The Biodiversity No Net Loss Assessment for the Scheme [REP2-009] (as updated at Deadline 5) will therefore be used to inform biodiversity changes at a national level. The Applicant acknowledges the Environment Agency's advice and will consider this within its national assessment of changes in biodiversity. As outlined in the response to Item 2, the Applicant considers the package of improvements (detailed within Item 2) to be satisfactory to mitigate and offset the impacts of the Scheme with regard to loss of watercourse channel. However, in addition to the current package of works, the Applicant remains in discussions with the Environment Agency, over the need for further mitigation and/or compensation, and if required what form this will take. Further information will be provided at a subsequent deadline when the discussions have progressed.
Otters		
20	<p>We do not dispute the survey methods used and agree they were completed in line with relevant standard guidelines. However, we disagree with the statement 'otters are assessed as likely absent from the order limits of Part B' as referenced in action A23 of Appendix A Response to RR-04 Environment Agency' [REP1-065], and as detailed in paragraph 9.8.2(c) of Chapter 9: Biodiversity Part B [APP-049]. The applicant has not taken into account historical records and as such has not taken a precautionary or full informed approach to their assessment, despite an acknowledgement that 'the desk study recorded 13 records of otter within the 2km search area'.</p>	<ol style="list-style-type: none"> The otter surveys have been undertaken in accordance with relevant standard guidelines and methods, including the use of historical data. The Applicant has provided a response regarding the categorisation of otter as likely absent from within the Order limits and Survey Area in response to Item 3.
21	<p>We also disagree with the statement, 'the assessment considered those records within the last 10 years, as earlier records may not be relevant to the current ecological baseline'. Although this may be applicable on smaller schemes, or for species that are in decline, otters are generally seen to be experiencing a favourable increase in their distribution and population and as such, it is expected that populations of otter could be higher than what records indicate. Furthermore, any future increase in otter population, as is the goal of nature conservation for the species, should be taken into account due to the lifespan of the road and its increased barrier to mammal movement. Nonetheless, a</p>	<ol style="list-style-type: none"> When interpreting desk study records, which represent historic records, it is correct and necessary "to give specific consideration to the age and likely validity of any records" (as detailed in paragraph 7.5, CIEEM Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK). The consideration of records of otter from within the previous 10 years is considered proportionate for the Scheme and assessment of impacts to otter.

Ref. No.	Response:	Applicant's Response:
	number of the records within 2km are within 10 years and again, these have not been considered in their assessment.	<ol style="list-style-type: none"> The review of desk study records, as described in response to Item 3, was also used to aid in the justification for practical field survey which is the primary avenue on which impact assessment is based. As detailed in paragraph 2.6 of CIEEM's Guidelines for Preliminary Ecological Appraisal, desk study data "<i>may include historical records, which need to be considered in the light of more up-to-date information.</i>" Otter surveys for Part B were undertaken along watercourses spanning either side of the existing A1 carriageway in 2016, 2017, 2018 and 2019, with no evidence of otter activity or presence recorded along any watercourses or riparian habitat within the Survey Areas. On the basis of the survey results spanning four years, the limited records held by relevant bodies would seem to correspond to the conclusion that otter are likely absent from within the Order Limits and Survey Area. Any increase in otter population or transience of otter through land adjacent to the carriageway would continue to be provided within suitable crossing features beneath the carriageway, with the presence of culverts and cattle creeps suitable for otter passage.
22	We do not disagree with search area used and have not requested this be widened as highlighted above, as records are present within the 2km boundary. The example of using 5km for highly mobile species was used to highlight and support our opinion that otters are widespread across the area.	<ol style="list-style-type: none"> The Applicant notes that the Environment Agency do not disagree with the search area used for the desk study. Although the Environment Agency considers otter to be widespread across Northumberland, it remains the case that otter surveys for Part B undertaken in 2016, 2017, 2018 and 2019 recorded no evidence of otter activity or presence along any watercourses or riparian habitat within the Order limits and Survey Area.
23	The survey methodology used is effective for identifying rest sites within a distance (c.200m) that could result in disturbance. However, records provide an important indicator of their likely presence in the wider area and their potential to be transient within proximity to the scheme, which we believe is clear from the '13 records of otter within the 2km search area'. Even though otters were not detected within 250m of the scheme, local knowledge and opinion shared by those at the Environment Agency is that we consider them as present extensively across Northumberland. This is supported by known ecological characteristics of otters as they are known to have range of up to 32km. Therefore, if records are found within 2km, we would expect them to be at least transient within the vicinity of the scheme which appears to have been acknowledged in the applicant's response. However, no mitigation is proposed. This is seen in contradictory statements within 7.11 Applicant's Comments on Responses to ExA's First Written Questions [REP2-020], such as 'otter are assessed as likely absent from the order limits of Part B'. However, the applicant then states 'The Applicant accepts that there is potential for otter to use crossing points / watercourses as commuting routes, particularly associated with Part A', thus suggesting that there is potential for otters to use Part B for commuting albeit less frequently.	<ol style="list-style-type: none"> The survey methodology employed is effective at identifying rest sites within a given radius, but also other signs of otter activity including feeding remains, prints, temporary rest spots (couches/hovers) and spraints. Spraints are a key mechanism by which otter demarcate their territory and are a key sign of repeated otter activity within a given area. Repeated survey effort over four survey seasons (2016 to 2019) within the Order limits and Survey Area returned no evidence of otter activity in any form and it can therefore be ascertained that the watercourses bounding the A1 carriageway, in this section, are not a key resource used by otter. This notion is supported by the habitat assessment completed as part of the otter and water vole surveys in 2018 and 2019 that identified the majority of watercourses surveyed as being of low suitability to support otter (see Table 4-1 of Appendix 9.3 – Otter and Water Vole Report Part B [APP-300]). The Applicant has informed their assessment on the basis of field survey data covering a number of years, which provides a more relevant baseline with which to assess potential impacts to otter than that of historic records.
24	The failure to acknowledge the likelihood of otter in Part B is even more concerning when records within 2km are looked at in greater detail. Of the 14 records found by our search for within 2km of the	<ol style="list-style-type: none"> The Applicant acknowledges that the existing A1 carriageway represents a current barrier and that the extension of the carriageway will continue to represent a barrier post-construction.

Ref. No.	Response:	Applicant's Response:
	<p>scheme, six are records of dead otters / road traffic accidents on the A1, within the DCO limits. This clearly highlights that the current single carriageway road already forms a barrier to movement and has resulted in deaths of otters. By increasing the length of the existing culverts, this will further discourage otters to use them, and by increasing the width of the road, there is a higher potential for further road traffic collisions given the greater crossing distances.</p>	<ol style="list-style-type: none">2. The Applicant would welcome receipt of the Environment Agency's records cited within their response to corroborate these against records currently held by the Applicant. The most recent record of otter from the Applicant's desk study (within 2km and from the last 10 years) dates back to 2015 approximately 1km to the east of the A1 carriageway. The most recent road casualty of otter within the Order limits dates back to 2011. As detailed in Item 21 above, desk study data "<i>may include historical records, which need to be considered in the light of more up-to-date information</i>" (paragraph 2.6 of CIEEM's Guidelines for Preliminary Ecological Appraisal). Otter surveys for Part B were undertaken along watercourses spanning either side of the existing A1 carriageway in 2016, 2017, 2018 and 2019, with no evidence of otter activity or presence recorded along any watercourses or riparian habitat within the Survey Areas. In light of historical records of otter, on the basis of the survey results spanning four years, the conclusion that otters are likely absent from within the Order limits and Survey Area remains accurate and appropriate.3. The Applicant disagrees with the statement that an increase in culvert length will discourage otters from using them. Of the 19 culverts for Part B, 10 are unchanged by the Scheme both in length and diameter (including four culverts with an existing diameter less than 0.6m, which are generally unsuitable for wildlife (particularly mammal) passage) and a single culvert is to be replaced like-for-like in terms of diameter and length (Tributaries of Kittycarter Burn, circular culvert (southern tributary)). As such, the Scheme would not change the level of impact associated with these culverts in comparison to impacts from the existing road. The remaining culverts involve extension of existing culverts, maintaining the existing diameter, and the construction of a single new culvert, all of which provide dimensions suitable for mammal passage with a diameter of 0.6m or greater. This additionally includes the extension of two cattle creeps along White House Burn and a Tributary of the Kittycarter Burn which provide ample space for mammal passage. Following extension, these culverts retain the ability to offer free passage to wildlife (particularly mammals) except in times of flood. As Part B represents the widening of an existing carriageway, where existing culverts are used by wildlife for safe passage, the Scheme would maintain these features. The Applicant and its expert ecologists disagree that extending those culverts that currently offer safe passage will "<i>discourage otters to use them.</i>"4. The Applicant has included provision for preconstruction surveys to update baseline survey information, alongside Ecological Clerk of Works presence throughout construction (see Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5) Items S-B5 and B-B18), whom would monitor changes in baseline. In the event changes in baseline from that presented within the impact assessment arise and through surveys otter are confirmed to utilise land within the Order limits and Survey Area, appropriate mitigation will be devised.

Ref. No.	Response:	Applicant's Response:
		<p>5. In addition, the Applicant is willing to undertake a period of post-construction monitoring to monitor instances of road traffic collisions (RTC) and use of culverts. Pending the results of such monitoring, options for mitigation may then be explored if considered required. Reference to the proposed post-completion monitoring has been included within the updated Outline CEMP issued at Deadline 5 (measure B-B30).</p>
25	<p>As it is may be unfeasible for culverts to be upgraded, we expect the assessment to be revised to acknowledge the likelihood of otters within Part B, and the increased risk the widened road and longer culverts are likely to pose on commuting otters. We would encourage as part of the assessment, that a form of connectivity assessment is undertaken to inform the mitigation required. We acknowledge this may seem a bespoke study for mobile mammals. However, this is something seen on other major road schemes such as within the 'Deer Vehicle Collision Study' for the A9 Duelling Scheme. We cannot assume that otters that are acclimatised to the current pressures and provision of existing 'safe' passage will be equally encouraged to use longer culverts or avoid crossing the roads without providing any further mitigation, such as making culverts more attractive to them to use. Any designs should conform to guidance on mammal passage, where risks have been adequately assessed.</p>	<p>1. As discussed with the EA during a meeting held on 11th March 2021, it is not feasible, proportionate or pragmatic to remove all extant culverts and upgrade them. The increased construction footprint requirement and damage to existing habitats, both terrestrial and aquatic, that would be required to facilitate this, outweigh the benefits of this approach (as per A.23 of the Applicant's Response to the Environment Agency's Relevant Representation [REP1-064]). The Environment Agency acknowledged this during the meeting. Structures are to be extended consistent with those currently present (in relation to form and dimension) and following extension, culverts will remain suitable for use by mammals for passage beneath the carriageway.</p> <p>2. In respect of the reference to the A9 Dualling Deer Collision Study and associated connectivity assessment, this study was undertaken because deer are common throughout the areas traversed by the A9 scheme and pose a heightened risk of serious traffic accidents due to vehicle collisions (a health and safety consideration). The circumstances of this Scheme are different. Given the Applicant's assessment and conclusion of the likely absence of otter from the Order limits and Survey Area, the Applicant does not agree that a connectivity assessment is necessary for this Scheme. Further to the assessment conclusion, measures to make culverts more attractive to use are currently not considered proportionate or sustainable (sustainable in terms of the implications of cost and subsequent maintenance requirements of fencing to ensure it remains efficacious).</p> <p>3. The Applicant proposes to include post-construction monitoring of otter passage within the suite of monitoring measures already prescribed for the Scheme. It is proposed that post-construction monitoring be undertaken for a minimum three-year period and seek to identify any road traffic collisions of otter which may indicate avoidance of the suitable structures available for passage beneath the carriageway. The surveys would also monitor usage of the culverts beneath Part B. This information would thereafter aid in determining needs for mitigation in discreet locations. Reference to the proposed post-completion monitoring has been included within the updated Outline CEMP issued at Deadline 5 (measure B-B30).</p> <p>4. Post-construction monitoring would be supplementary to mitigation cited within paragraph 7.1.2 of Appendix 9.3: Otter and Water Vole Report Part B [APP-300] which states "<i>It is therefore recommended that a pre-construction survey of all watercourses that may be directly affect by construction of Part B</i>" is completed. This is echoed within the Outline OCEMP [REP4-013 and 014] (and as updated at Deadline 5) for the Scheme which requires pre-</p>

Ref. No.	Response:	Applicant's Response:
		<p>construction surveys to be completed in advance of construction (Items S-B5 and B-B18). The results of pre-construction surveys, as with any other receptor, may necessitate a revision of mitigation requirements at that time.</p> <p>5. The inclusion of post-construction monitoring represents a pragmatic and sustainable compromise.</p>
26	<p>In terms of mitigation design, it is noted that there is a culvert proposed at 51m with an encouraging 1.5m diameter, yet a longer culvert of 55m with only 0.6m diameter. Where possible, the largest sized pipe should be used to encourage use. We would welcome further details and justification regarding culvert diameter and lengths, and why the largest possible size isn't being used.</p>	<ol style="list-style-type: none"> 1. The Applicant notes that the culvert examples that the Environment Agency have made reference to relate to wildlife culverts of Part A. 2. The wildlife culvert of 55m in length and 0.6m diameter (Ref. 5.4 on the Culvert Mitigation Strategy [REP1-066]) was designed to facilitate wildlife passage, principally badger, beneath a road approaching a junction of Part A. The size of the culvert is suitable for its purpose and aligns with the DMRB guidance at the time of assessment (DMRB, Volume 10, Section 4, Part 2, HA59/92 Mitigating against effects on badgers). 3. The wildlife culvert of 51m in length and 1.5m diameter (Ref. 8A on the Culvert Mitigation Strategy [REP1-066]) was designed for bat passage (see EM027, Table 9-23 of Chapter 9: Biodiversity Part A [APP-048]). The maximum size was used for this culvert. As detailed in EM028 [APP-048], <i>"the size of the culvert is constrained by the topography and level of cover (space between the top of the culvert and road above). Due to the reduced dimensions, there is potential that bats may not use the feature."</i> This factor was considered within the assessment of significant effects in relation to bats (see paragraph 9.10.44 [APP-048]). 4. The Applicant confirms that the design of wildlife culverts has considered the largest pipe possible taking into consideration the potential risk to wildlife at the given locations (a proportionate approach to design) and the constraints to the culvert dimensions (such as topography and level of cover, as detailed above).
7.9.1.1 Annex A - Culvert Mitigation Strategy - Rev 0 [REP1-066]		
27	<p>We support the inclusion of the culvert mitigation strategy, which outlines what is currently there and the proposed mitigation measures. The reference to realigned channels as new improved watercourses needs to be set against the fact that the original channel will be lost. This needs to be reflected the left-hand side of the table, current conditions in order to provide clarity and balance. The addition of accompanying maps would also improve the strategy.</p>	<ol style="list-style-type: none"> 1. The culvert mitigation strategy [REP1-066] is a summary document to aid the Environment Agency in their review of the WFDa [APP-255 and APP-312], where appropriate maps are provided. As outlined in Item 4 the applicant remains in discussion with the Environment Agency over these points and an updated version of the Culvert Mitigation Strategy has been submitted at Deadline 5.
28	<p>It is evident that the applicant has mitigated against the impacts the scheme will have on fish passage, via the introduction of low flow channels, baffles and gravel beds within culverts. However, the applicant still needs to provide compensation for the loss of watercourses and habitats, which is not evident in the culvert mitigation strategy or the Outline Construction Environmental Management Plan (CEMP) - Rev 2 [REP3-013].</p>	<ol style="list-style-type: none"> 1. The Applicant notes that the Environment Agency agree that mitigation has been included to address the impacts of the Scheme on fish passage. 2. A response regarding the compensation for the loss of watercourses is presented against Item 2.

Ref. No.	Response:	Applicant's Response:
29	The mitigation strategy states large areas of wet woodland will be created. We believe this is an incorrect definition of the habitat created and should be reclassified as riparian woodland, unless it can be clearly demonstrated that wet woodland is being created. The areas of 'wet woodland' created appear to align with the comments made in 7.9.1 Appendix A Response to RR-04 Environment Agency [REP1-065] which claim 'c.38ha of wet woodland and c.12ha of wetland marginal planting'. However, we are unable to see the evidence of this and request that these proposals are included in the Landscape Mitigation Masterplan or similar plan.	<ol style="list-style-type: none"> As detailed in the response to Items 2 and 4 above, the Applicant agrees that the term "wet woodland" does not accurately represent the habitat types that are proposed and that such woodland creation should more accurately be described as "riparian woodland." Notwithstanding terminology, the proposed woodland remains an appropriate measure within the package of improvements (as detailed in Item 2) to offset the loss of watercourse channel by improving the adjacent and connected habitat. A plan was issued at Deadline 4 that shows the woodland and marginal planting associated with watercourses and channels (Appendix F Proposed Woodland and Marginal Planting Plan (Part A and B) [REP4-031]).
30	We welcome the intention to improve 850m of Longdike Burn as a result of the 79.2m increased culverting of this watercourse, as reported in the action A-B40 of 7.3 Outline Construction Environmental Management Plan - Rev 2 [REP3-013] and 6.2 Environmental Statement - Chapter 9 Biodiversity Part A, table 9-23, EM0047 [APP-048]. However, we request that further details and clarity are provided on this proposal.	<ol style="list-style-type: none"> This comment replicates the Summary of Written Representations section above. A response is provided against Item 4a.
31	Improvements are described as 'nutrient management measures to address adverse impacts of run-off from agricultural land, aquatic planting and bankside stabilisation'. However, we would welcome evidence from the applicant demonstrating that nutrients from agricultural land are impacting the Longdike burn at the proposed improvement site. In particular, is there an identified source and point of entry to the watercourse that needs to be addressed? What type of work bank stabilisation is proposed? We would welcome early engagement during the development of these measures to ensure they are appropriate and effective. We are also able to provide alternative locations to applicant in order to help deliver mitigation and compensation for this scheme, on waterbodies that are hydraulically linked to the DCO and in need of improvements to improve their WFD status.	<ol style="list-style-type: none"> The Applicant is currently compiling the evidence base that has been requested by the Environment Agency to justify the proposed enhancement works on this watercourse. This will be submitted at Deadline 7, subject to conclusion of discussions with the Environment Agency. The Applicant confirms that engagement with the Environment Agency will be undertaken early in the detailed design process for the development of these measures. As outlined in the response to Item 2, the Applicant considers the package of improvements (detailed within Item 2) to be satisfactory to offset the impacts of the Scheme with regards to loss of watercourse channel. However, in addition to the current package of works, the Applicant remains in discussions with the Environment Agency, over the need for further mitigation and/or compensation, and if required what form this will take. To enable these discussions to progress further, the Applicant is waiting for the Environment Agency to provide alternative locations for mitigation / compensation for this Scheme, this was discussed in a meeting on 19/03/21, with the Environment Agency expected to provide this detail, the week beginning 29/03/21.
7.3 Outline Construction Environmental Management Plan (CEMP) - Rev 2 [REP3-013]		
32	<p>Protection of protected species</p> <p>Action S-G8 states that 'Any tree felling will be carried out by experienced contractors to reduce direct mortality of protected species according to agreed felling methods between contractors and the ECoW'. A 'reduction' is unacceptable and may constitute an offence under UK and EU law if tree felling results in the disturbance, harm, death or damage to resting places of a number of protected species. If any tree felling cannot avoid an offence then it must either be avoided or a method</p>	<ol style="list-style-type: none"> Measure S-G8 is a general measure within the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5). It is correct to state that tree felling carried out by experienced contractors will reduce the risk of mortality to protected species. This measure is supported by species or location specific measures, for example S-B7 (update pre-commencement assessments of trees for roosting bats), S-B9 (timing of clearance with regards to nesting

Ref. No.	Response:	Applicant's Response:
	<p>statement produced and likely licence acquired to enable tree felling whilst ensuring protection and mitigation. Action A-B17 states that a pre-commencement walkover survey for otters.</p> <p>However, it does not provide timescales nor does it identify the procedure if an otter rest site is found within the scheme.</p>	<p>birds) and A-B20/A-B21/B-B7/B-B8/B-B9 (pre-commencement inspection and method of works regarding red squirrel).</p> <ol style="list-style-type: none"> Further, protected species licences have been identified and secured by the Outline CEMP [REP4-013 and -014] (as updated at Deadline 5) where a likely offence is predicted. These include great crested newts (A-B22), bats (A-B25 and B-B16) and badger (A-B26). Precautionary working methods have also been identified for great crested newts (A-B23), bats (A-B24, B-B11), barn owl (A-B28 and B-B22), fish (A-B33) and reptiles (B-B27). In response to the comment on measure A-B17, the Applicant confirms that the pre-commencement walkover survey would, as a minimum, be undertaken immediately prior to works commencing in proximity of each watercourse. In the event that an otter rest site is recorded and activities may result in an offence, Natural England would be consulted and a licence obtained where necessary. If an otter rest site is recorded but an offence can be avoided through mitigation (either as detailed within the Outline CEMP or additional measures), the Ecological Clerk of Works (ECoW) would develop an appropriate plan and work with the main contractor to implement this. Measure A-B17 of the Outline CEMP [REP4-013 and 014] has been updated to capture the above detail and submitted at Deadline 5.
33	<p>Invasive Non-Native Species (INNS)</p> <p>With regards to action S-B8, we wish to review Biosecurity Method Statement (reference to S-B8) once produced. Therefore, we request that this action is updated to reflect this.</p>	<ol style="list-style-type: none"> The Applicant can confirm that measure S-B8 within the Outline CEMP [REP4-013 and 014] (as updated at Deadline 5) has been updated to reflect the need for consultation with and review by the Environment Agency with regards to the Biosecurity Method Statement (see column 'Achievement Criteria and Reporting Requirements').
34	<p>ECoW Responsibility</p> <p>Table 2-1(Responsibility Matrix - Ecological Clerk of Works (ECoW) (main contractor), states that ECoWs are responsible for ensuring that all ecological mitigation measures are implemented on site and ensuring that the requirements of ecological licences. However, action B-B28 states that 'monitoring will be undertaken throughout the construction period by a site-based ECoW. The ECoW will ensure construction works remain compliant with mitigation measures prescribed within the outline CEMP and then in the CEMP produced by the main contractor'. The role and responsibilities of the ECoW suggests that the ECoW responsible for enforcing compliance with legislation and planning conditions. They do not have legal, and likely do not have contractual powers, to do so and under Construction Design and Management Regulations 2015 they are the responsibly of the principle contractor. As defined by CIEEM (https://cieem.net/iam/current-projects/accredited-ecow/), ECoWs 'oversee the management of the risks on construction sites'.</p>	<ol style="list-style-type: none"> The legal manner by which the obligations under the CEMP and the Requirements will be secured is the Planning Act 2008. As a result of these controls, there is every incentive on the Applicant, its contractor(s) and the personnel listed under the Outline CEMP to ensure compliance. It is not the role of the CEMP to provide contractual enforcement, and it is not the role of the Examination to investigate contractual matters given the enforceability under the general law. The wording of measure B-B28 of the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5) with regard to the role of the ECoW does not make reference to enforcing compliance with legislation and planning conditions. Measure B-B28 states that the ECoW will undertake monitoring throughout the construction period and "<i>the ECoW will ensure construction works remain compliant with mitigation measures prescribed in this Outline CEMP and then in the CEMP produced by the main contractor.</i>" This would be achieved through appropriate advice and guidance provided to the contractor, to make them aware of the mitigation requirements (as detailed within the Outline CEMP) and support with the implementation of this mitigation. This aligns with CIEEMs definition of an ECoW (https://cieem.net/i-am/current-projects/accredited-ecow/), which identifies

Ref. No.	Response:	Applicant's Response:
		<p>the “need for a professional that can work on site with construction contractors to: 1. Advise on protecting valued biodiversity features on construction sites. 2. Provide practical, site-specific and proportionate assistance on how their clients can achieve compliance with environmental legislation...”</p> <p>3. The Applicant acknowledges that it is not the role of the ECoW to enforce compliance with legislation or planning conditions but that their role is to monitor compliance.</p>
35	<p>We welcome the requirement for a competent, qualified and experienced ECoW during construction that is either an Accredited ECoW by CIEEM or a member of The Association of Environmental Clerks of Works (AECOW). As such, it should be made clear that the ECoW's responsibility is to monitor compliance with environmental legislation, policy or mitigation and advice on compliance with the environmental planning conditions, with preparation of compliance reports for clients and stakeholders and advisory reports for site managers/staff.</p>	<p>1. The Applicant considers that it is not necessary to restrict this role to accredited individuals or those that are a member of the Association of Environmental Clerks of Works (AECOW). The Applicant also notes that the ECoW training and accreditation by CIEEM is still in its development phase and has not yet been released.</p> <p>2. Table 2-1 of the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5), which identifies the key responsibilities of the ECoW, acknowledges that this person(s) will need to be suitably experienced. With regards to responsibilities associated with the implementation of European Protected Species and relevant licences, the ECoW will also be appropriately licensed. The responsibilities of the ECoW in Table 2-1 of the Outline CEMP has been updated to include “<i>monitor compliance with environmental legislation and policy</i>” and to change “ensure” the implementation of mitigation and licence requirements to “monitor” the implementation. The responsibilities also now include “<i>as required or requested, the ECoW will prepare compliance reports for the Applicant and stakeholders, and advisory reports for site managers/staff.</i>”</p>
36	<p>Monitoring</p> <p>With respect to table 5-1(Monitoring to be Carried out During Construction) it states that monitoring of the freshwater environment will be undertaken by the Environmental Manager (ECoW) and the frequency is ‘As required, for instance during fish rescue activities.’ It also states that surface watercourses located within 50m of earthworks will be monitored/inspected to identify any pollution as a result of e.g. silt, fuel or chemicals on a weekly basis by the Environmental Manager. This should be updated to comply with the updated S-GS13 which states: ‘During construction works surface watercourses located within 50m of earthworks will be monitored/inspected regularly. Watercourses in high risk areas and where construction activities are more intensive will be subject to more regular checks, and clear actions will be defined by the main contractor in consultation with the Environment Agency, such as reporting when limits (such as turbidity NTU levels) are reached so that pollution incidents are appropriately reported to Environment Agency and issues are resolved. A baseline will be established prior to the commencement of construction.’</p>	<p>1. The Applicant has updated Table 5-1 of the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5) in relation to “surface watercourses located within 50m of earthworks will be monitored/inspected to identify any pollution as a result of e.g. silt, fuel or chemicals on a weekly basis by the Environmental Manager.” This description has been expanded using updated text of S-GS13 to include “clear actions will be defined by the main contractor in consultation with the Environment Agency.” The frequency has been amended to “Weekly. Watercourses in high risk areas and where construction activities are more intensive will be subject to more regular checks.”</p>
37	<p>Watercourse Protection and Silt Treatment</p> <p>The inclusion of additional silt mitigation measures and concepts such as those in action S-W9 are highly welcomed. S-GS4 states ‘pollution control measures including detention basins and filter drains</p>	<p>1. The design of the temporary drainage infrastructure is an aspect that will be progressed at detailed design. This is secured by S-W1 of the updated oCEMP (submitted at deadline 5) and will take account of the matters raised by the Environment Agency as a matter of course.</p>

Ref. No.	Response:	Applicant's Response:
	<p>will be incorporated into the drainage design of the Scheme.' This appears to indicate that the permanent structures designed to handle the operational phase and not the construction phase may be used. We would like to reiterate that detention basins are designed for the operational phase of the scheme, as such these should not be relied upon to deal with the large volumes of contaminated water that are associated with construction activities, as they are highly unlikely to be able to cope, and therefore, result in pollution incidents and impacts upon ecology throughout the scheme. We recommend that dedicated sediment traps and settlement ponds should be designed into the scheme, and where these are unlikely to be effective, treatment systems such as lamella tanks and chemical dosing should be costed into the scheme.</p>	
38	<p>Larger area for construction required on the north bank, increasing pollution risk to River Coquet</p> <p>A larger area of exposed soils on the northern bank will result in a greater risk of the creation and accumulation of site water with a high sediment load. Due to the nature of the works, there will be limited area to treat the water through standard methods such as settlement lagoons. A bespoke plan for treating the anticipated volumes and chemistry of the water should be developed, this must take into account any permits that may be required taking into account the designated receiving waters if using chemical dosing. The outline CEMP does not appear to identify the higher risks posed to the designated watercourse at this location. By not acknowledging the greater risk at the early stages, this risks sediment management not being adequately designed into the temporary works.</p>	<ol style="list-style-type: none"> 1. The larger area for construction required on the north bank of the River Coquet relates to the proposed changes to the Scheme, principally the Stabilisation Works. A full impact assessment is presented in Environmental Statement Addendum: Stabilisation Works for Change Request [REP4-063]. The ExA and Secretary of State for Transport have still to make a decision on the Change Request. The version of the Outline CEMP [APP-013 and 014] which is currently before the ExA does not currently include the additional measures which would be incorporated into the CEMP in relation to the Stabilisation Works (or indeed the other 2 parts to the Change Request). 2. Table E-1 in Appendix E: Register of Environmental Actions and Commitments of the ES Addendum details those measures that are additional or require amendment to those shown in the Outline CEMP [REP3-013 and 014] (as updated at Deadline 4 [REP4-13 and -014]) for the Stabilisation Works. If the ExA and Secretary of State for Transport accepts the Change Request for the Stabilisation Works then the measures in Table E-1 will be incorporated into a further version of the Outline CEMP. 3. In Order to assist the Environment Agency, Table E-1 [REP4-063] includes the following mitigation measures of relevance to the response provided by the Environment Agency: <ul style="list-style-type: none"> - SW-B1 – “river training measures and permanent scour protection will be constructed using suitable materials to avoid changes in water chemistry” - SW-B5 – “an assessment of the biological water quality and water chemistry will be undertaken prior to and during construction to monitor the river during the Stabilisation Works. The main contractor will monitor and take appropriate action if water quality deteriorates, following agreement with Natural England and the Environment Agency where required” - SW-B8 – “an assessment of the biological water quality and water chemistry will be undertaken post-construction to monitor water conditions within the River Coquet ... If required, remedial actions will be implemented following consultation and agreement with Natural England and the Environment Agency.” - SW-W1 – “Drainage arrangements will be designed to prevent build-up of groundwater behind the installed piles, if necessary.”

