A1 in Northumberland: Morpeth to Ellingham

Scheme Number: TR010059

7.14 Applicant's Comments on Local Impact Report

Rule 8(1)(c)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

February 2021

Infrastructure Planning

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The Infrastructure Planning (Examination Procedure) Rules 2010

The A1 in Northumberland: Morpeth to Ellingham

Development Consent Order 20[xx]

Applicant's Comments on Local Impact Report

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1 APPLICANT'S COMMENTS ON LOCAL IMPACT REPORT

1.1 PURPOSE OF THIS DOCUMENT

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 the Local Impact Report submitted by Northumberland County Council (NCC) at Deadline 1.

Table 1-1 – Planning Policy

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4.	**Local and National Development Plans and Policy**	
Whole Chapter	This Chapter sets out the development plan for the Scheme, identifies emerging planning policy in the form of the draft Northumberland Local Plan, and considers other material considerations.	1. The Applicant accepts that the descriptions of the development plan, emerging planning policies and material considerations are accurate. Furthermore, the Applicant accepts that the documents identified in Chapter 4 of the Local Impact Report (LIR) do comprise an important and relevant consideration to the determination of the DCO application.
5.	**Assessing the A1 Dualling proposal in the Northumberland planning policy context**	
Broad strategies		
5.1	The main regional and sub-regional documents listed above - i.e. the North East Strategic Economic Plan, the 'Borderlands' growth deal and the North of Tyne Devolution Deal - all aim to bring investment and improve economic and cultural prosperity over different geographies. They promote better connectivity to help business success, educational attainment and social cohesion. They amount to a 'levelling up' agenda, whether in terms of broadening opportunity - better quality jobs, access to further and higher education - or through reducing isolation and greatly improved communications.	1. The Applicant accepts that this characterisation of the main regional and sub-regional strategy documents is accurate. The Applicant also accepts that these documents are consistent with, and form an integral part of, delivering the aims and objectives of the 'levelling up' agenda.
5.2	Therefore, even though these strategies do not specifically provide for the upgrading of the A1 north of Morpeth and Alnwick, the scheme will undoubtedly contribute to the achievement of many of their aims, whether it be through reducing rural isolation, opening up a wider pool of labour for local employers, bringing more and better jobs and education within reach of rural communities or making Northumberland more accessible to visitors.	1. The Applicant accepts and supports the view that the Scheme will help contribute to the fulfilment of many of the identified aims of the documents identified in Paragraph 5.1 of the LIR. 2. Paragraph 2.4 of the LIR identifies that to the north of Morpeth the single carriageway nature of the A1 has resulted in *'reduced opportunity to access work and metropolitan services offered by the Tyneside conurbation and, to the north, Edinburgh*'. The Applicant considers that the Scheme will help to address this issue, consistent with the aims of these strategies.
Development Plan		
5.3	The Castle Morpeth Local Plan (2003), which covers all but the northernmost end of the 'part A' section, set out the former council's support for "*the dualling of the A1 north of Morpeth and junction improvements throughout the length of the A1 within the Borough*." This reflected evidence that had been assembled at the time and a history of accidents along the road that would, in its estimation, only be partially addressed through safety improvements to the existing carriageway. As the route of any dualling had not been fixed, no safeguarding line could be shown on the proposals map.	1. The Applicant accepts this description of the development plan and policy in relation to Part A. 2. The Applicant agrees that, as set out in Chapter 2 of the Case for the Scheme [APP-344], when the Castle Morpeth Local Plan was adopted in 2003 no preferred route had been identified for the dualling of the A1 between Morpeth and Ellingham. As such general support for the principle of dualling the A1 was the highest practical degree of support that could be included in the Castle Morpeth Local Plan in 2003. The Scheme will deliver the dualling of the A1 and junction improvements which are identified in the Castle Morpeth Local Plan.

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5.4	The southern end of Part A falls within the area of the made Morpeth Neighbourhood Plan (2016). However, while the plan recognises the importance of the A1 as a route the upgrades that it promotes, as part of Community Action CATra1, are focussed towards the south of the town - seeking new or improved junctions at Whalton Road or Clifton.	1. The Applicant accepts this description of Morpeth Neighbourhood Plan and its policy in relation to the southern end of Part A. The Morpeth Neighbourhood Plan does not contain any policies directly relevant to the dualling of the A1, although Paragraph 6.4.3 does note that the town has the potential for strong economic growth: '*due to its attractive setting as a rural market town, its location on the A1 and East Coast Mainline*', which the Scheme will help to support. The Scheme is considered to be compatible with the objectives of the Morpeth Neighbourhood Plan.
5.5	The Alnwick Core Strategy, which covers the 'part B' section and the northernmost end of the 'part A' section, reflects the then district council's strategy for transport, which sought to support and strengthen "the core elements of the transport system to promote economic regeneration in particular through support of A1 dualling, development of ECML services and development of Alnmouth station and local upgrading on the primary route network of A1068, A697 and A696." The Alnwick District Local Plan (1997) had already made explicit, in its aim "TT6" - i.e. that it would encourage the upgrading of the A1 to dual carriageway standard at the earliest opportunity. This is supported by the (still saved) Policy TT2, which opposes any developments that could prejudice the line of such upgrading. As such, the District Local Plan Proposals Map shows an indicative dotted line covering all non-dualled sections, including all those parts of the current proposal that fall within the former Alnwick District.	1. The Applicant accepts this description of the development plan and policy in relation to Part B and northernmost end of Part A. The plan includes the aim of "*upgrading of the A1 to dual carriageway standard at the earliest opportunity*" and includes a safeguarding policy to help facilitate this. The Scheme will deliver the dualling of the A1 which is sought in the Alnwick Core Strategy.
5.6	The Alnwick and Denwick Neighbourhood Plan (2017) area takes in parts of the southernmost end of the 'part B' section and the separate compound area that will be created in the Lionheart employment area in Alnwick. While the Neighbourhood Plan recognises the importance of the A1 in connecting the town with other areas, there is no policy or community action that specifically promotes the upgrades north or south of the town - unsurprising given that only a very minor section of the new carriageway would lie within the neighbourhood plan area.	1. The Applicant accepts this characterisation of the Alnwick and Denwick Neighbourhood Plan policy as it relates to the southernmost end of Part B and the compound area proposed at the Lionheart Enterprise Park. The Applicant considers that the Scheme responds to the Alnwick and Denwick Neighbourhood Plan key aims; specifically, those for "Economy and Employment" and "Transport". 2. Part of the vision of the plan, set out in Part 2.2, identifies that improving connectivity within the town to the A1 will help to *'sustain the local economy'*. Whilst not directly relevant, the Scheme will fulfil the objective of supporting the local economy by improving connectivity and journey times, and overall the Scheme is considered to be compatible with the objective of the Alnwick and Denwick Neighbourhood Plan.
Emerging Local Plan		
5.7	When the Northumberland Local Plan was drafted, (prior to submission to the Secretary of State in May 2019, it was known that (in late 2014) the Government had announced its proposals to dual the road as far north as Ellingham. Its delivery well within the Local Plan period has therefore been built into the strategy and some of the intended outcomes of the Plan as a whole - relating to improved	1. The Applicant acknowledges that the Government aim of dualling the A1 as far north as Ellingham was known when the emerging Northumberland Local Plan was drafted in 2014. The Applicant notes that the Council accepts that delivery of the strategic aims of the Northumberland Local Plan is partially depend on the Scheme proceeding. The Scheme is therefore a key infrastructure requirement for strategic planning objectives in Northumberland and is one of the '*Key Outcomes'* of the plan that are identified at Paragraph 3.11 of the draft Northumberland Local Plan.

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	communications for work, commerce and tourism - are, at least partly, dependent on the upgrade going ahead.	
5.8	In terms of a specific draft Policy promoting the scheme, Northumberland Local Plan Policy TRA 3 deals with all proposed improvements to Northumberland's core road network. Part 1(b) states that this will be helped by: "supporting and identifying acceptable lines and areas of improvements through the plan period including for the: (i). Full dualling of the A1 through Northumberland and improved local links/junctions to the A1."	1. The Applicant agrees that Policy TRA3 of the emerging plan specifically supports the "full dualling of the A1 through Northumberland". This The same policy also supports: "Any improvement measures emanating from Highways England's Road Investment Strategies and other strategic assessment of the highway network", which is directly relevant to the Scheme as he the dualling of the A1 is a committed scheme within the Road Investment Strategy. Overall, the Scheme will deliver the dualling the A1 as set out in Policy TRA 3 of the draft Plan.
5.9	As with many policies in the Plan, there are outstanding objections to be resolved through the Examination process and only limited weight can therefore be given to the policy. Nevertheless, the long-term ambition is clear, and the proposed scheme will go a long way towards meeting it.	1. The Applicant accepts that the emerging Northumberland Local Plan is not yet adopted, and as such does not have the full weight of development plan policy. As set out at 5.3 and 5.5, above, the dualling of the A1 is already an identified policy in the current development plan.
The Development Plan status of the land covered by the scheme		
Part A		
5.10	Beginning at the southern end of part A, covered by the Morpeth Neighbourhood Plan, there is no allocation, designation or land-specific proposal covering the red line area of the application. The Neighbourhood Plan shows the extent of the housing commitment on the Northgate Hospital site which abuts the very southern end of the red line area. However, it makes no particular proposal. The Castle Morpeth Local Plan does not show any allocation or designation within the roadline insofar as it lies within the Morpeth Neighbourhood Plan area.	The Applicant accepts that this is an accurate description of planning policy as it relates to the southern end of Part A.
5.11	However saved Policy S5 of the Northumberland and National Park Joint Structure Plan First Alteration (February 2005) states: "An extension to the Green Belt will extend from the existing boundary northwards to lie: – To the west of Netherwitton, Hartburn and Belsay; – North of Longhorsley and west of Widdrington Station, excluding the Stobswood Opencast site; – East of Pegswood;	1. The Applicant accepts that this is an accurate representation of Policy S5 of the Northumberland and National Park Joint Structure Plan.

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	– West of Ashington, Guide Post, Bedlington and the A1068; and – East of Bothal, Hepscott, Nedderton and Hartford Bridge.	
5.12	Precise boundaries, including those around settlements, should be defined in Local Plans having particular regard to the maintenance of the role of Morpeth as defined in Policy S7 and to the sequential approach in Policy S11.	1. The Applicant accepts that Structure Plan Policy S5 defined the general extent of the Green Belt to the north of Morpeth, but without identifying its precise boundaries.
5.13	This makes clear that the whole of this southern area of Part A, as covered by the made Morpeth Neighbourhood Plan, lies within the general extent of the Green Belt. There is now a considerable history of case law that confirms this status for various sites within the overall area described in the saved policy, including, most notably, a decision relating to a wind farm proposal north of Fenrother Lane (APP/P2935/A/13/2194915), well north of the Morpeth Neighbourhood Plan area. The defining of the Green Belt inset and outer boundaries in the emerging Local Plan is covered below.	1. The Applicant accepts that a significant proportion of Part lies within the Green Belt identified in Structure Plan Policy S5.
5.14	Moving north, beyond the outer edge of the Morpeth Neighbourhood Plan area, the Castle Morpeth Local Plan is the only statutory development plan document that covers 'part A' north to the River Coquet: – The stretch north of the edge of the Neighbourhood Plan area has no designation in the Castle Morpeth Local Plan up to and beyond the existing road junction for West Thirston. – The only designation that does cross the path of the road in this stretch is a wildlife corridor that follows the River Lyne. – Just north of the West Thirston turn-off, the Castle Morpeth Local Plan defines an Area of High Landscape Value, but this policy carries little weight given the preference for a landscape character approach to be employed. – The area immediately south of the River Coquet - effectively the valley slopes - are shown on the proposals map as having SSSI designation. While the Castle Morpeth policy is not saved, the designation remains correct and is subject to national protection. – In addition to the above, the emerging Local Plan for Northumberland shows that the southern bank of the River	1. The Applicant accepts that this is an accurate representation of planning policy in relation to Part A.

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	Coquet, where it will be crossed by the new bridge and coinciding with the landward section of the SSSI, is ancient woodland.	
5.15	The description of the Green Belt extension in saved Structure Plan Policy S5 makes clear that this designation covers a considerable part of the stretch of the part A roadline north of Morpeth. The description (in S5) "north of Longhorsley and west of Widdrington Station" implies that the extent would be at least as far north as Causey Park Bridge but probably north of that. The defining of the Green Belt outer boundary in the emerging Local Plan is covered below.	1. The Applicant accepts that this is an accurate representation of Policy S5 of the Structure Plan, and that the Green Belt boundary falls somewhere between the villages of Longhorsley and West Thirston. As such a substantial amount of Part A falls within the Green Belt defined by Policy S5.
5.16	The northern extremity of Part A of the road scheme falls within the former Alnwick District and is covered by the Alnwick Core Strategy (2007) and saved policies from the Alnwick District Local Plan (1997). The Proposals Map from Local Plan shows that the southern section, immediately north of the Coquet crossing, was designated an AHLV under saved Policy RE17, although the policy is somewhat outdated and Government guidance gives preference to a landscape character approach, as set out in the Alnwick Landscape Character Assessment Supplementary Planning Document (2010). As such, the designation of AHLV carries little weight in its own right - see below for landscape considerations.	1. The Applicant accepts this description of planning policy as it relates to the northern extremity of Part A. The Applicant acknowledges NCC's assertion that the designation of the AHLV should carry little weight. This is reflected within Chapter 7: Landscape and Visual Part B [APP-045] whereby the Applicant has acknowledged the presence of the AHLV, and that these have informed the baseline of the relevant landscape character areas, refer to Table 7-3 – Local Planning Policy Relevant to Landscape and Visual of Chapter 7: Landscape and Visual Part B [APP-045]. Appendix 7.3 Landscape Effects Schedule Part B [APP-288] describes the baseline of the Local Landscape Character Areas and how the relevant AHLV are identified within these and informed the assigned sensitivity.
5.17	NLP Policy MIN 4 seeks to safeguard a range of mineral resources from development that may unnecessarily sterilise them from future exploitation. Various such areas are shown along the route. The issue of mineral resources is covered later.	1. This description is accepted by the Applicant.
5.18	To summarise the development plan status of the land covered by Part A of the A1 upgrade application, (including all works, construction compounds etc.): – The southern (approximately) half of the length falls within the general extent of the Green Belt, albeit that the precise outer and inset boundaries have not been finalised. – Much of the remaining length of the route is not covered by any designation, with the main exception being the natural and landscape value clearly attributed to the areas on either side of the Coquet crossing. – Finally of note is the wildlife corridor that follows the River Lyne.	1. This description is accepted by the Applicant. 2. The Applicant acknowledges that, while much of the remaining length of the route is not covered by any designation, there are areas of natural and landscape value around the River Coquet at the northern extremity of Part A and a wildlife corridor that follows the River Lyne. These points are acknowledged and discussed in Part 6.3 of the Case for the Scheme [APP-344] which concludes that the impacts of the Scheme are compatible with the aims, objectives and policies of the Local Plan.

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Part B		
5.19	The whole of the length of Part B of the scheme falls within the former Alnwick District meaning that by the Alnwick Core Strategy (2007) and saved policies from the Alnwick District Local Plan (1997) apply throughout. In addition, the southern end of the route is within the area of the made Alnwick and Denwick Neighbourhood Plan.	1. The description of Alnwick District Local Plan policy is accepted by the Applicant and is consistent with the Case for the Scheme [APP-344].
5.20	The only area specific designation, shown on the Alnwick Local Plan proposals map is another of the AHLVs, which abuts the west side of the A1, towards the northern end of part B. As stated, the policy the guidance nowadays gives preference to a landscape character approach, as set out in the Alnwick Landscape Character Assessment Supplementary Planning Document (2010). As such, the designation of AHLV carries little weight in its own right - see below for landscape considerations.	1. The Applicant acknowledges NCC's assertion that the designation of the AHLV should carry little weight. This is reflected within Chapter 7: Landscape and Visual Part B [APP-045] whereby the Applicant has acknowledged the presence of the AHLV, and that these have informed the baseline of the relevant landscape character areas, refer to Table 7-3 – Local Planning Policy Relevant to Landscape and Visual of Chapter 7: Landscape and Visual Part B [APP-045]. Appendix 7.3 Landscape Effects Schedule Part B [APP-288] describes the baseline of the Local Landscape Character Area 3c – Rock, as identified on Figure 7.5 Landscape Character Area Part B, and how the relevant AHLV has informed the assigned sensitivity, which is considered High.
5.21	Turning to the Alnwick and Denwick Neighbourhood Plan, part of the southern end of the part B section of the road improvement falls within the designated area of the Plan. However, there is no allocation overlapping the redline area of the A1 improvement.	1. This is accepted by the Applicant.
5.22	The emerging Northumberland Local Plan (NLP) has no proposed allocations or designations that encroach onto the road apart from a small section of the route coinciding with the eastern edge of an area identified as potentially suitable for wind energy development under emerging Policy REN 2. This issue is dealt with in a separate section below.	1. This is accepted by the Applicant.
5.23	NLP Policy MIN 4 seeks to safeguard a range of mineral resources from development that may unnecessarily sterilise them from future exploitation. Various such areas are shown along the route. The issue of mineral resources is covered later.	1. This is accepted by the Applicant.
5.24	In summary, for Part B, the roadline for part B has no allocations or designations that would be 'showstoppers'. Some minor issues relating to mineral safeguarding and renewables are covered below.	1. This is accepted by the Applicant.

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Lionheart Enterprise Park Compound		
5.25	As discussed above, a very large compound area, known as the Lionheart Enterprise Park Compound, is proposed at the eastern edge of the built-up area of Alnwick. This takes up, albeit on a temporary basis, all the remaining available or undeveloped land of the Lionheart phase 3 area, which was newly allocated through the Alnwick and Denwick Neighbourhood Plan. Indeed, the compound will encroach onto open fields south-east of the allocated area.	1. This description of the temporary compound area, plot 19/1a on sheet 19 of the Land Plans [APP-006] in relation to the Lionheart Enterprise Park is accepted as accurate. 2. The Applicant has confirmed [REP1-032] that they will require a smaller temporary land take than was assessed in the ES. The required area would occupy approximately 40,000m^2. 3. This aspect was discussed with the landowner on 08/12/2020, when the Applicant confirmed that it will be possible to reduce the Scheme compound area so that there is no hindrance to the implementation of the landowner's recent planning permission at Lionheart Enterprise Park. 4. The Applicant considers that whilst the Scheme would occupy the area adjacent to the Lionheart Enterprise Park, it is not anticipated that the Scheme would impact on the wider policy aspiration for commercial development in this area as it is likely that the Scheme would be complete before the land is required for commercial development.
5.26	While the Alnwick Neighbourhood Plan makes the allocation, the emerging Northumberland Local Plan proposes to limit the range of uses allowed on the site to main industrial, warehouse or office employment uses. The section of the compound that extends beyond the allocated employment area is also beyond Alnwick's settlement boundary, as proposed in the emerging Local Plan.	1. The Applicant does not consider that there is any fundamental conflict between the long term aspirations of the Alnwick Neighbourhood Plan. Policy E2 ('*Location of Economic Growth*) identifies land to the east of Lionheart Business Park as providing land suitable for industrial, warehouse or office employment uses for the period up to 2031. The temporary use of the land as site compound is compatible with this long term aspiration for an employment use on the land.
5.27	The encroachment of the compound beyond the intended settlement boundary is not an issue, as the emerging policy, in line with Government policy, makes clear that provision for essential transport infrastructure is a permissible use in the open countryside, albeit in accordance with other environmental policies. The employment land issue is discussed next.	1. This is accepted by the Applicant. The Applicant notes that the Council accepts that the compound is essential transport infrastructure which is permissible in the countryside.
Employment Land Considerations		
5.28	Paragraph 8 of the NPPF sets out an economic objective of planning that includes "ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure".	1. This is accepted by the Applicant.
5.29	The Council must therefore make sure that the supply of employment land will meet objectively assessed needs.	1. This is accepted by the Applicant.
5.30	The Alnwick Core Strategy, in Policy S9, allocates a quota of employment land for the town and former district to cover its plan period and this has been eclipsed by evidence	1. This description of Policy E9 is accepted by the Applicant. 2. The land for a compound is only required for a temporary period and as set out in the response at 5.25, above, the amount of land required for the compound will be reduced. Overall, the Applicant does not consider that there is any inherent conflict between the safeguarding policy which seeks

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	used for the Neighbourhood Plan and the emerging Northumberland Local Plan – see below. However, Core Strategy Policy E9 goes on to state: "Existing employment sites will be safeguarded for employment uses unless it can be demonstrated that there is no shortage of suitable employment sites, which are sequentially more preferable, or the site is no longer appropriate for employment uses." This policy remains valid and can be applied using the current evidence.	to ensure the long term availability of the land for employment uses and the temporary use of the land as a site compound.
5.31	The most recent published evidence on the employment land supply in the town of Alnwick can be found in additional evidence submitted to the Northumberland Local Plan Examination.	1. This is accepted by the Applicant.
5.32	The available employment land to serve Alnwick and its surroundings during the Plan period is entirely on the eastern side of the A1 Alnwick bypass and includes two large areas newly allocated through Policy E2 of the Alnwick and Denwick Neighbourhood Plan (ADNP). One of these sites will be occupied in its entirety by the Lionheart Enterprise Park Compound. (As stated, the compound will also encroach into agricultural land to the SE). ADNP Policy E2 states that this land should "*meet employment needs in the period to 2031 and will be retained thereafter for employment-generating uses*."	1. Policy E2 of the Alnwick and Denwick Neighbourhood Plan identifies land required to meet employment needs for the period up to 2031. 2. Given the long term nature of this policy, the temporary use of part of the Lionheart Enterprise Park as a site compound is considered to be compatible with the long use of the land to meet the need for employment land in and around Alnwick for the period up to 2031. 3. Chapter 12: Population and Human Health Part B of the ES [APP-055] identifies that the Scheme will help to create a range of employment opportunities and economic activity that are consistent with the aims that Policy E2 seek to deliver. 4. The dualling of the A1 is also supportive of the development of the Enterprise Park as it will improve journey times and reliability in and around this area.
5.33	The evidence document shows that, at the time of the survey 20.2 hectares of employment land was available at Alnwick, although this included 2.9 hectares at West Cawledge that is not serviced or immediately available.	1. This is accepted by the Applicant.
5.34	The Lionheart Enterprise Park Compound will take up the whole of the area known as Lionheart Phase 3, meaning that around 8.9 hectares of the land deemed to be available will be taken up by the compound, representing about 45% of the total available and almost exactly half of the immediately available land.	1. As set out at 5.33, above, there will still be a number of alternate employment sites available throughout the use of part of the Enterprise Park as a site compound for a temporary period. Table EM1 ('Employment Land Supply') identifies that excluding Lionheart Enterprise Park there is an existing supply of employment sites in Morpeth, including at West Cawledge (2.4 hectares), Greensfield Moor (1.6 hectares). 2. As set out above, the applicant is looking to reduce the amount of land required for the temporary site compound. This will reduce this figure, and the aims is that the site compound does not prevent the implementation of the recent planning permission (Ref. 19/00530/OUT) for a major employment use at Lionheart Enterprise Park.
5.35	It can be stated that the supply of employment land at Alnwick is somewhat more generous – or at least more secure – than in many of Northumberland's market towns	1. The relative timescales of the temporary compound against the plan period mean that the Scheme is not considered likely to conflict with the aim of meeting the demand for employment land in and around Alnwick for the period up to 2031. 2. It is anticipated that the land take for the temporary compound can be reduced, and that the Scheme will not delay the implementation of planning permission (Ref. 19/00530/OUT) for a major employment use at Lionheart Enterprise Park.