Ref. No.	Response:	Applicant's Response:
		<ul style="list-style-type: none"> - SW-W4 – “The following additional measures will be implemented during the construction of the lower north bank piling platform and associated works, including temporary retaining wall / river training works: <ul style="list-style-type: none"> o ... Prior to construction, any sedimentary bed features that may be will be mapped and photographed, and boulders (>0.5 m) will be surveyed, numbered and marked to show orientation relative to the channel bed. At onset of the construction phase, these sediments will be removed and stored. Upon completion of construction, the sedimentary bed features will be reinstated where practicable, with boulders placed according to the surveyed data. o River training walls to be lined with geotextile to prevent release of construction aggregate associated with the piling platform, to the channel.” - SW-W5 – “The following additional measures will be implemented during the construction of the Stabilisation Works: <ul style="list-style-type: none"> o Sediment barriers (i.e. silt fences) will be installed at regular intervals following slope contours. The silt fences will be placed at regular intervals between the slope crest and foot to reduce the silt accumulation burden placed on silt fence. Silt fences and/or other edge protection measures will be installed along the River Coquet bank to reduce the risk of increased sedimentation entering the channel during construction. A site-specific drainage management plan will be created to attenuate, treat and discharge site runoff. o Due consideration of the drainage requirements will be given to collect, attenuate, treat and discharge any groundwater seepage that may occur due to cuts into the slope. o Suitable surface material will be used on haul roads to reduce structural damage from vehicular movements and exposure of bare ground which will be susceptible to surface water runoff.” - SW-W6 – “The following additional measures will be implemented during the construction of the Stabilisation Works: <ul style="list-style-type: none"> o ... During periods of heavy rain, adopt regular visual inspections of the watercourse to identify discharges of silt laden runoff and take immediate action if required.” - SW-W7 – “During construction, visual survey of the bed and banks will be undertaken to understand the degree and nature of change following any high flow events during construction to verify the findings of the assessment ...”
39	Watercourse mitigation / Compensation	1. As detailed in the response to Item 2 above, the Applicant agrees that the term “wet woodland” does not accurately represent the habitat types that are

Ref. No.	Response:	Applicant's Response:
	<p>The suggested mitigation of 38ha of 'wet woodland' and 12ha of 'marginal planting' is not contained within table 3-1- Register of Environmental Actions and Commitments: The Scheme. Therefore, there does not appear to be a defined commitment for mitigation and compensation for the impacts on the watercourses. It would be beneficial to know if the feasibility and locations of these been assessed? If so, where is the mapping associated with these as they appear to be missing from the Landscape Mitigation Masterplan. We would also welcome clarification regarding whether the 'wet woodland' is wet woodland, or if it's riparian planting? Furthermore, we would welcome clarity regarding whether protection measures from grazing pressures for this mitigation been established.</p>	<p>proposed and that such woodland creation more accurately should be described as "riparian woodland." It is not anticipated that these areas of woodland habitat would remain permanently wet.</p> <ol style="list-style-type: none"> 2. A plan was issued at Deadline 4 that shows the woodland and marginal planting associated with watercourses and channels (Appendix F Proposed Woodland and Marginal Planting Plan (Part A and B) [REP4-031]). These habitats are extracted from the Landscape Mitigation Masterplan documents for Part A [REP4-010] and Part B [APP-148], which are secured through the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5). Requirement 5 of the dDCO [REP4-004 and 005] also requires a landscaping scheme to be based on these Landscape Mitigation Masterplan documents. 3. Regarding protection of habitats from grazing, the majority of the areas of riparian woodland and marginal planting are located within the permanent highway boundary and would therefore be protected from grazing by a boundary hedge and/or fence. Where created habitats area located outside of the permanent highway boundary, provision of protection from grazing by domestic and non-domestic animals (such as fencing) would be afforded and detailed within the Series 3000 planting specification document. This document is secured through the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5) (see measure S-L11).
40	<p>Action A-B40 refers to compensation due to the direct loss of ~35m of the Longdike Burn due to the Bockenfiels Culvert (12) extension. It is understood that improvements will be delivered on a ~850m section of the Longdike Burn within the temporary boundary. Although we welcome compensation for the direct loss of ~35m of watercourse, we request further details on this proposal.</p>	<ol style="list-style-type: none"> 1. A response is provided against Item 4a above.
41	<p>As stated previously in this letter, improvements to the Longdike are described as 'nutrient management measures to address adverse impacts of run-off from agricultural land, aquatic planting and bankside stabilisation'. However, we would welcome evidence from the applicant demonstrating that nutrients from agricultural land are impacting the Longdike burn at the prosed improvement site.</p>	<ol style="list-style-type: none"> 1. This comment is repeated above. A response is provided against Item 31.
42	<p>A-W2 – A-W13 (excluding A-W7, 10, 14) and B-W1 details mitigation that will be delivered through culvert design to manage risk to the water environment and improve ecology. The majority of this mitigation focuses on maintaining fish passage due to the culverting of watercourses. However, the localised impacts of the scheme due to the culverting of watercourses will be significant. There is no reference as to how the applicant will provide mitigation and/or compensation for the culverting of watercourses and the resulting loss of riparian and river habitat.</p>	<ol style="list-style-type: none"> 1. A response regarding mitigation and compensation for the loss of watercourse and the resulting loss of riparian and river habitat is detailed in Items 1 and 2.
43	<p>We welcome the opportunity to be involved in discussions at the detailed design stage in relation to A-W16, construction of culverts and outfalls on the Longdike Burn</p>	<ol style="list-style-type: none"> 1. The Applicant confirms that engagement with the Environment Agency will be undertaken early in the detailed design process for the development of these aspects. Furthermore, this is something that the Environment Agency will be consulted upon, with further detail on this consultation provided in the response for Item 7.

Ref. No.	Response:	Applicant's Response:
44	The culvert mitigation strategy indicates a loss of 543.3m of riparian and river habitat whereas Annex A - Approach to the Assessment of Losses and Gains of Watercourses [REP2-010] suggests the total length to be 427m. This is a discrepancy of 116.3m. We would welcome clarification on the total length of riparian and river habitat that will be lost due to the culverting of watercourses.	1. This comment is a replicate of the Summary of Written Representations section above. A response is provided against Item 6.
45	The Environment Agency must be consulted on the detailed CEMP. Therefore, we request the inclusion of a requirement stating that the detailed CEMP will be approved by the Secretary of State following consultation with Northumberland County Council and the Environment Agency.	1. This comment is a replicate of the Summary of Written Representations section above. A response is provided against Item 7.
Geomorphology		
46	<p>With respect to action S-W6, the CIRIA Culvert, Screen and Outfall manual, section 9.2 states that a watercourse's hydromorphology should be considered in the design of culverts, screens and outfalls. When undertaking the design of new or replacement culverts, screens and outfalls (including their removal) it is important to assess and mitigate the impact of hydrogeomorphology. Ideally this should be undertaken by consulting an expert geomorphologist. This is to ensure that the response of the watercourse and sediment regime is fully understood and that the siting and design has a beneficial or minimal impact and works with natural processes. Therefore, we welcome the commitment to take hydromorphological considerations into account during the design of the scheme's culverts.</p> <p>However, we are concerned by the phrase "where appropriate", as this would imply divergence from best practice.</p>	<ol style="list-style-type: none"> 1. The Applicant agrees that it is important to consult a hydromorphologist where the Scheme could have impacts on a watercourse's hydromorphology, when designing culverts, screens and outfalls. However, there are some very minor watercourses crossed by the Scheme which are essentially ephemeral field ditches (further context on this is provided in the response to in Items 1,2 and 13), to which the hydromorphology is not considered significant. Therefore, the Applicant considers that it is not appropriate for a geomorphological assessment to be undertaken for these very minor watercourses which are detailed in the Culvert Mitigation Strategy [REP1-066], as revised and submitted as part of Deadline 5. 2. Notwithstanding this S-W6 of the Outline CEMP [REP4-013 and 014] has been updated to reflect the Environment Agency's concerns of the use of "where appropriate" and submitted at Deadline 5.
47	<p>Section 9.6.7 of this guidance outlines 4 broad principles that should be applied in the construction of new culverts.</p> <p>1 - When installing the culvert, the invert should be below the existing natural bed level. The design principal is to maintain bed material diversity through the culvert and avoid conditions where the culverts flat surface will be exposed. Appropriate burial depths for the retention of a natural bed are often in the region of 300mm – 600mm.</p> <p>2 - Maintaining the natural channel width, bed level and slope will provide adequate water velocity and depth for fish passage. Box culverts with wide flat floors should be avoided on fish migration routes if low flow depths (<200mm) occur, unless a low flow notch is provided. The installation of baffles in the invert of the culvert can improve conditions for fish and invertebrates by slowing the flow and locally increasing depth and encouraging the accumulation of gravels in refuge areas behind the baffles.</p>	<ol style="list-style-type: none"> 1. The Scheme has been developed over a number of years, during which time the best practise guidance has been updated, the original design was undertaken in accordance with The CIRIA Culvert Design and Operation Guide (C689). However, in the intervening period this has been superseded by the CIRIA Culvert, Screen and Outfall Manual (C786). It should be considered that the best practise guidance has been developed to enable the safe passage of coarse fish, brown trout, sea trout and salmon. These would not be present in the vast majority of the watercourses crossed by the Scheme and therefore not directly relevant. Full justification of this on a watercourse by watercourse approach is provided in the Culvert Mitigation Strategy [REP1-066], as revised and submitted as part of Deadline 5. 2. The standards for the design of the Scheme, at the time of design, was HA107/04 Design of Culvert and Outfall Details, this requires a bed level of 150mm or 75mm for a ditch culvert. It is this standard which was applied in the design and previously discussed with the Environment Agency.

Ref. No.	Response:	Applicant's Response:
	<p>3 - Bottomless culverts are recommended as these will maintain a natural bed. However, where this is not possible the hard culvert invert should be set below bed level.</p> <p>4 - Other features such as fish blocks, individual baffle structures or eel matting may be re-fitted through existing pre-cast culverts to provide refuge and diversity, improve passage and to help accumulate and retain material and improve conditions for fish, eels and invertebrates.</p>	<p>3. For Part A this was on 09/01/18, during which the Environment Agency agreed with the design approach of using the CIRIA Culvert Design and Operation Guide (C689). A further meeting was held with the Environment Agency on 05/09/18 during which details on the proposed bed levels and fish passage were discussed and agreed.</p> <p>4. For Part B no specific meeting was held with the Environment Agency, and instead the Applicant adopted the same principles for Part B as there are only three watercourses here, which can accommodate a natural bed and all of which are culvert extensions.</p> <p>5. The Applicant considers that the four broad principles outlined by the Environment Agency are not directly applicable to all the culverts impacted by the Scheme, for the reasons outlined below. This is because in a number of the watercourses there is insufficient water flow to support fish or other aquatic organisms for the majority of the year, these have been identified as ditches, it is these water features in which the applicant considers the four principles do not apply.</p> <p>6. The inclusion or not of a natural bed within the new or extended culverts has taken many aspects into consideration, these include:</p> <ul style="list-style-type: none">• Carbon neutrality;• Potential for the natural bed to silt up;• Impacts on culvert size;• Construction impacts on the watercourses; and• Potential for changes in flow conveyance / flood risk. <p>7. The inclusion of a greater depth of natural bed than currently proposed would require a greater amount of embedded carbon as a result of a larger culvert. The larger culvert would result in greater bed and channel disturbance as a result of increased construction works. Full justification of this on a watercourse by watercourse approach is provided in the Culvert Mitigation Strategy [REP1-066], as revised and submitted as part of Deadline 5.</p> <p>8. The Applicant therefore considers that the most appropriate depth of natural bed has been provided within the design, as previously agreed with the Environment Agency. Where a natural bed is not proposed, it is considered that any other aquatic organisms would be conveyed through the culverts in much the same manner as a relatively straight section of channel.</p> <p>9. Notwithstanding the above, the Applicant remains in discussion with the Environment Agency over the design of the new culverts and further information will be provided at Deadline 7. This is detailed in the Environment Agency SoCG submitted at Deadline 5 (document reference 7.6C).</p>

Ref. No.	Response:	Applicant's Response:
48	It is noted that there is a huge variation in the depth of "natural" bed proposed for the culverts, ranging from 100mm to 250mm. It is also unclear whether any of the culverts have a 300mm deep bed. Therefore, if the above principles are not being applied to new or existing culverts, we would welcome the inclusion of narrative /reasoning behind this decision.	1. A response is provided against Item 47 above and further information is provided in the Culvert Mitigation Summary [REP1-066], as updated and submitted as part of Deadline 5.
49	<p>With respect to the realignment of sections of the Fenrother, Kittycarter and the tributary of the Thirston Burn, we support the ambition to provide varied substrate features and flow dynamics within the watercourse channel and assist the movement of aquatic species. The realignment of these streams creates an opportunity to significantly improve these streams, and we would welcome the opportunity to work with the applicant in achieving this. Mimicking the existing channel conditions would be considered a missed opportunity, and failure to delivery on the applicant's commitments to the biodiversity challenge. In particular, the Government's Road Investment Strategy states that there should be 'no net loss of biodiversity from Highways England's activities, both from new schemes and its operational estate and progress towards the target of delivering a net gain in biodiversity by 2040. The mitigation and compensation measures outlined in the Culvert Mitigation Strategy [REP1-066] and in the outline CEMP provide a good framework to develop and build upon. However, it needs to acknowledge that culverting a watercourse leads to:</p> <ul style="list-style-type: none"> • Reduced ecological value within concrete channels and with reduced light. • Loss of and adverse effects on environmental features and wildlife habitat including disruption of the linear habitat of a watercourse, stopping species from spreading naturally. 	<ol style="list-style-type: none"> 1. The Applicant is glad that the Environment Agency supports the design principles. However, as agreed with the Environment Agency the nature of the Order limits does not facilitate the extensive channel improvements desired by the Environment Agency on adjacent farmland, which could improve the watercourses. 2. As outlined in the response to Item 19 above, the Applicant looks to consider biodiversity impacts across its whole network on a national scale as opposed to considering it on a scheme by scheme basis. 3. The impacts of culverting are relatively minor and localised and do not need to be compensated for, under the WFD. The applicant considers that the Scheme will not cause a deterioration in the overall waterbody status for any waterbody, nor will it prevent them from achieving their WFD objectives.
50	Measures such as baffles, fish easements, the establishment of natural beds and designing culverts around hydromorphological principles are means to prevent,reduce or control the adverse effects of culverting these watercourses. These should not be confused with measures to compensate for the loss of the watercourse through culverting.	<ol style="list-style-type: none"> 1. The Applicant agrees that the design of new or extended culverts (such as the inclusion of natural beds, baffles or fish easements) represents mitigation, as this seeks to reduce the adverse effects of the culvert. However, retrospective installation of fish baffles on the existing culvert of the River Lyne (Part A) and replacement of the wooden baffles within an existing culvert of Longdike Burn (Part A) represent improvement measures for these watercourses to offset the loss of watercourse. 2. The Applicant considers that the approach to mitigating and offsetting the impacts of the Scheme is suitable and no further mitigation or compensation is required to prevent a deterioration in biodiversity or WFD terms. However, notwithstanding this the Applicant remains in discussions with the Environment Agency over their ideal mitigation requirements, as documented within the meeting minutes 04/03/21 and 19/03/21.
51	It is considered that the length of watercourse lost or altered by the scheme is an under estimate as it doesn't take into account headwalls, scour protection, bank protection etc.The proposals for wetlands, wet woodland and along the Longdike Burn are welcomed, but we would like further details around these suggestions. We have some concerns that terrestrial habitats may not adequately compensate for the loss of a river or stream to a culvert.	<ol style="list-style-type: none"> 1. It is not possible to account for headwalls, scour protection, bank protection etc at this stage of the design where the need for such measures has yet to be identified or designed. However, the impact of these is considered to be minimal in consideration of the lengths of culvert being proposed. 2. Whilst the terrestrial habitats may not directly compensate for the loss of a river or stream to a culvert, which cannot be replaced the Environment Agency have agreed with the Applicant that the direct replacement is not always possible. The Applicant considers that the enhancement of the watercourse and adjacent habitats is the most suitable alternative approach

Ref. No.	Response:	Applicant's Response:
		<p>as it improves the adjacent and connected habitat thus improving the value of the waterbody.</p> <p>3. The Applicant has engaged with the Environment Agency to provide this additional detail and agree an approach to address this outstanding aspect, this is documented within the meeting minutes 04/03/21 and 19/03/21. Further details will be submitted at Deadline 7 once these discussions have appropriately concluded.</p>
6.32 Environmental Impact Assessment - River Coquet Geomorphology Modelling Assessment [REP3-009]		
52	The revised Geomorphology assessment has acknowledged our concerns and demonstrates that the proposals will not lead to any deterioration in the River Coquet.	<p>1. This comment is a replicate of the Summary of Written Representations section above. A response is provided against Item 8.</p>
6.34 Environmental Impact Assessment - Surface Water Outfall Strategy [REP3-011]		
53	We welcome the inclusion of setback outfalls on the Floodgate Burn, River Lyne, Earsdon Burn, Longdike Burn, Denwick Burn and White House Burns to reduce the loss of riparian habitat vegetation.	<p>1. The Applicant notes the Environment Agency's position.</p>
Appendix A Response to RR-04 Environment Agency		
54	The applicant's response to reference A.2, A.5, A.81, and A.82 refers to the fact that it is not viable to create new lengths of open watercourse to mitigate for the loss of watercourse as a result of the scheme. We would like to confirm that we agree with this, and that at no point have the Environment Agency suggested the creation of new lengths of watercourse to provide mitigation or compensation for the scheme.	<p>1. The Applicant notes that the Environment Agency agrees that it is not viable to create new lengths of open watercourse to compensate (rather than mitigate) for the loss of watercourse as a result of the Scheme.</p>
Annex C - Figure 11.7 Potential Contamination Sources - Rev 0 [REP1-068]		
55	Developments on or adjacent to Foot and Mouth burial or disinfectant sites require authorisation/permission from the Animal Health Protection Agency (APHA).	<p>1. Initial discussions with APHA in Jun-18 confirmed the site is not official. Parameter 2 is described in 2.12.4b of Chapter 2: The Scheme [APP-037] to allow flexibility within the Order limits and Limits of Deviation for Highlaws junction to be moved north in detailed design to completely avoid the burial site.</p> <p>2. As the Scheme is intending to be adjacent to an unofficial site, there is no requirement to seek authorisation/permission from APHA, but their guidance is to be followed if animal remains are found. This was confirmed in recent correspondence with APHA in Mar-21.</p>
6.5 Environmental Statement - Figure 11.2 Superficial Geology Part A [APP-114]		

Ref. No.	Response:	Applicant's Response:
56	Further information is required. The superficial map provided still identifies peat in two of the most southerly borrow pits whilst the borehole logs do not corroborate this. There is no assessment/discussion as to the presence or not of peat and what its relevance is in terms of impacts from dewatering.	<ol style="list-style-type: none"> 1. The Applicant believes this question relates to the change request as submitted at Deadline 4 Environmental Statement Addendum: Earthworks Amendments - Rev 1 [REP4 -061]. 2. There is no peat shown on Figure 11.2 Superficial Geology Part A [APP-114] and it is believed that this response relates to Figure 11.1 Superficial Geology Part B [APP-176] which shows peat in the area of borrow pit 4 and borrow pit 5. Figure 11.1 is based on British Geological Survey (BGS) mapping. 3. As part of the ground investigation completed in 2018, reported in Appendix 11.3 Ground Investigation Report Part B [APP-318], four exploratory holes were located within the area shown on BGS mapping (replicated on Figure 11.1 [APP-114]) to be underlain by superficial deposits comprising peat. Peat was not encountered in any of the exploratory holes located in this area. Localised areas of peat are reported to have been encountered in historical ground investigations (pre 2018) at Ch 56180, however only in thin layers (2-4mm). The presence of peat has also historically (pre 2018) been reported within Alluvial deposits between Ch 54600 and 55000, however only recorded as 'peat traces'. Based on the ground investigation data there is limited evidence to suggest that there are significant peat deposits in the area of borrow pit 4 and borrow pit 5. 4. As peat deposits are absent or found in trace amounts at the borrow pit locations it is assumed that lateral connectivity with water bearing deposits is also limited and therefore any dewatering is unlikely to impact sensitive receptors (i.e. abstractions). The Applicant previously consulted with NCC (Lead Local Flood Authority) to ascertain private water supply information, and this was not available at this time. NCC would be further consulted at detailed design stage to identify any further information that could assist with the dewatering appraisal. 5. As detailed in commitment EA-W1 of Table D-1 of the Environmental Statement Addendum: Earthworks Amendments [REP4-061], a dewatering appraisal will be undertaken at detailed design stage to support a water resources abstraction licence application if required. If the Change Request is accepted then this commitment will be incorporated into the Outline CEMP. A dewatering strategy will be developed preconstruction and implemented during construction if needed. The Environment Agency will be consulted regarding the need for a water resources abstraction licence.
57	Dewatering these could impact the deposits on the east side of the carriageways (excluded from the scheme). The sand and gravel deposits and limestone formations potentially link scheme to licenced abstraction and private water supplies. Dewatering activities should assess risk to these.	<ol style="list-style-type: none"> 1. The Applicant believes this question relates to the change request as submitted at Deadline 4 Environmental Statement Addendum: Earthworks Amendments - Rev 1 [REP4 -061]. 2. Confirmation of sensitive receptors (water feature survey) will be undertaken as a part of the permitting process for the dewatering activities. However, temporary dewatering of the superficial glacial deposits and bedrock geology has been calculated as a conservative estimate with the full formation thickness of 340 m (derived from BGS Lexicon and BGS Map sheet 6) used.

Ref. No.	Response:	Applicant's Response:
		<p>The calculated radius of influence is limited to 33 m and therefore makes it unlikely for groundwater abstractions to be present.</p> <p>3. There is no peat shown on Figure 11.2 Superficial Geology Part A [APP-114] and it is believed that this response relates to Figure 11.1 Superficial Geology Part B [APP-176] which shows peat in the area of borrow pit 4 and borrow pit 5. Figure 11.1 is based on British Geological Survey (BGS) mapping. However, onsite borehole logs located within the borrow pit footprints (Borrow Pit 4 and 5) indicate that no peat deposits were found within the superficial geology. As peat deposits are absent at the borrow pit locations it is assumed that lateral connectivity with water bearing deposits is also limited and therefore any dewatering is unlikely to impact sensitive receptors (i.e. abstractions), as stated in Item 56. The Applicant previously consulted with NCC (Lead Local Flood Authority) to ascertain private water supply information, and this was not available at this time. NCC would be further consulted at detailed design stage to identify any further information that could assist with the dewatering appraisal. As detailed in commitment EA-W1 of Table D-1 of the Environmental Statement Addendum: Earthworks Amendments [REP4-061], a dewatering appraisal will be undertaken at detailed design stage to support a water resources abstraction licence application if required. A dewatering strategy will be developed preconstruction and implemented during construction if needed. The Environment Agency will be consulted regarding the need for a water resources abstraction licence.</p>
Flood Risk		
58	We have reviewed 7.9.1.2 Annex B - Flood Risk Addendum - Rev 0 [REP1-067] and 6.30 Environmental Impact Assessment - Flood Risk Outside Order Limits [REP3-007]. The Flood Risk Addendum [REP1-067] now discusses the possibility of moving the piers of the proposed bridge structure over the River Coquet. The Addendum states that during a 1 in 1000 year flood event the calculated increase in depths is 0.25m. Although any increase should be avoided, and ideally flood risk should be reduced, there is no increase in risk to any receptors up or downstream. Therefore, we have no flood risk concerns in this regard.	1. The Applicant notes the Environment Agency's position.
59	We welcome the visual representation of the increased flood extents for the ordinary watercourses. We agree that although there is some increase in extents for certain locations, these are minimal and do not increase risk to receptors. We also welcome that local landowners will be consulted with regards to flood extents.	1. The Applicant notes the Environment Agency's position and would like to take this opportunity to inform the Environment Agency that the landowners were consulted by post on 23/03/21.
Statement of Common Ground		
60	We are working with the applicant to address the issues outlined in this letter and in our previous correspondence.	1. An updated SoCG has been submitted at Deadline 5 following discussions with the Environment Agency on 04/03/21 and 19/03/21 (document reference 7.6C).

Table 1-5 – Brockthorpe Consultancy on behalf of ME Beal and Sons

Ref. No.	Response:	Applicant's Response:
1	<p>We wish to point out that Charlton Mires Farmhouse is occupied by Mr & Mrs Beal □□□□ who have lived in the farmhouse since □□□□. □□□□ lives at □□□□s which is a □□□□ the west side of the A1. When Charlton Mires Farmhouse is taken, there is currently no alternative accommodation for Mr & Mrs Beal. □□□□ □□□□ □□□□. The upheaval and moving to a new house is going to be significant and given their age, will require appropriate timing</p>	<ol style="list-style-type: none"> 1. It is accepted that there will be an inevitable element of disruption as a result of the acquisition of the property. It is anticipated that possession of the farmhouse and buildings will be required by June 2022, so this gives a further 12-15 months for Mr & Mrs Beal to find & move to alternative accommodation. 2. Whilst the Applicant is very keen to work with the landowners to facilitate alternative accommodation, there will come a time when possession of the land will be required for the construction of the Scheme. If the replacement facilities are not ready for occupation by that time, the landowners will be required to give up possession of the property and make alternative arrangements. 3. In 2019, the landowner served a blight notice in relation to the whole of their farm, which demonstrates that as a matter of public record they are willing to vacate the property. The Applicant served a counter notice in July 2019 such that it should only be required to purchase the part required for the proposed design of the Scheme at that time. The landowner accepted the counter notice in September 2019. Given the acceptance of the counter notice, the interest of the landowner in the affected property is a matter for compensation and the principle of acquisition is not a matter for this Examination.
2	<p>The proposed scheme will require the demolition of the entirety of the existing farmyard used to house livestock, machinery and farm produce. There are no other buildings available on the farm and once they have been taken as part of the scheme, there will be no storage or animal welfare housing available. Unless appropriate alternative accommodation can be sought on the farm, my clients will be forced in to selling their livestock as there will be no accommodation and handling facilities for welfare purposes, and so will be left with no other alternative but to sell their livestock.</p>	<ol style="list-style-type: none"> 1. The landowner's 2019 blight notice and the July 2019 blight counter notice both encompassed the entirety of the farmyard, and the counter notice was accepted by the landowner. As such, the loss of the farmyard has been in contemplation since 2019 and is a matter for compensation.
3	<p>The proposed option chosen by Highways England for the siting of the flyover, causes a significant land take in comparison to the size of the holding, which will impact on the future viability of the farm as well as a significant severance to the farm unit. A few of the other options would have resulted in significantly less disturbance and loss to Charlton Mires farm.</p>	<ol style="list-style-type: none"> 1. The Scheme results in the demolition of the Charlton Mires farmhouse and farm buildings and, pursuant to July 2019 blight counter notice, the Applicant will acquire 42 acres out of a total land holding of 152 acres. 2. As summarised in the Applicant's Response to Deadline 3 submissions [REP4-024], Table 3.4 of the ES [APP-038] presents four different options in relation to the location of the proposed Charlton Mires junction. Options 1 and 3 were discounted following consultation with the landowners. This included consultation with the Beals in October 2016 and their response in December 2016. During the course of this consultation, it was identified that the Beals had a new residential property to the west of the A1 and north of Rock Nab. As option 1 would have blighted this new property, it was discounted. Option 3 was developed following further consultation with the Beals. This option would require less of the Charlton Mires Farm holding to be lost than for option 2 (the selected option) but would require the road to come close to Charlton Mires farmhouse and a loss of about 70% of its garden with loss also impacting the new residential property. As a result, options 1 and 3 were discounted and option 2 was selected as the preferred option. The discounting of option 4 was primarily on the basis of the increased diversionary requirements and the need for a new link road to the B6347.

Ref. No.	Response:	Applicant's Response:
		3. As noted above, given the acceptance of the counter notice, the interest of the landowner in the affected property is a matter for compensation. Discussions as to compensation are ongoing with the Valuer.
4	The land take will also result in the complete loss of the airstrip for which planning was granted for unlimited and unrestricted use. There will not be enough land left after the scheme for an alternative site to be chosen and so this will result in the complete loss of this airstrip.	1. Plot 15/1c (permanent acquisition), plot 15/1j (permanent rights) and plot 15/1h (temporary land take) as shown on the Land Plans [APP-006] are all plots which contain part of the existing airstrip. The July 2019 blight counter notice encompasses approximately 1.5 acres of the 3.0 acre airstrip. Discussions with the landowner are ongoing, and include the consideration of the airstrip as part of the landowner's overall compensation claim.
5	The scheme will have a significant long term impact on the Beal family and the farm business operation. We appreciate that discussions are on-going with Highways England to alleviate some of these concerns and reach agreement in regard to the Blight Notice served.	1. The Applicant continues to work closely with the landowners regarding the July 2019 blight counter notice and compensation and welcomes further discussion in this regard.

Table 1-6 – Gareth Moor and Colin Moor

Ref. No.	Response:	Applicant's Response:
1	The proposed meeting to discuss my concerns has not been held and is not scheduled to be held until after the deadline. Therefore, I respectfully request that I am allowed to make further comment following the conclusion of the above meeting.	1. The Applicant confirms that a virtual meeting with the Interested Party took place on Monday 15/03/2021 and that the participants included representatives from the Applicant's designer and contractor teams. Discussions with the Interested Party are ongoing.
2	Following on from the stage 3 hearings I feel I must once again raise my objections to part of the scheme. The area I object to be the works proposed to West View and the proposed tracks servicing Northgate Farm Warreners House and Stafford House and the proposal to use these roads for agricultural traffic .	1. Responses to the specific points raised are set out at rows 4 to 21, below.
3	The duelling of the A1 has been proposed for several reasons well detailed in the documentation	1. No response required.
4	From my perspective the main reason is one of safety of the public who will be using this road and the roads leading to and from the A1	1. The Interested Party is correct that one of the objectives for the Scheme is to improve safety. This objective and the other Scheme objectives are set out in section 3.7 of the Case for the Scheme [APP-344]. 2. The Applicant, as the strategic highways authority for the nation's Strategic Road Network, takes safety very seriously. It is licensed by the Office of Rail and Road and it is subject to the Construction (Design and Management) Regulations 2015 (CDM regulations), which also apply to the Applicant's designers. In addition to its adherence to the CDM regulations, the Applicant conducts road safety audits for its schemes. These audits ensure that the standards of construction and safety are suitable for a particular road's intended use.

Ref. No.	Response:	Applicant's Response:
		<ol style="list-style-type: none"> Under the Scheme, West View would serve other residential properties to the north, including Warreners House and agricultural land. In order to ensure the road is appropriate for its proposed use, the road safety audit and detailed design will consider the intended use of the road, including the types of vehicles that would use the road. The road safety audits that have already been undertaken have not shown any risks that are unacceptable in relation to West View. In line with the Scheme objectives, safety will be ensured in line with the regulatory arrangements that apply to the Applicant, including the CDM regulations, and this will ensure that the design will be safe as it is developed through the detailed design stage.
5	<p>You may recall the long campaign the late former Chief fire officer of Northumberland Jeff Ord championed and worked tirelessly to have the road duelled. He used a substantial portion of this road to commute to work and witnessed the carnage during his travelling, likewise he had first-hand knowledge the trauma his fire fighters faced when attending accidents. I therefore welcome these proposals for the A1 itself however, as I have previously stated I have serious concerns regarding the proposals for West View and the proposal to service the properties and agricultural activities beyond to the North</p>	<ol style="list-style-type: none"> The Applicant acknowledges that the interested party welcomes the proposals for dualling the A1. Responses to the specific points raised in relation to the proposals for West View are provided at row 4 above and rows 6 to 21 below.
6	<p>The current proposals are not the safest options available the safest route and more practical route is to build is a northern route</p>	<ol style="list-style-type: none"> The Applicant's proposal for West View forms Work No.5A as shown on Sheet 1 of 19 of the Works Plans [APP-007]. The works are detailed in in the draft DCO [REP4-004 and 005]. In addition, Appendix i to this response (document reference 7.22.1) describes the Applicant's proposal for West View and assesses the alternative access proposed by the Interested Party. The alternative access proposed by the Interested Party in Appendix A to the Statutory Consultation response in April 2020, attached to Colin Moor's Deadline 2 Submission - Comments on responses for Deadline 1 and Written Representations (WRs) [REP2-031] was for a new PMA to Warreners House to be accessed off Hebron Road, to the east of the proposed Highlaws junction, as an extension of the access track to Strafford House (Work No.8J on Sheet 2 of the Works Plans [APP-007]. The alternative route would run parallel to Work No. 1B (southbound A1) as a southern extension of Work No 8J, avoiding woodland to tie into the northern extent of Work No. 5D (field access track). The Applicant confirms that for this alternative the majority of Work No. 5B (Warreners PMA) would still be required to reach Work No. 5C (PMA from West View) to permit access for all residents at Warreners House and the adjacent agricultural plots. The Applicant has assessed and discounted two options to facilitate this alternative northern access arrangement. The options are shown on Figure 2, while the assessment of these options is presented in Appendix i. The assessment demonstrates that both options would result in an increase in the overall length of PMA required to provide access to the residents of Warreners House and the adjacent fields. Given that the extent of the construction works required to construct the alternative PMA would therefore be greater, both options would have adverse impacts on biodiversity, heritage, landscape and flooding. Further, the Applicant does not consider that the alternative PMA would reduce health and safety risks during construction. The Applicant acknowledges that the Scheme will result in additional traffic using West View but does not accept that the design results in material dangers to the residents.

Ref. No.	Response:	Applicant's Response:
7	My reasons for this are I doubt that at design stage a complete and sufficient risk assessment has been undertaken as required by the CDM Regulations indeed the applicant's response is to allude to a small number of additional vehicles using the road in addition to this a small number of agricultural vehicles. There is no acknowledgment to the number of people or other traffic that these vehicles impact on. In short who could be harmed? Had this been undertaken it would clearly indicate that the level of Risk and the potential for that risk been released is significantly much higher diverting the road South as opposed to North	<ol style="list-style-type: none"> 1. The Applicant has fully complied with the CDM Regulations and has appointed the relevant duty holders under the regulations. The Applicant confirms that the preliminary design has been undertaken in accordance with the CDM Regulations, that the proposed alterations to West View demonstrate that due consideration has been given to safety, that the proposed alterations exceed the design requirements for an access road serving 20 properties and that these alterations provide for safe usage of West View in operation. Further, the detailed design and construction of the PMA to Warreners House and the alterations to West View will be undertaken in accordance with the CDM Regulations. 2. In maximising the safety risk benefit of the Scheme with the proposed Warreners House PMA to West View, the safety risk assessment may also be able to utilise the HSE approved concept of trade-off (in accordance with the HSE document 'R2P2 Reducing Risks and Protecting People Ref 3.1). In applying a trade-off, any safety risk dis-benefit to a single population should be out-weighed by a safety risk benefit to one or all of the other populations. 3. The Applicant acknowledges that during construction and in service the PMA to Warreners House will result in additional traffic using West View and the access road leading to West View but does not accept that the design results in substantial dangers to the residents.
8	The applicant's response is to refer to a small number of Vehicles and not the numbers of people it impacts on. I would also add that it transpired within the meetings that whilst the applicant refers to the farmer only visiting a small number of times a year clearly it now transpires that the fields are regularly use for shoots, this begs the question where will they park when these are held. and what other activities take place on the land which have not been accounted for?	<ol style="list-style-type: none"> 1. There is a total of seven properties at Warreners House which will utilise West View following completion of the Scheme, along with access to field plots which previously used a direct access from the A697 slip road. The Applicant acknowledges that this will result in an increase in the number of vehicles using West View. However, West View will remain as a cul-de-sac serving fewer than 20 properties and the proposed alterations to West View exceed the minimum requirements for that category of access road in the Residential Roads and Footpaths in Northumberland manual produced by Northumberland County Council. 2. The additional vehicle usage on the access road leading to West View resulting from the Scheme will be small in comparison to the usage of this road by vehicles accessing Northgate Hospital, the adjacent housing developments and West View. 3. The Applicant understands that there are no formal shoots held in this area. The Applicant would suggest that any shooting noises experienced by residents in West View have been caused by either the farmer shooting or bird scarers. There would not therefore be additional vehicles nor issues for parking arising from shoots.
9	I have previously alluded to my concerns that the usage is well understated, and this only adds to my concerns and reinforces my view that this design is flawed.	<ol style="list-style-type: none"> 1. The proposed alterations provide for safe usage of West View in operation. As is the nature of agriculture and cropping cycles the level of access through West View for agricultural purposes may fluctuate depending on the specific activity being undertaken at any given time. This may on occasions give rise to some minor intensification of use on a periodic basis. 2. Any current permitted business uses or activities at Northgate Farm have been taken into account in the EIA and in particular, the Traffic Assessment. Any new business uses or activities at Northgate Farm that require planning permission would be based on the merits of that development, separate to this DCO. New developments would need to set out their traffic generation as well as any other potential changes to the locality in a Planning Application made to NCC who would make their decision accordingly on a case by case basis as to whether it would be an acceptable change of use and would be able to be granted permission on the basis of taking access through West View. As such, the Applicant does not accept that the usage of West View has been understated.

Ref. No.	Response:	Applicant's Response:
10	I can only conclude that there has been no consideration to whom or what could be harmed, and the applicant is relying on the number of vehicles as justification of the decision for the proposals. not a risk assessment.	<ol style="list-style-type: none"> 1. There is a total of seven properties at Warreners House which will utilise West View following completion of the Scheme, but this does not mean this increase in use will create an increased risk of harm as contended. West View will remain as a cul-de-sac serving fewer than 20 properties and the proposed alterations to West View exceed the minimum design requirements for that category of access road in the Residential Roads and Footpaths manual referenced in response to point 3 above. One of the key purposes for having design guidance for roads is to ensure that they are safe for the intended level of usage. The Applicant therefore considers that the proposed alterations therefore provide for safe usage of West View in operation.
11	The applicant verbal response at the hearing was to refer to what is “reasonably practicable” as their reasons for designing the road in a south ward’s direction. I would contend it is more reasonably practicable taking the road north for the following reasons.	<ol style="list-style-type: none"> 1. The Applicant’s reference to practicability during Open Floor Hearing 1 was to the duty under the CDM regulations, which is that risks are to be reduced as far as reasonably practicable, as opposed to being eliminated or considered in isolation. 2. In accordance with the CDM regulations, the Applicant’s proposals for West View and the access to Warreners House have reduced risks as far as reasonably practicable for the reasons set out as follows. 3. The Applicant has set out in the response to row 4 above and in Appendix i that providing a PMA to the Warreners House properties from the north will result in greater environmental impacts and a longer length of PMA being required which in turn will increase the extent and duration of the on site activities required to construct the alternative PMA. For these reasons, the option of providing an access from the North does not change the Applicant’s assessment that the proposals for West View have reduced the construction risks as far as reasonably practicable. 4. The Applicant accepts that providing an access to the Warreners House properties from West View will increase the traffic using West View in operation. However the Applicant considers that this risk has been mitigated by West View being upgraded to a higher standard than that required by the Residential Roads and Footpaths manual, by the Applicant designing the upgraded West View for safe use by agricultural vehicles and by the provision of a footway to separate the upgraded West View from the existing properties. 5. Responses to the specific points raised by the Interested Party in relation to the alternative access are set out at rows 12 to 21 below.
12	It is more practicable to work in a field with no other vehicular traffic or people for the majority of the time where ingress and egress can be easily controlled, and the track built from North to South in a progressive manner and very safe manner	<ol style="list-style-type: none"> 1. The Applicant acknowledges that constructing an alternative access to the Warreners House properties from the North will have a lower direct impact on the properties at West View. However, constructing an alternative access from the North would have a greater impact on traffic using Hebron Road and the greater length of PMA would increase the number of vehicle movements required to construct the access road. A full assessment of the reasons for the discounting of access from the North is provided in Appendix i. 2. In relation to the PMA as provided for by the Scheme, constructing the access road as a northern extension of West View will be undertaken in a controlled and safe manner and that the interface with vehicles and pedestrians using West View will be managed to ensure safety. The Construction Phase Plan will be developed as part of detailed design in accordance with Regulation 12 of the CDM Regs 2015 and that this plan will record the arrangements for managing the health and safety risks associated with the construction phase of the project. 3. Improvements to West View are already proposed by Taylor Wimpey as part of their consented development at Northgate Hospital, Morpeth (widening and new footway). The Scheme proposes enhanced works to West View based on consultation with West View residents, to alter the footpath

Ref. No.	Response:	Applicant's Response:
		<p>provision and provide parking bays. In the absence of the Scheme, works would be undertaken to West View by Taylor Wimpey as part of their development.</p> <p>4. The additional work proposed as part of the Scheme to provide a PMA to Warreners House from West View constitutes approximately 300m of construction in an agricultural field to reach the southern end of the PMA track (Work No. 5B) that is required around the perimeter of the residential properties at Warreners House. As highlighted at row 6 above, the majority of Work No. 5B would be required regardless of the direction of approach of the PMA.</p>
13	If designed correctly there is the potential to remove two proposed culverts from the scheme. Whilst the Environment Agency have commented on the scheme it is their preference to remove or not to culvert wherever possible	<p>1. The access route from the north proposed by the Interested Party (shown on Figure 2) would still require West Cotting Burn Culvert and East Cotting Burn Culvert, as shown on Sheet 1 of the General Arrangement Plans [APP-008]. Both alternative access routes from the north (shown on Figures 3 and 4) would also require a further culvert to provide a crossing of Shieldhill Burn (please see Appendix i to this document). As such, the alternative access route does not provide for a reduction in culverts, when compared to the access route from the South proposed by the Scheme.</p>
14	The specification for the proposed track is not to adoptable standard therefore will be considerably more cost effective than the works to West View.	<p>1. The Applicant confirms that the alterations to West View will be designed and constructed to adoptable standards.</p> <p>2. The PMAs are not to be adopted. However, the new access road to Warreners House which forms a direct continuation of West View will have a tarmac surface and be designed to the "Residential roads and footpaths in Northumberland" guide. If an alternative access were to be constructed from the North, this would also need to be tarmacked for its use as a residential access and be of sufficient width for agricultural use.</p> <p>3. The Applicant acknowledges that the works to upgrade West View itself will result in a cost to the public purse.</p> <p>4. However, an alternative route from the north would require a much larger area of privately owned tarmacked surface together with other costs associated with the additional land take, the provision of fences, glare protection and compensatory woodland planting and over its operational life would require an increased level of maintenance. As such, the alternative access proposed by the Interested Party would not be more cost effective.</p>
15	This design would eliminate all agricultural traffic from a residential street and eliminate the risk to the residents of two new housing estates, hospital complex users, and West View occupants, visitors, and delivery personnel. In Short, the risks are completely designed out, a fundamental requirement of the regulations that has not been adhered to in the proposed design.	<p>1. The Applicant acknowledges that the Scheme will result in a small number of agricultural vehicles using West View. The Applicant confirms that the proposed carriageway width of 5.4m for the upgrade of West View exceeds the guidelines for an access road serving up to 50 properties in the Residential Roads and Footpaths in Northumberland manual produced by Northumberland County Council. As West View will serve less than 20 domestic properties on completion the upgraded road provides additional capacity to accommodate increased usage of the road for agricultural purposes.</p> <p>2. The Applicant confirms that the usage of the access road leading to West View by these agricultural vehicles will be very small in comparison to the number of vehicle movements using this road to access Northgate Hospital and the housing estates and notes that this road has been and is being used by construction traffic building the housing developments.</p> <p>3. The duty under the CDM regulations is for risks to be reduced as far as practicable, as opposed to being eliminated or considered in isolation. While the northern access proposal would reduce the level of impact at West View, it would not design out risks on a global scale. As set out at row 11, above, in accordance with the CDM regulations the Applicant's proposals for West View and the access to Warreners House have reduced risks as far as practicable.</p>

Ref. No.	Response:	Applicant's Response:
16	This route would eliminate the modifications and removal of the Gas pumping Station at the North end of West View	<ol style="list-style-type: none"> 1. The Applicant acknowledges that the alternative route from the north would avoid the need to relocate the gas pumping station. However, it would present a number of other impacts, including the diversion of water mains. 2. Apparatus affected by the Scheme would be re-sited where necessary, with this process governed by the protective provisions set out in Schedule 10 of the dDCO [REP4-004 and 005]. The provision of any replacement apparatus will be considered at detailed design and coordinated between the Applicant and Northern Gas Networks. Any design would comply with all applicable guidance and legislation. Appendix G to the Applicant's Written Summary of Oral Submissions Made at Hearings [REP4-032] provides an indicative depiction of the potential options for relocation.
17	This route would eliminate from Highways England's budget substantial cost that would be incurred upgrading West View to adoptable standards a cost which at present is with the housing developer budget. This raises the question why should the public purse pay the costs of developer's commitments.	<ol style="list-style-type: none"> 1. The Applicant acknowledges that the works to upgrade West View itself will result in a cost to the public purse. 2. However, an alternative route from the north would require a much larger area of privately owned tarmacked surface together with other costs associated with the additional land take, the provision of fences, glare protection and compensatory woodland planting and over its operational life would require an increased level of maintenance. As such, the alternative access proposed by the Interested Party would not represent a saving to the public purse.
18	This route will eliminate the concerns I have regarding flooding due to the proposed works.	<ol style="list-style-type: none"> 1. The Applicant has previously addressed the Interested Party's concerns regarding flooding in reference 1.17.2 of Table 1-5 of REP3-026. 2. From the information provided previously by the Interested Party along with that within the FRA [APP-254] it is the Applicants understanding the existing flood risk in the vicinity of West View is a result of pluvial (surface water flows) and groundwater seepage. The catchment which generates these pluvial flows has been calculated, for this response, to have a maximum extent of 4 ha or 0.04 km². The Applicant has interpreted that groundwater seepage is another likely mechanism in this area, based upon the description the Interested Party provides in reference 1.17.2 of Table 1-5 of REP3-026, this states: <i>"At present after heavy rain the water in the afore mentioned ditch peculates [sic] out of the adjacent land on to my drive and on to the road this gradual draining of the land above this can last for several weeks after the rain has occurred"</i> 3. As previously outlined in 7.15 of the Applicant's Response to Written Representations [REP3-026] and in S-W5 of the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5) which specifies that the detailed design phase will ensure that this risk would not be exacerbated as a result of the Scheme, as any disturbances to land drainage as a result of the construction works would be repaired. The detailed design of the upgrade works to West View would also ensure that the drainage is upgraded to current standards and that the construction of the modifications to the drainage would address any issues with the existing system, such as blockages. 4. As such, the Scheme's proposed route for the PMA to Warreners House from the northern extent of West View will not adversely impact flooding in West View. Further, the northern route proposed by the Interested Party would not change or improve the current flood regime within West View, as PMA works would not be required in the vicinity of West View.
19	This route eliminates the temporary traffic that will be travelling through the housing estate, hospital grounds and West View removing spoil, delivering	<ol style="list-style-type: none"> 1. The Applicant confirms that to construct the modifications to West View and the PMA, both materials and resources would be delivered from the south through West View. As detailed in the response at

Ref. No.	Response:	Applicant's Response:
	road materials and construction plant to construct the road North of West View. A very reasonably practicable solution	<p>row 12, above, the works to upgrade West View itself would be required regardless of whether the Scheme proceeds or not.</p> <ol style="list-style-type: none"> The Applicant confirms that site vehicles will not travel through the new housing estate or hospital grounds. The only residential street that will be utilised is West View, which is also being upgraded. Site staff would be briefed if accessing this work area with heightened safety measures, the Applicant would seek to schedule deliveries around peak hours to minimise disruption for the limited plant and materials for the PMA and the Principal Contractor's Community Relations Manager will be in close contact with residents. Vehicle restrictions will be set out in the final Construction Traffic Management Plan. The Construction Phase Plan will be developed as part of detailed design in accordance with Regulation 12 of the CDM Regulations and this plan will record the arrangements for managing the health and safety risks associated with the construction phase of the project. Liaison with residents is secured through S-G3 of the Outline CEMP [REP4-013 and 014]. Section 6 of the outline CEMP sets out the relevant training and tool box briefing requirements for all staff which will include topics such as traffic management plans including haulage routes, nuisance minimisation and communication with the public. An alternative route from the north would compound additional construction traffic from the construction of a larger direct access onto the local network, on Hebron Road, along with the additional works required locally for the construction of Highlaws Junction.
20	This route preserves the features inherent in West View which is compatible to secure by design recommendations. It also preserves the existing hedgerows and trees in the area also.	<ol style="list-style-type: none"> An alternative northern route would avoid the requirement to remove a small area of existing planting at the northern end of West View. However, the alternative access taking the access road from the north would require a greater number of hedgerows to be severed, and trees to be removed to facilitate construction and operation of the PMA. These changes would likely have a greater negative effect on existing features of the landscape, and a detailed assessment is presented in Appendix i. The increase in vegetation clearance has the potential for a blight claim from Trafford House. The preservation of the existing trees at the northern end of West View has been a consideration. The indicative extent of vegetation clearance and retention (and which assumes a worst case) is indicated on Vegetation Clearance Plans [REP4-003]. The removal of vegetation would only be undertaken where it is necessary in order to construct the Scheme, this is secured within item S-L2(a) of the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5). Accordingly, if at detailed design the existing vegetation does not need to be removed either fully or in part, the remaining vegetation would be retained and would be protected in accordance with item S-L5(a) of the Outline CEMP [REP4-013 and 014] (and as submitted at Deadline 5). With regard to how the decision will be made as to whether vegetation is to be cleared, this is in accordance with S-B10 in of the Outline CEMP [REP4-013 and 014] (and as submitted at Deadline 5), by which, any vegetation clearance would be identified and agreed prior to its removal, and the ECoW would be able to challenge its removal where appropriate or agree suitable protection measures.
21	I would also contend that the applicant's assertion that the proposed road/track is shorter than a northern route is not correct I have previously provide dimension regarding this, these indicates that designed correctly it can be shorter.	<ol style="list-style-type: none"> The Interested Party submitted details in their Deadline 2 Submission - Comments on responses for Deadline 1 and Written Representations (WRs) [REP-031] quoting a total length for West View, Warreners PMA and Trafford House works totalling 1244. The alternative route suggested by the Interested Party is quoted in this document at 1100m long, some 114m shorter. Appendix i attached shows two alternative routes from the north and how the calculation of the net difference between the Current Proposal and the Alternative Routes. Figure 1 in the appendix shows

Ref. No.	Response:	Applicant's Response:
		sections which are to be included in any PMA configuration and that the works to West View are needed for adoption, demonstrating that the Current Proposal with 300m length of PMA track on agricultural land is shorter than the existing track or the alternatives.

Table 1-7 - Mark Hawes - Deadline 4 Submission - Comments on responses submitted for Deadline 3 - Part 1

Ref. No.	Response:	Applicant's Response:
Follow-up response to deadline 3 comments from the Applicant – Reference first comment		
	We very much welcome the statement from the Applicant to commit to providing mitigation. Similarly, we are happy to continue working with the Applicant to search for solutions.	1. The Applicant welcomes this response and is seeking to have a follow up meeting with the Principal Contractor in April 2021. The Applicant's Principal Contractor has recently responded to the Interested Party and dates for a further meeting have been requested from the land agent.
Follow-up response to deadline 3 comments from the Applicant – Reference 1		
1	The 2 nd point made by the Applicant is out of context and not relevant here as it is referring to the adverse visual effect to the west and north of the property. The original context is referring to the impact of acquiring 1-8b which is on the eastern boundary.	1. The Applicant's response at point 2 of Ref 1 of [REP3-026] was included to provide context as to the visual effects of the Scheme as presented within Chapter 12: Population and Human Health of the ES [APP-054]. The remainder of the points at Ref 1 of [REP3-026] deal with the points raised by Mr Hawes in relation to the property and plots 1-8a and 1-8b.
2	Point 3 from the Applicant in this section states, In terms of the loss of a "private and secure play area", there is no acquisition of garden ground in this location as part of the Scheme. As such there is no such loss. There is no additional overlooking and no impact on privacy. This statement is incorrect in every aspect. The road does involve the acquisition of part of the garden, we do lose all privacy with the road wrapping around the garden and cutting across the north east corner. This is a quiet peaceful spot in the garden where we regular sit to enjoy the views and wildlife. The construction of the access road will mean that all parts of this garden will be exposed to the road and the outlook to the North, West and South will be dominated by the access road.	<ol style="list-style-type: none"> 1. The Applicant maintains the position set out in point 2 of Ref 1 of [REP3-026]. 2. There is no acquisition of land comprised in Mr Hawes garden. Rather, there would be the acquisition of rights to facilitate the construction of the new PMA and the associated planting. 3. With reference to the issue of being overlooked and the concerns raised that this would result in a reduction in privacy. The proposed PMA would be accessed by the occupants of Capri Lodge and by the landowner when cultivating the adjacent field. The nature of any views into the property would be transitory, and both parties already have similar or comparable views either from Capri Lodge or whilst cultivating the adjacent field. Therefore, there is not any significant reduction in privacy as a result of these parties accessing the PMA. 4. Nevertheless, the Applicant has provided within Figure 7.8: Landscape Mitigation Masterplan Part A [REP4-010], for the replanting of trees within the corner of the plot (land parcel 1/8b), and the planting of a hedgerow. This is secured through item S-L2 (b) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline Construction and Environmental Management Plan (Outline CEMP) [REP4-013 and 014] (and as updated at Deadline 5). The Private Means of Access (PMA) would be visible to the east and north, during construction and in the period following, whilst the proposed hedgerow establishes, and trees mature. Whilst there is no legal right to a view, the Applicant is seeking to reduce the effects of the Scheme on receptors through appropriate mitigation measures. The Applicant maintains the position that subject to the establishment of these features the garden space would continue to provide Mr Hawes and his family sufficient privacy and security. The Applicant is unable to comment on how Mr Hawes chooses to use his garden and where suitable seating might exist.