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	and it is considered that the removal of half of the immediately available land from the its possible use by other occupiers can be accepted in principle for the following reasons: – While the land supply in the town will be halved, there will remain, available within Alnwick, other large sites that could be taken up should they be required. – The occupancy of the site by the compound will be for well under half of the plan period – probably less than a quarter, meaning that there should be an adequate supply elsewhere in the town, based on anticipated demand. – The site will provide construction-related employment for the period of the road's construction.	
5.36	It is therefore considered that Alnwick Core Strategy Policy S9 will be met insofar as it can be demonstrated that there will be no shortage of suitable employment sites as a result. The overarching economic aims of the both the Core Strategy (in Policy S8) and the Neighbourhood Plan (in Policy E1) should also be met given that the compound should provide local job opportunities, during its presence in the town.	1. This is accepted by the Applicant and it is noted that NCC accept that the Scheme complies with Alnwick Core Strategy Policy S9.
Sustainability criteria		
5.37	The NPPF promotes sustainable development by presuming in favour of development that three overarching sustainability objectives, as set out in paragraph 8 – i.e. the economic, social and environmental objectives.	1. This is accepted by the Applicant.
5.38	In promoting the dualling through past and emerging plans, the Council has been satisfied for a long period that the principle of building the road meets those Plans' sustainability criteria. The general benefits for the economy and communities of reducing remoteness and the relative absence of significant environmental constraints have been key factors in the Council's confidence regarding the sustainability of the scheme strategically speaking.	1. The Applicant agrees that the dualling of the A1 is compatible with the sustainability criteria used to develop both existing and emerging local plans that are relevant to the Scheme. The Applicant supports the view that the Scheme will help to improve connectivity and address the relative lack of significant environmental constraints is agreed.
5.39	Policy RE1 of the Castle Morpeth Local Plan sets out a basic principle that proposals should be located to minimise car use and permit the choice of more energy-efficient public transport so as to conserve energy, minimise the consumption of non-renewable resources and limit emissions of greenhouse gases. In similar vein, Policy S3 of the Alnwick Core Strategy promotes development that is accessible to homes, jobs, shops, services, the transport network and modes of transport other than the private car. As a road scheme	*1.* The Applicant does not take the view that there is an inherent conflict between the Scheme and the aims of Policy RE1 (*'Energy Conservation'*) of the Castle Morpeth Local Plan. This policy is aimed at locating development in sustainable locations and is not directly applicable to the provision of new infrastructure. The Local Plan specifically confirms that the Council supports: '*the dualling of the A1 north of Morpeth' (Castle Morpeth Local Plan, Page iv.)* 2. Policy S3 of the Alnwick Core Strategy sets out the sustainability criteria that will be used to assess planning applications. Figure 5 of the Core Strategy also acknowledges the District Council's strategy for transport, including supporting the strengthening of the core elements of the

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	it may be argued that the A1 dualling will have the opposite effect – encouraging greater car use. However, the decision to support the new road recognises that the scheme sits alongside policies and proposals for non-car modes and for the wider economy and social cohesion of the County.	transport system to promote economic regeneration '*in particular through support of A1 dualling'.* As such it is not considered that there are any inherent conflicts between the aims of Policy S3 and the dualling of the A1 in this location. It is noted that NCC accepts in 5.38 that dualling meets the sustainability criteria of successive plans and that this supports the wider Northumberland economy.
5.40	In commenting now, the Council is examining the sustainability of more detailed aspects of the proposal. Wider sets of sustainability criteria are set out in Policy S3 of the Alnwick Core Strategy (ACS), Policy Sus1 of the Morpeth Neighbourhood Plan (MNP) and Policy STP 3 of the emerging Northumberland Local Plan (NLP). In addition, Alnwick and Denwick Neighbourhood Plan (ADNP) contains a multi-pronged sustainability strategy.	1. The sustainability policy aims are noted and accepted by the Applicant. The Case for the Scheme [APP-344] assesses the Scheme against planning policy and concludes that it is consistent with the principles of sustainable development contained in the planning policy.
5.41	The principles set out in these policies follow various themes. In general, from a planning policy point of view, where not addressed separately elsewhere in this paper, the Council considers that these themes are adequately addressed in the numerous and varied documents submitted with the Environmental Statement. A few of the themes are responded to briefly here.	1. This is noted and accepted by the Applicant.
Sustainable economy		
5.42	It is sought that development contributes to building a strong, responsive and competitive economy (NLP Policy STP 3, MNP Policy Sus1). It is considered that the scheme will do this, not just through its reduction in travel time helping to bring businesses, residents and employees closer together across the County but also in its detailed design. The inclusion of new grade-separated junctions, the use of stretches of the existing carriageway as service roads and of bridges to link otherwise severed rural areas will all greatly help areas of the rural economy.	1. This is noted and accepted by the Applicant.
Health, social and cultural wellbeing		
5.43	Health-related issues are regarded as part of planning sustainably (NLP Policy STP_3). Many aspects are tested as part of the Environmental Report, including air and water quality, driver stress and the likely reduction in road accidents. There are also detailed "Population and Human Health" reports for each part of the scheme, which fits well with emerging requirements for Health Impact Assessments for all major developments (NLP Policy STP_5). The inclusion of features such as new junctions and	1. Refer to Chapter 5: Air Quality Part A [APP-040] and Part B [APP-041], Chapter 10: Road Drainage and the Water Environment Part A [APP-050] and Part B [APP-051] and Chapter 12: Population and Human Health Part A [APP-054] and Part B [APP-051] which provide an assessment of these issues.

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	linkages between severed rural areas will contribute to community, as well as economic, wellbeing.	
Natural environment		
5.44	The sustainability of development vis-à-vis its effects on the natural environment is picked up in the sustainability principles (ACS Policy S3, NLP Policy STP_3 and ADNP sustainable development strategy). The development plan and emerging documents also include many relevant criteria-based policies. The Environment Report and papers that accompany it examine the scheme's wildlife impacts and how these will be mitigated. Other sections of this paper comment on aspects of the natural environment impact and on the papers that seek to address them from the point of view of the Council's in-house experts.	1. Wildlife impacts and mitigation are set out in Chapter 9: Biodiversity Part A [APP-048] and Part B [APP-049] of the ES.
5.45	As mentioned above, the only key natural features and habitat designations on the line of the road or its associated junctions, compounds etc., lie along the Coquet Valley, where the river gorge is to be crossed by a new bridge towards the northern end of part A. The southern bank of the river at this point is ancient woodland. This along with adjacent stretch of the river form the 'River Coquet & Coquet Valley Woodlands' Site of Special Scientific Interest (SSSI). Finally, the north bank is part of the 'Coquet River - Felton Park' Local Wildlife and Geological Site (LWGS).	1. The Applicant confirms that the Scheme would pass through the River Coquet and Coquet Valley Woodlands Site of Special Scientific Interest (SSSI) and the Coquet River Felton Park Local Wildlife Site (LWS) to create a new bridge over the River Coquet adjacent to the existing road bridge (which carries the existing A1 carriageway).
5.46	The emerging approach set out in Northumberland Local Plan Policy ENV 1 part 2 puts great weight on avoiding the loss of irreplaceable natural assets, even where they are not designated. Ancient woodlands are recorded, and the resulting inventory is now depicted in the emerging Policies Map; but the woodlands are not themselves a designation in the same way as an SSSI, for example. The fact that the combined area of the ancient woodland and the river is also an SSSI, in this case, adds emphasis to this irreplaceability of the ancient trees, even if the 'scientific interest' element could be maintained.	1. In compliance with emerging Policies ENV 1 and ENV 2, the Applicant has applied the mitigation hierarchy by first seeking to avoid the impacts to ancient woodland. As detailed in paragraph 3.3.8 of Chapter 3: Assessment of Alternatives [APP-038], alternative routes were considered but would not avoid crossing the River Coquet and Coquet Valley Woodlands SSSI and would still require an entirely new bridge crossing to be constructed. Furthermore, other options to avoid the Coquet River Felton Park LWS would have required a significant length of additional dual carriageway (between 4 and 5 miles). As a result, no alignments to this effect were considered further and the option of a new bridge crossing the SSSI and LWS adjacent to the existing A1 road bridge was taken forward. 2. The Applicant acknowledges that the Scheme would result in the loss of 0.68 ha of ancient woodland, an irreplaceable habitat. This loss of ancient woodland comprises 0.27 ha from the River Coquet and Coquet Valley Woodlands SSSI (designated ancient woodland) and 0.41 ha from the Coquet River Felton Park LWS (not designated but treated as ancient woodland within the assessment, as detailed in paragraph 9.10.3, Chapter 9: Biodiversity Part A [APP-048], for the purpose of mitigation and compensation). 3. In recognition of the impacts of the Scheme on ancient woodland, the Applicant has developed a suitable compensation strategy; Appendix 9.21: Ancient Woodland Strategy Part A [APP-247]. This is discussed further in the response to 5.47 below.

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5.47	Emerging Policy QOP 4 goes on to say that development resulting in the loss or deterioration of ancient woodland and ancient or veteran trees will not be permitted unless wholly exceptional reasons exist to justify any loss or deterioration and a suitable compensatory strategy has been proposed.	1. Emerging Policy QOP 4 states "development resulting in the loss or deterioration of ancient woodland and ancient or veteran trees will not be permitted unless wholly exceptional reasons exist to justify any loss or deterioration and a suitable compensatory strategy has been proposed." 2. Whilst the term "wholly exceptional" is not defined within the Northumberland Local Plan, paragraph 8.18 of the Local Plan refers to the National Planning Policy Framework (NPPF) in the context of this terminology. When defining "*wholly exceptional*", footnote 58 of paragraph 175(c) of the NPPF states "*for example, infrastructure projects (including nationally significant infrastructure projects* ..." The Scheme is a Nationally Significant Infrastructure Project (NSIP) and therefore qualifies under the statement of "*wholly exceptional*". 3. In compliance with Emerging Policy QOP 4, a suitable compensation strategy has been developed in consultation with Natural England; Appendix 9.21: Ancient Woodland Strategy Part A [APP-247]. The Ancient Woodland Strategy addresses the impacts to the woodland habitat within the SSSI and LWS and proposes appropriate mitigation and compensation for the loss of ancient woodland. The Ancient Woodland Strategy secures 6.18 ha of woodland planting for the loss of 0.68 ha of ancient woodland (a 12:1 ratio).
5.48	This issue is addressed by ecologists and landscape experts elsewhere in this paper. However, it is considered far from clear that the loss of ancient woodland is being addressed satisfactorily from a spatial point of view in terms of the wording of these two policies. It should be pointed out that, while the policies cannot be given full weight, neither of the parts quoted is the subject of significant outstanding objections.	1. The responses above for 5.45 to 5.47 demonstrate how the loss of ancient woodland as a result of the Scheme has been addressed in relation to, and in compliance with, the wording of emerging policies ENV 1, ENV2 and QOP 4. In summary, the Scheme design has considered ways to avoid the loss of ancient woodland. As this has not been possible, a suitable compensation strategy has been developed, comprising woodland planting at a ratio of 12:1 (creation:loss) within an area adjacent and contiguous with the woodland impacted by the Scheme. 2. Natural England confirmed within their response to the Examining Authority's (ExAs) first written questions that the location and size of the woodland planting associated with the Ancient Woodland Strategy [APP-247] is acceptable [REP1-076] and are also in agreement with the Strategy as a whole, as evidenced within the Statement of Common Ground with Natural England submitted at Deadline 1 [REP1-029], a further version of which is submitted at Deadline 3. This demonstrates the support from Natural England, as the statutory regulator for nature conservation, 3. Further, paragraph 6.7.10 of the LIR states "whilst fine detail of that woodland creation is required ... the overall plan is welcomed."
5.49	The wording of these policies – especially the phrase 'compensatory strategy' – requires a clear definition of what the mitigation and compensatory measures will be. The precise areas of the ancient woodland affected by the construction and works and the areas for the compensatory measures will need to be defined. This will include any areas of ancient woodland that could be enhanced, as well as the areas of new woodland planting. It will include clear information on the nature and timing of these measures.	1. As detailed in the response to 5.47 above, the compensation strategy for the Scheme with regard to impacts to ancient woodland habitat is captured within Appendix 9.21: Ancient Woodland Strategy Part A [APP-247]. Whilst acknowledging that ancient woodland is an irreplaceable resource, paragraph 1.1.7 provides a clear definition of the term's 'mitigation' and 'compensation' in the context of the Strategy. 2. Mitigation measures are "methods, processes and actions put in place to reduce and/or minimise the potential impacts of the Scheme on ancient woodland, which in turn would result in retention of ancient woodland where possible." A summary of mitigation measures is presented in paragraphs 3.2.6 to 3.2.15 of the Ancient Woodland Strategy [APP-247] and includes, as examples, excavation protection zones around retained ancient woodland, installation of temporary protective fencing and salvage of materials from within the impacted areas of ancient woodland. 3. Compensation measures are "physical measures that would be carried out to address potential impacts associated with the direct loss of ancient woodland or temporary and permanent indirect impacts that would have a significant impact on ancient woodland." A summary of compensation measures is presented in paragraphs 3.2.16 to 3.2.18 of the Ancient Woodland Strategy [APP-

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		247] and comprises woodland planting within a "Woodland Creation Area" at a ratio of 12:1 (creation:loss). 4. The precise areas of ancient woodland affected by the Scheme and the area for the compensatory measures are detailed on Figure 1 of the Ancient Woodland Strategy [APP-247]. 5. Enhancement opportunities are identified in paragraphs 3.2.19 to 3.2.24 of the Ancient Woodland Strategy [APP-247] and would be developed further and refined at detailed design. 6. Section 5.2 of the Ancient Woodland Strategy [APP-247] provides a high-level summary of the timing of measures. However, as detailed in paragraph 5.1.3 of the Strategy [APP-247], "*an Ancient Woodland Management and Monitoring Plan (AWMMP) shall be developed at the detailed design stage ...*"
5.50	As mentioned, there is also a wildlife corridor that crosses the route running along the River Lyne. Castle Morpeth Local Plan saved Policy C12 requires the protection, maintenance or enhancement of the corridor through appropriate landscaping and habitat creation or re-creation as part of the development proposals. This appears to be addressed.	1. The offline section of Part A would result in a new crossing of the River Lyne, with the watercourse flowing beneath the new road through a culvert (Priest's Bridge Culvert). Whilst it has not been possible to avoid the River Lyne wildlife corridor (and therefore fully protect it), the Applicant has sought to maintain the function of the corridor within the Scheme design. The culvert has been designed to include a natural bed to maintain fish passage (A-W6 of the Outline Construction Environmental Management Plan (Outline CEMP) [REP1-023 and REP1-024]) (and as submitted at Deadline 3) and incorporates a mammal ledge to maintain mammal passage (measure A-B8 of the Outline CEMP [REP1-023 and REP1-024]) (and as submitted at Deadline 3). Woodland planting is also proposed either side of the road to strengthen the existing wildlife corridor along the River Lyne (as detailed within the Landscape Mitigation Masterplan Part A (Figure 7.8 [APP-095]) and as updated and submitted at Deadline 3. 2. Further, the Scheme has sought to enhance the corridor to improve fish passage within an existing culvert of the River Lyne (beneath the existing A1 carriageway) by retrospectively installing baffles or similar structure (measure A-B9 of the Outline CEMP [REP1-023 and REP1-024] (and as submitted at Deadline 3)). 3. As such, the Scheme design, landscape proposals and mitigation demonstrate how the Scheme complies with saved Policy C12 of the Castle Morpeth District Local Plan with regard to the wildlife corridor along the River Lyne.
Making the best use of land, resources and infrastructure		
5.51	Another sustainability principle that runs through the various development plan documents is making the best use of resources, (MNP Policy Sus1, ACS Policy S3, NLP Policy STP_33 and ADNP sustainable development strategy).	1. This is accepted by the Applicant.
5.52	There is clearly a considerable take-up of land involved with the road line itself and, on a temporary basis, with the various site compounds, materials storage areas etc. By necessity the vast majority of the land is 'greenfield', rather than 'brownfield'. The Council acknowledges that this is inevitable and accepts the situation so long as this does not result in longstanding – or even permanent – areas of brownfield or unproductive land being created	1. This is noted and accepted by the Applicant. 2. Chapter 11: Geology and Soils of the ES [APP-052 and APP-053] sets out mitigation measures which will ensure that, following reinstatement of the temporary land take, the land will be returned to a productive use. This will avoid the creation of new brownfield land and ensure that the land that is being temporarily use can be returned to a productive post construction use. 3. The Applicant notes the conclusion of Paragraph 5.53 of the LIR which supports this view: 'Another issue relating to resources is the displacement agricultural land and soils and the disruptions to the operation of farms. These matters are dealt with in great detail in the

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	in and around the compound areas once they are no longer needed for that purpose.	documentation and the Council considers that issues, such as the storing and reuse of materials and the continued operation and productive capacity of farms, have been adequately addressed.'
5.53	Another issue relating to resources is the displacement agricultural land and soils and the disruptions to the operation of farms. These matters are dealt with in great detail in the documentation and the Council considers that issues, such as the storing and reuse of materials and the continued operation and productive capacity of farms, have been adequately addressed.	1. The Applicant notes that the Council accepts that storage and reuse of materials and the impact on farms have been adequately addressed.
5.54	In terms of infrastructure, a detailed options exercise was undertaken before the current scheme was arrived at and it is considered that the solution is probably the optimal one in terms of the use of existing infrastructure – reuse of existing carriageway areas, drainage solutions etc.	1. It is noted that NCC accepts that a detailed options appraisal for the Scheme has been undertaken and that the proposal solution is probably the optimal one.
Other sustainability issues		
5.55	There are many other themes in the sustainability policies and additional policies that link to these, including climate change and modal shift.	1. This is accepted by the Applicant.
5.56	While it appears that these issues have been fully addressed in the various documents accompanying the Environmental Statement, the Council would wish to be assured that the opportunities that the route provides for dedicated cycleways, bus routes that do not involve long diversions and electric vehicle charging points are being fully exploited. (See especially Policies STP 4 and TRA 1 in the emerging Local Plan).	1. A programme of measures to promote the provision of facilities for pedestrians and cyclists on the de-trunked A1 is outside the remit of the Scheme and is not the responsibility of the Applicant as the body responsible for the operation, maintenance and improvement of the strategic road network. The provision of facilities for pedestrians and dedicated cycleways on the local road network are matters that fall within the responsibility of local highway and transport authorities as opposed to the operator of the strategic road network. Nonetheless, the Applicant welcomes the efforts of NCC in this regard. 2. A number of bus stops (northbound and southbound) would be removed for Part A but the Scheme includes retention, relocation and formalisation of existing bus stop provision. Three existing bus stops would be extinguished as part of Part B, but two new stops are proposed along the B6341 (offline from the A1 for safety reasons) to replace these. It was recognised in Chapter 12: Population and Human Health Part A [APP-054] and Part B [APP-055], Section 12.10 that usage of these services (as reported by the service provider) is low, however the Scheme ensures continued access to public transport without long diversions for the bus routes. Refer to Chapter 12: Population and Human Health Part A [APP-054] and Part B [APP-055] and Chapter 14: Climate Part A [APP-058] and Part B [APP-059]. 3. A programme of measures to promote the provision of facilities for electric vehicles is outside the remit of the Scheme and is not the responsibility of the Applicant in executing the RIS. The provision of charging facilities within the Scheme's proposed laybys is not a standard requirement, in accordance with CD 169 of the DMRB.

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		4. It should be noted that the emerging Local Plan was submitted to the Secretary of State for Housing, Communities and Local Government for independent examination in May 2019. Phase 1 of the examination hearings took place in October 2019 and February 2020, and the Inspector has confirmed that further hearing sessions will be necessary for Phase 2 of the examination. The Inspector will be issuing Matters, Issues and Questions in advance of these on details policies such as STP 4 and TRA 1. Therefore, despite the compliance as articulated above and in the referenced chapters, as the Local Plan is not yet adopted the Applicant considers that only limited weight can be attached to the policies that it contains.
Green Belt		
5.57	It was explained earlier that the general extent of the Green Belt in the area north of Morpeth forms part of the development plan through saved Policy S5 of the Northumberland Joint Structure Plan and that this means that a substantial section at the southern end of part A of the scheme falls within this general extent.	1. This is accepted by the Applicant.
5.58	The precise outer boundary and the boundary of the Morpeth inset, are being defined through the emerging Northumberland Local Plan, which is currently at Examination. The boundary has been drawn following an agreed methodology and continues to adhere to the description in the saved Structure Pan policy.	1. As set out in the Applicant's Comments on Responses to ExA's First Written Questions [REP2-020], the Applicant accepts that the Green Belt boundaries proposed in the submitted Northumberland Local Plan broadly illustrates the general extent of the Green Belt that described in Policy S5. As such the Applicant accepts them as a reasonable basis for defining the boundary of the Green Belt for the purpose of determining this DCO application.
5.59	As proposed, the Green Belt 'washes over' the line of the A1 on both sides of the existing carriageway as far north as the Causey Park staggered junction. The C-road that links the A1 with the hamlet of Chevington Moor forms the outer boundary. The proposed outer boundary then follows the western verge of the existing A1 carriageway for approximately 2 miles with areas to the west being Green Belt and to the east not. At a point north of Burgham, the outer boundary turns westwards to follow the C-road that links the A1 with the A697 via Bywell Cottages.	1. As per 5.58, the Applicant accepts this as a reasonable basis for defining the boundary of the Green Belt for the purpose of determining this DCO application.
5.60	The northern edge of the proposed inset boundary for Morpeth follows the edge of the Northgate hospital site, parts of which now have the status as housing development sites. The red line of the A1 dualling application abuts this proposed inset boundary and some landscaping type works associated with the roadworks may slightly overlap into the proposed inset area.	1. This is accepted by the Applicant. 2. The landscape proposal as set out on Figure 7.8: Landscape Mitigation Masterplan Part A [APP-095] (and as updated at Deadline 3) are required to mitigation the potential adverse effects on landscape character and visual amenity. They have been designed to minimise potential land take whilst ensuring measures are sufficiently robust, to avoid a significant effect.
5.61	It must be noted that, mindful of NPPF para 48, with unresolved objections to these boundary proposals, it remains a possibility that they could be amended as a result of the Examination into the	1. The Applicant agrees that, as the plan is undergoing examination, only limited weight can be placed on Policy STP 7.

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	overall soundness of the plan. Therefore, Policy STP 7, which defines the boundaries, can only be afforded limited weight.	
5.62	Considering which of the five main purposes for having a Green Belt would be most relevant to the area of Green Belt that straddles the road line, it would be the third Green Belt purpose – to assist in safeguarding the countryside from encroachment. The Morpeth Outer Green Belt Boundary Report (GBB) (2013) confirms that within this area "there is potential pressure from development interests such as renewable energy and tourism development. Therefore, the need to protect the countryside from encroachment, whilst avoiding the sterilisation of rural growth potential".	1. Paragraph 134 of the NPPF identifies that the Green Belt serves five functions: – To check the unrestricted sprawl of large built-up areas; – To prevent neighbouring towns from merging into one another; – To assist in safeguarding the countryside from encroachment; – To preserve the setting and special character of historic towns; and – To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. 2. Paragraph 4.66 of the emerging Northumberland Local Plan confirms that: 'The main function of the Green Belt in Northumberland is to prevent the unrestricted sprawl of the Tyne and Wear conurbation by keeping land permanently open. 3. The Scheme is not considered by the Applicant to undermine this main function, although the applicant accepts that the Scheme involves a degree of encroachment into the countryside, and that this is contrary to one of the five purposes on including land within the Green Belt.
5.63	In the past, planning inspectors have concluded that it is enough for an area of land to contribute to only one of the five purposes for it to be within the general extent of the Green Belt. (APP/C2741/W/16/3149489).	1. This is accepted by the Applicant.
5.64	Having established that a significant stretch of the new road is in the Green Belt, (bearing in mind that the precise definition of the boundary may alter), it is necessary to consider the appropriateness of the development in terms of Green Belt policy. The Green Belt policy in the Castle Morpeth Local Plan would not apply to this part of the Green Belt as that Plan predated the saved Structure Plan policy. In the emerging Local Plan, the policy that deals with appropriate development in the Green Belt is Policy STP 8. However, this mostly simply cross-refers to the NPPF.	1. This is accepted by the Applicant.
5.65	In assessing the proposal, it is therefore necessary to consider whether the proposal would constitute inappropriate development in the Green Belt. Paragraph146 of the NPPF sets out that certain forms of development are not inappropriate development in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. Under Paragraph 146(c), this includes local transport infrastructure which can demonstrate a requirement for a Green Belt location.	1. This is accepted by the Applicant. 2. As set out in Chapter 6 of the Case for the Scheme [APP-344], the Applicant accepts that the Scheme represents "inappropriate development" within the Green Belt as defined in the NPPF.
5.66	In relation to the second part of the test under Paragraph 146 (c), it is considered that the scheme can demonstrate a requirement for a Green Belt location as there is no available route option for this	1. The Applicant notes that NCC accepts that the Scheme can demonstrate a requirement for a Green Belt location.

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	scheme between Morpeth and Felton that avoids Green Belt and would allow Part A of the scheme to connect with the existing A1 to the south.	
5.67	In relation to the first part of Paragraph 146 (c), it is necessary to consider whether the proposed scheme would constitute 'local transport infrastructure'. The scheme is highways-related development, involving the construction of new sections of road with associated junctions, bridges, and other structures as well as other engineering works associated with the construction. On this basis it is considered that the proposal would constitute transport infrastructure.	1. The Applicant notes that NCC accepts that the Scheme comprises transport infrastructure.
5.68	It is also necessary to consider whether the scheme would be 'local' in the context of Paragraph 146 (c). It is recognised that the proposed scheme is located entirely within Northumberland and would provide public benefits to the local community. It would improve local connections between locations within Northumberland, including locations in the north of the County and the south of the County, and would provide safety improvements at local junctions along the route. In addition, the principle of the scheme is supported by the emerging Northumberland Local Plan which identifies the improvements to the A1 as a 'key outcome' that would facilitate 'improvements to transport and communications infrastructure and the County's gateways to international growth'. Policy support in the emerging Northumberland Local Plan is provided under Part 1 (b, i) of Policy TRA 3 (Improving Northumberland's core road network).	1. The Applicant notes that NCC accepts that the Scheme would result in benefits to the local community and that the principle of the Scheme is supported by the emerging Northumberland Local Plan.
5.69	Notwithstanding the local dimension to the scheme, it is recognised that the A1 is part of the Strategic Road Network. The route is of national importance as it provides an essential role in linking England and Scotland and provides an important route for long distance traffic. The benefits of the scheme include not only local benefits but regional and national benefits as well. The scheme aims to improve connectivity by road between England and Scotland and therefore it is also a transport infrastructure project that is of regional and national significance rather than just local significance. In addition, the southern extent of Part A of the scheme is around 42 kilometres from the northern extent of Part B of the scheme, which means that it covers several different localities along its length.	1. The Applicant notes that NCC accepts that the Scheme would not only provide local benefits but regional and national benefits as well.
5.70	Given the nature of the scheme it can be considered to have national element which means it is not purely a 'local' transport infrastructure project that would be consistent with Paragraph 146 (c) of the NPPF. Therefore, the Council agrees with the Applicant	1. The Applicant agrees that the Scheme is not purely a 'local transport infrastructure project' but is rather of national significance. The Applicant also accepts that Paragraph 144 of the NPPF offers appropriate advice for assessing the impact of the Scheme on the Green Belt.

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	that it would be more appropriate to consider the scheme against the policy test in Paragraph 144 of the NPPF as by virtue of the form of development that this scheme involves, it would represent inappropriate development in the Green Belt as defined in the NPPF.	
5.71	Paragraph 143 of the NPPF confirms states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 144 requires that when considering a proposal, substantial weight should be given to any harm to the Green Belt and that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.	1. The Applicant accepts that this characterisation of Paragraph 143 And 144 of the NPPF is accurate.
5.72	The harm to the Green Belt would arise from the expansion of the existing A1 beyond its current confines into areas of farmland that are currently undeveloped. As a result, there would be conflict with the purpose of safeguarding the countryside from encroachment (Paragraph 134 (c)). The scheme would not conflict with the other purposes of including land in the Green Belt as set out in Paragraph 134 of the NPPF.	1. This position is accepted by the Applicant.
5.73	It is noted that, where the dual carriageway 'veers away' from the line of the existing A1 between the River Lyne and Burgham, this means that there is a greater take up of land in the Green Belt than would have been the case if the line of the route had followed the existing A1. Nevertheless, the Council is fully aware that all practicable options for the line of the road have been thoroughly assessed and is satisfied that the choice of the line has been sufficiently justified. Furthermore, given the necessity of this choice of option, the Council considers that the details of the scheme have sought to minimise the land taken up by built structures of the sort that would have a greater impact on openness. The Council has looked at the assessments provided of visual impacts and urbanising effects resulting from the new structures and the landscaping and other mitigation measures being proposed and is generally satisfied that these will provide some compensation for the encroachment into the countryside and the harm to openness.	1. The Applicant notes that NCC accepts that all practicable options for the route have been thoroughly assessed and they are satisfied that the proposed route has been sufficiently justified. It is also noted that the Council is also satisfied that the Scheme seeks to minimise land take for open structures and consequent impact on openness.
5.74	With regards to the considerations that should be taken into account in demonstrating that very special circumstances exist, the Council agrees with the considerations identified by the Applicant. In particular the scheme reflects local planning policy objectives and	1. It is noted that NCC accepts that the Scheme would address local policy objectives and that there are no reasonable alternatives which would avoid the Green Belt.

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	would help in the delivery of these policy aims as covered in Paragraph 5.67. It is also recognised that there are no reasonable alternatives for this scheme that avoid Green Belt and would allow it to connect with the existing dual carriageway at the southern end of the scheme. In addition, consideration should be given to the important safety improvements that would result from the proposal. This includes the improvements to the safety of the junctions and improvements to safety for non-motorised users.	
5.75	On balance it is therefore considered that the harm to the Green Belt is significantly outweighed by the relevant other considerations and very special circumstances can be demonstrated in line with the requirements of Paragraph 144 of the NPPF.	1. It is noted that NCC accept that the harm to the Green Belt is significantly outweighed by other factors and that very special circumstances exist in terms of paragraph 1445 of the NPPF.
Landscape		
5.76	It has already been stated that parts of the roadline are in AHLVs designated in the Castle Morpeth and Alnwick Local Plans but that the policies associated with them (CMLP Policy C3 and ALP Policy RE17) simply seek to prevent development that will undermine their landscape value. However, they are not associated with any particular character descriptions and, given the preference for a character-based approach to assessing landscape impacts, these designations and the policies associated with them carry minimal weight and are ineffectual.	1. It is noted that NCC accept that the AHLV designations carry minimal weight and are ineffectual.
5.77	The Alnwick Core Strategy takes the preferred 'landscape character approach' in Policy S13 and cross refers to the Alnwick District Landscape Character Assessment Supplementary Planning Document. This document was already in place as SPD at the time when the Northumberland-wide landscape character assessment (LCA) was carried out and the two sets of character areas, while slightly different, are compatible in terms of their character descriptions and key qualities. The Northumberland LCA lists key qualities that, through emerging policy ENV 3 of the Northumberland Local Plan, can be material to decision making throughout the length of the scheme. However, the ACS and the accompanying SPD are able to be given greater weight, where they apply – i.e. the Part B section of the route and the very northern end of Part A.	1. NCC's view that the ACS and accompanying SPD should be given greater weight in the planning process is accepted by the Applicant. As set out below, the ES assesses the Scheme against these policies and relies on the relevant character areas described in the Alnwick District Landscape Character Area Assessment SPD and Northumberland Landscape Character Assessment in relation to Part B and the northern extent of Part A as the baseline for the assessment.
5.78	It is noted that, in the Environmental Statement appendices that deal with landscape character, the Alnwick District Landscape Character Assessment Supplementary Planning Document may have been overlooked. Having said this, it does appear that very thorough	1. The Alnwick District Landscape Character Assessment SPD has not been overlooked by the Applicant. It has been referenced within the assessment of landscape effects, as evidenced in paragraph 7.7.21 of Chapter 7: Landscape and Visual Part B [APP-045]. Those character areas

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	consideration has been given to the impacts of the proposal on landscape character in bringing forward the scheme itself and the associated landscaping. The Northumberland LCA is clearly referenced and, as mentioned, these character area descriptions are compatible with the Alnwick SPD. As such the criteria in parts 1 (e & f) of Policy ENV 3 of the Northumberland Local Plan and also the policy on landscaping (QOP 4) should be met.	relevant to the study area for the assessment of landscape character effects have been extracted from the Alnwick District Landscape Character Assessment SPD, comprising: – 6 North East Farmed Coastal Plain LCA – 7 Lower Aln Valley LCA – 11 Charlton Ridge LCA – 18 Longframlington / Shilbottle Rolling Farmland LCA. 2. Subsequently, the assessment has scoped down those character areas, based on the potential of a significant effect to arise. These have been identified to be taken forward for assessment of landscape character effects in Table 7-15 – List of Receptors for Landscape Assessment of Chapter 7: Landscape and Visual Part B [APP-045] which includes: – 7 Lower Aln Valley LCA – 11 Charlton Ridge LCA 3. These are assessed in Appendix 7.3 Landscape Effects Schedule Part B [APP-288].
Minerals		
5.79	Policy MIN 4 part 3 in the emerging Northumberland Local Plan seeks to ensure that proposals for non-mineral development would not lead to the unnecessary sterilisation of mineral resources within a Mineral Safeguarding Area. It is the case that the road line and its associated permanent structures coincide with a number of mineral resource areas proposed for safeguarding in the Local Plan. It is noted that these have been mapped and that the Applicant has acknowledged that the part B carriageway would sterilise a significant area safeguarded for possible future consideration for sand and gravel extraction.	1. It is noted within Chapter 11 Geology and Soils Part B of the ES [APP-053] that sections of Mineral Safeguarding Areas (MSAs) have been identified within the Study Area, however it is also identified that the percentage of the total area of the MSAs identified that would be affected by the Scheme are minimal. The percentage of the overall MSAs which would be sterilised is minimal, affected areas are identified to range between 0.3% (sand and gravel) and 1% (coal). The assessment of likely significant effects of the Scheme identified a slight adverse effect on mineral resources (not significant). 2. Furthermore, text from Chapter 13 Material Resources Part B of the ES (APP-057] confirms that: – Where the design of Part B results in changes to the highway, it does so on sections that are already online i.e. the extent to which Part B would further encroach on the MSAs is minimal; and – Where MSAs are within the Order limits, but do not fall under either the (existing) online, or Part B designs, the proportion of MSA that is impacted (as a percentage of the available resource) is in all cases extremely small. 3. Therefore, sterilisation of mineral resources beyond that which is already extant is expected to be minimal and Part B is not anticipated to adversely impact the MIN 4 policy objectives. Specifically, the magnitude threshold criterion for sterilisation is not reached.
5.80	In terms of criteria in Policy MIN 4, the building of a road is not one of the development types that is exempt from consideration as to its effects on safeguarded mineral resources. As such, the proposal needs to be considered against Policy MIN_4 parts 3a to 3e.	Within Chapter 11 Geology and Soils Part B of the ES [APP-053], it is identified that the percentage of the overall MSA which would be sterilised is minimal, as such it is considered that the Scheme poses a slight adverse effect on MSA. Policy MIN 4 Parts 3a to 3e have been considered as follows: "MIN_4 Part 3 - Proposals for non-mineral development which would lead to the unnecessary sterilisation of mineral resources within a Mineral Safeguarding Area will not be supported unless: a) The applicant can demonstrate that the mineral concerned is not of economic value;

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		• Comment - The overall area of MSA effected is considered minimal, a much larger extent of MSA would remain available across the wider area. It is considered that MIN_4 Part 3d "There are no reasonable alternative options for the proposed development which would avoid or minimise the sterilisation of minerals" outweighs the potential economic value of the minimal areas of MSA affected. It is stated within Chapter 11 Geology and Soils Part B of the ES [APP-053] that consideration will be given to the incorporation of site won materials from these MSAs into Part B where possible. Given the presence of the existing carriageway and the minimal areas of MSA, which are to be sterilised, the economic value of the minerals concerned is likely to be greatly reduced from those across the wider area given the practicalities involved of extraction adjacent to an existing highway and the economic viability of such an exercise. b) The mineral can be extracted prior to the non-mineral development proceeding without adversely affecting the viability of the development; • Comment - It is stated within Chapter 11 Geology and Soils Part B of the ES [APP-053] that consideration will be given to the incorporation of site won materials from these MSAs into Part B where possible. Part B involves the online widening of the existing carriageway which has previously sterilised sections of identified MSAs, the extent to which Part B further encroaches on the MSAs is minimal and the extraction from the minimal areas which are to be sterilised as a result of the Scheme is unlikely to be practicable, economically viable or environmentally acceptable given the presence of the existing highway. c) The development is temporary in nature and will not impact on the potential for mineral extraction within a timescale in which the mineral is likely to be needed; • Comment - The Scheme is permanent; however the national importance of the Scheme outweighs the potential loss of the minimal areas of MSA identified within the Order limits. d) There are no reasonable alternative options for the proposed development which would avoid or minimise the sterilisation of minerals. • Comment - The Scheme is an infrastructure project of National importance, given the Scheme comprises online widening of an existing highway it is considered that there are no reasonable alternatives to the Scheme which would avoid or further minimise the minimal area of MSA identified to be affected. e) The overall social, economic or environmental benefits of the proposed development outweigh the potential loss of the mineral resource; • Comment - Given the national importance of the Scheme, it is considered that the benefits of the Scheme outweigh the potential loss if the mineral resource. In summary, in consideration of the above it is recognised that there is potential for Part B to impact on mineral resources, albeit identified as a slight adverse effect (not significant) given the minimal area of MSA affected. The Applicant notes that the Scheme has been identified as an infrastructure project of national importance and it comprises the online widening of an existing highway, as such alternative options are limited. This alongside the mitigation measures outlined

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		in Chapter 11: Geology and Soils Part B of the ES [APP-053] to be implemented as part of Part B would ensure the above policy objectives are not compromised.
5.81	81 The Applicant has not sought to demonstrate that the mineral is not of economic value (part 3a), nor have they sought to extract material prior to the road development proceeding (part 3b). In terms of part 3c, some of the land take (for compounds etc.) will be temporary but the road itself is a permanent feature and the Applicants consider that the amount of the resource that will be permanently removed from the possibility of future extraction is small compared with the overall safeguarded. The Council concurs with this conclusion and notes that proposed extraction sites for the forthcoming plan period are well away from the roadline. The Council is also satisfied that there are no reasonable alternative roadlines that would avoid the safeguarded resource areas, given that various options for the road scheme were considered, (part 3d). Furthermore, the Council considers that the overall social, economic or environmental benefits of the proposed development will outweigh the potential loss of the mineral resource, (part 3e).	1. It is noted that NCC concur with the Applicant's considerations of Policy MIN-4 to Part 3c, 3d and 3e. The response to Policy MIN-4 to Part 3c, 3d and 3e is considered to negate the requirement to demonstrate that the mineral is not of economic value. In relation to Part 3b it is stated within Chapter 11 Geology and Soils Part B of the ES [APP-053] that consideration would be given to the incorporation of site won materials from these MSAs into Part B where possible, extraction prior to development is not considered to be practical or economically viable.