Ref. No.	Response:	Applicant's Response:
3	In point 5 the Applicant has said “the design of the access road has sought to avoid unnecessary removal of trees along the property boundary”. In this instance the designer can very easily avoid felling the trees and spoiling a garden haven by simply moving the road a short distance into an arable field which is already being used for the road.	<ol style="list-style-type: none"> 1. In considering impacts on woodlands and vegetation, in the design of the PMA the Applicant has sought to avoid unnecessary removal of trees along the property boundary by siting the track within the arable field. Nevertheless, it has been identified that a limited number of trees would need to be removed in the north east corner of the property, in order to achieve the design bend radius for the access road whilst avoiding unnecessary land take from the adjacent field. 2. The Applicant has, at Deadline 4, provided a Technical Note in the Written Summaries of the Applicant's Oral Submissions to Hearings, Appendix D - Warreners private means of access [REP4-029] that sets out how the Applicant: would seek to avoid unnecessary removal of trees; would consider how the PMA might be constructed to reduce the effect on the remaining trees; and potentially seek to acquire additional land in the adjacent field, subject to agreement, or provide for further tree planting within the garden space itself. This note sets out a five stage approach to the alignment of the Warreners PMA, to complement the items already secured through item S-B10 in Table 3.1 Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] and updated at Deadline 5. 3. While discussions with Mr Hawes as to these measures are ongoing, the Applicant considers that the loss of the limited number of trees (anticipated to be less than 10 no. and subject to detailed design) is not anticipated to significantly reduce the enjoyment of the wider garden space. Awareness of the PMA from the garden space would be screened through the establishment of a hedgerow between the property and the PMA, as identified on Figure 7.8 Landscape Mitigation Masterplan Part A [REP4-010].
4	The Applicant also states in point 5, “The loss of the limited number of trees (anticipated to be less than 10 no., subject to detailed design) is not anticipated to significantly reduce the enjoyment of the garden space”. I do not understand how the Applicant is qualified to offer such a strong subjective opinion, as they have never had the opportunity to enjoy the space or understand how we use it. Indeed, the Applicant designer acknowledges later that they have not had the opportunity to visit the site. The use of aerial maps gives a one dimensional view and cannot relay the real feeling of a place. I can categorically state that this is our favourite spot in the garden and once the access road is constructed, we will no longer use it. The construction of the road will effectively nullify all the things that we love about this area.	<ol style="list-style-type: none"> 1. The Applicant is unable to be certain on how Mr Hawes uses his garden and in particular the north east corner of the plot, although the amenity and visual change as a result of the Scheme are entirely appropriate matters for expert judgement by the Applicant's expert landscape architect. 2. However, the garden space is extensive, and the Applicant considers that the limited and transient impact on the north-east corner would not substantially harm the enjoyment of the remainder of the space available to Mr Hawes and his family. The Applicant would, by providing replacement planting along the eastern and northern boundaries seek to reduce the awareness of the PMA on the property, including its garden. This is indicated on Figure 7.8: Landscape Mitigation Masterplan Part A [REP4-010] and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5). 3. The construction period would be temporary, and would lead to some disruption, however, once construction is complete and boundary vegetation has established, the visual intrusion on the northern and eastern boundaries would be reduced, affording the garden privacy from users of the PMA. The Applicant's view is that the amenity and enjoyment of the property would not be materially affected by the Scheme or the PMA.
Follow-up response to deadline 3 comments from the Applicant – Reference 1A		
1	<p>The Applicant states, the permanent acquisition of rights over land 1-8b (as shown on the Land Plans [APP-006]) would not result in the loss of over 50 mature deciduous trees.</p> <p>Although I am relieved the read that the Applicant will not fell all the trees in the acquired area. However, at this stage of the design, the Applicant cannot</p>	<ol style="list-style-type: none"> 1. In considering impacts on woodlands and vegetation, in the design of the PMA the Applicant has sought to avoid unnecessary removal of trees along the property boundary. Nevertheless, it has been identified that a limited number of trees would need to be removed in the north east corner of the property, in order to achieve the design bend radius for the access road. 2. Avoidance of vegetation removal is secured through item S-L2 (a) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the outline CEMP [REP4-013 and 014]

Ref. No.	Response:	Applicant's Response:
	provide any guarantees on what part of the hedgerow and trees will be felled. As the acquired area includes over 50 trees a worst case outcome would involve all the trees being felled.	(and as updated at Deadline 5). The Applicant considers that the loss of a limited number of trees (anticipated to be less than 10 no. (subject to detailed design) cannot be ruled out, and to address this the Applicant has at Deadline 4, provided a Technical Note in the Written Summaries of the Applicant's Oral Submissions, Appendix D Warreners private means of access [REP4-029] that sets out how the Applicant: would seek to avoid unnecessary removal; would consider how the PMA might be constructed to reduce the effect on the remaining trees; and potentially seek to acquire additional land in the adjacent field, subject to agreement, or provide for further tree planting within the garden space itself.
2	The Applicant states, "Further, there is no hedgerow habitat present within land parcel 1-8b. Land parcel 1-8b represents the eastern edge of a small woodland block that comprises two parallel lines of trees and a central corridor/path wide enough for vehicular access". This description of the garden is both inaccurate and very clinical in describing what is a beautiful garden haven to us. It illustrates why the Applicant designer (who acknowledges that they have not visited the site) does not feel a need to preserve it. For accuracy, the boundary of this area is demarked by an old hedgerow, which admittedly does need some attention. The trees are randomly placed around a mowed path which runs through the wood.	<ol style="list-style-type: none"> 1. It is appropriate that both ecological and visual assessments are undertaken objectively and in accordance with the respective guidance in order that impartial assessments are carried out. The Applicant's landscape architect has not been to the property's garden space, the assessment of visual effects having been undertaken from publicly available locations. However, the description provided in Applicant's Responses to Written Representations [REP3-026] is based on site walkovers undertaken by the Applicant's ecologists in March and September 2018, and the parallel lines of trees are also discernible from aerial photography. 2. It should be noted that land parcel 1-8b does not comprise the entire garden and relates to the eastern edge of the small woodland block, which comprises two parallel lines of trees and a central corridor/path wide enough for vehicular access. As such, the Applicant's description remains accurate. A hedgerow was not recorded within land parcel 1-8b, although hedgerows have been recorded in adjacent land parcels.
3	Point 3 from the Applicant. We have invested a lot of time in encouraging wildlife in this area. The wrap around nature of the new access road will create a barrier around woods preventing its use by some wildlife. The wildlife does not need be on the protected species list for us to enjoy. For example, we particularly enjoy watching deer in the woods. Unfortunately, it is highly likely that the construction of the road will deter them.	<ol style="list-style-type: none"> 1. As standard practice and a requirement in accordance with UK legislation and policy, an ecological assessment of a development focuses on protected and notable species, identified based on their conservation status. As a private means of access, the road constitutes a single lane with a proposed width of 4.8m [REP4-029] that would be expected to be used infrequently by vehicles. As such, the access road would not create a barrier to wildlife including deer, which can and do cross roads. 2. The Applicant acknowledges that the construction of the access road would incur temporary disturbance to local wildlife. However, upon completion of construction, the access road would not prevent wildlife returning to the retained area of the woodland block of land parcel 1-8b (including deer).
Follow-up response to deadline 3 comments from the Applicant – Reference 1B		
1	The original point made in reference 1B was to highlight the additional security risk as a result of the new access road. The first point from the Applicant is out of context here.	1. The Applicant's response at point 1 of Ref 1B of [REP3-026]] was included to summarise the assessment of access to the private property during construction and operation presented within Chapter 12: Population and Human Health of the ES [APP-054]. Points 2 and 3 of the Applicant's response then address the specific concerns raised by Mr Hawes.
2	The 2nd point suggests that a boundary fence will enclose the new access road to help mitigate the security risk. Having looked at the plans I cannot find any reference to this boundary fence which follows the route of the road.	1. Subject to further discussion with Mr Hawes, the provision of a boundary fence to provide security along the boundary of the property with the route of the PMA would be in accordance with DMRB and its Highway Construction Details. The form of fencing will be in accordance with Requirement 13 of Schedule 2 to the draft DCO [REP4-004 and 005] which stipulates fencing should be constructed and installed in line with Volume 1, Series 0300 of the Manual of Contract Documents for Highway Works. The design of the fence itself would need to be sufficient to deter access to the garden

Ref. No.	Response:	Applicant's Response:
		space. This was discussed when the Applicant met with Mr Hawes and the Principal Contractor in Feb-21. Please refer to Appendix 2.2: Technical Drawings [APP-188] for cross-sections that indicate a fenceline in addition to hedge.
3	Point 3 from the Applicant. I am not clear what the Applicant means by the "boundary treatment measures" as I am not aware of any such measures and I doubt that they would be effective in reducing the security risk.	1. The boundary treatment measures were set out in the preceding paragraph B.2 of Table 1-6 in Applicant's Responses to Written Representations [REP3-026]. It describes the establishment of a hedgerow and trees as identified on Figure 7.8 Landscape Mitigation Masterplan Part A [REP4-010] and is secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5). In addition, and until the hedgerow is suitably established and provides a secure boundary, a fence would be provided to secure the garden space.
Follow-up response to deadline 3 comments from the Applicant – Reference 1C		
1	The first response from the Applicant is out of context as it refers to the point of view from the west boundary rather than the woods on the eastern boundary which is the original point made.	1. Paragraph C.1 of Table 1-6 in the Applicant's Responses to Written Representations [REP3-026] describes the view looking north and east from within the external spaces of the property. The description therefore of the view 'to' the north takes account of the view from within the garden space looking north towards the existing A1, boundary vegetation and the rear of Capri Lodge and the open countryside beyond. Likewise, the views to the east from within the garden space comprise the boundary trees and open countryside.
2	Point 3 from the Applicant suggests that the formation of the PMA would not give rise to a significant impact to the outlook. The new access road approaches from the south replacing the rolling fields outlook referred to. It then wraps around the eastern hedgerow boundary of the property, before heading west across the north eastern corner of our property. As such the access road will dominate the south, west and north outlook when viewed from the wooded garden in question. In addition, the proposed lay-by and dual carriageway will also be in plain view as you look west from this point. If the road is in plain site that it also means that the users of the road can also see directly into this area of the garden.	1. With the retention of the majority of the existing boundary vegetation, and the addition of a boundary hedgerow and trees to the eastern and northern boundary of the property and as indicated on Figure 7.8 Landscape Mitigation Masterplan Part A [REP4-010], awareness of the PMA, would be substantially mitigated once the hedgerow is established, and the views of the PMA from within the garden space would be substantially screened. The combination of the proposed planting would also reduce awareness beyond the PMA towards the Scheme including the lay-by to the west. 2. Likewise, the proposed hedgerow would provide screening from the PMA, main alignment of the Scheme and lay-by into the garden space. The retention of existing vegetation and provision of replanting are secured through item S-L2 (a) and (c) respectively of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013] (and as updated at Deadline 5).
3	Point 4 from the Applicant suggests that the road will only service two households. This is not correct as the road is also intended to be used by the farmer and Northumbrian Water. Furthermore, the referenced neighbour has business aspirations to develop the property as part of a buy to let arrangement thereby increasing the level of traffic. Based upon current usage this is likely to exceed 20 vehicle journeys a day along with a number of people on foot.	1. The Applicant has previously acknowledged that the northern end of the PMA will be used for access to two properties, access to a water main and field accesses. 2. Any new business uses or activities which require planning permission which would be based on the merits of the development, separate to the A1 in Northumberland: Morpeth to Ellingham Scheme. New developments would need to set out their access and parking arrangements as well as any other potential changes to the locality in a Planning Application made to NCC who would make their decision accordingly on a case by case basis as to whether it would be an acceptable change of use, able to be granted permission.
Follow-up response to deadline 3 comments from the Applicant – Reference 1D		

Ref. No.	Response:	Applicant's Response:
1	The response from the Applicant makes reference to fencing to help mitigate some of the security risk. Whilst this will be helpful it will not remove the risk.	1. The form of fencing will be in accordance with Requirement 13 contained in Schedule 2 to the draft DCO [APP-014] which stipulates fencing should be constructed and installed in line with Volume 1, Series 0300 of the Manual of Contract Documents for Highway Works. This is considered sufficient to ensure that any fencing installed before native hedgerows are fully established will contribute to the security of children and pets.
2	As a point of note I was not able to find any details on the type of fence being proposed here and therefore unable to assess whether it will provide any security.	1. Subject to further discussion with Mr Hawes, the provision of a boundary fence to provide security along the boundary of the property with the route of the PMA could be secured through a suitably worded measure within an updated Outline CEMP at a subsequent deadline. The design of the fence itself would need to be sufficient to deter access to the garden space.
Follow-up response to deadline 3 comments from the Applicant – Reference 1E		
1	Point 1 from the Applicant. The felling of trees and hedgerow will impact wildlife through the loss of habitat, shelter and connectivity through the reduction of habitat condition. This area instead can be enhanced to mitigate for the impact of replacement of habitat for hard standing and the dualing through the planting of native shrubs creating a varied structure and installing bat and bird boxes. The trees themselves are mature and provide carbon sequestration, loss of these trees would result in the release of CO2 which would contribute to global warming. This is also contradictory to Northumberland Climate Change Action Plan 2021-23 (Northumberland County Council - Climate Change Action Plan 2021-23)and any trees lost would need to result in the planting of at least three trees although it will be decades until they reach the value of the current trees in place	<ol style="list-style-type: none"> 1. The impacts to wildlife as a result of tree and hedgerow removal (loss of habitat, shelter and connectivity) are identified and assessed within Chapter 9: Biodiversity Part A [APP-048] and Part B [APP-049]. 2. In relation to the loss of a limited number of trees in the northeast corner of Mr Hawes' land, the Applicant acknowledges this constitutes loss of habitat. However, connectivity would not be significantly impacted given the majority of the woodland block is retained. As a private means of access, the road constitutes a single lane with a proposed width of 4.8m [REP4-029] and would not create a barrier to wildlife. The landscape proposals, as set out on Figure 7.8 Landscape Mitigation Masterplan Part A [REP4-010] incorporates tree planting and hedgerow along the proposed access road to provide replacement habitat and maintain/improve connectivity to habitats in the wider landscape for wildlife movement. 3. In relation to greenhouse gas emissions, the removal of trees may result in immediate emissions and an ongoing loss of carbon sequestration. However, the additional planting within Part A is likely to result in a net increase in carbon sequestration in relation to the impact on land use change emissions, as set out in Chapter 14: Climate Part A [APP-048]. The Northumberland Climate Change Action Plan's commitment to reduce CO2 emissions and be net-zero by 2030 is not a moratorium on the development of new roads or the improvement of existing roads. The Action Plan sets out a range of measures to reach the Net Zero target, of which tree planting is just one action. Although the Scheme is expected to result in an increase in emissions it is not possible to deduce that the Scheme will stop Northumberland County Council from meeting their Net Zero target. 4. The Applicant cannot find reference to Mr Hawes statement regarding "<i>any trees lost would need to result in the planting of at least three trees</i>" within the Northumberland Climate Change Action Plan 2021-23 and is not aware of such a requirement. In relation to the loss of woodland, this is assessed at a landscape scale for the Scheme as a whole and the Scheme achieves a net gain in priority woodland habitat (as detailed in the Biodiversity No Net Loss for the Scheme [REP2-099] (and updated at Deadline 5)). As such, the Applicant has provided sufficient compensation for the loss of woodland habitat.
2	Point 2 from the Applicant. Moderate roosting suitability does not rule out maternity use as it is possible bats could use moderate roosting features for a maternity colony. Although standard practice if no bats have been recorded an updated survey will need to be carried out if it has been over a year since	1. The Applicant agrees that a classification of Moderate roosting suitability does not rule out the presence of a maternity roost entirely. However, in accordance with the definition of Moderate roosting suitability (as detailed in Table 2-1, Appendix 9.9 Bat Survey Report 2018 Part A [APP-235]), this classification is attributed where one or more potential roost sites are present that could be used by bats but the features are unlikely to support a roost of high conservation status (such as

Ref. No.	Response:	Applicant's Response:
	the last survey as bats are known to alternate roosts between years. Tree surveys also often do not retain evidence of bats presence due to weathering and bat activity surveys on trees are questionable in their accuracy/effectiveness due to the difficulty in seeing features during full leaf when bats should be present.	<p>a maternity roost). This definition aligns with current good practice guidelines published by the Bat Conservation Trust (Table 4.1, Bat Surveys for Professional Ecologists Good Practice Guidelines, 3rd Edition). Following the preliminary assessment, dusk emergence/dawn re-entry surveys were completed for the small woodland block on the northeast corner of Mr Hawes' land. This involved an appropriate level of survey effort for Moderate roost suitability (two surveys) at the appropriate time of year (August 2018) in accordance with good practice guidelines. The surveys did not record any bat roosts. The Applicant has received agreement from Natural England regarding the ecological surveys undertaken to date for the Scheme.</p> <ol style="list-style-type: none">It is correct to state that bats are known to switch roosts, particularly those associated with trees, and appropriate mitigation is in place to ensure an updated assessment is undertaken. All trees assessed with bat roost suitability (Low, Moderate or High) that require to be pruned or felled would be subject to a pre-felling inspection and/or dusk emergence/dawn re-entry survey no more than 24 hours prior to works. Trees of Moderate or High suitability where the presence of a roost(s) has not been recorded would be soft felled under ecological supervision. These actions are secured by measure S-B7 of the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5).Weather (particularly rain) can wash evidence away from the external surface of a tree, such as bat droppings and staining that can sometimes be visible beneath a roost entrance. However, whilst the presence of bat field signs can confirm presence of a roost, the absence of field signs does not indicate the absence of a roost. The presence of field signs represents just one factor that is considered during an assessment of bat roost suitability. For the trees in question, no evidence of roosting bats was recorded during the preliminary survey, although potential roost features were identified that resulted in a Moderate roost suitability classification (see Tree 232A of Appendix B, Appendix 9.9 Bat Survey Report 2018 Part A [APP-235]). The limitation to visibility in identifying potential roost features whilst trees are in leaf is acknowledged, although was not highlighted as a specific constraint to the preliminary ground-level survey of the trees in question. Further, the trees were subsequently subject to dusk emergence/dawn re-entry surveys (as detailed in the first paragraph of this response), which did not identify any bat roosts.Overall, the assessment and level of survey effort employed for the trees in the northeast corner of Mr Hawes' land is in compliance with current good practice and appropriate mitigation is in place to identify any changes in roosting suitability or roost presence in advance of construction commencing.
3	Point 3 from the Applicant. Mitigation of nest loss should also include replacement habitat and enhancement as per National Planning Policy Framework (NPPF) 2019 in the form of bird boxes for a variety of species which have been recorded on site or within the desk study from ERIC (Environmental Records Information Centre North East).	<ol style="list-style-type: none">The Scheme is a Nationally Significant Infrastructure Project (NSIP) and is governed by the National Policy Statement for National Networks (NPS NN) rather than the National Planning Policy Framework (NPPF). Nevertheless, the Scheme remains compliant with the NPPF with regard to impacts to breeding birds.The NPPF does not state that mitigation for loss of bird nesting habitat should be provided in the form of bird boxes. Paragraph 174 of the NPPF states that <i>"to protect and enhance biodiversity ... plans should ... promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species."</i> For the Scheme, the loss of nesting habitat for birds has been addressed through appropriate habitat creation within the Landscape Mitigation Masterplans (Part A [REP4-010] and Part B [REP4-053]). This includes the creation of hedgerows and woodland habitat across the length of the Scheme (which also compensate for the loss of these priority habitats).An exception to this is barn owl, where four barn owl nest boxes have been installed to compensate for the potential functional loss of barn owl breeding/roosting sites due to their proximity to the

Ref. No.	Response:	Applicant's Response:
		<p>Scheme (see measure A-B41, Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5)). The barn owl nest boxes have been installed outside the Order limits at suitable receptor sites, located over 1 km from any major roads. However, impacts to barn owl are not associated with the trees in the northeast corner of Mr Hawes' land.</p> <p>4. In compliance with paragraph 175d of the NPPF, enhancement opportunities have been identified, which include the installation of bird nest boxes (paragraph 9.9.11c, Chapter 9: Biodiversity Part A [APP-048] and paragraph 9.9.9b, Chapter 9: Biodiversity Part B [APP-049]). The Applicant has committed to the development of a strategy of biodiversity enhancement, based on the opportunities identified in Chapter 9: Biodiversity Part A and Part B. This is secured by measure S-B20 of the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5).</p>
4	Point 5 from the Applicant. Will these enhancements take place prior to the roads being built and the duelling of the A1? The use of mitigation is diminished if the species have already been detrimentally impacted as a poor season could have drastic impacts on local populations down the line.	<p>1. The Applicant's response at Point 5 of Ref 1E of [REP3-026] related to Figure 7.8 Landscape Mitigation Masterplan Part A [REP4-010] that indicates where woodland and replacement trees would be provided. The implementation of the landscape mitigation plans is secured by Requirement 5 of Schedule 2 to the dDCO [REP4-004 and 005] and would occur at the end of the construction phase, as many of the areas of habitat creation are located within the construction area.</p> <p>2. It remains that the loss of a limited number of trees in the north eastern corner of Mr Hawes' property (anticipated to be less than 10 no., subject to detailed design) is not predicted to have a significant impact on biodiversity (including tree/woodland habitat or the species it supports).</p>
5	Point 6 from the Applicant. Connectivity to different habitat parcels should be a consideration and mitigation elsewhere benefits the species there rather than where the impact takes place. Opportunity to enhance the area by creating a permeable network along the woods, retain the trees and instead enhance through native planting of a varied structure which extends along the tree line with native species rich hedgerow to the stream to the south. Thereby benefiting the wildlife present in the area and creating enhanced habitat rather than offsite mitigation only.	<p>1. Connectivity has been considered when identifying and assessing the potential impacts of the loss of a limited number of trees in the northeast corner of Mr Hawes' property and also when developing mitigation and landscape proposals.</p> <p>2. The existing woodland block is well connected by existing linear green infrastructure to woodland within the wider landscape, of which the majority would be retained by the Scheme (as shown on the Vegetation Clearance Plans [APP-013]). This includes a line of mature trees to the south of the woodland block (majority maintained) that connects to a network of hedgerows extending outside the Order limits. The woodland block is also connected to the north by a retained hedgerow outside the Order limits, which connects to a large woodland block of greater biodiversity value than the small woodland block on Mr Hawes' land that is impacted by the Scheme. The existing and retained connective habitats provide an opportunity for wildlife to disperse into surrounding suitable habitats during construction. These habitats also provide linkages for wildlife to return post-construction.</p> <p>3. The landscape proposals, as set out on Figure 7.8 Landscape Mitigation Masterplan Part A [REP4-010] incorporates tree planting and hedgerow along the proposed access road. The Applicant considers that the landscape proposals are proportionate to the impacts in the locality. Offsite mitigation is not proposed.</p>
Follow-up response to deadline 3 comments from the Applicant – Reference 1F		
1	Point 1 from the Applicant suggests that the wooded area does suffer from noise and air pollution. Although we can hear some road noise when the wind blows from the west, otherwise the area is far enough away from the current a1 road to not suffer. On previous visits from the Applicant, it has been noted how peaceful and quiet the area is.	<p><u>Noise</u></p> <p>1. The noise section within Ref. 1.F of Table 1-6 in the Applicant's Responses to Written Representations [REP3-026] responds to Mr Hawes' statement that, "<i>The introduction of the road will add noise and air pollution where there was none.</i>" As set out in the Applicant's response, the property's garden is within relatively close proximity (between 50-150m) to the A1 such that the noise environment in the garden and wooded area is substantially influenced by road traffic from the</p>

Ref. No.	Response:	Applicant's Response:
		<p>A1, which will be audible at this location. Whilst noise levels will reduce at greater distances from the A1, the noise environment of the area is dominated by road traffic noise from the A1.</p> <p><u>Air Quality</u></p> <ol style="list-style-type: none"> The Applicant stated at paragraph 1F in the Applicant's Responses to Written Representations [REP3-026]: "<i>It is not the case that noise and air pollution are absent in this location</i>". This does not mean that the wooded area experiences unacceptable levels of air pollution, merely that pollutant concentrations are, to a degree influenced by the local roads, and non-zero.
2	Air Quality response from the Applicant. Although I understand that the additional fumes and pollution from passing vehicles is not likely to exceed legal thresholds it will be unpleasant to breathe fumes from passing vehicles in this area.	<ol style="list-style-type: none"> Under the guidance set out in DMRB document LA105, the air quality assessments are undertaken against the UK's air quality thresholds, which have been set for the protection of human health. As per the Applicant's response in the Applicant's Responses to Written Representations [REP3-026], "the assessment has demonstrated that no significant effects are likely as a result of the Scheme":
3	Applicant response to Noise. Much of the response provided by the Applicant is out of context here. The original point was made to highlight that the noise of the vehicles using the new access road will intermittently spoil the enjoyment of this area. This noise will be much louder than any other noise in the area especially as there are no speed limits on the road. Based upon current usage this is expected to exceed 20 vehicle journeys a day.	<ol style="list-style-type: none"> The noise section within Ref. 1.F of Table 1-6 in the Applicant's Responses to Written Representations [REP3-026] provides a discussion of the noise environment at this property. The Applicant cannot comment on the enjoyment of the garden as this is a subjective issue. However, it is anticipated that any vehicle movements on the access road will be infrequent and short in duration and therefore, for the majority of the time, this area will not experience noise from vehicles on the access road. Whilst noise from infrequent vehicles on the access road may be audible, given the low number of daily vehicle trips expected and the likely low speed of vehicles given the nature of the access road, the use of the access road would be expected to have an inconsequential effect on noise levels in this area and would not change the overall noise environment of the area, which is already substantially influenced by road traffic from the A1.
Follow-up response to deadline 3 comments from the Applicant – Reference 1G		
1	I acknowledge and welcome the intent to preserve the trees and hedgerow but do not understand why this cannot be achieved here as there is a simple alternative to take up a little more of the arable field which already forms the main route of the road.	<ol style="list-style-type: none"> The Written Summaries of the Applicant's Oral Submission at Hearings, Appendix D – Warreners Private Means of Access [REP4-029] at Deadline 4 shows that the main PMA alignment is to be on the arable field, close to the Order limits. This would largely avoid tree loss within the woodland block, apart from in the vicinity of the bend at the north eastern corner of the property (Figures 1 and 2 [REP4-029]). Appendix D [REP4-029] explains how measures are in place (secured through the Outline CEMP [REP4-013 and 014]) to retain as much vegetation as practicable (measures S-L2 and S-L5 [REP4-013 and 014]). Further, Appendix D details those measures within the Outline CEMP to protect retained vegetation (measures S-L8(a) and S-B10 [REP4-013 and 014]). It also sets out a five stage approach to the alignment of the Warreners PMA, to complement the items already secured through the Outline CEMP [REP4-013 and 014].
2	The Applicant again states "The loss of the limited number of trees (anticipated to be less than 10 no., subject to detailed design) is not anticipated to significantly reduce the enjoyment of the garden space". I do not understand how the Applicant is qualified to offer such a strong subjective opinion, as they have never had the opportunity to enjoy the space or	<ol style="list-style-type: none"> Please refer to the response to item Reference 1/4 provided above.

Ref. No.	Response:	Applicant's Response:
	understand how we use it. Indeed, the Applicant designer acknowledges later that they have not had the opportunity to visit the site. The use of aerial maps gives a one dimensional view and cannot relay the real feeling of a place. I can categorically state that this is our favourite spot in the garden and once the access road is constructed, we will no longer use it. The construction of the road will effectively nullify all the things that we love about this area.	
Follow-up response to deadline 3 comments from the Applicant – Reference 1H		
1	Although the reason for acquiring the 1-8a parcel is well understood it is concerning that such a critical design feature to the household remains outstanding as such a late stage in the process. The point of access to the property is crucial to the overall integrity of the property. The current outline proposal does not lend itself to the layout of the property and will require removal of trees further exposing the 7 lanes of tarmac. In addition, the current access route is less than picturesque, and the owner of the neighbouring property has stated in the strongest terms that do not accept this point of access to our property.	<ol style="list-style-type: none"> 1. The current outline proposal is described in Appendix D to the Written Summaries of the Applicant's Oral Submission at Hearings [REP4-029]. As detailed in this response, the proposal would require the removal of a limited area of trees on the northern boundary to facilitate construction of the PMA and access onto the property. 2. It is acknowledged by the Applicant that in using the northern section of the PMA that there would be views of the Scheme. However, from within the property and in the external spaces and garden, the majority of the views of the Scheme would remain screened by retained boundary vegetation, that would be strengthened by the proposed additional boundary planting as identified on Figure 7.8 Landscape Mitigation Masterplan Part A [REP4-010], and secured through secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5). 3. Initial conversations with the new owner of Capri Lodge confirmed the proposed access route/location was acceptable as it had been with the previous owner. Since completion of the purchase by the new owner, the Applicant understands that the new owner of Capri Lodge is in support of the closure of the existing direct A1 access but wishes to avoid a shared access situation. Discussions to achieve this are ongoing. 4. Please note the Applicant's response to: Follow-up response to deadline 3 comments from the Applicant – Reference 6-1 with regard to the number of lanes.
2	Given the above position we very much welcome the opportunity to discuss with the Applicant an alternative point of access to the property.	<ol style="list-style-type: none"> 1. The Applicant welcomes this response and is seeking to have a follow up meeting with the Principal Contractor in April 2021. The Applicant's Principal Contractor has recently responded to the Interested Party and dates for a further meeting have been requested from the land agent..
Follow-up response to deadline 3 comments from the Applicant – Reference 2		
1	Point 1 from the Applicant suggests that the layby is 200m north of the property. This is not consistent with our estimation which suggests that it is circa 150m from the property and only 75 metres from the access road leading to the property. More importantly the runoff road for the layby starts to widen at our property and a such the layby is prominent feature on most points of view from the property.	<ol style="list-style-type: none"> 1. It is correct to state that the proposed layby (centre point of the layby, and where vehicles are likely to be parked) is approximately 200m from the façade of the Northgate Farm property (i.e. the dwelling). Measured from the north-west corner of the property boundary the distance to the centre of the layby is approximately 180m, while it is approximately 120m from the PMA at the point at which it turns south to pass in front of Capri Lodge and access Northgate Farm. For clarity the southern end of the layby is approximately 30m south from the centre of the layby. 2. With reference to the 'runoff' into the layby, the kerbline would widen approximately 20m north-west of the northern boundary of Northgate Farm property. At this point, the retained vegetation on the western boundary of Northgate Farm would in conjunction with the proposed sound barrier limit awareness of the 'runoff', before this widens to the north and the full width of the layby is reached. The 'runoff' extends for 130m from the diverge to the southern end of the layby.

Ref. No.	Response:	Applicant's Response:
		<p>3. The Applicant has set out in this response and in previous submissions how views from the property would be substantially mitigated through the retention of existing vegetation on the western and northern boundaries, with the exception of a narrow gap to facilitate the construction of the proposed PMA. The Applicant has identified on Figure 7.8: Landscape Mitigation Masterplan Part A [APP-095] as updated at Deadline 4 refer to [REP4-010], where this vegetation would be retained or provided, and this is secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline Construction and Environmental Management Plan (CEMP), updated at Deadline 4 [REP4-013].</p>
2	<p>Point 2 from the Applicant includes an explanation of why this position was chosen.</p> <p>Although I appreciate reading, for the first time, the rationale behind why this position I am surprised that to see that the close proximity to housing is not an important consideration here. Despite the explanation I am struggling to understand why the layby could not have remained in the current position further north. As this has been in place for over 30 years, I assumed that it must have met the required criteria.</p>	<p>1. The existing layby further north could not remain as it will be absorbed by the carriageway widening to the west. A new layby cannot be in the same location due to the requirements of new Advance Direction Signs for the new Highlaws Junction, which overlap in this location.</p> <p>2. Additionally, the recently completed Morpeth Northern Bypass required the removal of 2 lay-bys to the south of this scheme. No alternative lay-by arrangements were made resulting in the nearest lay-by to the south being near Clifton. Therefore, the existing layby does not meet the required criteria of maximum distance between laybys.</p>
3	<p>Point 3 from the Applicant suggests that the views are “oblique”. This is not correct as the layby will be in plain site from the majority of the garden and particularly those areas, we use the most. Crucially it will form the main outlook from the point of access to our property directly impacting upon kerb appeal.</p>	<p>1. The Applicant's description of the views towards the proposed lay-by from the dwelling at paragraph 2 of the Applicant's Responses to Written Representations [REP3-026] is correct. The retention of the majority of the boundary vegetation would result in perpendicular views (i.e. directly north) being substantially screened, while the narrow block of planting that would be removed to allow the construction of the access would mean that views of the lay-by would be oblique and narrow in their nature.</p> <p>2. The assessment of effects, as outlined in Chapter 7: Landscape and visual Part A [APP-044] and Appendix 7.3 Residential Visual Effects Schedule Part A [APP-218] has been undertaken from publicly available locations, and access to private property, including gardens is not sought. As such, and in assessing the most likely views from the main elevation of the property the assessment has considered the effects on the occupants of the dwelling. In this case, the front elevation was considered to be the north elevation and the assessment has considered the effects on views based on this. The assessment took into account the existing screening provided by the boundary planting, the awareness of a view to the north arising from the removal of a small block of planting to provide access, within which views of the Scheme, as a modification to an existing road were considered. Assessment of garden spaces does not form the main focus of the assessment of effects on the occupants of dwellings, as the assessors are unable to determine how this space is used. Nevertheless, the Applicant has provided a solution that would avoid or reduce the impact of the PMA on the occupants of the property and external spaces, the assessment of which concludes that the effects would be slight adverse (non-significant) as outlined in Appendix 7.3 Residential visual effects schedule Part A [APP-218].</p> <p>3. The proposed access point would result in views of the Scheme being visible along the PMA as it runs north of the property and of Capri Lodge, and when travelling towards the property. However, a hedgerow (untrimmed). which would also include frequently spaced trees. is proposed to extend from the existing tall retained vegetation on the north west corner of the Northgate Farm property northwards, between the PMA and the main alignment, and continue along the eastern side of the Scheme to the north. Once established, this would provide a screen to views of the Scheme, from</p>

Ref. No.	Response:	Applicant's Response:
		the PMA and the garden area, which would be further screened by a proposed hedgerow between the property's northern boundary and the PMA. This is indicated on Figure 7.8: Landscape Mitigation Masterplan Part A [REP4-010], and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5).
4	Point 5 from the Applicant suggests that the current bus stop poses the same issues that a layby does. As an active bus stop, (with restrictive space) vehicles are not permitted to park for convenience as such vehicles are deterred from using. This is in contrast to a layby where vehicles are actively encouraged to stop. Furthermore, unlike the layby, the bus stop is not part of the main outlook.	<ol style="list-style-type: none"> 1. It is noted by the Applicant that the landowner does not feel that the existing bus stops poses similar perceived risk of antisocial behaviour at laybys. 2. As referred to paragraph 2 of the Applicant's Responses to Written Representations [REP3-026], vehicles parked in the layby will be fully visible to other vehicles passing on the A1 carriageway and this will act as a deterrent to anti-social behaviour or fly tipping. 3. Item Reference 2/3 above explains why the lay-by is not anticipated to form a substantial part of the views experienced by the occupants of the dwelling.
5	Point 6 from the Applicant highlights a fundamental difference in how to measure the visual effect. It would appear that the Applicant has assessed the impact from a single point of view which sits behind existing trees and next to the sound barrier. It is very rare that we utilise this space to enjoy the view from the property. With the view limited to the trees in this area I can now see why the Applicant has assessed the visual impact as minimal. It is far more relevant and informative to consider the outlook from those areas of the garden that are used the most to enjoys the views. Unfortunately, there is minimal natural shielding available in these areas.	<ol style="list-style-type: none"> 1. The assessment of effects, as outlined in Chapter 7: Landscape and visual Part A [APP-044] and Appendix 7.3 Residential Visual Effects Schedule Part A [APP-218] has been undertaken from publicly available locations, and access to private property, including gardens is not sought. As such, and in accessing the most likely views from the main elevation of the property the assessment has considered the effects on the occupants of the dwelling. In this case, the front elevation was considered to be the north elevation and the assessment has considered the effects on views based on this. The assessment took into account; the existing screening provided by the boundary planting, and the awareness of a view to the north arising from the removal of a small block of planting to provide access, within which views of the Scheme, as a modification to an existing road. Assessment of garden spaces does not form the main focus of the assessment of effects on the occupants of dwellings, as the assessors are unable to determine how this space is used. Nevertheless, the Applicant has provided a solution that would avoid or reduce the impact of the Scheme on the occupants of the property and external spaces, the assessment of which concludes that the effects would be slight adverse (non-significant) as outlined in Appendix 7.3 Residential visual effects schedule Part A [APP218].. As such, the Applicant has proposed to plant a hedgerow between the property's boundary and the PMA. This is indicated on Figure 7.8: Landscape Mitigation Masterplan Part A [REP4-010] and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5).
6	Point 7 from the Applicant suggests that the sound barrier and the existing vegetation will be sufficient to mask the worst of the views. As the sound barrier only covers a short stretch of the western boundary it does not provide any benefit to masking the northerly outlook and the 7 lanes of tarmac. Similarly, the existing vegetation will provide no benefit here. It is disappointing to read that the sound barrier is the only mitigation on offer to mask the views of the layby and new carriageway.	<ol style="list-style-type: none"> 1. The response in paragraph 2 of the Applicant's Responses to Written Representations [REP3-026] identified that a combination of retained vegetation and the proposed noise barrier would provide screening of the Scheme. This would include the north facing elevation of the dwelling and immediate external spaces, including views to the west from the existing access point. Views north-west and northwards, with the exception of the narrow view as a result of the proposed access point would also be substantially screened by the retained planting, such that views beyond the northern boundary would be constrained. Further, a hedgerow (untrimmed), which would also include frequently spaced trees, is proposed to extend from the existing tall retained vegetation on the north west corner of the Northgate Farm property northwards, between the PMA and the main alignment, and continue along the eastern side of the Scheme to the north, which would provide further screening beyond the existing boundary to Northgate Farm. This hedgerow and trees are indicated on Figure 7.8: Landscape Mitigation Masterplan Part A [REP4-

Ref. No.	Response:	Applicant's Response:
		<p>010], and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5)</p> <p>2. Please note the Applicant's response to: Follow-up response to deadline 3 comments from the Applicant – Reference 6-1 with regard to the number of lanes.</p>
7	<p>The Applicant suggests in point 7 that the visual effects will be improved “as mitigation along the boundary matures”. Not sure what is being referred to here as I am not aware of any in the mitigation plan for my boundary. I assume the Applicant is referring to the mitigation actions that we are having to take to plant further trees.</p>	<p>1. Mitigation planting is proposed along the highway boundary, extending directly north of Northgate Farm and would comprise a hedgerow (untrimmed) which would also include frequently spaced trees as part of the replacement of the Coronation Avenue. This hedgerow and trees are indicated on Figure 7.8: Landscape Mitigation Masterplan Part A [REP4-010], and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014 (and as updated at Deadline 5)]. The assumption is that by year 15, hedgerows are anticipated to be a minimum of 2m in height, and trees 6m in height. As such, ground level views would be substantially screened in the Design Year (15 years after Scheme opening) through a combination of existing vegetation, noise barrier and proposed mitigation planting. The Applicant does not anticipate Mr Hawes having to plant additional trees, but this does not prevent him from planting additional trees on his property should he wish to do so.</p>
Follow-up response to deadline 3 comments from the Applicant – Reference 2A		
1	<p>Point 1 from the Applicant suggests that the layby is 200m north of the property. This is not consistent with our estimation which suggests that it is circa 150m from the property and only 75 metres from the access road leading to the property. More importantly the runoff road for the layby starts to widen at our property and as such the layby is prominent feature on most points of view from the property.</p>	<p>1. Please refer the response to item Reference 2/1 provided above.</p>
2	<p>The Applicant also suggests in point 1 that the visual effects will be improved by the boundary vegetation. Not sure what is being referred to here as I am not aware of any in the mitigation plan for my boundary.</p>	<p>1. Mitigation planting is proposed along the highway boundary, extending directly north of Northgate Farm and would comprise a hedgerow (untrimmed) which would also include frequently spaced trees as part of the replacement of the Coronation Avenue. This is identified on Figure 7.8: Landscape Mitigation Masterplan Part A [REP4-010], and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5). As the hedgerow and trees establish and mature, the capacity of them to provide screening of the Scheme to the north would also increase. The assumption, as stated in paragraph 7.5.1 (c) of Chapter 7: Landscape and visual Part A [APP-044], is that by year 15 hedgerows are anticipated to be a minimum of 2m in height, and trees 6m in height. As such, ground level views would be substantially screened in the Design Year (15 years after Scheme opening) through a combination of existing vegetation, noise barrier and proposed mitigation planting.</p>
Follow-up response to deadline 3 comments from the Applicant – Reference 2B		
1	<p>Point 1 from the Applicant suggests that the layby is 200m north of the property. This is not consistent with our estimation which suggests that it is</p>	<p>1. Please refer the response to item Reference 2/1 provided above</p>

Ref. No.	Response:	Applicant's Response:
	circa 150m from the property and only 75 metres from the access road leading to the property. More importantly the runoff road for the layby starts to widen at our property and a such the layby is a prominent feature from most points of view from the property.	
2	Point 1 from the Applicant. If they do cross the road, they can easily access the property via the path and gateway into the property	1. The layby is proposed on the northbound carriageway, which is on the opposite side of the carriageway from Northgate Farm. The new dual carriageway and central reserve configuration will deter drivers using the layby from choosing to cross the road. Furthermore, the noise fence (with gate) and hedges mean that the property will not be an obvious choice for occupants of broken down vehicles seeking assistance.
Follow-up response to deadline 3 comments from the Applicant – Reference 2C		
1	Point 1 from the Applicant suggests that the layby is 200m north of the property. This is not consistent with our estimation which suggests that it is circa 150m from the property and only 75 metres from the access road leading to the property. More importantly the runoff road for the layby starts to widen at our property and a such the layby is a prominent feature from most points of view from the property.	1. Please refer the response to item Reference 2/1 provided above.
2	Point The bus stop is not a legitimate place to stop and would raise suspicion whereas people are actively encouraged to stop at a layby for any length of time. Given the convenience of parking at a layby without risk of being challenged it seems obvious that this is how a burglar (opportunist or planned) would attempt a burglary.	1. There is no reason to suppose that the risk of burglary will increase when taking on balance the removal of opportunist stopping close to the property at the existing bus stop verses the new layby 200m north of the property on the opposite side of the dual carriageway, central reserve configuration and boundary fences and hedges.
Follow-up response to deadline 3 comments from the Applicant – Reference 2D		
1	Point 1 from the Applicant suggests that the layby is 200m north of the property. This is not consistent with our estimation which suggests that it is circa 150m from the property and only 75 metres from the access road leading to the property. More importantly the runoff road for the layby starts to widen at our property and a such the layby is a prominent feature from most points of view from the property.	1. Please refer the response to item Reference 2/1 provided above.
2	In addition, the Applicant suggests that the views are “oblique”. This is not correct as the layby will be in plain site from the majority of the garden and particularly those areas we use the most. Crucially it will form the main outlook from the point of access to our property directly impacting upon kerb appeal	1. Please refer to the response provided in relation to item Reference 2/3 above.
3	The current views to the north of the property include 13 mature coronation trees and hedgerow which will be felled to accommodate the expansion. The additional breadth of the layby will constrain what can be achieved in	1. The Scheme would require the removal of existing roadside hedgerows and removal of the existing trees that form the Coronation Avenue of trees. The replacement planting along the wider corridor would increase the width between the lines of trees either side of the Scheme. However, the

Ref. No.	Response:	Applicant's Response:
	replicating the original avenue arrangement. Furthermore, what is achieved will take a number of years before they can have any impact on the visual effect.	replacement strategy, which has been agreed with NCC, as evidenced in the Statement of Common Ground with NCC [REP4-016] would be such that over time, the tree lined nature of the corridor would be substantially restored. The replacement strategy is identified on Figure 7.8: Landscape Mitigation Masterplan Part A [APP-010], and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5). This comprises the replacement of the existing roadside hedgerows and the planting of 38 no. trees to replace those removed. The Applicant acknowledges that the replacement trees would be immature when planted, nevertheless, the Applicant has committed to the replacement trees being of advanced nursery stock when planted, and this is secured through item S-L4 of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5).
Follow-up response to deadline 3 comments from the Applicant – Reference 2F		
1	Point 1 response from Applicant. Unfortunately, being exposed to passing traffic does not appear to act as a deterrent to other users of laybys along the A1. Although layby bins are emptied once a week it is also common to see an overflow of rubbish strewn across the area of the layby.	1. The Applicant does not foresee that the operational maintenance of this layby will lead to anti-social behaviour.
Follow-up response to deadline 3 comments from the Applicant – Reference 3		
1	Point 1 from the Applicant. I am reassured to hear that there is will not be an operational depot with offices and equipment store. I referenced the Swale and soil deposit work in this area as a depot as this is how it was referenced in the past by the Applicant. Notwithstanding, all of the points raised in written statement are still relevant and remain outstanding. I stand corrected and will not refer to it as a depot in the future.	1. The Applicant has responded to all the written queries previously raised by Mr Hawes as part of his Relevant Representation [RR-045], Deadline 1 response to ExA's Written Questions [REP1-082] and Deadline 2 Written Representations [REP2-034] which included points raised on the storage area.
2	Point 2 from the Applicant. I appreciate the explanation for why this particular site was chosen but I still do not understand why it was necessary to place the site within 50 meters of our property.	<ol style="list-style-type: none"> 1. The site for the soil storage area was chosen because part of the site will become a storage swale (Storage Swale 1 as shown on Sheet 1 of the General Arrangement plans [APP- 008]) for the treatment of carriageway drainage prior to discharge into the adjacent watercourse. The construction of the swale will require the excavation of soil which will have to be stored temporarily until it can be used elsewhere on the Scheme. Use of the site therefore avoids the requirement for the acquisition of rights over a further plot of land. 2. The closest point of Topsoil Storage Location 1 shown on Figure 7.8 Landscape Masterplan Part A [REP4-010] to the property is approximately 100m. 3. As highlighted in the Applicant's Responses to Written Representations [REP3-026] , the site selected for the soil storage area, avoided the need to acquire a further plot of land and sited it near an area that during construction will generate a large area of arisings. The material that is generated here, will largely be used in the same locality, dressing the newly formed slopes or for the screening bunds to the south of the proposed Highlaw's junction; therefore, making it most logical to store it, temporarily in the vicinity of both generation and use. Storing the material locally will support more efficient construction and minimises the associated noise and air pollution effects that would arise if the material had to be carted further away to an alternative location.

Ref. No.	Response:	Applicant's Response:
3	Point 3 from the Applicant highlights additional information that I was not aware of. I understand that a further permanent access road will be constructed to maintain the Swale and to facilitate access to lorries transferring soil. This is a further disappointment as additional mature trees will need to be felled to accommodate large HGV vehicles. As the site of this access road is less than 30 meters from our property this will be a further detriment to the visual effect.	<ol style="list-style-type: none">1. No additional vegetation over and above that which is already identified on the Vegetation Clearance Plans [REP4-003], is anticipated to require removal by the Scheme. The retention of vegetation is secured through item S-L2 (a) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5). The visual effect of the removal of the trees that are identified for removal would in part be mitigated by the erection of the proposed noise barrier that would screen views in the direction of the soil storage area and swale, and retained vegetation on the property's western boundary. As part of the mitigation strategy, the Applicant is committed to planting a cluster of trees at the eastern end of the access road to replace those trees removed. These are indicated on Figure 7.8: Landscape Mitigation Masterplan Part A [REP4-010], and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5).
4	Point 1 Air Quality from the Applicant. Given the close proximity to the property the movement of large vehicles in and out of the soil deposit area will undoubtedly increase fumes and dust.	<ol style="list-style-type: none">1. The construction dust assessment set out in Chapter 5: Air Quality Part A [APP-040] and Appendix 16.4: Air Quality Likely Significant Effects of the Scheme [APP-330] considers the impacts of construction activities at all receptors within 200m of the Scheme red line boundary. The assessment considers all potential construction activities associated with a major scheme, such as the Scheme in question, including the use of stockpiles. The receptors, including Mr Hawes' property, are shown in Figure 5.4 Construction Receptors Part A [APP-078]. With the application of the recommended mitigation measures, which are set out within the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5), the conclusion of the construction dust assessment is that there would be no significant air quality effects resulting from the Scheme during construction.2. The construction traffic assessment set out in Appendix A of Appendix 16.4: Air Quality Likely Significant Effects of the Scheme [APP-330] considers the impact of construction traffic on pollutant concentrations at human receptors. The conclusion of this assessment was that pollutant concentrations remain would well below the relevant air quality standards, and that there would be no significant air quality effect as a result of construction of the Scheme, including at Mr Hawes' property.
5	Points on Noise from the Applicant. Given the close proximity to the property the movement of large vehicles in and out of the soil deposit area will increase noise levels at the property.	<ol style="list-style-type: none">1. This query was addressed in the noise section of the response to Ref. 3 within Table 1-6 of the Applicant's Responses to Written Representations [REP3-026] submitted at Deadline 3. Noise generating activity associated with the soil store has been considered and assessed as part of the earthwork's activity within Chapter 6: Noise and Vibration Part A [APP-042]. The potential for noise impacts resulting from construction traffic has also been assessed within Chapter 6 Noise and Vibration Part A [APP-042] and Appendix 16.5 Noise and Vibration Likely significant Effects of the Scheme [APP-331]. Construction mitigation measures are set out in the Outline CEMP [REP-013 and 014] (and as updated at Deadline 5) within Section 3 Register of Environmental Actions and Commitments. The construction noise and vibration assessment within Section 6.10 Assessment of Likely Significant Effects of Chapter 6 Noise and Vibration Part A [APP-042] concludes that, following the implementation of mitigation, no significant adverse noise effects are predicted during the construction stage of the Scheme, including at this property.2.

Follow-up response to deadline 3 comments from the Applicant – Reference 3A

Ref. No.	Response:	Applicant's Response:
1	Whilst I welcome the extra information provided it has not changed my concerns, indeed in looking at the extra information it has heightened our concerns given close proximity of the additional access road and the additional trees to be felled to facilitate the access road.	<ol style="list-style-type: none"> Paragraph 3A of the Applicant's Responses to Written Representations [REP3-026] clarifies that no woodland is required to be removed to accommodate the proposed temporary soil storage area itself and details the protections in place. As described in the response to item Reference 3-3, above, the access road to the soil storage area and swale would replace the existing lane along the edge of the woodland, and would avoid additional vegetation removal over and above that which is already identified on the Vegetation Clearance Plans [REP4-003]. The retention of vegetation is secured through item S-L2 (a) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5). The visual effect of the removal of the trees would in part be mitigated by the erection of the proposed noise barrier that would screen views in the direction of the soil storage area and swale and retained vegetation on the property's western boundary. As part of the mitigation strategy, the Applicant is committed to planting a cluster of trees at the eastern end of the access road to replace those trees removed, these are indicated on Figure 7.8: Landscape Mitigation Masterplan Part A [REP4-010], and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5).
Follow-up response to deadline 3 comments from the Applicant – Reference 3B		
1	It is reassuring that there is some acknowledgement that the loss of the charming cottage does represent a direct adverse visual effect. When aggregated together with all the other visual effects highlighted previously this does constitute an overall significant effect, especially when you consider the point of view from the area of the garden that are commonly used.	<ol style="list-style-type: none"> The Applicant has within the landscape and visual assessment considered the effects on visual receptors, the assessment is provided in Chapter 7: Landscape and visual Part A [APP-044] and Appendix 7.3 Residential visual effects Schedule Part A [APP-218]. This acknowledges that during the construction the loss of North Gate House would contribute towards the effects identified, which are identified as being significant. However, following construction, the erection of the proposed noise barrier and retention of the vegetation on the western boundary would combine to result in little awareness of the Scheme and the loss of the North Gate House. Furthermore, and as mitigation planting establishes on the opposite side of the carriageways, awareness of the loss of the North Gate House would further diminish. The visual effects following construction are identified as being slight adverse which are non-significant. The owner of North Gate House served a blight notice on the Applicant and has not objected to the acquisition.
Follow-up response to deadline 3 comments from the Applicant – Reference 3C		
1	The footpath referred to is clearly marked on all the plans shared by the Applicant. Although not recognised as a formal public footpath it has been maintained by Northumberland County council to provide easier access to the public. Given the low levels of traffic on the single carriageway it is safe to cross the road at my property and use this path through the woods to access other public rights of way. As suggested in the response the dualling of the road will prevent any access to the west, hence for the reason for the land locked statement.	<ol style="list-style-type: none"> As set out in Table 1-6 of the Applicant's Responses to Written Representations [REP3-026], page 36, the Applicant has assessed the impact on walkers, cyclists and horse riders (WCH) using designated public rights of way and non-designated footways within the study area, as outlined within Chapter 12: Population and Human Health Part A [APP-054]. The Rights of Way and Access Plans [REP2-003] do not show an existing footpath through the woodlands, and there are no additional designated footpaths shown on the Northumberland County Council Public Right of Way mapping tool in this location (including through the woodland south and west of Northgate Farm). The NCC PRoW Officer has confirmed, following a site visit on 24/03/2021, that it does not form part of NCC's rights of way or adopted footway network and no evidence of a path through this woodland area was located. Locally used, un-designated footpaths on private land have not been included within the Population and Human Health assessment.