Table 1-2 – Economic Growth and Transportation

Ref. No.	Local Impact Report Statement:	Applicant's Response:
6.2	Economic Growth and Transportation – Positive Impact	
6.2.1	The Case for the Scheme (Chapter 7.1 of the Environmental Statement (ES)) (APP-062) has been produced by Highways England (HE) and sets out the case for the scheme from a transportation and economic development perspective.	1. No response required.
6.2.2	A number of studies have been undertaken across a range of different transport modes `and from a variety of perspectives which demonstrate the need and the benefits of dualling the A1. The Road Investment Strategy (RIS) has identified the dualling of the A1 north of Newcastle as providing a "nationally important" connection between Newcastle and Edinburgh and that it comprises an "essential" link for the North East and Northumberland and needs "substantial improvement" to meet the needs of the local economy and to better fulfil its role in the national transport network.	1. The Applicant agrees with the Council's analysis of the RIS. Further relevant details of the RIS are set out in paragraphs 2.4.13 to 2.4.16 and 2.4.30 to 2.4.32 of the Case for the Scheme [APP-344].

Ref. No.	Local Impact Report Statement:	Applicant's Response:
6.2.3	The A1 North of Newcastle Feasibility Study (2015) identified several key problems and issues on the A1 to the north of Newcastle which are set out at paragraph 2.4.18 of the Case for the Scheme (APP-062).	1. The Applicant agrees with the Council's analysis of the A1 North of Newcastle Feasibility Study (2015). Further relevant details from the A1 North of Newcastle Feasibility Study are set out in paragraphs 2.4.17 to 2.4.29 of the Case for the Scheme [APP-344]. These include the key objectives and options considered at stage 2 of the 2015 Study.
6.2.4	The London to Scotland East Route Based Strategy (March 2017) sets out the current performance and perceived pressures on this route and identifies the current proposal as a means to supporting economic growth and providing a safe route through the region. The strategy identifies the opportunity to provide better cycle and pedestrian accessibility where there are severance issues in this single carriageway section of the network.	1. The Applicant notes the Council's characterisation of the current performance and perceived pressures on this route that are identified in the London to Scotland East Route Based Strategy (March 2017). Further relevant details from the London to Scotland East Route Based Strategy are set out on paragraphs 2.4.33 to 2.4.35 of the Case for the Scheme [APP-344]. 2. The Applicant notes that the London to Scotland East Route Based Strategy identifies on Page 10 that: 'Poor cycle accessibility and difficulties for pedestrians contribute to severance issues either side of the A1 over the single carriageway sections north of Morpeth.' The over new overbridges and underbridges will help, in part, to address this severance.
6.2.5	The Northumberland Economic Strategy 2015 -2020 identifies the need to connect the county's economy to that of the wider region and the dualling of the A1 will deliver the infrastructure and connectivity to support successful towns and communities.	1. The Applicant agrees with the Council's analysis of the Northumberland Economic Strategy 2015 - 2020. Further relevant details from the Northumberland Economic Strategy are set out in paragraphs 3.6.34 to 3.6.36 of The Case for the Scheme [APP-344].
6.2.6	The existing infrastructure and proposed improvements were analysed (2015/6) for the proposed year of opening (2023), design year (2038) and horizon year (2051). The Council is content with the baseline assessments undertaken.	1. The Applicant notes that the Council is content with the baseline assessments undertaken.
6.2.7	On the Highways England network, the Case for the Scheme demonstrates that the scheme will reduce delays and accidents and allow the free flow of traffic on the A1. We continue to assess whether the redistribution of traffic on the local road network will impact upon the capacity of the wider local road network. On the local road network, it demonstrates that the scheme will provide capacity at least equal to the present arrangement and improves facilities for non-motorised users (NMUs)	1. The Applicant agrees that the Scheme will reduce delays and accidents and allow the free flow of traffic on the A1, as demonstrated at sections 4.8 and 4.10 of the Case for the Scheme [APP-344]. 2. The Applicant continues to liaise with NCC regarding the impact of redistributed traffic on the local road network. The Applicant provided wider traffic flow information to NCC by email on 31st January and 1st February 2021. Further engagement and agreement will be recorded in the Statement of Common Ground with NCC [REP1-028] to be issued at Deadline 3. 3. The traffic modelling of the Scheme as described in section 4.10 of the Case for the Scheme [APP-344] forecasts a general decrease in flows across the local road network, due to traffic reassigning onto the Scheme itself. The Applicant agrees that the Scheme will provide capacity at least equal to the present arrangement and improves facilities for non-motorised users.
6.2.8	The Case for the Scheme concludes that the scheme provides benefits to the A1 corridor and that it: – Meets the requirements of central government's transport objectives around economy, environment, social and public accounts; – Aligns with national and local planning policy; – Addresses future traffic demand and creates improved traffic congestion conditions and journey experience for motorists; – Improves facilities for NMUs;	1. The Applicant agrees with the Council's summary of the conclusions of the Case for the Scheme [APP-344]. The full conclusion is set out at Chapter 7 of the Case for the Scheme [APP-344].

Ref. No.	Local Impact Report Statement:	Applicant's Response:
	– Creates a safer environment for all.	
6.2.9	The Council considers that the proposed scheme will contribute to economic growth both during the construction period and thereafter. It is anticipated that the improved accessibility throughout the A1 corridor will make towns and sites in Northumberland more attractive to new businesses and attract further investment for improvements at existing sites.	1. The Applicant notes that the Council considers that the Scheme will contribute to economic growth, improve accessibility throughout the A1 corridor, make towns and sites in Northumberland more attractive to new businesses and attract further investment.
6.2.10	In delivering highway improvements which will address future traffic demand and reduce congestion on this key regional route, the Council is content that the proposals are in full accordance with current local plan, national transport policies and the Northumberland Economic Strategy to improve access both to key employment corridors and residential areas and to help foster the right conditions to ensure that the region can offer transport infrastructure which will ensure it is attractive to future investment and associated job growth.	1. The Applicant notes that the Council is content that the Scheme is in accordance with local plan and national transport policies as well as the Northumberland Economic Strategy.
6.2.11	The Council considers that the needs of NMU has not been fully utilised by the proposed development in particular on the Morpeth to Felton section of the scheme where the potential to provide a continuous footway and cycleway connection between the settlements has not been fully utilised. The de-trunked section, use of diverted Public Rights of Way and small sections of additional connectivity over that currently shown in the proposals offer the opportunity to provide a strong connection along the former A1 route between Morpeth and Felton. We continue to work with Highways England to secure this improvement and reduce the impact upon NMUs as a result of the scheme.	1. The Applicant does not accept that the needs of Walking, Cycling and Horse Riding (WCH) users would not be met by the Scheme. The specific points raised by NCC are addressed in turn: **De-trunked A1:** 1. The Objectives of the Scheme must align with the Roads Investment Strategy (RIS) and the RIS description for the Scheme states that is for "upgrading multiple sections of the A1 to dual carriageway to provide continuous high quality dual carriageway from Newcastle to Ellingham, north of Alnwick". 2. The Scheme Objectives also align with local, regional, national policy and Highways England's Key Performance Indicators (KPIs), to ensure the Scheme addresses the RIS and the agreed problems are set out below: – Improving the resilience of the network. – Improving journey times. – Improving accessibility. – Improving safety. – Facilitating economic growth and development 3. The Scheme is designed as a dual carriageway to address the known issues on the existing single carriageway sections of the A1. This accords with the Scheme Objectives. 4. The former A1 will be de-trunked as part of the Scheme. As a result of the de-trunking and through traffic utilising the dualled A1, following completion of the Scheme the former A1 is predicted to be much more lightly trafficked (as detailed below). As such, the de-trunked A1 will be suitable for use by WCH users and there will not be a need for additional cycling provision. 5. The Applicant has undertaken traffic modelling of the Scheme and this is described in Chapter 4 of the Case for the Scheme [APP-344]. The Scheme is forecast to significantly reduce traffic flows on the de-trunked sections of the A1, including in the section passing the Causey Bridge junction. In the opening year, without the Scheme in place, model flows at this location are

Ref. No.	Local Impact Report Statement:	Applicant's Response:
		forecast to be between 800 and 1000pcu in each direction during both the morning and evening peak periods. With the Scheme in place, forecast flows reduce to between 20 and 140 pcu in each direction. **Wider provision for WCH users** 1. The following sets out the provisions for pedestrians and cyclists along the Scheme and these are considered to provide sufficient provision for Walking, Cycling and Horse Riding (WCH) users when considered alongside the de-trunked A1, which connects the key communities along the Scheme. 2. The existing footway along the A1 from the A697 junction to Hebron Road is to be retained together with the existing footway along the A1 to be de-trunked from Tritlington School to Causey Park Road. A new shared footway is proposed for the new link road connecting the de-trunked A1 with Felton Road at West Moor grade separated junction. 3. A programme of measures to promote the provision of facilities for pedestrians and cyclists on the de-trunked A1 is outside the remit of the Scheme and is not the responsibility of the Applicant as the body responsible for the operation, maintenance and improvement of the strategic road network. 4. The provision of facilities for pedestrians and cyclists between settlements on the local road network are matters that fall within the responsibility of local highway and transport authorities as opposed to the operator of the strategic road network. As described in the foregoing, a significant proportion of the existing traffic using the A1 will be removed it is therefore expected that the de-trunked carriageway could be shared by vehicles and cyclists and it does not warrant the specific creation of a separate cycle track. The de-trunked A1 is the subject of ongoing discussions with NCC as part of development of the Statement of Common Ground (SoCG) [REP1-028]. 5. Subject to funding availability and any proposals meeting set criteria, such as being able to demonstrate it is an activity deemed beyond business as usual that is not required to mitigate the impacts of the Scheme, there may be opportunities to make use of Designated Funds. Designated Funds is a series of the ring-fenced funds provided by Government to address a range of issues over and above the traditional focus of road investment and may be available to deliver additional enhancements, for example, cycling provision to enhance safety, connectivity and integration. The Applicant will liaise with NCC to identify possible enhancements for which Designated Funds can be applied for. There may also be other funding opportunities that NCC can explore such as through the Department for Transport Transforming Cities Fund.

Table 1-3 – Noise and Vibration

Ref. No.	Local Impact Report Statement:	Applicant's Response
6.3	**Noise and Vibration – Neutral Impact**	
6.3.1	The Environmental Statement (ES) dated June 2020 (TR010041) has been produced by Highways England. Chapter 6 of the ES (DCO documents APP-042 and APP-043) refers to the noise and vibration	1. The Applicant notes that NCC is in agreement with the methodology and the baseline data used in Chapter 6: Noise and Vibration Part A [APP-042] and Part B [APP-043]. At Deadline 1, a Noise Addendum [REP1-019] to the Environmental Statement (ES) was submitted which replaces the operational stage road traffic noise assessments within Chapter 6: Noise and Vibration Part A

Ref. No.	Local Impact Report Statement:	Applicant's Response
	assessments that have undertaken. The Council is in agreement with the methodology and the baseline data used.	[APP-042], Chapter 6: Noise and Vibration Part B [APP-043] and Appendix 16.5 Noise and Vibration Likely Significant Effects of the Scheme [APP-331]. 2. As set out within Section 1.2 Purpose of the Noise Addendum [REP1-019], the purpose of the Noise Addendum is primarily to validate the operational stage noise assessment of the Scheme presented within Chapter 6: Noise and Vibration Part A [APP-042], Chapter 6: Noise and Vibration Part B [APP-043] and Appendix 16.5 Noise and Vibration Likely Significant Effects of the Scheme [APP-331] for the revised opening year of 2024 and consequential design year of 2039. 3. Although the primary purpose of the Noise Addendum [REP1-019] assessment is to verify the findings presented within the ES for the new opening and design years, the approach to the Noise Addendum assessment now follows new guidance in the form of the Design Manual for Roads and Bridges (DMRB) LA 111 Noise and Vibration, Revision 2, May 2020. The Noise Addendum assessment also combines the Part A and Part B into the overall Scheme in a consistent manner where this has the potential to influence the conclusions of the assessment. 4. It is noted that the Northumberland County Council (NCC) response to Deadline 1 documents [REP2-025] refers to the Noise Addendum and states that the relevant Local Plan and Core Strategy policies seem to have been satisfactorily addressed. As no further comment has been made by NCC, the Applicant assumes that NCC remains in agreement with the methodology used in the Noise Addendum [REP1-019].
	Noise – Operational – Positive Impacts	
6.3.2	The eighteen-hour LA10 (LA10, 18-hour) metric is widely used in road traffic assessments as it more accurately correlates to the subjective response of the human receptor. The LA10 metric has been used for comparison of Do-Minimum (without dualling) to Do-Something (dualling of the two sections as proposed) for 2023 (Opening Year) and 2038 (Design Year).	1. NCC's summary is correct that the LA10,18h metric is widely used for operational road traffic noise assessments. The Noise Addendum [REP1-019] operational assessment is based on the revised projected opening and design years of 2024 and 2039.
6.3.3	Operational noise levels have been modelled for Part A and Part B of the scheme and the most significant impacts are related to the entirely new dual-carriageway section from Priest Bridge to Felmoor Park, which will be up to 450 metres west of the existing single-carriageway.	1. The operational noise impacts, based on the revised projected opening and design years of 2024 and 2039, are discussed in the Noise Addendum [REP1-019]. As expected, the greatest beneficial impacts occur on the section of existing A1 that is relieved by the new offline section (from Priest's Bridge to Burgham Park [referred to by NCC as Priest Bridge to Felmoor Park]) as the majority of traffic would use the new carriageway rather than the existing A1 carriageway. It follows that the most significant adverse impacts occur at receptors which would have the new offline section closer to their property, or on the other side of their property. However, a significant adverse operational road traffic noise effect is also predicted at Northgate Farm at the southern end of the Scheme. At this location the A1 currently merges from dual to single carriageway but following the opening of the Scheme would continue as a dual carriageway. Northgate Farm was not identified as a significant adverse operational road traffic noise effect as part of the assessment undertaken in accordance with the now superseded DMRB HD 213/11 within Chapter 6: Noise and Vibration Part A [APP-042]. However, this receptor was predicted to experience a significant adverse operational road traffic noise effect as part of the DMRB LA 111 sensitivity test assessment presented within Appendix 6.10 Noise and Vibration DMRB Sensitivity Test Part A [APP-215].

Ref. No.	Local Impact Report Statement:	Applicant's Response
6.3.4	For the opening year for Part A of the scheme, the overall impact is minimal with many of the closest receptors having an improvement in noise levels principally because of an overall improvement in traffic flow. Places such as Hebron will see a slight deterioration in noise levels, but these are predicted to be at or below the perceptible audible level.	1. As identified in the Noise Addendum [REP1-019], for the opening year (2024), receptors on the section of the A1 proposed to be relieved by the new offline section are expected to experience significant beneficial noise impacts, as a result of the large reduction in vehicles using this existing section of the A1. Whilst adverse impacts are predicted within the detailed calculation area, a greater number of significant beneficial effects are predicted than significant adverse effects. Whilst receptors on some roads that fall outside of the detailed calculation area (including that passing through Hebron) are expected to experience an increase in noise level, no significant adverse noise effects are predicted as a result of noise level increases on any of the roads that fall outside of the detailed calculation area.
6.3.5	As mentioned, the most significant noise impact is for the realigned section of the dualling from Priest Bridge to Felmoor where one receptor will experience a marked shift in their noise environment of 3 to greater than 5 dB LA10 increase in noise. However, this must be weighed against the acoustic improvement for over thirty receptors on the stretch of the existing single carriageway A1 which will be left once the dualled section is opened. One of these thirty receptors that will experience a positive improvement is a first school where noise levels will be reduced by more than 5dB LA10.	1. As identified in the Noise Addendum [REP1-019], within the Part A detailed calculation area, significant adverse and beneficial noise effects are predicted to occur as a result of the Scheme. 2. Whilst additional significant effects are predicted within the Noise Addendum [REP1-019], it remains the case that a greater number of significant beneficial operational road traffic noise effects than significant adverse operational road traffic noise effects are predicted. 3. Overall, for Part A of the Scheme, within Table 1-40 – Determination of Residual Significance – Part A within the Noise Addendum [REP1-021] it is reported that a greater number of significant beneficial operational road traffic noise effects (29 receptors within Groups 1 and 2, including Tritlington C of E First School) are predicted than significant adverse operational road traffic noise effects (ten receptors in Groups 7, 9, 10 and 11).
6.3.6	The long-term changes (2038) are broadly similar with a slight contraction in the areas with a positive improvement in noise levels.	1. The operational stage noise assessment presented within the Noise Addendum [REP1-019] is based on the revised design year of 2039. Figure 5: Long-term Noise Level Change – Part A within Noise Addendum Appendix D Part 1 – Rev 0 [REP1-021 shows that in the long-term the areas predicted to experience beneficial noise impacts of minor, moderate or major magnitude are smaller than those in the short-term. This is supported by the specific receptor impacts for the short- and long-term as presented within Table 1-28 – Short-term Traffic Noise Changes – Part A and Table 1-29 – Long-term Traffic Noise Changes – Part A within the Noise Addendum [REP1-019]. During the daytime (for both residential and other sensitive receptors), in the short-term two moderate and 29 major beneficial impacts are predicted. However, in the long-term 24 moderate and four major beneficial impacts are predicted. This shows, as noted by NCC, that in the long-term the positive impacts of the Scheme are of a lesser magnitude than in the short-term.
6.3.7	Operational noise levels have also been modelled for Part B of the dualling scheme where the impacts have been determined. Many receptors are predicted to experience an immediate improvement in the noise environment associated with improved flows of road traffic and the associated noise in the 2023 (Opening Year) and 2038 (Design Year). This has to be set against a predicted negligible deterioration in noise (+0.1 to +2.9 dB LA10 increase) in a Do-Minimum scenario (no dualling).	1. The operational noise impacts for Part B are discussed in the Noise Addendum [REP1-019]. Within Table 1-23 – Noise Sensitive Receptors, Long-term Noise Changes without the Scheme, it can be seen that, in the long-term without the Scheme, negligible adverse impacts are predicted for all receptors. Within Table 1-35 - Short-term Traffic Changes – Part B of the Noise Addendum [REP1-019], it can be seen that there are a number of receptors which are predicted to experience noise level decreases ranging from a negligible to major magnitude of impact, with others predicted to experience increases ranging from a negligible to minor magnitude of impact. 2. Overall, for Part B, within Table 1-37 – Specific Noise-Sensitive Receptor Summary and Determination of Significance – Operational Road Traffic Noise – Part B within Noise Addendum [REP1-021] it is reported that a greater number of significant beneficial operational road traffic noise effects (three dwellings and one other sensitive receptor in Group 1) are predicted than significant adverse operational road traffic noise effects (no receptors).

Ref. No.	Local Impact Report Statement:	Applicant's Response
		3. The Scheme has been designed as far as reasonably possible to avoid giving rise to significant adverse effects for noise and vibration. Where possible, the alignment has been designed to avoid passing sensitive receptors at closer distances than the existing (Do Minimum) situation. The surface of the road would be laid with a Low Noise Surface (except from bridge decks where Hot Rolled Asphalt would be laid). These design measures are predicted to lead to beneficial effects at a number of receptors.
6.3.8	However, unlike Part B of the scheme, there does not appear to be the inclusion of a Do-Minimum noise prediction for Part A of the scheme. Therefore, it is impossible to draw any conclusions of the relative impact of a Do-Something (Opening Year) against a Do-Minimum (without dualling) scenario. For consistency and appropriate interpretation of the impacts of the scheme, the applicant should produce and submit a Do-Minimum (without dualling) prediction of operational road traffic on Part A of the scheme.	1. A figure comparing the operational road traffic predictions for the Do-minimum (without Scheme) scenarios in the opening and future years on Part A is provided within Figure 2 - Do-Minimum Noise Level Change - Part A of Noise Addendum Appendix D Part 1 [REP1-021]. It can be seen from this figure that predominantly negligible noise level changes are predicted when comparing the Do Minimum opening and design year scenarios.
6.3.9	With the exception of the new receptor introduced by the new section of dual carriageway between Priest Bridge and Felmoor Park, most receptors are already at similar distance from the existing A1 carriageway and may already have some impact from road traffic noise.	1. The Applicant assumes that NCC is referring to the proposed new (offline) section of the A1 which is introduced by the Scheme leading to some receptors being closer to the A1 carriageway than they currently are. However, these are not new receptors.
6.3.10	This is generally acceptable, and the Public Health Protection Unit would see the proposed dualling as an overall betterment in the noise impacts to the existing and future receptors along both sections of the scheme.	1. The Applicant notes that NCC considered that the overall operational noise impacts from the Scheme presented in Chapter 6 Noise and Vibration Part A [APP-042] and Part B [APP-043] were generally acceptable. 2. Whilst additional significant effects are predicted within the updated assessment presented in the Noise Addendum [REP1-019], it remains that a greater number of significant beneficial operational road traffic noise effects than significant adverse operational road traffic noise effects are predicted. 3. Within the Part A detailed calculation area, 29 receptors are predicted to experience significant beneficial operational road traffic noise effects and ten receptors are predicted to experience significant adverse operational road traffic noise effects. 4. Within the Part B detailed calculation area, four receptors are predicted to experience significant beneficial operational road traffic effects. No significant adverse operational road traffic effects are predicted within the Part B detailed calculation area.
	Vibration – Operational – Neutral Impacts	
6.3.11	Ground-borne vibration from road traffic is normally brought about because of issues with the quality of the road surface. As stated by the applicant, guidance indicates that ground-borne vibration from road traffic on new roads is unlikely to be important in relation to disturbance.	1. No response required.

Ref. No.	Local Impact Report Statement:	Applicant's Response
6.3.12	Air-borne vibration has been assessed and the relationship between air-borne vibration and noise (LA10,18-hour) are broadly similar other than less people are unduly disturbed by vibration as compared to noise. Guidance indicates that the proportion of people bothered by airborne vibration is ten per cent lower than for noise.	1. NCC's summary that the relationship between airborne vibration and noise are broadly similar is correct. Under the DMRB HD 213/11 methodology, the assessment of airborne vibration nuisance is inherently based on predicted noise levels. The DMRB HD 213/11 guidance states that the percentage of people bothered by airborne vibration is 10% lower than for noise, with, on average, traffic induced vibration nuisance tending to zero at a noise level of 58 dB $L_{A10, 18h}$. 2. The Noise Addendum [REP1-019] replaces the operational stage road traffic assessments within Chapter 6 Noise and Vibration Part A [APP-042], Chapter 6: Noise and Vibration Part B [APP-043] and Appendix 16.5 Noise and Vibration Likely Significant Effects of the Scheme [APP-331]. This assessment was undertaken based on guidance contained within DMRB LA 111 which does not require an assessment of airborne vibration.
6.3.13	The assessment has shown that consideration of airborne vibration nuisance is only appropriate for dwellings within 40 metres of a carriageway and that at noise levels above 58 dB LA10 should be considered to cause disturbance to residential receptors.	1. Within Chapter 6: Noise and Vibration Part A [APP-042] and Chapter 6: Noise and Vibration Part B [APP-043], the operational airborne vibration study area was defined in accordance with DMRB HD 213/11 as being within 40 m of any roads identified in the operational road traffic noise detailed calculation area. The subsequent assessments of operational airborne vibration nuisance were undertaken following the guidance presented within DMRB HD 213/11. As stated within Chapter 6: Noise and Vibration Part A [APP-042] paragraph 6.8.60 and Chapter 6 Noise and Vibration Part B [APP-043] paragraph 6.8.56, DMRB HD 213/11 notes that for airborne vibration nuisance, noise levels below 58 dB $L_{10, 18hr}$ should be considered not to cause any bother to residents. 2. The assessment of operational stage impacts and effects presented within Chapter 6: Noise and Vibration Part A [APP-042] and Chapter 6 Noise and Vibration Part B [APP-043] is now superseded by the Noise Addendum [REP1-019]. The Noise Addendum follows the DMRB LA111 guidance which replaces DMRB HD 213/11 and does not include an assessment of operational airborne vibration.
6.3.14	With the exception of the new receptor introduced by the new section of dual carriageway between Priest Bridge and Felmoor Park, most receptors are already at similar distance from the existing A1 carriageway and may already have some impact from road traffic vibration.	1. The Applicant assumes that NCC is referring to the proposed new (offline) section of the A1 which is introduced by the Scheme leading to some receptors being closer to the A1 carriageway than they currently are. However, these are not new receptors.
6.3.15	This is generally acceptable, and the Council would see the proposed dualling to not introduce a source of operational vibration from the carriageways at existing and future receptors along both sections of the scheme	1. The applicant notes that NCC consider that the overall operational vibration impacts from the Scheme would be generally acceptable.
	Noise and Vibration – Construction/Demolition – Negative Impacts	
6.3.16	The applicant has predicted areas LOAEL (Lowest Observable Adverse Effect Level) and SOAEL (Significant Observed Adverse Effect Level) for construction noise and vibration, although it appears that the LOAEL areas are not shown on any of the submitted plans.	1. Potential construction noise and vibration impacts and effects have been assessed within Chapter 6 Noise and Vibration Part A [APP-042] and Chapter 6: Noise and Vibration Part B [APP-043]. Appropriate mitigation is also presented. Level 1 mitigation measures (as presented within Appendix 6.8 Construction Noise and Vibration Mitigation Clauses Part A [APP-213] and Appendix 6.9 Construction Noise and Vibration Mitigation Clauses Part B [APP-284]) would be implemented for all receptors within the Construction Stage Study Area (a distance of 300m from the boundary

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		of any construction works), rather than only at receptors predicted to exceed the LOAEL. Both Level 1 and Level 2 mitigation measures would be implemented where noise or vibration levels at sensitive receptors are predicted to exceed the SOAEL and there is potential for significant adverse effect to occur. It was therefore not deemed necessary to present the LOAEL on any Figures.
6.3.17	The applicant has proposed that LOAEL would be where construction noise was below the ambient noise level and SOAEL would follow the ABC method in the British Standard (BS 5228-1:2009+A1:2014) where the threshold would be either; A – absolute limit rounded to 5dB where ambient noise level is lower, B – threshold rounded to 5dB where ambient noise level is equal to absolute limit in A or C - threshold rounded to 5dB where ambient noise level is higher than the absolute limit in A.	1. NCC's summary of the ABC method within BS 5228-1:2009+A1:2014 which has been used to derive the construction noise SOAEL is correct.
6.3.18	These have been presented using the specific ambient noise levels measured in the baseline noise assessment at a number of measurement locations/receptors.	1. No response required.
6.3.19	The SOAEL would be the level above which significant adverse effects on health and quality of life occur and is dependent upon the nature of the noise / vibration occurring and the subjective appreciation of a receptor to any impacts. Areas identified as exceeding the SOAEL limit would introduce stricter controls on works.	1. NCC's summary is correct that where construction noise or vibration levels are predicted to exceed the SOAEL, both the Level 1 and Level 2 mitigation measures (as presented within Appendix 6.8 Construction Noise and Vibration Mitigation Clauses Part A [APP-213] and Appendix 6.9 Construction Noise and Vibration Mitigation Clauses Part B [APP-284]) would be implemented.
6.3.20	For vibration, areas of earthworks and piling (principally for bridge construction) have been identified and the receptors within these areas. For Part A there are no receptors within a SOAEL area for vibration from piling and only one in Part B. Both parts of the scheme would see receptors impacted above SOAEL by earthworks.	1. For Part A there are no receptors predicted to be within the SOAEL zone for vibration impacts from piling due to bridge and underbridge construction. For Part B, one receptor is predicted to be within the SOAEL zone for vibration impacts from piling due to bridge and underbridge construction. 2. For Parts A and B, vibration levels from the use of vibratory rollers are predicted to exceed the SOAEL at some receptors. 3. For both Parts and A and B, noise levels from earthworks are predicted to exceed the SOAEL at some receptors.
6.3.21	The applicant has submitted an outline construction environmental management plan (CEMP) which addresses noise and vibration from the construction/demolition phase. Understandably this is embryonic at this stage given that specific plant is unknown at this stage. However, generic modelling has been carried out using "standard" noise levels from a likely composition of plant along the routes and within compounds.	1. No response required.
6.3.22	The applicant has stated that:	1. No response required.

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	"The main contractor will develop and submit a noise and vibration management plan (NVMP) including method statements and any monitoring and reporting protocols that demonstrate to the Applicant that no significant impact will result from their construction works"	
6.3.23	Additionally, the applicant has submitted a statement on "statutory nuisance" as required with Regulation 5(2)(f) of the Infrastructure Planning (Prescribed Forms and Procedure) Regulations 2009. This statement concludes that the proposed scheme will not give rise to "statutory nuisance" as defined in S79 of The Environmental Protection Act 1990 with mitigation measures in place.	1. No response required.
6.3.24	The submitted documents makes reference to consents under Section 61 of The Control of Pollution Act 1974, but it is not entirely clear whether there is an intention to apply to Northumberland County Council for any such consents.	1. Within the Outline CEMP [REP1-023 and REP1-024] (and as submitted at Deadline 3), Table 3-1, Ref. S-G9 and S-N2 there is a commitment for the main contractor to produce and submit an application under Section 61 of Part III of the 1974 Act to NCC Environmental Health Department prior to commencement of construction.
6.3.25	It is noted that alternate access road and tracks have been considered for noise for the scheme and this is accepted as necessary inconvenience for the delivery of the scheme. It would be expected that these access points are not exploited to the detriment of receptors living on or near these accesses.	1. Construction mitigation measures including the implementation of Best Practicable Means at all times throughout the construction stage are presented within Section 6.9 Design, Mitigation and Enhancement of Chapter 6: Noise and Vibration Part A [APP-042] Section 6.9 Design, Mitigation and Enhancement of Chapter 6: Noise and Vibration Part B [APP-043] and Appendix 6.8 Construction Noise and Vibration Mitigation Clauses Part A [APP-213] and Appendix 6.8 Construction Noise and Vibration Mitigation Clauses Part B [APP-284]. 2. An Outline CEMP [REP1-023 and REP1-024] (and as submitted at Deadline 3) has been produced for the Scheme which includes the construction noise and vibration mitigation measures within Table 3-1 – Register of Environmental Actions and Commitments: The Scheme (Ref. S-N2 and S-N3). The measures identified, when implemented, aim to control, minimise and mitigate all potential construction stage noise and vibration impacts, including those associated with the use of construction access routes. Following the implementation of mitigation, no significant adverse effects are predicted during the construction stage of the Scheme.
6.3.26	Whilst it is expected that for some parts of the dualling, access and works may need to occur outside the normal construction hours – these should not be considered as a normal approach to the proposed dualling but exceptional works which require agreement with the Council and prior notification to local receptors.	1. Chapter 2: The Scheme [APP-037] paragraph 2.8.14 states that standard working hours would be from 7.00 am until 7:00 pm, Monday to Friday. 2. As detailed in Requirement 4(2)(c) of the dDCO [REP2-004 and 005] as well as paragraph 1.2.5 and Reference S-G4 in Table 3-1 – Register of Environmental Actions and Commitments: The Scheme of the Outline CEMP [REP1-023 and 024] (and as submitted at Deadline 3), there are exceptions for working outside these standard working hours. These exemptions include: (i) night-time closures for bridge demolition and installation; (ii) any oversize deliveries or deliveries where daytime working would be excessively disruptive to normal traffic operation; (iii) junction tie-in works; (iv) removal of overhead power lines;

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		(v) overnight traffic management measures; and (vi) cases of emergency. 3. All other extended hours beyond the standard working hours would need to be agreed in consultation with NCC.
6.3.27	Ultimately, noise and vibration from demolition/construction works can be managed and mitigated and compliance with the (to be submitted) noise and vibration management plan from the main contractor and compliance with supporting information for any COPA Section 61 "prior consent" (if this is to be applied for) will be the controlling mechanisms during development.	1. The Applicant notes that NCC accepts that noise and vibration from construction and demolition work can be managed and mitigated. As stated above in the Applicant's response to paragraph 6.3.24, within the Outline CEMP [REP1-023 and REP1-024] (and as submitted at Deadline 3), Table 3-1, Ref. S-G9 and S-N2 there is a commitment for the Applicant to submit an application under Section 61 of Part III of the 1974 Act to NCC Environmental Health Department prior to commencement of construction.

Table 1-4 – Air Quality

Ref. No.	Local Impact Report Statement:	Applicant's Response
6.4	**Air Quality – Neutral Impact**	
6.4.1	The Environmental Statement (ES) dated June 2020 (TR010041) has been produced by Highways England. Chapter 5 of the ES (DCO documents APP-040 and APP-041) refers to the air quality assessments that have undertaken. The Council is in agreement with the methodology and the baseline data used.	1. The Applicant notes that the Council is in agreement with the methodology and the baseline data used for Chapter 5: Air Quality Part A [APP-040] and Part B [APP-041]. 2. The Applicant further notes that a sensitivity test of the Scheme impacts to the updated Design Manual for Roads and Bridges (DMRB) methodology (updating from HA207/07 to LA105) was undertaken and reported in Appendix 5.8:Air Quality DMRB Sensitivity Test Part A [APP-205] and Appendix 5.7: Air Quality DMRB Sensitivity Test Part B [APP-275]. 3. In addition, an updated assessment using the DMRB LA105 methodology and a revised Scheme opening year of 2024 has been undertaken and submitted at Deadline 3 (Air Quality Updated Assessment (Scheme Opening Year 2024) (document reference 6.35)). The Council will be afforded the opportunity to comment on the updated assessment at Deadline 4.
	Operational – Neutral Impact	
6.4.2	The applicant has undertaken modelling of NO_2, PM_{10} and $PM_{2.5}$ using accepted methods and modelling based principally upon the predicted changes of road traffic flows resulting from the implementation of the scheme.	1. The Applicant notes that the Council accepts the modelling of NO2, PM10 and PM2.5 was conducted using accepted methods.
6.4.3	Baseline levels from DEFRA background maps for thirty-five (ten in Part A and twenty-five in Part B) of the nearest receptors has; NO_2 – 6 to 33 µg/m^3, PM_{10} / $PM_{2.5}$ – 8 to 24 µg/m^3.	1. The Applicant agrees with the Council's summary of the assessment presented within Chapter 5: Air Quality Part A [APP-040 and Part B [APP-041], although notes that the concentrations quoted are the baseline concentrations modelled by the Applicant for 2015 (Table 5.8 of Chapter 5 [APP-

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		040] and Part B [APP-041]) rather than baseline levels taken from the Defra background maps. The Defra baseline levels are lower and can be found in Table 5.9 [APP-040 and APP-041].
6.4.4	The modelling of nitrogen dioxide (NO_2) impacts for thirty-five receptors (human) has shown that the difference between Do-Minimum (without dualling) and Do-Something (dualling of the two sections as proposed) results in an increase of 1.0 microgramme per cubic metre (µg/m3) or less for the opening year (2023) for the majority of receptors. Only one receptor would experience an increase of +3.1 µg/m^3 and this is still below the current national Air Quality Objective for nitrogen dioxide.	1. The Applicant agrees with the Council's summary of the assessment presented within Chapter 5: Air Quality Part A [APP-040] and Part B [APP-041].
6.4.5	The modelling of particulate (PM_{10} and $PM_{2.5}$) impacts for thirty-five receptors (human) has shown that the difference between Do-Minimum (without dualling) and Do-Something (dualling of the two sections as proposed) results in an increase of 0.4 µg/m^3 for the Opening Year (2023) or less for the majority of receptors. Only one receptor would experience an increase of +1.3 µg/m^3 and this is still below the current national Air Quality Objective for PM_{10}.	1. The Applicant agrees with the Council's summary of the assessment presented within Chapter 5: Air Quality Part A [APP-040] and Part B [APP-041].
6.4.6	Current guidance on emission factors does not contain emission rates for $PM_{2.5}$ so the applicant has assumed these to be the same as for PM_{10}. This is acceptable and represents a "worst-case scenario". However, experience of roadside monitoring by Northumberland County Council has shown $PM_{2.5}$ levels to be in the region of half the measured PM_{10} levels.	1. The Applicant notes that the Council accepts the assumption presented at paragraphs 5.4.16 and 5.5.7 of Chapter 5: Air Quality Part A [APP-040] and paragraphs 5.4.16 and 5.5.6 of Chapter 5: Air Quality Part B [APP-041] that the emission rates for PM2.5 are the same as for PM10. The Applicant also notes that the Council agrees that this represents a "worst-case scenario" and that the Council's experience is that PM2.5 levels in the region are half the measured PM10 levels.
6.4.7	The predictions show that there will be a net reduction in emissions by 2038, even with an increase in AADT because of a "natural" replacement of older, higher emission vehicles over this time.	1. The Applicant agrees with the Council's summary of the assessment presented within Chapter 5: Air Quality Part A [APP-040] and Part B [APP-041]
6.4.8	This is generally acceptable, and the Public Health Protection Unit would see the proposed dualling will improve the overall flow of traffic on the entire section of dual-carriageway from Fairmoor to Ellingham and specifically along the two existing single-carriageway sections (Part A and B). This will improve emissions from the majority of smaller vehicles whose speed limit is often constrained by slower moving HGV traffic.	1. The Applicant notes that the Council accepts the position presented within Chapter 5: Air Quality Part A [APP-040} and Part B [APP-041]. The Applicant agrees that the Scheme would improve the flow of traffic on the section of dual-carriageway from Fairmoor to Ellingham.
	Construction and Demolition – Neutral Impact	
6.4.9	The applicant has not submitted any detailed or geographically specific information on the risks or mitigation from "dust" generated by construction / demolition works and this would often be something	1. The assessment of potential emissions of dust from construction works has followed the requirements of the Design Manual for Roads and Bridges (DMRB) HA207/07 in identifying potential receptors within 200m of works and presenting example mitigation measures. These

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	which would require by condition. No apparent distinction has been made between dust and particulates in relation to construction/demolition works: The Department of the Environment Minerals Division, in December 1995 described 'dust' as comprising organic or inorganic particles in the size range of 1-75µm. Dust particles with an aerodynamic diameter between 1 and 10µm are classed as particulate matter and those between 10 and 75µm are simply termed dust.	measures are included within the Outline CEMP [REP1-023 and 024] (and as submitted at Deadline 3) to avoid causing a statutory nuisance the appointed contractor would need to demonstrate 'Best Practicable Means' in mitigating emissions. The Development Consent Order (DCO) application is accompanied by a Statement Relating to Statutory Nuisance [APP-343] which sets out how the Scheme would mitigate any potential nuisance 2. In relation to the geographic distribution of the assessment of potential impacts from dust from construction works and any associated requirement for mitigation, the distribution of receptors is shown in Figure 5.1: Affected Road Network Part A [REP1-053] and Figure 5.1: Affected Road Network Part B [REP1-053]. As set out at para 5.4.22 of Chapter 5: Air Quality Part A [APP-040] and Part B [APP-041], receptors are identified within 200m of the Order limits and it is, therefore, it is assumed that dust generating activities could occur anywhere within the Order limits and that any of the identified receptors could be at risk of experiencing impacts. This assumption represents a reasonable worst case assessment and negates the requirement for an individual assessment of potential emissions of dust from construction works for each receptor. 3. No distinction is required within the assessment between dust and particulate matter. This is appropriate since particulate matter is a constituent of dust and, therefore, it is the same construction activities that are a potential source of the larger dust particles that have the potential to cause visible deposition of dust on surfaces and/or an increase in concentrations of particulate matters in air. Since the principle sources of emissions of dust and particulate matter are co-located, the same receptors are at risk of impacts from both. Further, given the low background concentrations of particulate matter, as set out in Table 5.9 in Chapter 5: Air Quality Part A [APP-040] and Part B [APP-041], there is no enhanced risk due to exposure to particulate matter that would necessitate its distinction from dust in this case.
6.4.10	Whilst it is generally accepted that the greatest dust impacts and deposition will be within 100 metres of a source and this includes both large (>30 µm) and small dust particles, there does not appear to be a risk assessment of dust and particulate impacts to local receptors.	1. An assessment of risks from dust impacts from construction works has been undertaken and has followed the requirements of DMRB HA207/07 in identifying potential receptors within 200m of works. These are the receptors at risk of impacts and, as a worst case, it is assumed that construction works could occur anywhere within the Order limits (paragraph 5.4.22 of Chapter 5: Air Quality Part A [APP-040] and Part B [APP-041]). Mitigation measures are then presented within Section 5.9 of Chapter 5: Air Quality Part A [APP-040] and Part B [APP-041]. The Council is correct to state that the greatest risk of dust impacts will be within 100 metres of a source, and this demonstrates that the identification of potential receptors within 200m of works within the assessment represents a reasonable worst case scenario. As set out in response to 6.4.10 above, no distinction is required within the assessment between dust and particulate matter since there is no enhanced risk due to exposure to particulate matter that would necessitate its distinction from dust in this case.
6.4.11	The principal source of dust/particulates will be from earthworks and the most impacted will be within one hundred metres of the source, without mitigation. There are eight receptors within 100 metres of the carriageway on Part A of the scheme, seven are these are at Fairmoor and there are thirteen receptors within 100 metres of the carriageway on Part B of the scheme, one of these is to be demolished to accommodate the scheme.	1. The Applicant agrees with the Council's summary of the assessment presented within Figure 5.4 Construction Receptors Part A [APP-078] and Figure 5.4 Construction Receptors Part B [APP-126].

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6.4.12	The applicant has submitted an outline construction environmental management plan (CEMP) which very briefly addresses dust from the construction / demolition phase. This does not constitute a dust management plan document which a contractor or sub-contractor could work from on a daily basis. The outline CEMP states that a "…dust audit programme will be devised and implemented by the main contractor".	1. Reference S-A1 of the Outline CEMP [REP1-023 and 024] (and as updated at Deadline 3) was updated at Deadline 1 to explicitly state that a Dust Management Plan will be produced by the Applicant prior to construction commencing.
6.4.13	It is recommended that the applicant commits to a dust management plan (which could include a dust audit programme) which identifies the main sources and locations of dust and particulates generation and methods to mitigate. This could be in an outline format which is refined and finalised by the main contractor.	1. Reference S-A1 of the Outline CEMP [REP1-023 and 024] (and as updated at Deadline 3) was updated at Deadline 1 to explicitly state that a Dust Management Plan will be produced by the Applicant prior to construction commencing.
6.4.14	Any dust management plan could form part of further iterations of the CEMP but the aspects relating to "dust" needs to be developed further and be specific to the likely sources from operations along the routes and within compounds and to local receptors.	1. The agreed measures within the Dust Management Plan will be activity specific and take into account proximity of potential receptors. As specified at reference S-A1 of the Outline CEMP [REP1-023 and 024] (and as updated at Deadline 3), this will be produced by the Applicant prior to construction commencing.
6.4.15	Ultimately, "dust" from demolition / construction works can be managed and mitigated and compliance with a dust management plan would be the controlling mechanism during development.	1. The Applicant notes that the Council accepts dust impacts can be managed and mitigated. Further, the Applicant agrees that the Dust Management Plan would be the mechanism through which to achieve this.