Ref. No.	Response:	Applicant's Response:
		<ol style="list-style-type: none">There are no formal WCH crossings of the A1 in the vicinity of the Northgate Farm, so safe access to the west of the A1 is already limited under the existing layout of the A1. The only non-designated footway identified in this area is the footway alongside the carriageway of the A1, which traverses north to south, and would be retained as part of the Scheme.The Applicant does not agree that the property would be "land locked". It is accepted that with the current A1 with a single carriageway configuration it is possible for pedestrians to cross westwards from Northgate Farm, and this would not be possible with the Scheme being a dual carriageway, which would restrict travel to the west. However, access to the east, north and south will would be possible for pedestrians.Bridleway 407/010 is located south of Warreners House, between the A697 and the unclassified road between Morpeth and Hebron, providing access from an easterly direction from the property. This PRow would still be accessible with the Scheme in place.The Scheme would result in the dualling of the A1, and therefore crossing it in the vicinity of the property would not be safe for WCH. The existing footway along the A1, which is located on the eastern side of the A1, and accessible to residents of Northgate Farm, would be retained and extended to the new Highlaws Junction, where provision would be made for safe, grade separated, east to west crossing of the Scheme onto either Hebron Road, or High Highlaws Road. To improve the overall Scheme safety objective, there are no at-grade WCH crossing proposed on the dualled section of the Scheme. A new section of bridleway would also be provided at the south of the Scheme, extending on from Bridleway 407/010, which would tie into the road network north of Morpeth at West View. From here, travel west by footway is possible on the A192.
Follow-up response to deadline 3 comments from the Applicant – Reference 3D		
1	<p>The comments provided include new information that I was not aware of. Unfortunately, none of it is good news and has served to heighten my concerns further. Based upon the information provided the HGV vehicles will access the soil deposit via the gate directly across the road from my property. In addition, I understand that an additional permanent maintenance road will be constructed directly across the road from our property to facilitate future maintenance of Swale 1. This access road is in addition to the 7 lanes of tarmac previously referred to. Furthermore, the visual outlook is made worse with the felling of trees in the woods thereby making the A697 clearly visible.</p>	<ol style="list-style-type: none">Whilst the Applicant will maintain the right to access the soil store from the existing access to Northgate House from the A1 carriageway, the Scheme is not planning to use this route regularly throughout construction. It is likely this route will be used at the establishment and reinstatement of the area and only require infrequent movements during the use of the soil store. It is currently planned that almost all material movements to and from the soil store will be from within the construction works area west of the existing A1 between the A697 junction and the proposed Highlaws Junction (plots 1/4b, 1/4c, 1/1g, 2/4b, 2/3c, 2/3d, 2/1b etc). As noted in response 3/2 above, the material being stored in the soil store here is generated from, and intended to be used, within the area between A697 and Highlaws Junction west of the existing A1. As such, movements will predominantly take place with site dump trucks within the boundary. To take material by road would be excessively time consuming and costly, and using road vehicles would also result in reduced capacity, meaning more movements.The Applicant has within the landscape and visual assessment considered the effects on visual receptors, including those at the property. The assessment is provided in Chapter 7: Landscape and visual Part A [APP-044] and Appendix 7.3 Residential visual effects Schedule Part A [APP218]. This acknowledges that during the construction the effects would be significant. However, following construction, the erection of the proposed noise barrier and retention of the vegetation on the western boundary would combine to result in little awareness of the changes arising to the west and any infrequent use of the access track to access the drainage features.With reference to the removal of vegetation, the Applicant would only remove the vegetation that it requires in order to construct the Scheme, which includes the permanent access track. This is

Ref. No.	Response:	Applicant's Response:
		<p>identified on the Vegetation Clearance Plans [REP4-003]; which identify that a block of woodland is retained between the drainage features adjacent to the A697 and the A1 carriageways. The retention of vegetation is secured through item S-L2 (a) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5). Furthermore, and as mitigation planting establishes on the opposite side of the carriageways, awareness of the removal of existing trees and woodland would further diminish. The effects following construction are identified as being slight adverse which are non-significant.</p> <p>4. Please note the Applicant's response to: Follow-up response to deadline 3 comments from the Applicant – Reference 6-1 with regard to the number of lanes.</p>
Follow-up response to deadline 3 comments from the Applicant – Reference 3E		
1	<p>As highlighted above the additional information on the access to the soil store has increased my concerns. Given the close proximity to our property and the limited mitigation measure the additional traffic to access the soil will increase noise and worsen air quality. In addition, having a major soil deposit within 50 metres of the property will directly impact the levels of dust given the predominant westerly winds.</p>	<p><u>Noise</u></p> <p>1. Noise generating activity associated with the soil store has been considered and assessed as part of the earthworks activity within Chapter 6: Noise and Vibration Part A [APP-042]. The potential for noise impacts resulting from construction traffic has also been assessed within Chapter 6 Noise and Vibration Part A [APP-042] and Appendix 16.5 Noise and Vibration Likely significant Effects of the Scheme [APP-331]. Construction mitigation measures are set out in the Outline CEMP [REP-013 and 014] (and as updated at Deadline 5) within Section 3 Register of Environmental Actions and Commitments. The construction noise and vibration assessment within Section 6.10 Assessment of Likely Significant Effects of Chapter 6 Noise and Vibration Part A [APP-042] concludes that, following the implementation of mitigation, no significant adverse noise effects are predicted during the construction stage of the Scheme, including at this property.</p> <p><u>Air Quality</u></p> <p>1. The construction dust assessment set out in Chapter 5: Air Quality Part A [APP-040] and Appendix 16.4: Air Quality Likely Significant Effects of the Scheme [APP-330] considers the impacts of construction activities at all receptors within 200m of the Scheme red line boundary. The assessment considers all potential construction activities associated with a major scheme, such as the Scheme in question, including the use of stockpiles. The receptors, including Mr Hawes' property, are shown in Figure 5.4 Construction Receptors Part A [APP-078]. With the application of the recommended mitigation measures, which are set out within the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5), the conclusion of the construction dust assessment is that there would be no significant air quality effects resulting from the Scheme during construction.</p> <p>2. The construction traffic assessment set out in Appendix A of Appendix 16.4: Air Quality Likely Significant Effects of the Scheme [APP-330] considers the impact of construction traffic on pollutant concentrations at human receptors. The conclusion of this assessment was that pollutant concentrations remain would well below the relevant air quality standards, and that there would be no significant air quality effect as a result of construction of the Scheme, including Mr Hawes' property.</p>
Follow-up response to deadline 3 comments from the Applicant – Reference 3F		

Ref. No.	Response:	Applicant's Response:
1	We appreciate the explanation on why this site was chosen, but we remain surprised that the close proximity the cluster of houses does not appear to part of the criteria in deciding upon the optimum position. The net impact of this decision has the following impact on the properties in the area:	1. The reason for the selection of this site for the soil storage area is detailed in the response to 3/2 above. The further points raised by Mr Hawes are addressed in points 3F/1a to 3F/1f below.
1a	Additional permanent access road in view	1. The proposed access road would be reached from the A697 and would require the removal of a small area of woodland at the tie in. However, a cluster of trees would be planted at the end of the access road to replace those trees removed as part of the demolition of North Gate House and construction of the swale. Awareness of the new access road would be limited, it being substantially screened from view by the proposed noise barrier adjacent to Northgate Farm and the retained boundary vegetation and would not contribute to a significant visual effect on the receptor.
1b	Felling trees will expose the A697 which is currently hidden	1. Vegetation would only be removed where it is required to in order to construct the Scheme and is not anticipated to expose direct, unfiltered views of the A697 where they do not currently exist. This is identified on the Vegetation Clearance Plans [REP4-003], the aim being that a block of woodland is retained between the drainage features adjacent to the A1 northbound carriageway. The retention of vegetation is secured through item S-L2 (a) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5).
1c	A significant number of trees to be felled to accommodate the access.	1. Vegetation would only be removed where it is required to do so in order to construct the Scheme, and in this location would require the removal of between 6-8 no. trees. These are identified on the Vegetation Clearance Plans [REP4-003]. The retention of vegetation is secured through item S-L2 (a) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5). Furthermore, the Applicant has identified where replacement trees could be planted at the end of the access road to replace those removed. These are indicated on Figure 7.8: Landscape Mitigation Masterplan Part A [REP4-010], and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5).
1d	Additional HGV traffic within 30 metres of our property.	<u>Noise</u> 1. Noise generating activity associated with the soil store, including as a result of HGV operations, has been considered and assessed as part of the earthworks activity within Chapter 6 Noise and Vibration Part A [APP-042]. The potential for noise impacts resulting from construction traffic has also been assessed within Chapter 6 Noise and Vibration Part A [APP-042] and Appendix 16.5 Noise and Vibration Likely significant Effects of the Scheme [APP-331]. Construction mitigation measures are set out in the Outline CEMP [REP-013 and 014] (and as updated at Deadline 5) within Section 3 Register of Environmental Actions and Commitments. The construction noise and vibration assessment within Section 6.10 Assessment of Likely Significant Effects of Chapter 6: Noise and Vibration Part A [APP-042] concludes that, following the implementation of mitigation, no significant adverse noise effects are predicted during the construction stage of the Scheme, including at this property.

Ref. No.	Response:	Applicant's Response:
		<p><u>Visual</u></p> <ol style="list-style-type: none">1. The presence of HGVs would be visible from the entrance to Northgate Farm until such time as the new access road is constructed, and the erection of the noise barrier takes place. Once this is erected, there would be little awareness of the vehicle movements comprising site dump trucks and associated plant accessing and moving within the soil storage area and moving material within the main construction area during construction, with the exception of when using the PMA and entering the property, when views towards the works would be briefly observed, beyond the main construction works to modify the existing A1 in the foreground.2. Following construction, infrequent access to the swales would be required for maintenance purposes via the purpose-built access road of the A697. In addition, the proposed hedgerow extending between the PMA and the main A1 alignment would gradually reduce views to the west as it establishes. The alignment of the hedgerow is indicated on Figure 7.8: Landscape Mitigation Masterplan Part A [REP4-010], and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5). <p><u>Air Quality</u></p> <ol style="list-style-type: none">1. The HGV movements during construction are considered as part of the construction traffic assessment set out in Appendix A of Appendix 16.4: Air Quality Likely Significant Effects of the Scheme [APP-330]. This assessment considers the impact of construction traffic on pollutant concentrations at human receptors. The conclusion of this assessment was that pollutant concentrations remain would well below the relevant air quality standards, and that there would be no significant air quality effect as a result of construction of the Scheme, including at Mr Hawes' property.
1e	Additional adverse impact on noise, dust and air quality.	<p><u>Noise</u></p> <ol style="list-style-type: none">1. Noise generating activity associated with the soil store has been considered and assessed as part of the earthwork's activity within Chapter 6: Noise and Vibration Part A [APP-042]. The potential for noise impacts resulting from construction traffic has also been assessed within Chapter 6: Noise and Vibration Part A [APP-042] and Appendix 16.5 Noise and Vibration Likely significant Effects of the Scheme [APP-331]. Construction mitigation measures are set out in the Outline CEMP [REP-013 and 014] (and as updated at Deadline 5) within Section 3 Register of Environmental Actions and Commitments. The construction noise and vibration assessment within Section 6.10 Assessment of Likely Significant Effects of Chapter 6 Noise and Vibration Part A [APP-042] concludes that, following the implementation of mitigation, no significant adverse noise effects are predicted during the construction stage of the Scheme, including at this property. <p><u>Air Quality</u></p> <ol style="list-style-type: none">1. In terms of the potential impacts to dust and air quality, the operational depot and soil store could result in an increase in dust from construction activity, or an increase in vehicle-generated pollutants arising from increased traffic levels. However, both of these potential impacts are covered in the air quality assessment for the Scheme, which concludes that there would be no significant air quality effects resulting from the Scheme during construction, including at this property.2. The construction dust assessment set out in Chapter 5: Air Quality Part A [APP-040] and Appendix 16.4: Air Quality Likely Significant Effects of the Scheme [APP-330] considers the impacts of

Ref. No.	Response:	Applicant's Response:
		<p>construction activities at all receptors within 200m of the Scheme red line boundary. These receptors are shown in Figure 5.4 Construction Receptors Part A [APP-078]. With the application of the recommended mitigation measures, which are set out within the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5), the conclusion of the construction dust assessment is that there would be no significant air quality effects resulting from the Scheme during construction.</p> <p>3. The vehicle movements during construction are considered as part of the construction traffic assessment set out in Appendix A of Appendix 16.4: Air Quality Likely Significant Effects of the Scheme [APP-330]. This assessment considers the impact of construction traffic on pollutant concentrations at human receptors. The conclusion of this assessment was that pollutant concentrations remain would well below the relevant air quality standards, and that there would be no significant air quality effect as a result of construction of the Scheme.</p>
1f	Overall adverse impact on visual effect.	<p>1. The presence of construction activities would be visible from the entrance to Northgate Farm until such time as the erection of the noise barrier takes place. Once this is erected, there would be little awareness of the vehicle movements accessing the soil storage area during construction with the exception of when the residents are using the PMA and entering the property, when views towards the works would be briefly observed, beyond the main construction works to modify the existing A1 in the foreground. Following construction, infrequent access to the swales would be required for maintenance purposes via the purpose-built access road off the A697. In addition, the proposed hedgerow extending between the PMA and the main A1 alignment would gradually reduce views to the west as it establishes. This is indicated on Figure 7.8: Landscape Mitigation Masterplan Part A [REP4-010], and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5). In addition, the swale would be below existing ground level and not form a prominent component of the view.</p>
Follow-up response to deadline 3 comments from the Applicant – Reference 4		
1	Point 2 from the Applicant suggests that there was no cost benefit to acquiring the two properties. This is not correct. A business case was presented that demonstrated that the costs of constructing the additional access road to the two properties was greater than the cost of acquiring the two properties. In addition, there was a 6-month window where the owners at the time were open to this proposal.	<p>1. An initial analysis was undertaken in 2018 based on the proposal put forward by Mr Hawes that the Applicant acquire his property and partially demolish it to provide access to Capri Lodge. A high level cost comparison based on a number of assumptions demonstrated this was not an option of benefit to the Scheme.</p> <p>2. Following that exercise a second proposal was put forward by Mr Hawes. That proposal required the acquisition of two properties (Capri Lodge and Northgate Farm). However, the then owner and the prospective purchaser of Capri Lodge had no desire to see the property acquired and demolished as part of the scheme. As such, this proposal was also discounted.</p> <p>3. At the time of the second proposal the DV, through discussions with the executor for Capri Lodge, was informed that an offer to purchase Capri Lodge had been submitted by a third party and was progressing. Subsequent telephone discussions with the prospective owner of Capri Lodge confirmed that their purchase of the property was underway and they were, at that point in time, content with the Scheme and the Applicant's proposed access provisions.</p>
2	Point 3 from the Applicant highlights that the new owner of neighbouring property is happy with the proposal. This is not entirely true as they have made it very clear that they are not happy with the current point of access to	<p>1. Initial conversations with the new owner of Capri Lodge confirmed the proposed access route/location was acceptable as it had been with the previous owner. Since completion of the purchase by the new owner, the Applicant understands that the new owner of Capri Lodge is in</p>

Ref. No.	Response:	Applicant's Response:
	our property. Given the different circumstances of the two properties it is less than fair to make such a comparison. The new owner bought the property at a reduced price knowing the full extent of the changes and Impact. We understand that the property has been bought on a buy to let basis and as such the new access road will remove existing covenant constraints and facilitate business expansion aspirations. These circumstances are very different to our losing many benefits that we have enjoyed at our family home for over 25 years.	<p>support of the closure of the existing direct A1 access but wishes to avoid a shared access situation. Discussions to achieve this are ongoing.</p> <p>2. Where any changes to the use of the property known as Capri Lodge would require planning permission through Northumberland County Council, Mr Hawes would have the opportunity to object or comment on any application that was submitted in relation to the property expansion or change of use.</p>
Follow-up response to deadline 3 comments from the Applicant – Reference 4A		
1	In buying the property we looked upon the 20-minute commute to Newcastle and Alnwick as a key benefit. As such we have been more than happy with the current access arrangement for over 25 years. As they stand the proposed plans for the new access road remove many benefits replacing them with a catalogue of negative changes and long-term legacy issues. I am hopeful that as a result of further discussions with the Applicant that some improvements can be made to the current design.	<p>1. The Applicant has provided detailed responses to the specific concerns raised by Mr Hawes in relation to the proposed access road, both in this response and in responses submitted in Applicant's Responses to Written Representations [REP3-026].</p> <p>2. The Applicant will continue discussions with Mr Hawes and family and attempt to address concerns where possible.</p>
Follow-up response to deadline 3 comments from the Applicant – Reference 4B		
1	Given the history of conflict and contention it is absolutely crucial that a sustainable usage/ maintenance model is established to avoid placing additional burden and stress on the household. For a variety of reasons which have been previously documented, leaving responsibility for maintenance with the property owners will not work in this instance. I would welcome the opportunity to discuss further with the Applicant other options, in particular, the suggested management association approach.	<p>1. The standard provision is that the landowner for each section of the proposed access would be liable for its maintenance. In this scenario, a commuted sum for any additional future maintenance liabilities would be agreed with each party.</p> <p>2. In order to address Mr Hawes' concerns, the Applicant has highlighted potential maintenance models which could be put in place, such as a residents association. Such a provision would require the agreement of all parties and is an avenue that will continue to be explored and discussed with the residents/users of the proposed access road.</p>
2	This issue of road adoption was raised at one of the Issue Specific hearings. I understood that the road could not be adopted by the council as the road was being used by residential properties. Is this correct?	<p>1. Northumberland County Council, acting as the local highway authority, have confirmed that they will not be adopting this private means of access.</p>
Follow-up response to deadline 3 comments from the Applicant – Reference 4C		
1	The majority of Applicant response is out of context as it refers to the impact of dual carriageway to the west of the property and not the impact of the new access road on the eastern boundary.	<p>1. The Applicant's response at item 4/C of Table 1-6 – Mark Hawes in Applicant's Responses to Written Representations [REP3-026] provides a description of views from the property to the north and west, encompassing the A1, and to the north and east, encompassing the new access track. As such, it is not accepted that this is out of context.</p>
2	The new access road approaches from the south replacing the rolling fields outlook referred to. It then wraps around the eastern hedgerow boundary of the property, before heading west across the north eastern corner of our property. As such the access road will dominate the south, west and north	<p>1. The Applicant maintains that with the retention of the majority of the existing boundary vegetation, and the addition of a boundary hedgerow and trees to the eastern and northern boundary of the property and as indicated on Figure 7.8 Landscape Mitigation Masterplan Part A [REP4-010], awareness of the PMA would be mitigated once the hedgerow is established, and the views of the</p>

Ref. No.	Response:	Applicant's Response:
	outlook when viewed from the wooded garden in question. As the Applicant designer acknowledges that they have not visited the site I am sure that they would have a different perspective if they were to do so.	PMA from within the garden space would be substantially screened, avoiding it dominating the views. Likewise, the proposed hedgerow would provide screening from the PMA into the garden space. The retention of existing vegetation and provision of replanting are secured through item S-L2 (a) and (c) respectively of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5). The Applicant's landscape architect has not been to the property's garden space, the assessment of visual effects having been undertaken from publicly available locations, which is recognised as being the industry's best practice for an assessment of this nature.
Follow-up response to deadline 3 comments from the Applicant – Reference 4D		
1	Although we can hear some road noise in the woodland when the wind blows from the west, otherwise the area is far enough away from the current a1 road to not suffer. On previous visits from the Applicant, it has been noted how peaceful and quiet the area is.	1. The noise section within Ref. 4.D of Table 1-6 in the Applicant's Responses to Written Representations [REP3-026] responds to Mr Hawes' statement that, " <i>The introduction of the road will add noise and air pollution where previously there was none.</i> " As set out in the Applicant's response, the property's garden is within relatively close proximity (between 50-150m) to the A1 such that the noise environment in the garden and wooded area is substantially influenced by road traffic from the A1 which will be audible at this location. Whilst noise levels will reduce at greater distances from the A1, the noise environment of the area is dominated by road traffic noise from the A1.
2	The noise from vehicles using the new access road will intermittently spoil the enjoyment of this area. This noise will be noticeably louder than any other experienced in the area especially as there are no speed limits on the road. Based upon current usage this is expected to exceed 20 vehicle journeys a day.	1. The Applicant cannot comment on the enjoyment of the garden as this is a subjective issue. However, it is anticipated that any vehicle movements on the access road will be infrequent and short in duration and therefore, for the majority of the time, this area will not experience noise from vehicles on the access road. Whilst noise from infrequent vehicles on the access road may be audible, given the low number of daily vehicle trips expected and the likely low speed of vehicles given the nature of the access road, the use of the access road would be expected to have an inconsequential effect on noise levels in this area and would not change the overall noise environment of the area, which is already substantially influenced by road traffic from the A1.
3	Although I understand that the additional fumes and pollution from passing vehicles is not likely to exceed legal thresholds it will be unpleasant to breathe fumes from passing vehicles in this area.	1. Under the guidance set out in DMRB document LA105, the air quality assessments are undertaken against the UK's air quality thresholds, which have been set for the protection of human health. 2. As per the Applicant's response in the Applicant's Responses to Written Representations [REP3-026], "the assessment has demonstrated that no significant effects are likely as a result of the Scheme":
Follow-up response to deadline 3 comments from the Applicant – Reference 4E		
1	The comments provided the Applicant do not provide any assurance on security.	1. The Applicant in their response to the point raised by Mr Hawes about security in the Applicant's Responses to Written Representations [REP3-026], identified that in addition to the proposed hedgerow as indicated on Figure 7.8 Landscape Mitigation Masterplan Part A [REP4-010], a fence would be provided until such time as the hedgerow is established. Under Schedule 2, Requirement 13, of the draft DCO [REP4-004 and 005] any fencing or other means of enclosure that is erected must be DMRB compliant, unless formally agreed as a departure with the Secretary of State. This is considered sufficient to ensure that any fencing will be safe and secure.

Ref. No.	Response:	Applicant's Response:
2	Please see previous comments relating to loss of enjoyment and privacy.	<ol style="list-style-type: none"> 1. The Applicant has provided detailed responses to Mr Hawes' specific concerns as to loss of enjoyment and privacy in response to 1/3, 1/4 and 1F/3, and privacy in response to 1/2. 2. The Applicant maintains that with the retention of the majority of the existing boundary vegetation, and the addition of a boundary hedgerow and trees to the eastern and northern boundary of the property and as indicated on Figure 7.8 Landscape Mitigation Masterplan Part A [REP4-010], awareness of the PMA would be mitigated once the hedgerow is established, and the views of the PMA from within the garden space would be substantially screened, avoiding it from dominating the views. Likewise, the proposed hedgerow would provide screening from the PMA into the garden space. The retention of existing vegetation and provision of replanting are secured through item S-L2 (a) and (c) respectively of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5).
3	The 2nd point suggests that a boundary fence will enclose the new access road to help mitigate the security risk. Having looked at the plans I cannot find any reference to this boundary fence which follows the route of the road.	<ol style="list-style-type: none"> 1. The Applicant in their response to the point raised by Mr Hawes about security in the Applicant's Responses to Written Representations [REP3-026], identified that in addition to the proposed hedgerow as indicated on Figure 7.8 Landscape Mitigation Masterplan Part A [REP4-010], a fence would be provided until such time as the hedgerow is established. Refer to Appendix 2.2: Technical Drawings [APP-188] for cross-sections that indicate a fenceline in addition to hedge. Under Requirement 13 of the draft DCO [REP4-004 and 005] any fencing or other means of enclosure that is erected must be DMRB compliant, unless formally agreed as a departure with the Secretary of State. This is considered sufficient to ensure that any fencing will be safe and secure.
Follow-up response to deadline 3 comments from the Applicant – Reference 4F		
1	In buying the property we looked upon the 20-minute commute to Newcastle and Alnwick as a key benefit. As such we have been more than happy with the current access arrangement for over 25 years. Adding an additional 15 minutes to the travel time is not seen as an “enhanced amenity”.	<ol style="list-style-type: none"> 1. The existing direct access onto the A1 will be closed on the grounds of safety as a result of the Scheme. Access to the A1 would be via grade separated junctions. The enhancement is from the significant safety benefit over the existing “left in/left out” access to the Property. 2. Currently, for southbound journeys, there is direct access onto the A1. With the Scheme in place, the route would be via the new link road onto West View, joining the A192 then the Morpeth Northern Bypass to join the A1. This would result in an additional journey distance of approximately 0.78km on roads with a lower speed limit and through junctions, therefore journey time will likely increase. 3. For northbound journeys, there is currently no direct access to the northern carriageway, so there is already a requirement to travel south to the junction at Morpeth in order to access the northbound carriageway.
2	The Applicants response suggests that the extra 15 mins time will be offset by the increased speed when travelling on the new carriageway. I would need to travel circa 60 miles on dual carriageway to offset the lost time.	<ol style="list-style-type: none"> 1. The Applicant acknowledges that the residents of the property would have a greater distance to travel to access the A1. Traffic modelling of the Scheme has been undertaken as described in Chapter 4 of the Case for the Scheme [APP-344]. Section 4.8 of Chapter 4 details the forecast improvements to average journey times as a result of the Scheme, which would help to offset any increase in journey time for drivers accessing the A1 from the property. Drivers would also benefit from using the new grade separated junction at St Leonards Junction via Morpeth Bypass which would enable safer access through avoiding right turn traffic movements and reduced delays compared with the current left in/left out” access.

Ref. No.	Response:	Applicant's Response:
3	The additional time to travel will pose problems to others users looking to access the property, including emergency services. In the absence of google maps coverage it will more difficult to find the property.	<ol style="list-style-type: none"> Detailed design of strategic destinations for Advance Directional Signs (ADS) and other approved signs are to be confirmed in the Signage Strategy. The Outline CEMP [REP4-013 and 014] (references S-PH3 and S-PH5) confirms that appropriate signage for the Scheme will be implemented to avoid creating route uncertainty and that during construction temporary signage and layout will be clear to avoid creating route uncertainty. The outline CEMP (reference S-PH5) also confirms that any diversions or closures during construction will be advertised and any diversion routes will be clearly signposted and not lead to uncertainty. Changing satellite navigation systems is not the responsibility of the Applicant.
Follow-up response to deadline 3 comments from the Applicant – Reference 4G		
1	Unfortunately, existing contentions and a history of conflict suggests that any such covenants placed will not be followed leaving a legacy of issues	<ol style="list-style-type: none"> The Applicant will ensure that each user has the required rights following the creation of the new access road. The Applicant will continue to discuss potential methods of dispute resolution with Mr Hawes and the other residents should that be required.
Follow-up response to deadline 3 comments from the Applicant – Reference 4H		
1	The need to travel across 5 properties to get access to the rear of the property in the car places extra burden on the property and will not be attractive to future owners.	<ol style="list-style-type: none"> Northgate Farm will be provided with the required rights of access to the rear of the property. The proposed access road will be safer than the present use of two existing “left in/left out” accesses. Compensation for injurious affection is not a matter for the Examination.
Follow-up response to deadline 3 comments from the Applicant – Reference 4I		
1	The vast majority of the population are able to access their property via public roads without constraints and not being dependent upon reasonable behaviour from the other property. Although a simple benefit it is nonetheless a very important one that I fully appreciate. I would have purchased the property had this been in place 25 years ago.	<ol style="list-style-type: none"> A requirement of the proposed scheme is to improve safety. A consequence of this requirement is that direct access to properties is to be closed in line with current standards. The property will ultimately be connected to the public highway system.
Follow-up response to deadline 3 comments from the Applicant – Reference 4J		
1	The point being raised was not about budget but more about the additional burden and the dependency on other property owners.	<ol style="list-style-type: none"> All users of the proposed access will be granted the necessary rights of access to their property. The Applicant will continue to discuss potential methods of dispute resolution with Mr Hawes and the other residents should that be required.
Follow-up response to deadline 3 comments from the Applicant – Reference 4K		
1	Unfortunately, the response provided does not alleviate our concerns here. However, we do welcome the opportunity to explore alternative options with the district valuer as suggested.	<ol style="list-style-type: none"> The Hawes have presented a proposal on 05/02/2021, through their land agent, for an alternative route of access, through their own garden and to the east of the Capri Lodge outside of the Order limits. This is currently being reviewed by the Principal Contractor and feasibility confirmed. Following a site visit by the Principal Contractor, the Applicant has also identified another potential

Ref. No.	Response:	Applicant's Response:
		alternative access route into the property, again east of Capri Lodge, which is being reviewed. The Applicant will be responding to the Hawes on the outcome of that review in early April.
Follow-up response to deadline 3 comments from the Applicant – Reference 4L		
	A business case was presented that demonstrated that the costs of constructing the additional access road to the two properties was greater than the cost of acquiring the two properties. In addition, there was a 6-month window where the owners at the time were open to this proposal. The business case was not based upon just the one property.	<ol style="list-style-type: none"> 1. An initial analysis was undertaken in 2018 based on the proposal put forward by Mr Hawes that the Applicant acquire his property and partially demolish it to provide access to Capri Lodge. A high level cost comparison based on a number of assumptions demonstrated this was not an option of benefit to the Scheme. 2. Following that exercise a second proposal was put forward by Mr Hawes. That proposal required the acquisition of two properties (Capri Lodge and Northgate Farm). However, the then owner and the prospective purchaser of Capri Lodge had no desire to see the property acquired and demolished as part of the scheme. 3. As such, this proposal was also discounted 4. At the time of the second proposal the District Valuer, through discussions with the executor for Capri Lodge, was informed that an offer to purchase Capri Lodge had been submitted by a third party and was progressing. Subsequent telephone discussions with the prospective owner of Capri Lodge confirmed that their purchase of the property was underway and they were, at that point in time, content with the Scheme and the Applicant's proposed access provisions.
Follow-up response to deadline 3 comments from the Applicant – Reference 5		
1	We welcome the additional information provided to explain the approach.	1. Noted
Follow-up response to deadline 3 comments from the Applicant – Reference 5A		
1	I understand the rationale for removing bus stop but to date there has been no recognition that this represents a loss of benefit to the household.	1. It is recognised within paragraph 12.10.15 and 12.10.18 of Chapter 12: Population and Human Health Part A [APP-054] that longer journeys and reduced access to public transport would occur for those at Warreners House.
Follow-up response to deadline 3 comments from the Applicant – Reference 5B		
1	The Applicant offers a number of options but none are feasible given the distances that need to be walked and the additional bus changes. The reality is that we will now have to walk 2k to the X15 bus service to Newcastle. Given the route over fields this is not a safe option for my family on dark nights.	1. It is recognised within paragraph 12.10.15 and 12.10.18 of Chapter 12: Population and Human Health Part A [APP-054] that longer journeys and reduced access to public transport would occur for those at Northgate.
Follow-up response to deadline 3 comments from the Applicant – Reference 5C		
1	It is reassuring to read that there is an aspiration, if funds can be found, to improve the cycle links.	1. The Applicant is continuing to work with NCC to identify separate funding to enhance cycling opportunities outside of the Scheme.