Table 1-5 – Landscape and Visual Impacts

Ref. No.	Local Impact Report Statement:	Applicant's Response:
6.5	**Landscape and Visual Impacts – Negative Impacts**	
6.5.1	The Environmental Statement (ES) dated June 2020 (TR010041) has been produced by Highways England (HE). Chapter 7 of the ES (DCO documents APP-044 and APP-045) refers to the Landscape and Visual impacts of the scheme. It is considered that one of the most major impacts of the scheme is to the landscape and the visual impacts of the proposal and therefore the Council have engaged consultants to assess these impacts in the absence of employing an in-house specialist.	1. The assessment of Landscape and Visual impacts of the Scheme are set out in Chapter 7: Landscape and Visual Part A [APP-044] and Chapter 7: Landscape and Visual Part B [APP-045]. It is inevitable that due to the nature of the Scheme there would be impacts on landscape character and visual amenity. However, as evidenced in the above chapters, the effects arising as a result of the Scheme are appropriately mitigated, and with the exception of some significant effects on visual receptors are not considered to be significant. 2. The landscape assessments have determined that there would be significant effects during construction and in winter year 1 for the landscape character associated with Part A, and for the construction period for Part B, but that by the summer of the design year in year 15, and as the planting mitigation measures mature, the effects would no longer be significant. 3. The assessment of visual effects has determined that for Part A significant visual effects would not arise, with the exception of a limited number, which due to a combination of proximity and limited opportunities to mitigate would remain subject to a significant effect in the summer of year

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		15. Similarly, for Part B, with the exception of a limited number of residential receptors the visual effects would not be significant in the summer of the year 15, by which time the proposed planting that forms the mitigation measures would have sufficiently matured to provide visual screening. 4. The Applicant has demonstrated that for the most part, the Scheme has been successful in mitigating potentially significant adverse effects, reducing its impact on the landscape.
6.5.2	This section of the report sets out the Local Impacts in relation to landscape and visual matters on behalf of Northumberland County Council (NCC). It has been prepared by Chartered Landscape Architects at Stephenson Halliday who are appointed by the Council to consider the A1 Dualling: Morpeth to Ellingham project.	1. No response required
6.5.3	Whilst the body of this report focusses on environmental impacts, we would also note the 'local impact' arising from the Applicant's desire to avoid effort and cost resulting in the use of an LVIA methodology which is out-dated; presenting the assessment as two separate LVIAs undertaken to different approaches; and adding a further document which reviews whether using the outdated methodology matters or not. This has notably complicated the reviewing of the application compared to a single LVIA undertaken to current guidance.	1. The Applicant does not accept the criticisms made. 2. Part A and Part B were originally proposed to be the subject of separate applications for Development Consent Orders (DCOs), and therefore the assessment of Part A and Part B were originally prepared separately to reflect this. As a result, there are differences in the approaches taken in Chapter 7: Landscape and Visual Impact Assessment, Part A [APP-044] and Chapter 7: Landscape and Visual Impact Assessment, Part B [APP-045]. 3. Further, as stated at paragraph 16.4.22 of Chapter 16: Assessment of Cumulative Effects of the ES [APP-062], the separate nature of the two study areas meant that a proportionate approach was taken to the assessment of landscape and visual effects, and differences in the approach to the assessment of each Part do not alter the findings of the assessment. This is confirmed in Chapter 16: Assessment of Cumulative Effects of the ES [APP-062], paragraphs 16.4.18 – 16.4.22, for consideration of the landscape and visual assessment for the Scheme. 4. The differences in the approaches are acknowledged and described in paragraph 7.1.6 in Chapter 7: Landscape and Visual Impact Assessment, Part A [APP-044], and paragraph 7.1.6 in Chapter 7: Landscape and Visual Impact Assessment, Part B [APP-045]. These differences are focused around the agreed scope (agreed in consultation with Northumberland County Council (NCC) - refer to Table 7-4 – Summary of Consultation in Chapter 7: Landscape and Visual Impact Assessment, Part A [APP-044] and Table 7-4 – Summary of Consultation in Chapter 7: Landscape and Visual Impact Assessment, Part B [APP-045]) of the assessments set out in Chapter 7: Landscape and Visual Impact Assessment, Part A [APP-044] and Chapter 7: Landscape and Visual Impact Assessment, Part B [APP-045]. 5. As detailed at paragraph 7.10.60 – 7.10.65 of Chapter 7: Landscape and Visual Impact Assessment, Part A [APP-044] and paragraph 7.10.28 – 7.10.33 of Chapter 7: Landscape and Visual Impact Assessment, Part B [APP-045] the assessment referred to IAN 135/10, which at the time was the current guidance for undertaking landscape and visual assessments for highway schemes. Following the issuance of LA 107, the Applicant undertook a sensitivity test, Appendix 4.5 DMRB Sensitivity Test [APP-197], which concluded that whilst there would be slight differences in the approach had the LA107 guidance been applied, these would not result in substantial changes to the findings of the assessment. 6. This approach is in accordance with DMRB GG101 Rev 0 (in particular, paragraphs 1.3 and 1.4), in that the Applicant's approach to the adoption of new guidance was to rely upon existing assessments where they have reached a stage such that additional significant costs would be incurred should the new guidance be adopted. For the Scheme, assessments were substantially complete, and should the new guidance have been adopted significant costs would have been

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		incurred. Nevertheless, and out of an abundance of caution, the Applicant undertook sensitivity tests to demonstrate that the conclusions of the original assessments remained valid.
6.5.4	There is agreement on a number of aspects of the landscape and visual impacts as set out within the Statement of Common Ground. This report focusses on those matters which are not agreed, as follows: – Certainty and clarity of design and mitigation measures – see paragraph 6.5.5 -6.5.8; – Adequacy of mitigation measures – see paragraphs 6.6.9 - 6.6.10. – Landscape character – consideration of sensitivity and effects – see paragraphs 6.6.11 - 6.6.23 – Effects on viewpoints – see paragraph 6.6.24; and – Visual effects on communities – see paragraphs 6.6.25 - 6.6.52	1. The Applicant has responded to the specific points raised at paragraphs 6.5.5 to 6.5.52, below.
	Design and Mitigation – Certainty and Clarity of Design and Mitigation	
6.5.5	NCC remain concerned that the landscape design and mitigation measures included within the application are not clearly communicated by the plans which include a mix of proposed and 'desirable' measures. Furthermore, the inclusion of these plans as ES Figures (Part A Figure 7.8 and Part B Figure 7.14) rather than application plans suggests a stance that regards the road itself as the proposal and landscape mitigation as an 'add on'.	1. Whether proposals are contained in separate plans or in the Environmental Statement (ES) is not relevant to the effectiveness of mitigation. As the ES will be a certified document it is reasonable and proportionate for its figures to be used as designs in appropriate circumstances. 2. As set out in paragraph 7.5.1 points q and r of Chapter 7: Landscape and Visual, Part A [APP-044] and on Figure 7.8: Landscape Mitigation Masterplan Part A, [APP-095] (latest version submitted at Deadline 3) and which has been agreed with NCC and is evidenced in the SoCG [REP1-028] (latest version submitted at Deadline 3), only those measures that are within the Order Limits and that form the essential mitigation strategy are committed to and have been incorporated into the assessment. Likewise, for Part B, paragraph 7.5.1(c) of Chapter 7: Landscape and Visual Part B [APP-045] sets out the mitigation measures to be provided, in line with those set out on Figure 7.10 Landscape Mitigation Plan Part B [App-144], and Figure 7.14 Landscape Mitigation Plan including Assessment Parameter 3 Part B [APP-148], should parameter 3 be required. 3. Those hedgerows identified on Figure 7.8 Landscape Mitigation Masterplan Part A [APP-095] (latest version submitted at Deadline 3) as 'Proposed hedgerows – by agreement', would require agreement with the adjacent landowner as they are outside of the Order limits, as indicated on Figure 7.8: Landscape Mitigation Masterplan Part A [APP-095] (latest version submitted at Deadline 3), and which has been agreed with NCC and is evidenced in the SoCG (latest version submitted at Deadline 3). As these hedgerows cannot be committed to at this stage, the mitigating effect has not been included within the assessment of landscape and visual effects as set out in Chapter 7: Landscape and Visual, Part A [APP-044]. Nonetheless, the secured measures that form the essential mitigation measures are sufficient to appropriately mitigate the Scheme, as set out in Chapter 7: Landscape and Visual Part A [APP-044] and Chapter 7: Landscape and Visual Impacts Part B [APP-045]. 4. Other desirable measures (for example, proposed bunds that, depending on the amount of surplus material, might not be required) have been assessed within Table 7-25 - Consideration of Assessment Parameters in Chapter 7: Landscape and Visual, Part A [APP-044], specifically parameters 4 and 5, which address the profile of embankment slopes and non-essential bunds to

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		dispose of material respectively. As confirmed in Table 7-25, the conclusions of the assessment as set out in Chapter 7: Landscape and Visual, Part A [APP-044] are not significantly altered as a result of any or all of these parameters being adopted. 5. The final design will be approved by the Secretary of State as the Landscape Mitigation Masterplan (Part A) and the Landscape Mitigation Plan (Part B) following consultation with NCC as per Requirement 5 of Schedule 2 to the draft DCO [REP2-004 and 005] 6. The landscape design and mitigation proposals forming the essential mitigation strategy are illustrated on Figure 7.8: Landscape Mitigation Masterplan Part A [APP-095] (latest version submitted at Deadline 3) and which has been agreed with NCC and is evidenced in the SoCG [REP1-028] (latest version submitted at Deadline 3), Figure 7.10 Landscape Mitigation Plan Part B [APP-144]) and Figure 7.14 Landscape Mitigation Plan including Assessment Parameter 3 Part B [APP-148] and are referred to in the relevant ES chapters. These figures are secured within the Outline CEMP [REP1-023 and 024] (and as updated at Deadline 3) (refer to Table 3-1, S-L1 – S-L4), and therefore form an integral part of the Application. They are also individually identified as documents to be certified in Schedule 12 of the draft DCO [REP2-004 and 005]. Further, the landscape design as set out in Figure 7.8: Landscape Mitigation Masterplan Part A [APP-095] (latest version submitted at Deadline 3) and which has been agreed with NCC and is evidenced in the SoCG (latest version submitted at Deadline 3), and Figure 7.10 Landscape Mitigation Plan Part B [APP-144]) and Figure 7.14 Landscape Mitigation Plan including Assessment Parameter 3 Part B [APP-148], will be approved by the Secretary of State following consultation with NCC as per Requirement 5 of Schedule 2 to the draft DCO [REP2-004 and 005]. As such, the Applicant is committed to delivering the measures required to mitigate the impacts of the Scheme.
6.5.6	Apart from the lines and areas on the plans and brief descriptions in the ES chapters and Outline CEMP, very little information is provided regarding the landscape proposals in terms of design intent or the proposed materials and approaches to achieve this.	1. The key used on Figure 7.8: Landscape Mitigation Masterplan Part A [APP-095] (latest version submitted at Deadline 3) and which has been agreed with NCC and is evidenced in the SoCG [REP1-028] (latest version submitted at Deadline 3), Figure 7.10: Landscape Mitigation Plan Part B [APP-144] and Figure 7.14 Landscape Mitigation Plan including Assessment Parameter 3 Part B [APP-148] provides for typical landscape features that would form elements within the design and delivery of a highway scheme, with Sheet 19 of 19 of Figure 7.8: Landscape Mitigation Masterplan Part A [APP-095] (latest version submitted at Deadline 3) and which has been agreed with NCC and is evidenced in the SoCG (latest version submitted at Deadline 3), providing indicative species mixes and composition. This approach is identified in LD 117, which is Highway England's guidance with reference to landscape design, which replaced DMRB Volume 10, Section 0, Part 3 [REP2-022]. However, this earlier document provided more explanation of what the Landscape Elements should deliver, and in the absence of further details in LD117, the Applicant has reverted to the earlier guidance. Within the guidance are Environmental Functions, which outline the purpose of providing particular elements within the design, for example, elements coded as EFA are provided for landscape screening, EFB for landscape integration. 2. Within these Environmental Functions are elements, and these range from Environmental to Landscape Elements, these providing additional information in terms of the form that the landscape elements would take and how these would be managed, in order to deliver the environmental function. 3. As such, the level of detail provided is in accordance with the relevant guidance. Further, the Landscape design as set out in Figure 7.8: Landscape Mitigation Masterplan Part A [APP-095] (latest version submitted at Deadline 3) and which has been agreed with NCC and is evidenced in the SoCG (latest version submitted at Deadline 3), Figure 7.10 Landscape Mitigation Plan Part B

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		[APP-144]) and Figure 7.14 Landscape Mitigation Plan including Assessment Parameter 3 Part B [APP-148] should Parameter 3 be adopted, will be approved by the Secretary of State following consultation with NCC as per Requirement 5 of Schedule 2 to the draft DCO [REP2-004 and 005].
6.5.7	The approach taken to this application contrasts sharply with that for another Highways England NSIP - the M25 junction 10/A3 Wisley interchange, which has clear, holistic layout plans including the intended treatment of planting and footpaths, and a detailed landscape and ecology management and monitoring plan (LEMP) to provide further supporting detail: https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010030/TR010030-000108-TR010030_2.8_scheme_layout_plans11_31.pdf https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010030/TR010030-000202-TR010030_6.5_environmental_statement_appendix7.20_Lemp.pdf	1. The application documents for the Scheme provide all of the necessary information to the ExA in order to consider the environmental, and specifically the landscape and visual, effects. NCC has made a comparison with the M25 junction 10/A3 Wisley interchange, and whilst the presentation of the documentation is different, the nature of the information provided is comparable. Indeed, the information provided in Figure 7.8: Landscape Mitigation Masterplan Part A [APP-095] (latest version submitted at Deadline 3) and which has been agreed with NCC and is evidenced in the SoCG (latest version submitted at Deadline 3), and Figure 7.10 Landscape Mitigation Plan Part B [APP-144], and Figure 7.14 Landscape Mitigation Plan including Assessment Parameter 3 Part B [APP-148] is proportionate and adheres to the Highways England guidance provided in LD117. 2. In response to NCC's response to LV.1.17 of Responses to The ExA's Written Questions (ExQ1) [REP1-078], reference ExA S-L100 in Table 3-1 - Register of Environmental Actions and Commitments: The Outline CEMP [REP1-023 and 024], submitted at Deadline 3, has been updated to include a commitment that the Applicant will prepare a Landscape and Ecological Management Plan (LEMP) for each of Part and Part B prior to the construction commencement of that Part and will follow Highways England (LA120 Environmental Management Plan) guidance and will include reference the following documents: – Table 3-1 of the Outline CEMP [REP1-023 and 024] (and as submitted at Deadline 3). – Figure 7.8: Landscape Mitigation Masterplan Part A [APP-095] (latest version submitted at Deadline 3), and which has been agreed with NCC and is evidenced in the SoCG (latest version submitted at Deadline 3), and Figure 7.10 Landscape Mitigation Plan Part B [APP-144] or Figure 7.14: Landscape Mitigation Plan including Assessment Parameter 3 Part B of the ES [APP-148], whichever is appropriate. – Figure 9.2: Ecological Mitigation Plan (Public) Part A [APP-107]. – Appendix 9.21: Ancient Woodland Strategy Part A of the ES [APP-247]. – Appendix LV.2 Trees to be Removed and Replaced at Coronation Avenue WQ LV.1.8 - Rev 0 [REP1-044].
6.5.8	Whilst we understand the desire for some flexibility before finalizing the detailed design, we consider that the level of detail included in the M25 junction 10/A3 Wisley interchange application is sufficient to give some certainty over the effectiveness and delivery of the landscape proposals whilst retaining flexibility, and the application in its present form is too vague.	1. The application documents for the Scheme, specifically Figure 7.8: Landscape Mitigation Masterplan Part A, [APP-095] (latest version submitted at Deadline 3) and which has been agreed with NCC and is evidenced in the SoCG [REP1-028] (latest version submitted at Deadline 3), and Figure 7.10 Landscape Mitigation Plan Part B [APP-144], have been prepared in accordance with LD117, supported through the additional information within the DMRB, Volume 10, Part 0, Sections 2 and 3, provided at Deadline 2 (refer to Applicant's Comments on Responses to Written Questions - Appendix B - DMRB Guidance [REP2-022]), which provide greater information on the nature and form of the proposed mitigation measures and provide all of the necessary information to the ExA in order to consider the landscape and visual effects of the Scheme. 2. Further, the detailed landscape scheme, based on the above drawings and Table 3-1 - Register of Environmental Actions and Commitments: The Scheme within the Outline CEMP [REP1-023 and 024] (and as submitted at Deadline 3), will be approved by the Secretary of State following consultation with NCC as per Requirement 5 of Schedule 2 to the draft DCO [REP2-004 and 005].

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		3. NCC has made a comparison with the M25 junction 10/A3 Wisley interchange, and whilst the presentation of the documentation is different, the nature of the information provided is comparable. The information provided in Figure 7.8: Landscape Mitigation Masterplan Part A [APP-095] (latest version submitted at Deadline 3) and which has been agreed with NCC and is evidenced in the SoCG (latest version submitted at Deadline 3), and Figure 7.10 Landscape Mitigation Plan Part B [APP-144] or Figure 7.14 Landscape Mitigation Plan including Assessment Parameter 3 Part B [APP-148] is proportionate and adheres to the Highways England guidance provided in LD117.
	Adequacy of Mitigation	
6.5.9	Notwithstanding the uncertainty of the landscape proposals, we also have some concerns about their adequacy. In some cases, this overlaps with elements of uncertainty or lack of detail such that whilst it is likely that the design intent is to provide adequate mitigation, there is insufficient detail or certainty to ensure effectiveness. In other cases, we judge that the proposed mitigation would be insufficient regardless of the design intent.	1. For the reasons detailed above, the Applicant does not accept that the landscape proposals are uncertain, lacking in detail, insufficient or inadequate. Nonetheless, the Applicant has responded to points raised by NCC in relation to the specific locations listed within paragraph 6.5.10, below.
6.5.10	The key areas where we have concerns are:	1. The Applicant has addressed the specific concerns relating to the landscape mitigation strategy in the following paragraphs.
	– Loss and very limited reinstatement of trees within Coronation Avenue –The removal of 187 no. (mostly category B) of the 300 no. trees that form the Coronation Avenue is proposed to be mitigated by 38 no. trees planted at roughly 100m intervals – which, even at the 'Design Year' would fail to achieve the appearance of an avenue (see photomontages for viewpoint 6). No justification has been provided for the inadequacy of the replanting, which will have a permanent and adverse effect on landscape fabric due to the loss of mature trees in good condition, local character (paras 6.6.11-23) and views (see para 6.6.24).	1. The Applicant has prepared a draft strategy for the replacement of trees along the Coronation Avenue, identifying the final number and spacings of the replacement trees that would be planted to restore the landscape feature. This is provided in Appendix LV.2 Trees to be Removed and Replaced at Coronation Avenue WQ LV.1.8 [REP1-044] and was agreed with NCC via email in January 2021, as recorded within the Statement of Common Ground (SoCG) submitted at Deadline 3.
	– Lack of confidence in the effectiveness of mitigation and the potential appearance of bunding and the proposed junction in views from Fenrother (paras 6.6.28-30). –	1. The Applicant has had further discussions with NCC regarding the current landscape design associated with the Fenrother Junction and has submitted an updated landscape design, capturing the minor amendments agreed with NCC, as evidenced in the SoCG (revised at Deadline 3), in an updated Figure 7.8: Landscape Mitigation Masterplan Part A [APP-095} at Deadline 3. The updates in respect of the Fenrother Junction are a greater density of trees on either side of the carriageways; additional trees extending around the junction and along the link road to the former A1; and additional woodland to the west of the junction.

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	– Lack of confidence in the effectiveness of mitigation and the adequacy of 'individual tree' planting proposed to mitigate effects in views from Causey Bridge (paras 6.6.31-34). –	1. The Applicant has had further discussions with NCC regarding the current landscape design associated with the Causey (Park) Bridge and has submitted an updated landscape design, capturing the minor amendments agreed with NCC, as evidenced in the SoCG (revised at Deadline 3), in an updated Figure 7.8: Landscape Mitigation Masterplan Part A [APP-095} at Deadline 3. The updates in respect of the Causey (Park) Bridge are an indication of additional tree planting within the previously proposed hedgerow to the east of the Scheme; scrub planting along the embankment slope; and additional tree planting within the area of the drainage attenuation feature.
	– Inadequate mitigation of significant visual effects on the community at West Moor (see 6.6.37-39 below). –	1. The Applicant has had further discussions with NCC regarding the current landscape design associated with the West Moor Junction and has submitted an updated landscape design, capturing the minor amendments agreed with NCC, as evidenced in the SoCG (revised at Deadline 3), in an updated Figure 7.8: Landscape Mitigation Masterplan Part A [APP-095] at Deadline 3. The updates in respect of the West Moor Junction are additional tree planting within the previously proposed hedgerow to the west of the junction, tying previously proposed woodland on the embankment slope with the proposed hedgerow and trees extending west along West Moor Road.
	– The provision of 'hedgerows' of unspecified scale along stretches of Part B, where it is judged that substantial hedgerows or tree belts would provide more effective and characteristic mitigation (see 6.6.20 -23 and 6.6.40 onwards below).	1. As identified in 6.5.6 above, the Applicant has drawn on guidance provided in DMRB Volume 10, Section 0, Part 3 [REP2-022] to provide further information in relation to the form that landscape elements, as identified on Figure 7.8: Landscape Mitigation Masterplan Part A [APP-095] (latest version submitted at Deadline 3) and which has been agreed with NCC and is evidenced in the SoCG (latest version submitted at Deadline 3), Figure 7.10 Landscape Mitigation Plan Part B [APP-144] and Figure 7.14 Landscape Mitigation Plan including Assessment Parameter 3 Part B [APP-148]. For Parts A and B these comprise a mixture of: 2. **Landscape Element 4.3** – Native Species Hedgerows – "Shrub or tree species appropriate to the location or as exist already on site managed as informal hedgerows with cyclical laying where appropriate". A typically untrimmed hedgerow that would naturally develop, with the capacity to provide a robust screen to features of the highway. 3. **Landscape Element 4.4** – Native Hedgerows with Trees – "Shrub and occasional tree species appropriate to the location or as exist already on site with intermittent standard trees". A typically untrimmed hedgerow that would naturally develop, with the capacity to provide a robust screen to features of the highway, with the added benefit of tree species that would punctuate the hedgerow to achieve greater screening or integration with similar features within the landscape. 4. Neither of these landscape elements would require routine trimming, except for any potential issues of forward visibility which has been avoided through their location away from the edge of carriageways. As a result, they would be planted in accordance with best practice and as a double staggered row of plants, predominantly hawthorn, and allowed to establish naturally. Once established it is reasonable to expect that the hedgerow would form a 4-5m high dense hedgerow with trees, that would serve to substantially screen the elements of the highway. As such, the formation of the hedgerow types would represent a substantial hedgerow, and in combination with taller tree species, as per Landscape Element 4.4 – Native Hedgerows with Trees, would create a substantial landscape element, capable of screening the majority of the elements of the Scheme.
	Local Landscape and Visual Impacts	

Ref. No.	Local Impact Report Statement:	Applicant's Response:
	Effects on Landscape Character	
6.5.11	For both Part A and Part B we identified some concerns arising from the methodology in relation to the way in which landscape character is considered: – The landscape susceptibility judgements are not explained or supported by way of reference to guidance or factors considered – the assessment text primarily focuses on quality and value. – The identified effects on landscape character pay insufficient attention to localised effects, with this tendency being particularly pronounced for Part B.	1. The assessment was undertaken in accordance with Interim Advice Note (IAN) 135/10, and sensitivity has been determined using descriptions set out in Annex 2 Table 1 Visual Sensitivity and Typical Descriptors. The Applicant carried out a sensitivity test as provided in Appendix 4.5 DMRB Sensitivity Test [APP-197], which concluded that adopting the LA107 methodology would not change the overall findings of the assessment. 2. In line with IAN 135/10 the approach to landscape sensitivity is primarily focused on quality and value, alongside the capacity of the landscape features to be substituted or replaced. Nevertheless, the Applicant has provided an indication of the susceptibility within the assessment, and the approach to incorporating susceptibility into the assessment has been outlined in paragraph 7.4.36 – 7.4.37 of Chapter 7: Landscape and Visual Part A [APP-044] and paragraph 7.3.35 – 7.3.36 of Chapter 7: Landscape and Visual Part B [APP-045]. Susceptibility for the landscape character areas is identified, alongside quality and value, in Table 7-15 - Local Landscape Character Area, in Chapter 7: Landscape and Visual I Part A [APP-044], and Table 7-1 – Appendix 7.3: Landscape Effects Schedule Part B [APP-288]. Nevertheless, the emphasis remains on quality and value in determining landscape sensitivity, as these are the primary considerations in undertaking an assessment in line with IAN 135/10. 3. The identified effects on landscape character have considered the effect of the Scheme, within the context of the defined character areas, and consider both local and area wide effects, with reference being made to specific locations within Appendix 7.1 Landscape Effects Schedule Part A [APP-216] and Appendix 7.3 Landscape Effects Schedule Part B [APP-288], in line with guidance provided in IAN 135/10. As such, it is not accepted that insufficient attention has been paid to localised effects. 4. The assessment of landscape character effects for Part A and Part B are outlined in Appendix 7.1 Landscape Effects Schedule Part A [APP-216] and Appendix 7.3 Landscape Effects Schedule Part B [APP-288]. The Applicant considers that these are proportionate in the level of detail provided against the nature of the proposals. This is particularly relevant for Part B as an online widening, whereby the existing A1 is an existing feature of the landscape.
6.5.12	Taken together with our concerns regarding the lack of detail in mitigation proposals, we judged it appropriate to reconsider both the sensitivity and assessment of effects for the host landscape character areas through which the proposal passes in order to identify the local impacts and ensure that mitigation addresses localised impacts on landscape character.	1. The Applicant does not accept NCC's concerns with respect to the mitigation proposals, sensitivity and potential effects on the host character areas and has responded to specific concerns below in rows 6.5.15 – 6.5.52.
6.5.13	Appendix 1 contains a full consideration of landscape sensitivity for the four main host landscape character areas.	1. NCC has identified within Appendix 1 of the LIR [REP1-071], consideration of the landscape sensitivity for the four main host landscape character areas, which the Applicant has considered in comparison with the assessment as set out in Chapter 7: Landscape and Visual Part A [APP-044] and Chapter 7: Landscape and Visual Part B [APP-045]. Whilst the approach taken by NCC is aligned with LA107, and is different to that adopted by the Applicant in determining sensitivity, and the terminology used to describe sensitivity also varies, the sensitivity ratings are broadly similar in using a three tier description rating. Whilst the two approaches differ, the conclusions on sensitivity are broadly comparable, this supports the Applicant's findings of the sensitivity test

<table>
<tr><th>Ref. No.</th><th>Local Impact Report Statement:</th><th>Applicant's Response:</th></tr>
<tr><td></td><td></td><td>provided in Appendix 4.5: DMRB Sensitivity Test [APP-197], that the assessment carried out by the Applicant would not give rise to a material change in the findings had LA107 been adopted.
<table>
<tr><th>LCA</th><th>NCC's Assessment of Sensitivity</th><th>Applicant's Assessment of Sensitivity (equivalent NCC rating)</th></tr>
<tr><td>LCA 38b Longhorsely (Part A South)</td><td>Medium/Low</td><td>Moderate (Medium)</td></tr>
<tr><td>LCA 35a Coquet Valley (Part A North)</td><td>Medium</td><td>High (High)</td></tr>
<tr><td>LCA 3c Rock (Part B East)</td><td>Medium</td><td>High (High)</td></tr>
<tr><td>LCA 8c Charlton Ridge (Part B West)</td><td>Medium</td><td>Moderate (Medium)</td></tr>
</table>
2. As can be seen in the table above, NCC and the Applicant do not fundamentally disagree with the relative sensitivity, and there is a level of professional judgement that has been applied in determining these. As a result, the Applicant has for LCA35a Coquet Valley and LCA 3c Rock assessed the sensitivity to be greater than NCC, which, depending upon the magnitude of change considered likely to arise may give rise to a more significant effect. This represents a reasonable worst case assessment, and the use of the sensitivity categorisations assigned by NCC would not result in any increase to the significance of effects within the assessment set out at Chapter 7: Landscape and Visual Part A [APP-044] and Chapter 7: Landscape and Visual Part B [APP-045].</td></tr>
<tr><td>6.5.14</td><td>Appendix 2 contains a consideration of effects on landscape character for the four main host landscape character areas.</td><td>1. NCC has identified within Appendix 2 of the LIR [REP1-071], consideration of the landscape effects on the four main host landscape character areas, which the Applicant has considered in comparison with the assessment as set out in Chapter 7: Landscape and Visual Part A [APP-044] and Chapter 7: Landscape and Visual Part B [APP-045]. Whilst the approach taken by NCC is different to that adopted by the Applicant in determining significance of effect, the terminology used to describe significance does not vary, with the exception that NCC have in some instance provided a split rating i.e. Moderate/Minor Adverse, whereas the Applicant has , the sensitivity ratings are broadly similar in using a three tier description rating. Whilst the two approaches differ, the conclusions on sensitivity are broadly comparable this supports the Applicant's findings of the sensitivity test provided in Appendix 4.5: DMRB Sensitivity Test [APP-197], that the assessment carried out by the Applicant would not give rise to a material change in the findings had LA107 been adopted.</td></tr>
</table>

Ref. No.	Local Impact Report Statement:	Applicant's Response:

LCA	NCC's Assessment of Landscape Effects	Applicant's Assessment of Landscape Effects
LCA 38b Longhorsley (Part A South)	Moderate Adverse (findings of the Applicant's assessment are agreed)	Moderate Adverse
	Moderate Adverse (findings of the Applicant's assessment are agreed)	Moderate Adverse
	Moderate Adverse	Slight Adverse
LCA 35a Coquet Valley (Part A North)	Moderate Adverse (localised Large Adverse around the bridge construction) (findings of the Applicant's assessment are agreed)	Moderate Adverse (localised Large Adverse around the bridge construction)
	Slight Adverse (findings of the Applicant's assessment are agreed)	Slight Adverse
	Slight Adverse (findings of the Applicant's assessment are agreed)	Slight Adverse
LCA 3c Rock (Part B East)	Moderate Adverse (findings of the Applicant's assessment are agreed)	Moderate Adverse
	Moderate Adverse	Slight Adverse
	Slight Adverse (findings of the Applicant's assessment are agreed)	Slight Adverse
LCA 8c Charlton Ridge (Part B West)	Moderate Adverse (findings of the Applicant's assessment are agreed)	Moderate Adverse
	Moderate/Minor Adverse	Slight Adverse

Ref. No.	Local Impact Report Statement:	Applicant's Response:

	Neutral (findings of the Applicant's assessment are agreed)	Neutral

2. As can be seen in the table above, in the majority of cases NCC and the Applicant do agree as to the significance of effect for the host landscape character areas. The differences between NCC's and the Applicant's assessment of significance in relation to LCA 38b Longhorsley and LCA 8c Charlton Ridge are analysed below:
   - **LCA 38b Longhorsley** - NCC considers that the long-term effect at summer year 15 would remain moderate adverse, as a result of a higher magnitude of impact. This is in contrast to the Applicant's assessment, which concludes that the effect would be slight adverse as outlined in Table 7-20 - Landscape Character Residual Effects – Operation of Chapter 7: Landscape and Visual Part A [APP-044]. However, within paragraph 6.6.19 of NCC's LIR [REP1-071] and within Appendix 2 (page 75), NCC note that further mitigation associated with West Moor Junction and the Coronation Avenue would reduce the effect for this character area further, to below the threshold of significance. The Applicant has provided an updated landscape strategy within Figure 7.8: Landscape Mitigation Masterplan Part A [APP-095] at Deadline 3, and which has been agreed with NCC as evidenced in the SoCG (revised at Deadline 3), which provides for additional tree planting west of the West Moor Junction, and further clarification as to the tree replacement strategy for the Coronation Avenue. These provide the clarification as to further mitigation requested by NCC, and result in the reduction of the effect for this character area. This reflects the position presented by the Applicant within Chapter 7: Landscape and Visual Part A [APP-044].
   - **LCA 8c Charlton Ridge** - NCC consider that immediately following construction and in winter of year 1, the effect on LCA 8c Charlton Ridge would be marginally greater than the effect identified by the Applicant, although this remains below the threshold of significance. NCC agree with the findings of the Applicant's assessment that by the summer of year 15, and with mitigation measures maturing, the effect would be slight adverse and non-significant. The difference in the findings of the assessment are attributable to the degree to which NCC consider the magnitude of change to be greater to the south of the character area (moderate/slight magnitude) giving rise to a moderate/slight significance of effect as outlined in Appendix 2 (page 78) of NCC's LIR [REP1-071]; in comparison to the Applicant's assessment of (negligible) giving rise to a slight adverse significance of effect, as outlined in Table 7-20 - Landscape Character Residual Effects – Operation of Chapter 7: Landscape and Visual Part A [APP-044].
3. In summary, the difference in the assessment of effects outlined by NCC are attributable to the Applicant's clarification of the mitigation at West Moor Junction and Coronation Avenue not having been available to NCC at the time the assessment set out in Appendix 2 to the LIR [REP1-071] was carried out. With the exception of LCA 38b Longhorsley and LCA 8c Charlton Ridge, NCC's assessment of significance accords with that presented within Chapter 7: Landscape and Visual Part A [APP-044] and Chapter 7: Landscape and Visual Part B [APP-045].

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	Part A	
6.5.15	Part A passes mainly through two host landscape character areas (omitting the small area at the southern end near Morpeth).	1. The Applicant can confirm that the two host character areas referred to by NCC are: – LCA 35a Coquet Valley – LCA 38b Longhorsley 2. The geographic extent of these are set out in Figure 7.2 Landscape Character Area Part A [APP-089]. As part of the baseline studies, the Applicant identified that the north east area of LCA 38b Longhorsley had a particular concentration of recreational (non-agricultural) land uses associated with it, which along with the expanse of the Eshott Airfield, resulted in the area being identified as its own host character area within the assessment, outlined in Chapter 7: Landscape and Visual Part A [APP-044]. This is identified as: – LCA 38b(1) Hub of Recreational Activity. 3. The small area identified by NCC to the southern end near Morpeth recognised the development of the Northgate area of Morpeth and the change from a largely rural character area to one that is more noticeably urban in nature. This is identified as: – LCA 35b (2) Northgate
6.5.16	The ES LVIA assessment of the magnitude of effects on character area 35a Coquet Valley is agreed. Given the slightly lower assessment of sensitivity set out within Appendix 1, its is judged that effects may be of slightly lower significance than those set out within the ES, however NCC agree that effects during construction would be significant and effects after construction would not be, reducing to negligible with time as vegetation matures.	1. The Applicant acknowledges NCC's agreement of the effects on 35a Coquet Valley presented within the ES, the effects being significant during construction but reducing to non-significant as the woodland re-establishes (refer to Appendix 7.1 Landscape Effects Schedule Part A [APP-216]).
6.5.17	As set out within Appendices 1 and 2, the ES LVIA assessment of effects on character area 38b Longhorsley at the construction and early completion stages is agreed. However, it is judged that the significance of permanent effects greater than Minor magnitude effects (defined within the ES as "Slight loss or damage to existing character or feature and elements, and/or the addition of new but uncharacteristic features and elements").	1. The Applicant acknowledges agreement on the assessment of effects during construction and early completion stages (winter Year 1), refer to Appendix 7.1 Landscape Effects Schedule Part A [APP-216]. 2. As detailed at paragraph 6.5.14, above, there is some disagreement in relation to the assessment of significance for LCA 38b Longhorsley whereby NCC consider that the long-term effect at summer year 15 (referred to as permanent by NCC) would remain moderate adverse, as a result of a higher magnitude of impact. The differences can attribute to professional judgement along with the Applicant's clarification of the mitigation at West Moor Junction and Coronation Avenue not having been available to NCC at the time the assessment set out in Appendix 2 to the LIR [REP1-071] was carried out. It is the professional judgement of the Applicant's landscape advisor that the damage to existing landscape character and elements would be limited, with the Scheme forming a new uncharacteristic feature of the landscape of LCA 38b Longhorsley but which would be substantially screened by the proposed mitigation measures by year 15. This reflects the assessment presented Table 7-20 - Landscape Character Residual Effects – Operation of Chapter 7: Landscape and Visual Part A [REF]APP-044]. 3. Paragraph 6.6.19 of NCC's LIR [REP1-071] and Appendix 2 (page 75) goes on to note that some further mitigation associated with West Moor Junction and the Coronation Avenue would reduce the effect further, and importantly below the threshold of significance. The Applicant has

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		responded to this by providing an updated landscape strategy within Figure 7.8: Landscape Mitigation Masterplan Part A [APP-095] at Deadline 3, which has been agreed with NCC, as evidenced in the SoCG [REP1-028] (provided at Deadline 3), which provides for additional tree planting west of the West Moor Junction, and further clarification as to the tree replacement strategy for the Coronation Avenue. As such, it is the professional opinion of the Applicant's landscape advisor that the effect would, in the summer of year 15 be slight adverse, as presented at Table 7-20 - Landscape Character Residual Effects – Operation of Chapter 7: Landscape and Visual Part A [APP-044].. The mitigation measures continuing to mature beyond year 15 would further integrate the Scheme into the landscape.
6.5.18	The development involves the introduction of the entirely new elements of dual carriageway and grade-separated junctions which do not currently exist within the character area, and the loss and inadequate replacement of Coronation Avenue, which is a key feature of the A1 corridor in this area. Screening by existing and proposed vegetation would mean that away from these more obvious features the change would be less apparent, and the extent of effects would be fairly contained.	1. The Applicant agrees with NCC's statement that both the dual carriageway and grade separated junctions are new elements within this landscape character area. The Applicant also notes that NCC's agrees that any change away from key features would be less apparent and the effects contained. 2. Within the landscape strategy, refer to Figure 7.8 Landscape Mitigation Masterplan [APP-095] (latest version submitted at Deadline 3) and which has been agreed with NCC and is evidenced in the SoCG (latest version submitted at Deadline 3), the Applicant has provided a robust landscape strategy, and it is the Applicant's view that this provides sufficient mitigation so as to avoid significant effects on the perception of the landscape character of LCA 38b Longhorsley in the long term. This includes the provision of mitigation for "more obvious features" such as the Coronation Avenue and proposed junctions. 3. The Applicant would also draw the ExA's attention to the additional detail provided within the strategy for the replacement of the Coronation Avenue provided at Deadline 1 – refer to Appendix LV.2 Trees to be Removed and Replaced at Coronation Avenue WQ LV.1.8 - Rev 0 [REP1-044], which has been agreed with NCC. This clarification on the replacement of the Coronation Avenue has been incorporated into an updated Figure 7.8 Landscape Mitigation Masterplan Part A, (latest version submitted at Deadline 3) and which has been agreed with NCC and is evidenced in the SoCG (latest version submitted at Deadline 3). As such, the Applicant does not accept that the mitigation strategy, in relation to Coronation Avenue or otherwise, is inadequate.
6.5.19	NCC agree that the permanent effects would fall below the threshold of significance, but judge that this is more borderline than the ES suggests, falling closer to the definition of Moderate magnitude effects ("Partial loss or noticeable damage to existing character or distinctive features and elements, and/or the addition of new but uncharacteristic noticeable features and elements."). Improvements to the Coronation Avenue replanting to achieve a more substantial replacement and further mitigation planting around the West Moor junction to achieve better screening (akin to the more substantial planting proposals around the proposed High Laws junction) are needed to mitigate effects to the lower levels assessed by the ES.	1. The Applicant notes NCC's agreement that the permanent effects would fall below the threshold of significance. 2. NCC consider that the permanent effects (aligning with summer Year 15 and beyond) would give rise to a moderate magnitude of change which on the character area of medium/low sensitivity. This is slightly different to the Applicant's assessment (refer to Appendix 7.1 Landscape Effects Schedule Part A [APP-216]), which judges the character area to be of slightly higher sensitivity (moderate) but the magnitude of impact, taking the maturation of the mitigation strategy into account, would be in the order of minor. In contrast, in NCC's opinion the permanent effect would be moderate adverse (significant), but some additional detail on the mitigation measures associated with West Moor Junction and the replacement of the Coronation Avenue would mitigate the effects to the lower levels presented in the ES. 3. The Applicant has considered NCC's suggestion of additional mitigation measures associated with the West Moor Junction and has updated the mitigation strategy for Part A to include additional tree planting to the west of the junction's slip road, as provided in an updated Figure 7.8 Landscape Mitigation Masterplan Part A [APP-095] submitted at Deadline 3 and which has been agreed with NCC and is evidenced in the SoCG (latest version submitted at Deadline 3) .