Ref. No.	Response:	Applicant's Response:
Follow-up response to deadline 3 comments from the Applicant – Reference 5D		
1	This point was raised to highlight a shortcoming in the plans not to raise the subject of compensation.	1. The Applicant has provided detailed responses to the specific concerns raised by Mr Hawes at 5A/1, above, and in Table 1-6 of the Applicant's Response to Written Representations [REP3-026].
2	In looking at the previous usage the bus service was used on a daily basis. Although this may represent a low usage it is still a vital service especially when there is no alternative transport available. The removal of the bus service means that we have to be a multi car family when we prefer not to be.	1. The Scheme (including the location of bus stops) has been designed according to design standards to achieve the Scheme objectives as set out in section 3.7 of the Case for the Scheme [APP-344]. The Applicant considers the approach taken with regards to bus stop closure and location is proportionate in terms of levels of usage and the safe operational function of the overall Scheme. The Applicant has acknowledged that reduced access to public transport will occur for those at Northgate. This is due to the Scheme severing pedestrian access to the northbound bus stop, safety concerns and that the bus provider policy is to have pairs of stops, also requiring removal of the southbound bus stop.
Follow-up response to deadline 3 comments from the Applicant – Reference 6		
1	Point 1 from the Applicant suggests that there are only 6 lanes rather 7. In this instance I do not think the Applicant is taking into account the new access road which is also in plain view. In addition, the Applicant has not factored in the additional access road required to maintain the Swale and provide access to the soil deposit.	<ol style="list-style-type: none"> 1. The six lanes of traffic comprise the main carriageways of the A1, and the wider sections where the lay-bys widen the corridor. Mr Hawes is suggesting that the access road would add a further lane to total seven lanes however, the access track will be perceived as being separate to the main carriageway and access will come from the A697 instead. Between the access track and the main northbound carriageway would be an area of verge, with several trees planted, as indicated on Figure 7.8: Landscape Mitigation Masterplan Part A [REP4-010], and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5). 2. The proposed access road would be reached from the A697 and a cluster of trees would be planted at the end of the access road to replace those trees removed as part of the demolition of North Gate House and construction of the swale. Awareness of the new access road would be limited, it being substantially screened from view by the proposed noise barrier adjacent to Northgate Farm and the retained boundary vegetation. As such, any awareness of the access road would not represent a new and conspicuous feature.
2	Point 2 from the Applicant highlights a fundamental difference in how to measure the visual effect. It would appear that the Applicant has assessed the impact from a single point of view which sits behind existing trees and next to the sound barrier. It is very rare that we utilise this space to enjoy the view from the property. With the view limited to the trees in this area I can now see why the Applicant has assessed the visual impact as minimal. It is far more relevant and informative to consider the outlook from those areas of the garden that are used the most to enjoys the views. Unfortunately, there is minimal natural shielding available in these areas.	1. The assessment of effects, as outlined in Chapter 7: Landscape and visual Part A [APP-044] and Appendix 7.3 Residential Visual Effects Schedule Part A [APP-218] has been undertaken from publicly available locations, and access to private property, including gardens is not sought. As such, and in assessing the most likely views from the main elevation of the property the assessment has considered the effects on the occupants of the dwelling. In this case, the front elevation was considered to be the north elevation and the assessment has considered the effects on views based on this. The assessment took into account; the existing screening provided by the boundary planting, and the awareness of a view to the north arising from the removal of a small block of planting to provide access, within which views of the Scheme, as a modification to an existing road. Assessment of garden spaces does not form the main focus of the assessment of effects on the occupants of dwellings, as the assessors are unable to determine how this space is used. Nevertheless the Applicant has provided a solution that would avoid or reduce the impact of the Scheme on the occupants of the property and external spaces, the assessment of which concludes

Ref. No.	Response:	Applicant's Response:
		that the effects would be slight adverse (non-significant) as outlined in Appendix 7.3 Residential visual effects schedule Part A [APP218]. . As such, the Applicant has proposed to plant a hedgerow between the property's boundary and the PMA. This is indicated on Figure 7.8: Landscape Mitigation Masterplan Part A [REP4-010], and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5).
3	Point 3 from the Applicant suggests that the outlook to the west will be returned after construction. This is not true as a number of mature trees would have been felled and North Gate House will be demolished leaving a view of the A697 and the Swale access road.	<ol style="list-style-type: none"> 1. The Applicant's response at 3/A of Applicant's Responses to Written Representations [REP3-026] clarifies that the soil storage area would be returned to its former use following construction. It does not state that the outlook would be returned. 2. The Applicant has within the landscape and visual assessment considered the effects on visual receptors, the assessment is provided in Chapter 7: Landscape and visual Part A [APP-044] and Appendix 7.3 Residential visual effects Schedule Part A [APP218]. This acknowledges that during the construction the loss of North Gate House would contribute towards the effects identified, which are identified as being significant. However, following construction, the erection of the proposed noise barrier and retention of the vegetation on the western boundary would combine to result in little awareness of the Scheme and the loss of the North Gate House. Furthermore, and as mitigation planting including a cluster of proposed trees, establishes on the opposite side of the carriageways, awareness of the loss of the North Gate House would further diminish. Whilst there would be some removal of vegetation, the majority of the roadside woodland would be retained, and as such new views of the A697 would not be exposed by the Scheme. The effects following construction are identified as being slight adverse which are non-significant.
4	Point 4 from the Applicant suggests that the access road would not be readily visible from the property. The new access road approaches from the south replacing the rolling fields outlook referred to. It then wraps around the eastern hedgerow boundary of the property, before heading west across the north eastern corner of our property. As such the access road will dominate the south, west and north outlook when viewed from the wooded garden in question. In addition, the proposed lay-by and dual carriageway will also be in plain view as you look west from this point. If the road is in plain site that it also means that the users of the road can also see directly into this area of the garden.	<ol style="list-style-type: none"> 1. The Applicant maintains that with the retention of the majority of the existing boundary vegetation, and the addition of a boundary hedgerow and trees to the eastern and northern boundary of the property and as indicated on Figure 7.8 Landscape Mitigation Masterplan Part A [REP4-010], awareness of the PMA would be mitigated once the hedgerow is established, and the views of the PMA from within the garden space would be substantially screened, avoiding it from dominating the views. Likewise, the proposed hedgerow would provide screening from the PMA into the garden space. The retention of existing vegetation and provision of replanting are secured through item S-L2 (a) and (c) respectively of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5). The Applicant's landscape architect has not been to the property's garden space, the assessment of visual effects having been undertaken from publicly available locations, which is recognised as being the industry's best practice for an assessment of this nature. Please refer to the response provided in relation to views of the lay-by to item Reference 1C/2 above.
5	Point 5 from the Applicant suggests that the noise barrier will help mask some of the visual effects. As the sound barrier only covers a short stretch of the western boundary it does not provide any benefit to masking the northerly outlook on 7 lanes of tarmac. Similarly, the existing vegetation will provide no benefit here. It is disappointing to read that the sound barrier, which does not help, is the only mitigation on offer to mask the views of the layby and new carriageway.	<ol style="list-style-type: none"> 1. The provision of the noise barrier forms part of the mitigation of the effects of noise on the property, it also has the secondary benefit of screening immediate views from the north elevation of the dwelling to the west, where the existing access gate currently affords views of the existing A1. The retention of the majority of the remaining vegetation to the northern boundary, with the exception of a narrow gap to provide the new access point to Northgate Farm, would be unchanged. The provision of a boundary hedgerow and trees to the northern boundary of the property, as indicated on Figure 7.8 Landscape Mitigation Masterplan Part A [REP4-010], would provide further screening

Ref. No.	Response:	Applicant's Response:
		to views from within the garden space, with views west being screened by the existing buildings, retained vegetation on the western boundary and the proposed noise barrier.
Follow-up response to deadline 3 comments from the Applicant – Reference 6A		
1	I welcome confirmation that the road will not be constructed with tarmac and so will not further worsen the 7 lanes already on view.	<ol style="list-style-type: none"> 1. Noted 2. Please note the Applicant's response to: Follow-up response to deadline 3 comments from the Applicant – Reference 6-1 with regard to the number of lanes.
Follow-up response to deadline 3 comments from the Applicant – Reference 6B		
1	The new access road approaches from the south replacing the rolling fields outlook referred to. It then wraps around the eastern hedgerow boundary of the property, before heading west across the north eastern corner of our property. As such the access road will dominate the south, west and north outlook when viewed from the wooded garden in question. If the road is in plain site that it also means that the users of the road can also see directly into this area of the garden.	<ol style="list-style-type: none"> 1. The Applicant maintains that with the retention of the majority of the existing boundary vegetation, and the addition of a boundary hedgerow and trees to the eastern and northern boundary of the property and as indicated on Figure 7.8 Landscape Mitigation Masterplan Part A [REP4-010], awareness of the PMA would be mitigated once the hedgerow is established, and the views of the PMA from within the garden space would be substantially screened, avoiding it from dominating the views, likewise, the proposed hedgerow would provide screening from the PMA into the garden space. The retention of existing vegetation and provision of replanting are secured through item S-L2 (a) and (c) respectively of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5). In relation to views of the lay-by please refer to item Reference 1C/2 above.
Follow-up response to deadline 3 comments from the Applicant – Reference 6C		
1	In considering the impact on the visual effect the following trees are being felled:	
1a	A number of trees are being felled to west to facilitate the Swale watercourse.	<ol style="list-style-type: none"> 1. A small number of trees, 5 no. would be removed as part of the works associated with the demolition of North Gate House, and a small area of woodland to the western tie in of the access track with the A697. The permanent access track to facilitate access to the swale being required to avoid access directly from the A1. The Applicant is committed to planting a cluster of trees (6no.) at the eastern end of the access road to replace those trees removed, and to planting a hedgerow along the edge of the access track and around the swale, extending north to run alongside the A1. These are indicated on Figure 7.8: Landscape Mitigation Masterplan Part A [REP4-010], and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5).
1b	Further trees are being felled to create a permanent access route for Swale 1 maintenance and to allow access for soil deposit	<ol style="list-style-type: none"> 1. No further trees over and above those outlined above are proposed to be removed. This is indicated on Vegetation Clearance Plan Rev 1 [REP4-003]], and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5).
1c	13 Coronation trees are being removed on the western side of the A1.	<ol style="list-style-type: none"> 1. The Scheme would require the removal of existing roadside hedgerows and removal of the existing trees that form the Coronation Avenue of trees. The replacement planting along the wider corridor would increase the width between the lines of trees either side of the Scheme. However, the

Ref. No.	Response:	Applicant's Response:
		replacement strategy, which has been agreed with NCC, as evidenced in the Statement of Common Ground with NCC [REP3-018] would be such that over time, the tree lined nature of the corridor would be substantially restored. The replacement strategy is identified on Figure 7.8: Landscape Mitigation Masterplan Part A [REP4-010] and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5). This comprises the replacement of the existing roadside hedgerows and the planting of 38 no. trees to replace those removed. The Applicant acknowledges that the replacement trees would be immature when planted, nevertheless, the Applicant has committed to the replacement trees being of advanced nursery stock when planted, and this is secured through item S-L4 of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5).
1d	Potential for trees to be felled in 18a to facilitate access to the property	1. The current outline proposal would require the removal of a limited number of trees on the northern boundary, anticipated to be less than 10, to facilitate construction of the PMA and access onto the property. This clearance is indicated on the Vegetation Clearance Plans [REP4-003], and the retention of existing vegetation is secured through item S-L2 (a) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5).
1e	Trees are hedgerow are to felled on the east boundary to facilitate the new access road	2. In considering impacts on woodlands and vegetation, the design of the PMA has sought to avoid unnecessary removal of trees and hedgerows along the property boundary and within plot 1/8b, nevertheless it has been identified that a limited number of trees, anticipated to be less than 10, and the remnant of a hedge would be required to be removed, in the north east corner in order to achieve the design bend radius for the access road whilst avoiding unnecessary land take from the adjacent field. The Applicant has at Deadline 4, provided a Technical Note as Appendix D Warreners private means of access [REP4-029] that sets out how the Applicant would seek to avoid the unnecessary removal, would consider how the PMA might be constructed to reduce the effect on the remaining trees, and potentially seek to acquire additional land in the adjacent field, subject to agreement, or provide for further tree planting within the garden space itself. Nevertheless, the Applicant considers that the loss of the limited number of trees (anticipated to be less than 10 no., subject to detailed design) is not anticipated to significantly reduce the enjoyment of the wider garden space. Awareness of the PMA from the garden space would be screened through the establishment of a hedge line between the property and the access road, as identified on Figure 7.8 Landscape Mitigation Masterplan Part A [REP4-010].

Table 1-8 - Mark Hawes - Deadline 4 Submission - Comments on responses submitted for Deadline 3 - Part 2

Ref. No.	Response:	Applicant's Response:
Follow-up response to deadline 3 comments from the Applicant – Reference 6		
1	As the Applicant responding to the Visual effect section acknowledges that they have not visited my property I thought it useful to share some photographs which further illustrate the impact the scheme has on visual effect. Please see the section at the end of this document for further details.	<ol style="list-style-type: none">1. The assessment of effects, as outlined in Chapter 7: Landscape and visual Part A [APP-044] and Appendix 7.3 Residential Visual Effects Schedule Part A [APP-218] has been undertaken from publicly available locations, and access to private property, including gardens is not sought. As such, and in accessing the most likely views from the main elevation of the property the assessment has considered the effects on the occupants of the dwelling. In this case, the front elevation was considered to be the north elevation and the assessment has considered the effects on views based on this. The assessment took into account; the existing screening provided by the boundary planting, and the awareness of a view to the north arising from the removal of a small block of planting to provide access, within which views of the Scheme, as a modification to an existing road.2. Assessment of garden spaces does not form the main focus of the assessment of effects on the occupants of dwellings, as the assessors are unable to determine how this space is used. Nevertheless, the Applicant has proposed a solution that would avoid or reduce impact of the PMA on the occupants of the property and external spaces, the assessment of which concludes that the effects would be slight adverse (non-significant) as outlined in Appendix 7.3 Residential visual effects schedule Part A [APP218]. As such, the Applicant has proposed to plant a hedgerow between the property's boundary and the PMA. This is indicated on Figure 7.8: Landscape Mitigation Masterplan Part A [REP4-010], and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5). Nevertheless, the Applicant has responded to the individual points raised by Mr Hawes, including the photographs appended to his submission, below.
Follow-up response to deadline 3 comments from the Applicant – Reference 7		
1	Point 1 from the Applicant. We welcome confirmation that the noise barrier will be constructed but disappointed to read that cost is the only reason why it does not extend to the end of the property boundary. The response from the Applicant suggests that their sole focus is to protect the noise impact upon the buildings, with little consideration or provision for its impact within the garden area.	<p><u>Noise</u></p> <ol style="list-style-type: none">1. The operational stage noise assessment presented in the Noise Addendum [REP1-041] is based on guidance contained within DMRB LA 111 Noise and Vibration as agreed with Northumberland County Council (NCC) in the Statement of Common Ground (SoCG) [REP4-016] (and as submitted at Deadline 5). DMRB LA 111 requires that noise level changes are predicted at noise-sensitive buildings.2. It should be noted that the short-term noise level changes as a result of the Scheme within the garden of the property are not high and would be considered no greater than of minor magnitude of impact based on the magnitude of impact scale presented in DMRB LA 111. As expected, at greater set back distances from the A1 carriageway, the absolute noise levels within the garden will decrease, but road traffic will remain the dominant noise source.3. The proposed barrier is anticipated to mitigate noise levels at Northgate Farm such that the operational road traffic noise effect at this property will not be significant. As the barrier mitigates the significant effect, whilst providing meaningful noise benefits and is value for money, an extension is not considered by the Applicant to be necessary. As such, it is plain that cost is not the “only reason” for not extending the barrier further.

Ref. No.	Response:	Applicant's Response:
		<ol style="list-style-type: none"> As identified in response to 6.1 above, the assessment of effects, as outlined in Chapter 7: Landscape and visual Part A [APP-044] and Appendix 7.3 Residential Visual Effects Schedule Part A [APP-218] has been undertaken from publicly available locations and access to private property, including gardens is not sought. The assessment determined that with the proposed noise barrier in place, and the vegetation on the western boundary retained, the effects would not be significant. It is therefore considered that there is no requirement to further extend the noise barrier beyond the northern boundary to the Northgate Farm. However, a hedgerow (untrimmed), which would also include frequently spaced trees, is proposed as a visual screen, and would extend from the existing tall retained vegetation on the north west corner of the Northgate Farm property northwards, between the PMA and the main alignment, and continue along the eastern side of the Scheme to the north. This would provide further screening beyond the existing boundary to Northgate Farm. This hedgerow and trees are indicated on Figure 7.8: Landscape Mitigation Masterplan Part A [REP4-010], and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5).
2	Point 2 from the Applicant recognises that it is necessary to regularly resurface the road to minimise the noise impact. Unfortunately, I am not confident that this will happen as suggested. The stretch of the A1 south of this scheme has not been resurfaced in the last 25 years and is heavily pitted and worn. The only maintenance on this stretch of the road has been to fill potholes.	<ol style="list-style-type: none"> The Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5) include the commitment (in Table 3-2 row A-N1) that the entire length of the A1 (apart from structures) will be laid with a low noise surface (LNS) as part of the Scheme. Bullet point 'b' of this row states: "All existing sections of LNS on the A1 will be replaced with a new LNS (and if necessary, replaced again by the future year such that they can be considered to be well maintained)." With regard to the resurfacing of the road, paragraph 5.2.5 of the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5) states that: "In the longer term, expected planned maintenance will include activities such as resurfacing the road and replacement of assets when they become life expired." Requirement 4 of Schedule 2 to the dDCO [REP2-004 and 005] requires the Scheme to be constructed in accordance with the CEMP approved by the Secretary of State, which must be based on the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5). Further, paragraphs 4 to 6 of Requirement 4 require a HEMP to be developed by the end of the construction, addressing matters in the CEMP relevant to operation and maintenance. The Scheme must then be operated and maintained in accordance with the HEMP. As such, the maintenance requirements set out in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5) are secured. Pursuant to section 161(1)(b) of the Planning Act 2008, a breach of the terms of this requirement would constitute a criminal offence. This should provide Mr Hawes with reassurance that the Applicant will meet its maintenance obligations, as set out in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5).
3	Point 3 from the Applicant recognises that the increased traffic and speeds, (at opening) will raise the level of noise above Significant Observed Adverse Effect (SOAEL) safe levels. This is very alarming given the known adverse effects noise has on health. This statement reinforces the disappointment that the Applicant is not prepared to extend the noise barrier or consider other mitigation. The Applicant speculates that without the scheme the noise levels will eventually exceed SOAEL thresholds. I am very doubtful of this forecast as the Applicant has previously suggested that the average speed of the traffic will decrease without the scheme going ahead. As there is a direct correlation between speed	<ol style="list-style-type: none"> With regard to the absolute noise levels predicted at the building, in the opening year (2024), without Scheme scenario, noise levels are predicted to exceed the significant observed adverse effect level (SOAEL) on one façade during both the daytime and night-time (albeit only marginally). In the opening year, with Scheme scenario with the proposed noise barrier (PNB1) in place, noise levels at the building are predicted to exceed the SOAEL on one façade during the night-time only and to a slightly lesser extent than in the opening year without Scheme scenario. In terms of noise level changes as a result of the Scheme, including the attenuation afforded by PNB1, a decrease in the representative noise level is predicted at the Northgate Farm building during the daytime and night-time, resulting in a beneficial impact in the short-term.

Ref. No.	Response:	Applicant's Response:
	and noise it is logical to assume that noise levels will not increase markedly as suggested. Even in the unlikely event that noise levels did increase without the scheme this will happen at a much slower rate and well beyond the rapid digital increase expected in 2024.	4. The operational stage noise assessment predictions, both with and without the Scheme are based on appropriate guidance for road traffic noise assessments and valid traffic data including traffic speeds.
4	Point 4 from the Applicant. As previously highlighted the Applicant does not provide any indication of the adverse noise impact within the garden area where we spend most of leisure time. The garden is the main attraction of the property and is the primary reason why we bought the property. The projected increase in noise is likely to significantly change our use of the garden and the property unless additional mitigation can be provided.	<ol style="list-style-type: none"> 1. The operational stage noise assessment presented in the Noise Addendum [REP1-041] is based on guidance contained within DMRB LA 111 Noise and Vibration as agreed with NCC in the SoCG [REP4-016] (and as submitted at Deadline 5). DMRB LA 111 requires that noise level changes are predicted at noise-sensitive buildings. 2. It should be noted that, as shown on Figure 4. Short-term Noise Level Change – Part A, within Noise Addendum Appendix D Part 1 [REP1-021], the noise level changes in the garden of the property are of no greater than minor magnitude of impact based on the magnitude of impact scale presented in DMRB LA 111. As expected, at greater set back distances from the A1 carriageway the absolute noise levels within the garden will decrease, but road traffic will remain the dominant noise source. 3. Consequently, no additional noise mitigation measures are considered necessary to protect the garden area of Northgate Farm.
5	Point 6 from the Applicant. It is reassuring to read that the Applicant did consider other mitigation measures but disappointing that none were taken forward. In looking at the possibility of an earth bund the applicant suggests that this is not feasible due to the lack of space. We are surprised by this conclusion as there is a sizeable area at the end of the noise barrier which would be ideal for an earth bund. I would welcome the opportunity to explore this further with the Applicant.	1. The earth bund discussed in point 6 of Ref. 7 of the Applicant's Responses to Written Representations [REP3-026] submitted at Deadline 3 was in the context of a replacement for the proposed noise barrier rather than as an additional measure. The barrier in this location mitigates noise levels such that the operational road traffic noise effect at Northgate Farm is not significant and the barrier is value for money. Therefore, additional mitigation measures (such as the extension of the noise barrier in the form of a bund) are not considered necessary in this location.
Follow-up response to deadline 3 comments from the Applicant – Reference 7A		
1	Point 1 from the Applicant. We welcome confirmation that the noise barrier will be constructed.	1. No response required
2	Point 4 from the Applicant. Given the significant adverse impact it is particularly disappointing to read that cost is the only reason for not providing noise barrier coverage to the full length of the property. As a full-length barrier would also help mask some of the visual impact, I am surprised that this was not also factored into the cost benefit analysis. Similarly, having made a decision to shorten the barrier it is disappointing that other cheaper options are not provided.	<ol style="list-style-type: none"> 1. The proposed barrier is predicted to mitigate noise levels at Northgate Farm such that the operational road traffic noise effect at this property would not be significant. As the barrier mitigates the significant effect, whilst providing meaningful noise benefits and is value for money, an extension is not considered necessary. The cost benefit analysis for a noise barrier is based on noise levels only and therefore, visual implications have not been factored into these calculations. 2. In responding to Mr Hawes' point about extending the barrier to mitigate visual impacts, as identified in response to 6.1 above, the assessment of effects, as outlined in Chapter 7: Landscape and visual Part A [APP-044] and Appendix 7.3 Residential Visual Effects Schedule Part A [APP-218] has been undertaken from publicly available locations and access to private property, including gardens is not sought. The assessment determined that with the proposed noise barrier in place, and the vegetation on the western boundary retained, the effects would not be significant. It is therefore considered that there is no requirement to further extend the noise barrier beyond the northern boundary to the Northgate Farm. However, a hedgerow (untrimmed), which would also include frequently spaced trees, is proposed as a visual screen, and will extend from the existing tall retained vegetation on the north west corner of the Northgate Farm property


Ref. No.	Response:	Applicant's Response:
		northwards, between the PMA and the main alignment, and continue along the eastern side of the Scheme to the north. This would provide further screening beyond the existing boundary to Northgate Farm. This hedgerow and trees are indicated on Figure 7.8: Landscape Mitigation Masterplan Part A [REP4-010] and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5).
Follow-up response to deadline 3 comments from the Applicant – Reference 7B		
1	Point 3 from the Applicant. As previously highlighted the assessment the focus on noise impact is solely on the building and not the garden where we like to spend most of our leisure time. In acknowledging that the noise barrier is the only mitigation it stands to reason that those areas not sheltered by the barrier will be a lot noisier. For example, the point of access to the property will be circa 20 metres from the dual carriageway and totally exposed to the road and increased noise.	<ol style="list-style-type: none"> 1. The operational stage noise assessment presented in the Noise Addendum [REP1-041] is based on guidance contained within DMRB LA 111 Noise and Vibration as agreed with NCC in the SoCG [REP4-016] (and as submitted at Deadline 5). DMRB LA 111 requires that noise level changes are predicted at noise-sensitive buildings. 2. It should be noted that, as shown on Figure 4. Short-term Noise Level Change – Part A within Noise Addendum Appendix D Part 1 [REP1-021], the noise level changes in the garden of the property are of no greater than minor magnitude of impact based on the magnitude of impact scale presented in DMRB LA 111. As expected, at greater set back distances from the A1 carriageway the absolute noise levels will decrease, but road traffic will remain the dominant noise source. 3. The proposed barrier is anticipated to mitigate noise levels at Northgate Farm such that the operational road traffic noise effect at this property will not be significant. As the barrier mitigates the significant effect, whilst providing meaningful noise benefits and is value for money, an extension is not considered necessary. 4. Consequently, no additional noise mitigation measures are considered necessary to protect the garden area or point of access of Northgate Farm.
Follow-up response to deadline 3 comments from the Applicant – Reference 7C		
1	As highlighted in the DCO the introduction of the scheme will see a change in how the road is used. There will be a greater level of long-distance travel which is less constrained by peak hours. As such it is likely that the biggest increases in traffic (and noise) will be in the periods outside of peak hours, particularly the early evening period in the summer. This is where we will notice the noise increase the most as the current levels of traffic at this time are very low. Unfortunately, it is when we enjoy using the garden the most. It is unfortunate that this is not recognised by the Applicant as they only consider the impact of noise in two time periods. This would appear to be a very clunky approach given the wide range of noise variation between 06.00 and 00.00.	<ol style="list-style-type: none"> 1. Detailed traffic modelling of the changes in traffic flows and patterns has been undertaken and is documented in Chapter 4 of the Case for the Scheme [APP_344]. This traffic modelling has been undertaken in accordance with DfT WebTAG guidance, with a focus on weekday peak period flows which will be the busiest time periods. The traffic model forecasts indicate there will be a reassignment of traffic from parallel routes including the A697 and the de-trunked A1 onto the Scheme, comprising a mix of local and regional traffic rather than very long distance trips which tend to favour routes to the west such as the M6. 2. As stated previously in point 2 of Ref. 7C of the Applicant's Responses to Written Representations [REP3-026] the time periods used for the operational road traffic noise assessment (06:00 – 00:00 hours and 23:00 – 07:00 hours) are in accordance with guidance contained within DMRB LA 111. 3. The operational stage noise assessment presented within the Noise Addendum [REP1-019] is therefore robust and in line with appropriate guidance including the different time periods considered.
Follow-up response to deadline 3 comments from the Applicant – Reference 7D		
1	As previously highlighted the Applicant does not provide any indication of the adverse noise impact within the garden area where we spend most of leisure	<ol style="list-style-type: none"> 1. The operational stage noise assessment presented in the Noise Addendum [REP1-041] is based on guidance contained within DMRB LA 111 Noise and Vibration as agreed with Northumberland


Ref. No.	Response:	Applicant's Response:
	time. The garden is the main attraction of the property and is the primary reason why we bought the property. The projected increase in noise is likely to significantly change our use of the garden and the property unless additional mitigation can be provided.	<p>County Council (NCC) in the Statement of Common Ground (SoCG) [REP4-016] (and as submitted at Deadline 5). DMRB LA 111 requires that noise level changes are predicted at noise-sensitive buildings.</p> <ol style="list-style-type: none"> It should be noted that, as shown on Figure 4. Short-term Noise Level Change – Part A within Noise Addendum Appendix D Part 1 [REP1-021], the noise level changes in the garden of the property are of no greater than minor magnitude of impact based on the magnitude of impact scale presented in DMRB LA 111. As expected, at greater set back distances from the A1 carriageway, the absolute noise levels within the garden will decrease, but road traffic will remain the dominant noise source. The proposed barrier is anticipated to mitigate noise levels at Northgate Farm such that the operational road traffic noise effect at this property will not be significant. As the barrier mitigates the significant effect, whilst providing meaningful noise benefits and is value for money, an extension is not considered necessary. Consequently, no additional noise mitigation measures are considered necessary to protect the garden area of Northgate Farm.
Follow-up response to deadline 3 comments from the Applicant – Reference 7E – New Access road		
1	Although we can hear some road noise in the woodland when the wind blows from the west, otherwise the area is far enough away from the current a1 road to not suffer. On previous visits from the Applicant, it has been noted how peaceful and quiet the area is.	<ol style="list-style-type: none"> The property's garden is within relatively close proximity (between 50 – 150m) to the A1 such that the noise environment in the garden and wooded area is already substantially influenced by road traffic from the A1 which will be audible at this location. Whilst noise levels would reduce at greater distances from the A1, the noise environment of the area is currently dominated by road traffic noise from the A1.
2	The noise from vehicles using the new access road will intermittently spoil the enjoyment of this area. This noise will be noticeably louder than any other experienced in the area. Based upon current usage this is expected to exceed 20 vehicle journeys a day.	<ol style="list-style-type: none"> The Applicant cannot comment on the enjoyment of the garden as this is a subjective issue. However, it is anticipated that any vehicle movements on the access road would be infrequent and short in duration and therefore, for the majority of the time, this area would not experience noise from vehicles on the access road. Whilst noise from infrequent vehicles on the access road may be audible, given the low number of daily vehicle trips expected and the likely low speed of vehicles given the nature of the access road, the use of the access road would be expected to have an inconsequential effect on noise levels in this area and would not change the overall noise environment of the area, which is already substantially influenced by road traffic from the A1.
Follow-up response to deadline 3 comments from the Applicant – Reference 7E - Depot		
1	As highlighted previously, I have no doubt that the close proximity of the soil store and the limited noise mitigation measures, will mean HGV vehicles accessing the soil store will increase noise levels during construction.	<ol style="list-style-type: none"> This query was addressed in the noise section of the response to Ref. 7.E within Table 1-6 of the Applicant's Responses to Written Representations [REP3-026] submitted at Deadline 3. Noise generating activity associated with the soil store has been considered and assessed within Chapter 6 Noise and Vibration Part A [APP-042]. The potential for noise impacts resulting from construction traffic has also been assessed within Chapter 6: Noise and Vibration Part A [APP-042] and Appendix 16.5 Noise and Vibration Likely significant Effects of the Scheme [APP-331]. Construction mitigation measures are set out in the Outline CEMP [REP-013 and 014] (and as updated at Deadline 5) within Section 3 Register of Environmental Actions and Commitments. The construction noise and vibration assessment within Section 6.10 Assessment of Likely Significant Effects of Chapter 6 Noise and Vibration Part A [APP-042] concludes that, following the


Ref. No.	Response:	Applicant's Response:
		implementation of mitigation, no significant adverse noise effects are predicted during the construction stage of the Scheme, including at this property.
Follow-up response to deadline 3 comments from the Applicant – Reference 7F		
1	The thrust of the original comment was to highlight that there will be no longer be anywhere within the property where we can escape the noise of cars or avoid a view of a tarmac road. This still stands true despite the response from the Applicant.	<p><u>Noise</u></p> <ol style="list-style-type: none"> 1. The Applicant cannot comment on the enjoyment of the garden as this is a subjective issue. However, it is anticipated that any vehicle movements on the access road will be infrequent and short in duration and therefore, for the majority of the time, this area will not experience noise from vehicles on the access road. Whilst noise from infrequent vehicles on the access road may be audible, given the low number of daily vehicle trips expected and the likely low speed of vehicles given the nature of the access road, the use of the access road would be expected to have an inconsequential effect on noise levels in this area and would not change the overall noise environment of the area, which is already substantially influenced by road traffic from the A1. 2. With reference to the avoidance of a view of tarmac, the Applicant maintains that it has made all reasonable efforts to retain existing vegetation and has proposed further measures to mitigate the effects on views from the dwellings itself and from the garden space. These have included the retention of the existing planting on the western boundary to screen direct views of the Scheme in close proximity to the west; the secondary benefit of the proposed noise barrier to wholly screen views from the north elevation and immediate environs of the dwelling to the west and north-west; the inclusion of a hedgerow and trees extending northwards from the north-west corner of the Northgate Farm property to screen views to the north and from the PMA (approaching Northgate Farm); and inclusion of a hedgerow with trees between the PMA and the garden space extending along the northern and eastern boundaries to the garden space. 3. The above measures are identified on the Vegetation Clearance Plans Rev 1 [REP4-003] and Figure 7.8 Landscape Mitigation Masterplan Part A [REP4-010], and secured through item S-L2 (a) and (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5).
Follow-up response to deadline 3 comments from the Applicant – Reference 7G		
1	The Applicant response states, "Operational vibration is scoped out of the assessment methodology as a maintained road surface will be free of irregularities as part of project design and under general maintenance, so operational vibration will not have the potential to lead to significant adverse effects." . In living at the property, it is very noticeable when large vehicles pass the property at fast speeds the house does vibrate. As this is not frequent it is something that we can tolerate. With increased speeds and HGV traffic we believe that this will become a common occurrence, taking the issue above any reasonable tolerance levels.	<ol style="list-style-type: none"> 1. Due to the widening of the A1 carriageways as part of the Scheme adjacent to Northgate Farm, a proportion of the vehicles using the A1 will pass Northgate Farm at a greater distance than is currently the case. Furthermore, the road will be resurfaced as part of the Scheme and will be free from irregularities. Therefore, in accordance with DMRB LA111 section 1, operational vibration is not expected to have the potential to lead to significant adverse effects, it has therefore not been considered necessary to undertake an assessment of operational vibration.
2	The Applicant has suggested that vibrations only occur when there are irregularities in the road surface. We do not believe that there are any	<ol style="list-style-type: none"> 1. As road traffic vibration stated to be currently experienced at this property has not been observed by the Applicant, the Applicant cannot comment on the cause of this.

Ref. No.	Response:	Applicant's Response:
	irregularities in the current surface, so how does that account for the current vibrations felt at the property.	<ol style="list-style-type: none">As stated above in the Applicant's response to Reference 7G Ref. 1, in accordance with DMRB LA111 section 1, given that operational vibration is not expected to have the potential to lead to significant adverse effects, it has not been considered necessary to undertake an assessment of operational vibration.
3	The Applicant suggests that the road will regularly be resurfaced to minimise the risk of vibration. As previously highlighted, the stretch of the A1 south of this scheme has not been resurfaced in the last 25 years and is heavily pitted and worn. The only maintenance on this stretch of the road has been to fill potholes.	<ol style="list-style-type: none">The Applicant's response at Reference 7 Ref. 2 above addresses the concern raised by Mr Hawes in relation to maintenance.
4	Given the closeness of the property to the carriageway and the adverse impact that vibrations have on a property of this age, it was disappointing to read that a vibration survey was never carried out on this project.	<ol style="list-style-type: none">As stated above in the Applicant's response to Reference 7G Ref. 1 in accordance with DMRB LA111 section 1, given that operational vibration is not expected to have the potential to lead to significant adverse effects, it has not been considered necessary to undertake an assessment of operational vibration. Therefore, it was also not considered necessary to undertake a vibration survey at the property.
Follow-up response to deadline 3 comments from the Applicant – Reference 9 – Air Quality		
1	The Applicant has provided a lot of detail in this section to explain the approach to forecasting air quality. This includes a lot of technical detail, which I am not in a position to challenge or question. However, in deriving the results the Applicant is very focused on demonstrating that government threshold limits will be achieved and appears to have neglected the human element here. As recognised by the Highways England own on-line literature, increased traffic travelling at faster speeds will result in a degradation in air quality. Any degradation in air quality could have a direct impact upon my family's health. As highlighted in the Applicant's response if the models are proven to be incorrect then there are no options for recourse.	<ol style="list-style-type: none">The Applicant provided the technical detail of the forecasting methods used in the air quality assessment in response to the comment set out in Reference 9 in the Applicant's Responses to Written Representations [REP3-026].The assessment of the effects of changes to air quality on Human health (as well as ecological health) underpins the air quality assessment undertaken in Chapter 5: Air Quality Part A [APP-040] and Part B [APP-041]. The assessment assesses the Scheme's ability to affect compliance with the air quality standards – in particular, the annual mean standard for NO₂ of 40µg/m³. This standard is set for the protection of human health on the basis of epidemiological studies. In addition, the locations of modelled receptors used to determine compliance with the standards have all been chosen to represent worst-case human exposure to pollutants. In particular, R009 is representative of modelled pollutant concentrations at Mr Hawes' property.It is unclear what Highways England literature is being referred to in the response, as no reference is given. However, as a general point, it is incorrect to state that increased traffic travelling at faster speeds will always result in a degradation to air quality. The impact of a change in traffic flows and speeds must be assessed on a case-by-case basis.The air quality assessment for Part A [APP-040], Part B [APP-041] and the cumulative Scheme [APP-330] was undertaken in line with Highways England guidance documents HA207/07 (and all associated Interim Advice Notes). Sensitivity Tests for Part A [APP-205], Part B [APP-275] and for a Scheme Opening Year of 2024 [REP3-012] have all been undertaken in line with the updated DMRB guidance document LA105. Whilst it is accepted that the Scheme would result in increases in pollutant concentrations arising from increased traffic flow along the A1 and changes to traffic speeds, the conclusion of the assessments and sensitivity tests outlined above was that the Scheme would not result in any exceedances of an air quality standard at any human receptor, and that there would subsequently be no significant air quality impact on human health.Whilst it is recognised that uncertainty exists in the elements of the modelling undertaken within the air quality assessments, the Applicant has taken measures to ensure that the modelling undertaken to inform the air quality assessment is robust and appropriately conservative, and is


Ref. No.	Response:	Applicant's Response:
		<p>consistent with monitored pollutant concentrations and trends. The technical detail of the measures taken to ensure a robust and appropriately conservative model are covered in the Applicant's response in Reference 9 in the Applicant's Responses to Written Representations [REP3-026] and have not be elaborated on any further here, but the Applicant's response to Reference 9E is reiterated:</p> <p><i>"Given the projected future concentrations (well below the air quality standards), the risk that the forecast air quality impacts are incorrect to such a degree as would cause an exceedance of the air quality standards, or significantly increased risk of exceedance of the standards, is negligible. As such, no options for recourse are necessary for air quality."</i></p>
Follow-up response to deadline 3 comments from the Applicant – Summary Response		
1	Point 1 Applicant Response. The Applicant states, "does not accept that there are 50 issues which remain outstanding." As part of the PIER consultation in May 2020 we made a submission, which included a detailed list of over 50 issues. Although we have yet to receive a response to this submission, we are currently looking to meet so that we can go through the list to confirm the latest status. Having recently updated the list to reflect the deadline 3 responses from the Applicant the number of outstanding issues is growing rather reducing. I intend to share the latest list with the Applicant prior to our meet.	<ol style="list-style-type: none"> 1. The Applicant does not consider that there are 50 issues which remain outstanding. While extensive written submissions have been exchanged with Mr Hawes, the underlying points at issue are capable of being condensed into a set of key issues, which number rather fewer than 50. Discussions are ongoing with Mr Hawes to condense the points raised.
2	Point 2 Applicant Response. The Applicant suggests that the list of 50 issues is partially composed of detail design queries that I shared at our recent on-site meet. This is not correct. The list of queries shared with the Applicant at the site meet are very much questions rather than issues and do not form part of the 50 outstanding issues.	<ol style="list-style-type: none"> 1. The outstanding queries are predominantly related to the detailed design of the Scheme in the vicinity of Warreners House, which would be addressed during the detailed design stage following the making of a DCO. Further meetings are being arranged with the Hawes to discuss outstanding design queries, but these will be on a without prejudice basis as the finalised design is yet to be prepared.
Follow-up response to deadline 3 comments from the Applicant – Reference 6		
1	As the Applicant responding to the Visual effect section acknowledges that they have not visited the property I thought it useful to share some photographs which further illustrate the impact the scheme has on visual effect. We understand that an Accompanied Site Inspection is planned to for Warrener's house A1 bus stop which sits outside my property but there are no plans to look at the impact of the PMA within. If considered useful and appropriate we would be more than happy to accommodate a site inspection within the Northgate Farm property. The shared pictures include:	<ol style="list-style-type: none"> 1. The assessment of effects, as outlined in Chapter 7: Landscape and visual Part A [APP-044] and Appendix 7.3 Residential Visual Effects Schedule Part A [APP-218] has been undertaken from publicly available locations, and access to private property, including gardens is not sought. As such, and in accessing the most likely views from the main elevation of the property the assessment has considered the effects on the occupants of the dwelling. In this case, the front elevation was considered to be the north elevation and the assessment has considered the effects on views based on this. 2. The Applicant would not object to the ExA visiting the garden space at Northgate Farm as part of the accompanied site inspection. However, it should be recognised that there is no legal right to a view and limited weight should be given to the effects on private views and views from garden spaces. Nevertheless, the Applicant is seeking to reduce the effects of the Scheme on receptors through appropriate mitigation measures, which have been set out in response to item 7A-2 above.
1a	View to the South of the property and the route of the new PMA	<ol style="list-style-type: none"> 1. A specific response has been provided below.

Ref. No.	Response:	Applicant's Response:
1b	View to the North East of the property	1. A specific response has been provided below.
1c	View to the West of the property	1. A specific response has been provided below.
1d	View to the North West of the property	1. A specific response has been provided below.
View to the South of the property and the route of the new PMA		
	<p>The following two photographs are taken from the South East corner of the property. This view will change dramatically when the new PMA is constructed. The intended route of the road is along the trees and then across the immediate foreground. Following construction, the road will be very much in the foreground of this view. When the hedgerow matures the road will become hidden but the hedgerow will block the outlook across the field.</p>	1. The Applicant agrees that the foreground of the view would be changed by the construction of the PMA, and that the proposed hedgerow and trees to form the boundary to the garden space would over time reduce the sense of openness beyond, however it would also reduce the prominence of the PMA from within the garden space, provide a degree of privacy to the garden space and provide a secure boundary. As stated in paragraph 7.5.1 (c) of Chapter 7: Landscape and visual Part A [APP-044], by year 15 hedgerows are anticipated to be a minimum of 2m in height, and trees 6m in height. As such, ground level views would be substantially screened in the Design Year (15 years after Scheme opening), the height of the hedge could be managed through regular trimming to maintain a height that provides a substantial screen to the PMA and the tarmac itself but retains some views beyond the hedge and the PMA to the countryside beyond. However, should this management approach be adopted it is inevitable that there would be a reduced capacity to provide privacy and security.
		
	<p>The following photograph is taken from the South East corner of the property. This view will change dramatically when the new PMA is constructed. The</p>	1. The Applicant agrees that the foreground of the view would be changed by the construction of the PMA, and that the proposed hedgerow and trees to form the boundary to the garden space would over time reduce the sense of openness beyond, however it would also reduce the prominence of

Ref. No.	Response:	Applicant's Response:
	intended route of the road is along the trees and then across the immediate foreground. This is one of our favourite spots for relaxing and enjoying the views.	the PMA from within the garden space, provide a degree of privacy to the garden space and provide a secure boundary. As stated in paragraph 7.5.1 (c) of Chapter 7: Landscape and visual Part A [APP-044], by year 15 hedgerows are anticipated to be a minimum of 2m in height, and trees 6m in height. As such, ground level views would be substantially screened in the Design Year (15 years after Scheme opening), the height of the hedge could be managed through regular trimming to maintain a height that substantially screens the PMA and the tarmac itself but retains some views beyond the hedge and the PMA to the countryside beyond. However, should this management approach be adopted it is inevitable that there would be a reduced capacity to provide privacy and security.
		
View to the North East of the property		
	The following photograph is taken from the North East corner of the property looking to the North. This view will change dramatically when the new PMA is constructed. The intended route of the road is directly across this view blocking any outlook	<ol style="list-style-type: none">1. The Applicant agrees that the foreground of the view would be changed by the construction of the PMA, and that the proposed hedgerow and trees to form the boundary to the garden space would over time reduce the sense of openness beyond, however it would also reduce the prominence of the PMA from within the garden space, provide a degree of privacy to the garden space and provide a secure boundary. As stated in paragraph 7.5.1 (c) of Chapter 7: Landscape and visual Part A [APP-044], by year 15 hedgerows are anticipated to be a minimum of 2m in height, and trees 6m in height. As such, ground level views would be substantially screened in the Design Year (15 years after Scheme opening), the height of the hedge could be managed through regular trimming to maintain a height that substantially screens the PMA and the tarmac itself but retains some views beyond the hedge and the PMA to the countryside beyond. However, should this

Ref. No.	Response:	Applicant's Response:
		management approach be adopted it is inevitable that there would be a reduced capacity to provide privacy and security.
		
View of the Hedgerow and trees to be felled		
	<p>This is taken from the North East corner of the property looking back at the hedgerow and trees to be felled.</p>	<ol style="list-style-type: none">1. The Applicant agrees that the foreground of the view would be changed by the construction of the PMA.2. The Applicant maintains that there will be retention of the majority of the existing boundary vegetation, and the addition of a boundary hedgerow and trees to the eastern and northern boundary of the property, including the one shown on the attached image, and as indicated on Figure 7.8 Landscape Mitigation Masterplan Part A [REP4-010]. With this, awareness of the PMA would be substantially mitigated once the hedgerow is established, and the views of the PMA from within the garden space would be substantially screened and reduce its visual prominence. Likewise, the proposed hedgerow would provide screening from the PMA into the garden space. The retention of existing vegetation and provision of replanting are secured through item S-L2 (a) and (c) respectively of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013] (and as updated at Deadline 5).3. The proposed hedgerow and trees to form the boundary to the garden space would over time reduce the sense of openness beyond, however it would also reduce the prominence of the PMA from within the garden space, provide a degree of privacy to the garden space and provide a secure boundary. As stated in paragraph 7.5.1 (c) of Chapter 7: Landscape and visual Part A [APP-044], by year 15 hedgerows are anticipated to be a minimum of 2m in height, and trees 6m in height. As such, ground level views would be substantially screened in the Design Year (15 years after Scheme opening), the height of the hedge could be managed through regular trimming to maintain a height that substantially screens the PMA and the tarmac itself but retains some views beyond the hedge and the PMA to the countryside beyond. However, should this management

Ref. No.	Response:	Applicant's Response:
		approach be adopted it is inevitable that there would be a reduced capacity to provide privacy and security.
		
View of the Westerly outlook from the North West corner of the property		
	<p>This is taken from the North West corner of the property looking West to where the new Swale1 Maintenance road will be constructed and the soil store will be set up. This will involve several trees being felled and North Gate House being demolished. The proposed noise barrier does not have an impact here.</p>	<ol style="list-style-type: none">1. The photograph would appear to have been taken from the north-west corner of the Northgate Farm boundary. However, it has been taken from the existing roadside verge which is publicly accessible.2. With the exception of the gated entrance that open directly onto the A1, the western boundary to the property is screened by a substantial belt of planting, which includes evergreen species. The point is made by Mr Hawes that the noise barrier would not provide a visual screen at this location, however within comparable views to the south such as at the gated access to the property where an open view is achieved from within the property boundary, this view would be screened.3. Notwithstanding the above, the view comprises the existing A1 as it widens to the south to become dual carriageway, and North Gate House which it is proposed will be demolished in order to construct the Scheme, beyond which is woodland that screens the A697, which will be retained. Figure 7.8 Landscape Mitigation Masterplan Part A [REP4-010] identifies that the trees removed to facilitate the construction would be replaced, and the proposed swale (which would appear as a broad ditch) would extend northwards. The impact of the access track is not considered to be a

Ref. No.	Response:	Applicant's Response:
		prominent feature, and as the mitigation measures (trees and hedgerows) establish the prominence of the access track and swale will reduce.
		
View of the North West outlook from the North West corner of the property		
	This is taken from the North West corner of the property looking North West. This photograph highlights:	<ol style="list-style-type: none">1. The photograph would appear to have been taken from the north-west corner of the Northgate Farm boundary, however it has been taken from the existing roadside verge which is publicly accessible. Views are substantially screened from within the property boundary by existing boundary vegetation.
1	The Coronation Trees to be felled	<ol style="list-style-type: none">1. The Scheme would require the removal of existing roadside hedgerows and removal of the existing trees that form the Coronation Avenue of trees. The replacement planting along the wider corridor would increase the width between the lines of trees either side of the Scheme. However, the replacement strategy, which has been agreed with NCC, as evidenced in the SoCG with NCC [REP4-016] would be such that over time, the tree lined nature of the corridor would be substantially restored. The replacement strategy is identified on Figure 7.8: Landscape Mitigation Masterplan Part A [APP-010] and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5). This comprises the replacement of the existing roadside hedgerows and the planting of 38 no. trees to replace those removed. The Applicant acknowledges that the replacement trees would be immature when planted, nevertheless, the Applicant has committed to the replacement trees being of advanced nursery stock when planted, and this is secured through item S-L4 of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014] (and as updated at Deadline 5).

Ref. No.	Response:	Applicant's Response:
2	In addition to the dual expansion the road starts to widen here for the layby runoff.	<ol style="list-style-type: none"> 1. A similar view to the one provided by Mr Hawes of the wider carriageway would be achieved from the PMA on entering or exiting the property immediately following construction, and would include the wider carriageway, but would not form a view experienced from within the dwelling by the occupants. The existing boundary vegetation and adjacent built form limiting views from the dwelling and the wider garden space. Mitigation planting is proposed along the highway boundary, extending directly north of Northgate Farm and would comprise a hedgerow (untrimmed) which would also include frequently spaced trees as part of the replacement of the Coronation Avenue. This hedgerow and trees are indicated on Figure 7.8: Landscape Mitigation Masterplan Part A [REP4-010] and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014 (and as updated at Deadline 5)]. The assumption is that by year 15, hedgerows are anticipated to be a minimum of 2m in height, and trees 6m in height. As such, ground level views including those experienced from the PMA would be substantially screened in the Design Year (15 years after Scheme opening).
3	The approximate position of the new layby is illustrated by the sign.	<ol style="list-style-type: none"> 1. A similar view to the one provided by Mr Hawes of the wider carriageway would be achieved from the PMA on entering or exiting the property immediately following construction, and would include the wider carriageway and an awareness of the proposed layby to the north, but would not form a view experienced from within the dwelling by the occupants nor from the majority of the garden space. 2. The existing boundary vegetation and adjacent built form limiting views from the dwelling and the wider garden space. Mitigation planting is proposed along the highway boundary, extending directly north of Northgate Farm and would comprise a hedgerow (untrimmed) which would also include frequently spaced trees as part of the replacement of the Coronation Avenue. This hedgerow and trees are indicated on Figure 7.8: Landscape Mitigation Masterplan Part A [REP4-010] and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014 (and as updated at Deadline 5)]. The assumption is that by year 15, hedgerows are anticipated to be a minimum of 2m in height, and trees 6m in height. As such, ground level views including those experienced from the PMA would be substantially screened in the Design Year (15 years after Scheme opening).
4	From this vantage point in the future, you will see a very different outlook which includes the expanded carriageway, the new Layby, the PMA access road leading to our property and the Swale 1 maintenance access road.	<ol style="list-style-type: none"> 1. A similar view to the one provided by Mr Hawes of the wider carriageway would be achieved from the PMA on entering or exiting the property immediately following construction, and would include the wider carriageway, but would not form a view experienced from within the dwelling by the occupants. The existing boundary vegetation and adjacent built form limiting views from the dwelling and the wider garden space. Mitigation planting is proposed along the highway boundary, extending directly north of Northgate Farm and would comprise a hedgerow (untrimmed) which would also include frequently spaced trees as part of the replacement of the Coronation Avenue. This hedgerow and trees are indicated on Figure 7.8: Landscape Mitigation Masterplan Part A [REP4-010] and secured through item S-L2 (c) of Table 3.1 – Register of Environmental Actions and Commitments: The Scheme in the Outline CEMP [REP4-013 and 014 (and as updated at Deadline 5)]. The assumption is that by year 15, hedgerows are anticipated to be a minimum of 2m in height, and trees 6m in height. As such, ground level views including those experienced from the PMA would be substantially screened in the Design Year (15 years after Scheme opening).

Ref. No.	Response:	Applicant's Response:
		

© Crown copyright 2020.

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence:

visit www.nationalarchives.gov.uk/doc/open-government-licence/

write to the **Information Policy Team, The National Archives,**

Kew, London TW9 4DU, or email

psi@nationalarchives.gsi.gov.uk.

This document is also available on our website at www.gov.uk/highways

If you have any enquiries about this document
A1inNorthumberland@highwaysengland.co.uk

or call **0300 470 4580***.