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		4. The Applicant would also like to draw the ExA's attention to the additional detail provided within the strategy for the replacement of the Coronation Avenue provided at Deadline 1 – refer to Appendix LV.2 Trees to be Removed and Replaced at Coronation Avenue WQ LV.1.8 - Rev 0 [REP1-044], which has been agreed with NCC. This clarification on the replacement of the Coronation Avenue has been incorporated into the updated Figure 7.8: Landscape Mitigation Masterplan Part A at Deadline 3. 5. The Applicant considers that in providing this additional information it has addressed NCC's concerns relating to the effects on LCA 38b Longhorsely, and that significant effects on the perception of landscape character in the long term would not arise either with the Applicant's assessment or with the NCC assessment. Nevertheless, the Applicant considers that its own assessment should be preferred.
	Part B	
6.5.20	Part B largely passes through the 3c Farmed Coastal Plain – Rock character area and only just encroaches into the edge of the 8c Outcrop Hills and Escarpments – Charlton Ridge character area, as illustrated by Part B ES Figure 7.6 Local Landscape Character.	1. The Applicant agrees with NCC's summary of the location of Part B, as shown on Figure 7.6 Local Landscape Character Part B [APP-140].
6.5.21	The ES LVIA assessment of the significance of effects on character area 8c is mostly agreed although it is judged that the Long-term effects on this area would be greater than the Negligible magnitude identified within the ES LVIA, and until planting is well-established would be Moderate\slight magnitude, Moderate\minor significance and Adverse set out in Appendix 2.	1. The Applicant notes that NCC agree with the assessment of the significance of effects on character area 8c, with the exception of long term effects. 2. The conclusions drawn in NCC's LIR [REP1-071] and relative landscape sensitivity relating to LCA 8c Outcrop Hills and Escarpments – Charlton Ridge is comparable to those outlined in the Chapter 7: Landscape and Visual Part B [APP-045], being medium or moderate sensitivity. Furthermore, the conclusion of the LIR in terms of the construction and short term (referred to as winter Year 1 in Chapter 7: Landscape and Visual Part B [APP-045]) are comparable concluding that a moderate adverse effect (significant) would occur during construction, but that this would reduce to slight adverse (non-significant) in winter Year 1. 3. NCC has suggested within Appendix 2 of the LIR [REP1-071] that the slight adverse (non-significant) effect (identified within the Chapter 7: Landscape and Visual Part B [APP-045]) would remain, and has suggested that it might be slightly higher than that assessed (moderate/minor significance), in summer of Year 15 and would represent a permanent effect. NCC has suggested that until planting is well established the moderate/minor significance of effect, which is non-significant (if the threshold of significance remains at moderate adverse or above), would remain, and continue from year 1 up to year 15. This slight discrepancy is considered by the Applicant to arise as a result of the different approach taken by NCC to identifying the magnitude of change against sensitivity and professional judgement in applying the degree to which mitigation measures would have established by year 15 sufficient to mitigate the impacts. The Applicant considers that its assessment of effects should be considered to be accurate in that evidence of the degree to which proposed mitigation planting will have established is provided in paragraph 7.5.1 9(c) of Chapter 7: Landscape and Visual Part A [App-044]. 4. As detailed in Appendix 7.3 Landscape Effects Schedule Part B [APP-288], and in widening an existing highway within the landscape that currently forms a detracting feature, and providing a robust roadside mitigation strategy comprising woodland, native hedgerows, including hedgerows with trees, and groups of trees, the magnitude of impact would be negligible and the effects would

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		be substantially mitigated, such that that in the summer of Year 15 the effect would be neutral. Importantly, NCC consider that the long-term effect would also be neutral.
6.5.22	As set out within Appendices 1 and 2, the ES LVIA assessment of effects on character area 3c Farmed Coastal Plain – Rock at the construction stage is agreed. However, it is judged that Long-term effects would remain Moderate Adverse until the design year and potentially a little beyond. The proposals would result in a particularly dramatic change in the southern part of the character area where the undulating landform confines the road within a more intimate localised valley setting.	1. The Applicant notes that NCC agrees with the assessment of effects on character area 3c Farmed Coastal Plain – Rock at the construction stage presented within the ES. 2. However, the conclusions drawn in Appendices 1 and 2 of NCC's LIR [REP1-071] and relative landscape sensitivity relating to LCA 3c Farmed Coastal Plain – Rock are not comparable to those outlined in the Chapter 7: Landscape and Visual Part B [APP-045], NCC concluding that the character area is of medium sensitivity, whilst the Applicant considers that the character area is of high sensitivity. 3. The conclusions drawn in NCC's LIR [REP1-071] on the effects on LCA 3c Farmed Coastal Plain – Rock within NCC's LIR suggest that the effects in winter of Year 1 would be greater (moderate adverse) than those outlined in Chapter 7: Landscape and Visual Part B [APP-045] which were that the effects would be slight adverse. The assessment presented in Chapter 7: Landscape and Visual Part B [APP-045] is on the basis that the existing A1 represents a visual detractor within the existing baseline, and that the Scheme would result in changes to this, but would not substantially increase the degree to which the perception of the landscape character associated with the character area would be changed as a result. This slight discrepancy is considered by the Applicant to arise as a result of the different approach taken by NCC to identifying sensitivity, using value and susceptibility and professional judgement in interpreting the Scheme, including associated mitigation measures as outlined on Figure 7.10: Landscape Mitigation Plan Part B [APP-144] and Figure 7.14 Landscape Mitigation Plan including Assessment Parameter 3 Part B [APP-148], and applying the relevant ratings against timelines. 4. NCC have suggested that the Scheme 'would present a particularly dramatic change in the southern part of the character area, and a more intimate localised valley setting'. Appendix 7.3 Landscape Effects Schedule Part B [APP-288] states that the Scheme would 'lead to a change in land use and topography within a localised area.' In recognising these localised effects, the Applicant has sought to mitigate these through the avoidance of existing vegetation removal, particularly to the east of the Scheme between chainage 53500 and 53800 and the subsequent and extensive roadside planting of native hedgerows, native hedgerows with trees increasing the frequency of trees in comparison to the existing hedgerows, and woodland associated with the drainage attenuation measures, increasing local tree cover. As a result, the change would be appropriately mitigated. The Applicant considers that its assessment of effects should be considered to be accurate in that evidence of the degree to which proposed mitigation planting will have established is provided in paragraph 7.5.1 9(c) of Chapter 7: Landscape and Visual Part A [APP-044]. 5. The Applicant considers that the assessment of effects on this character area have been appropriately assessed and described within Chapter 7: Landscape and Visual Part B [APP-045].
6.5.23	The proposals involve the removal of extensive roadside vegetation that provides a considerable degree of screening of the existing road and traffic upon it. This would be replaced with a much larger road and proposed mitigation planting would take a considerable amount of time to provide a comparable degree of screening to the current baseline. However, given sufficient time this is likely to occur. NCC agree that the	1. NCC and the Applicant are in agreement that once the mitigation strategy set out in Figure 7.10 Landscape Mitigation Plan [APP-144] or Figure 7.14 Landscape Mitigation Plan including Assessment Parameter 3 Part B [APP-148] is established, the effects of the Scheme would no longer be significant. NCC suggests that this may take longer to reach than the 15 years outlined within Chapter 7: Landscape and Visual Part B [APP-045], but does not provide any information on how this assumption has been derived.

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	permanent effects would be Slight, as set out in the ES, although may take longer to reach this stage than the design year (year 15).	2. The Applicant considers that the mitigation planting would by Year 15 have established sufficiently to form effective screening. This is based on the assumptions outlined in paragraph 7.5.1 (c) of Chapter 7: Landscape and Visual Part A [App-044]which assumes that hedgerows would have achieved a minimum height of approximately 2m and woodland approximately 6m. These are a relatively conservative estimates and is a worst-case scenario given the relatively challenging growing conditions. It is therefore assumed that depending upon the angle of view, hedgerows at a minimum of 2m would have the capacity to provide screening to the road surface and low level elements, including cars and the lower half of high-sided vehicles, whilst woodland at 6m in height, would substantially screen most elements of the road, including high sided vehicles.
	Effects on Viewpoints	
6.5.24	The assessment for Part B contains no assessment of the scale or magnitude of effects on viewpoints. The Part A assessment does contain such judgements and for the most part these are agreed, with the following exceptions: • Viewpoint 6 - The ES assessment appears to take inadequate account of the loss of vegetation and the way in which the road will appear closer and traffic more eye-catching without the mature hedges and trees. Given this and the proximity and width of view occupied by the proposals it is considered that for users of the nearby PRoW, Year 1 effects would be of Moderate (rather than Minor) magnitude and Large (rather than Moderate) significance and Adverse at Year 1 would remain so at Year 15 (rather than Negligible magnitude and Slight significance) – as illustrated by the photomontages provided. • Viewpoints 31 and 36 – there is a mismatch between the ES assessment of effects for nearby residents at the viewpoint in Appendix 7.2 and the assessment of effects on the nearest residents in Appendix 7.3. In each case the viewpoint assessment indicates markedly lower effects, and we judge that the effects should match those assessed for the nearest dwellings. For viewpoint 31, this would be dwellings R50 at Causey Park and for viewpoint 36 this would be dwellings R78 and R79 at Fenrother, indicating significant effects for local residents near both viewpoints rather than the non-significant effects identified in the viewpoint assessment.	1. The assessment of visual effects in Chapter 7: Landscape and Visual Part B [APP-045] focused on specific receptors and used the viewpoints to illustrate the nature of the views. The viewpoints are referenced alongside the relevant receptors within Appendix 7.2 Visual Effects Schedule - Part B [APP-287]. This approach is explained in Table 4-7 - Differences between Technical Chapters for Part A and Part B, of Chapter 4 Environmental Assessment Methodology [APP-039], it goes on to explain that the assessments are directly comparable in terms of assessment approach as the users / occupiers of all sensitive visual receptors have been assessed to an appropriately detailed level for both Part A and Part B. 2. With reference to Part A, the Applicant notes that NCC agree with the Applicant's assessment of the visual effects, as set out in Chapter 7: Landscape and Visual Part A [APP-044] with the exception of three viewpoints listed below: 3. **Viewpoint 6 –** the assessment of effects as described within NCC's LIR [REP1-071] has concluded that the effects would be greater than those outlined in the Applicant's assessment of effects on receptors associated with Viewpoint 6. NCC's assessment relies on the indicative replacement strategy for the Coronation Avenue, which is located along the alignment of the existing A1 to the west of Viewpoint 6, (as set out on Figure 7.8 Landscape Mitigation Masterplan Part A [APP-095] (latest version submitted at Deadline 3 and which has been agreed with NCC and is evidenced in the SoCG (latest version submitted at Deadline 3). However, the Applicant has provided a more detailed planting strategy within Appendix LV.2 Trees to be Removed and Replaced at Coronation Avenue WQ LV.1.8 - Rev 0 [REP1-044], which once implemented would result in effects in line with the Applicant's assessment of the effects on associated receptors. In Year 15 this would be slight adverse, with the Scheme reflecting the existing A1 corridor within the view, and roadside trees establishing to replace the trees which would be removed. As noted above, the Applicant considers that its original assessment was accurate, but it is anticipated that with mitigation as described the concerns of NCC would be addressed. 4. **Viewpoint 31 –** The Applicant acknowledges that there is a discrepancy between the assessment of R50 within Appendix 7.3 Residential Visual Effects Schedule - Part A [APP-218] and Viewpoint 31 within Appendix 7.2 Viewpoints Visual Effects Schedule Part A [APP-217]. This has arisen due to Viewpoint 31 being selected as a representative view of the broader cluster of receptors that form Causey Park with varied appreciation of the Scheme resulting in a lower overall significance of effect rating, compared with the assessment of R50 that considered the specific view from the receptor with views to the south, and which concluded that the effect would be significant. The Applicant does not consider that this undermines the findings of the assessment, the detailed

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		assessment of visual effects within Appendix 7.3 Residential Visual Effects Schedule - Part A [APP-218] providing a robust assessment of the effects. 5. Viewpoint 31 was selected as it presented a viewpoint from the cluster of properties along Causey Park Road, R50 being the closest, but with additional receptors to the west (R51-R54 – refer to Figure 7.6 Visual Effects Drawings Residential Properties Part A [APP-093]). Whilst in the detailed assessment of R50 the effects have been appropriately identified as being significant (moderate adverse) during construction and in winter Year 1, the effects for R52 – R54 are identified as being slight adverse (R51) or neutral (R52-R54), which are not significant. The Applicant notes that NCC do not disagree with the effects outlined within Appendix 7.3 Residential Visual Effects Schedule - Part A [APP-218], identifying that there is only a discrepancy between the detailed residential receptor assessment (which should take precedence) and the relevant viewpoint, associated with groupings and with Public Rights of Way (PRoW). 6. **Viewpoint 36 –** As above, the Applicant acknowledges that there is a discrepancy between the assessment of R78 and R79 within Appendix 7.3 Residential Visual Effects Schedule - Part A [APP-218] and Viewpoint 36 within Appendix 7.2 Viewpoints Visual Effects Schedule Part A [APP-217]. This has arisen due to Viewpoint 36 being selected as a representative view of the broader cluster of receptors that form Fenrother with varied appreciation of the Scheme resulting in a lower overall significance of effect rating, compared with the assessment of R78 and R79 that considered the specific view from the individual receptors with views to the east, and which concluded that the effect would be significant. The Applicant does not consider that this undermines the findings of the assessment, the detailed assessment of visual effects within Appendix 7.3 Residential Visual Effects Schedule - Part A [APP-218] providing a robust assessment of the effects. 7. Viewpoint 36 was selected as it represented a viewpoint from the cluster of properties that form Fenrother, R78 and R79 being the closest but with additional receptors to the west (R80 – R81 – refer to Figure 7.6 Visual Effects Drawings Residential Properties Part A [APP-093]). The detailed assessment has identified that R78 and R79 would be subject to moderate adverse (significant) effects during construction and in winter Year 1, the effects on R80 and R81 would be slight adverse, which is not significant. The findings of the assessment of effects associated with the receptors identified as being represented by viewpoint 36, in Table 7-17 – Viewpoint Locations and Sensitivity, in Chapter 7: Landscape and Visual Part A [APP-044] would suggest that the effects in winter Year 1 and outlined in Appendix 7.2 Viewpoints Visual Effects Schedule Part A [APP-217] is appropriate. The Applicant notes that NCC do not disagree with the effects outlined within Appendix 7.3 Residential Visual Effects Schedule - Part A [APP-218], identifying that there is only a discrepancy between the detailed residential receptor assessment (which should take precedence) and the relevant representative viewpoint, associated with groupings and with PRoW.
	Visual Effects on Communities	
6.5.25	The ES assessments for both sections do not fully consider effects on local communities close to the route, focusing more on views from private properties and public rights of way. Effects on views from roads in and near settlements are only considered in Part A at the viewpoint locations, and in part B not at all. Residents of local communities will use these	1. The combination of detailed assessments undertaken in line with IAN 135/10 and set out in Chapter 7: Landscape and Visual Part A [APP-044] and Chapter 7: Landscape and Visual Part B [APP-045] for the occupants of residential and commercial receptors, the users of PRoWs, and in the case of Part A, the users of local roads, provides a robust assessment, identifying the effects on a variety of receptor types that represents local communities and the wider public.

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	roads frequently, including for recreational activities such as cycling, horse-riding or walking. NCC judge that this approach of regarding hamlets as individual homeowners rather than as a place and community with shared public amenity has led to inadequate mitigation of effects for the communities affected by the proposal.	2. NCC has identified that whilst Part A has considered the effects from near settlements, Part B has not. However, Part B has referred to viewpoints, associated with groups or clusters of receptors within Appendix 7.4 Landscape and Visual Sensitive Receptors Part B [APP-289]. This approach is explained in Table 4-7 - Differences between Technical Chapters for Part A and Part B, of Chapter 4 Environmental Assessment Methodology [APP-039], and goes on to explain that the assessments are directly comparable in terms of assessment approach as the users / occupiers of all sensitive visual receptors have been assessed to an appropriately detailed level for both Part A and Part B. Whilst the way in which the information is presented is different, the assessment of visual effects is comparable. 3. NCC considers that as a result of the assessment of individual receptors rather than as a community has led to inadequate mitigation of effects being provided. The Applicant disagrees with this opinion. The assessment of visual effects has utilised both viewpoints in the case of Part A as representative views, refer to Appendix 7.2 Viewpoints Visual Effects Schedule Part A [APP-217], alongside a detailed assessment outlined in Appendix 7.3 Residential Visual Effects Schedule - Part A [APP-218]. Equally for the assessment of visual effects for Part B, the assessment set out in Appendix 7.4 Landscape and Visual Sensitive Receptors Part B [APP-289] has robustly assessed the significance of effects, identifying groups of receptors with a similar outlook alongside the relevant viewpoint, and identified appropriate mitigation measures, as set out on Figure 7.8: Landscape Mitigation Masterplan Part A [APP-095] (latest version submitted at Deadline 3) and which has been agreed with NCC and is evidenced in the SoCG (latest version submitted at Deadline 3), and Figure 7.10: Landscape Mitigation Plan Part B [APP-144] or Figure 7.14 Landscape Mitigation Plan including Assessment Parameter 3 Part B [APP-148] respectively, aimed at avoiding or reducing the relative significance.
	Part A	
6.5.26	The communities along this route where we feel that effects should be better communicated (and in some instances better mitigated) are: – Fenrother & Tritlington, – Causey Bridge, – Causey Park and – West Moor.	1. The Applicant has addressed the specific concerns that NCC have raised in the LIR [REP1-071] below.
6.5.27	Effects on these communities, drawing on the information provided in the ES and supplemented with further information as necessary, are considered below. Key references within the ES relating to these community receptor groups are listed in Appendix 3.	1. The Applicant has addressed the specific concerns that NCC have raised in the LIR [REP1-071] below.
	Fenrother and Tritlington	
6.5.28	This community consists of a small number of homes at Fenrother and Tritlington and the local primary school. There are two distinct clusters with a nucleated group of properties on the higher ground at Fenrother and a looser grouping near the existing A1 and the primary school. These	1. The Applicant agrees with NCC's description of Fenrother and Tritlington being two distinct settlement groups, however due to their relative intervening distance, of approximately 2.7km between respective centres, does not consider them to represent a community. This is also evidenced in Chapter 12: Population and Human Health Part A [APP-054] which identifies them

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	two groups are connected by a local road and footpaths 423/001 and 423/002.	as separate communities. Fenrother is formed of a number of residential and farm buildings lying on slightly higher ground, approximately 750m to the west of the centreline of Part A. Tritlington, formed by the more focused cluster of properties, is approximately 2km to the east of the of the centreline of Part A, with the existing A1 forming a dividing feature of the intervening landscape, along with scattered farms, dwellings, and Tritlington Primary School. The two hamlets are connected by a local road and the footpaths 423/001 and 423/002, however the existing A1 interrupts these linkages, and creates a disjointed connection.
6.5.29	The proposed dual carriageway would intervene between these two groups, rerouting both footpath 423/001 and local road over a grade-separated junction. The assessments of effects on views from the nearest homes and from the local road and footpath 423/001 indicate significant effects during construction and early completion, with some (but not all) of these effects reducing to become not significant as vegetation matures.	1. The assessment as set out in Chapter 7 Landscape and Visual Part A [APP-044] and supported within Figure 7.6 Visual Effects Drawings Residential Properties Part A [APP-093], Figure 7.7 Visual Effects Drawings Public Rights of Way Part A [APP-094], Appendix 7.3 Residential Visual Effects Schedule - Part A [APP-218], Appendix 7.4 Public Rights of Way Visual Effects Schedule Part A [APP-219], reflects NCC's assertion that only the occupants of the nearest residential property (R78, and R79 within Fenrother), along with PRoW 423/001 and 423/002 (construction only) would be subject to a significant effect during construction and in winter Year 1. R73, forming part of the looser group, adjacent to the existing A1 would be subject to a significant effect only during construction. 2. With the exception of PRoW 423/001 these receptors would not be subject to a significant effect in summer Year 15, as a result of the maturing of the proposed landscape and visual mitigation measures outlined in Figure 7.8 Landscape Mitigation Masterplan Part A [APP-095] (latest version submitted at Deadline 3) and which has been agreed with NCC and is evidenced in the SoCG (latest version submitted at Deadline 3). PRoW 423/001 would remain subject to a moderate adverse effect (significant) as a result of the route being partially stopped up and a diversion via the Fenrother Junction overbridge, which cannot be fully mitigated, due to the nature of the diversion. This diversion provides a safe crossing point as identified in Table 12-38 - Summary of Potential Operation Impacts on PRoWs within the Study Area within Chapter 12: Population and Human Health Part A [APP-054].
6.5.30	As shown by viewpoint 8, proposed planting would provide limited mitigation for views from the de-trunked A1, or from footpath 423/001 approaching from the east. Permanent effects on viewpoint 36, for local residents living on the elevated edge of Fenrother, and for people using the local road in this area are hard to judge given that no visualisation has been provided from this direction to show the appearance or effectiveness of the proposed mitigation bund and planting.	1. With reference to viewpoint 8 – the Applicant has provided a photomontage from this viewpoint (as agreed with NCC, refer to Appendix 4.2 Environmental Consultation 1 of 2 [APP-193]) to illustrate the view to Fenrother Junction from the east, PRoW 423/001 as it meets with the A1 and the edge of Tritlington, and a local bus stop. The photomontage illustrates that although the new overbridge would be visible immediately following construction as a new feature on the skyline, it would gradually reduce in prominence as planting associated with the junction matures, reducing awareness of the embankments, such that in Year 15, the impact would be limited to an awareness of the bridge structure itself. This is anticipated to further reduce as proposed roadside hedgerows and woodland surrounding the junction continues to mature. As such, it is not accepted that the proposed planting would provide only limited mitigation. 2. The location for Viewpoint 36 was agreed with NCC, refer to Appendix 4.2 Environmental Consultation 1 of 2 [APP-193], to illustrate the view to Fenrother Junction from the west. Furthermore, in proposing the location for the photomontages and agreeing these with NCC, as identified in Table 7-4 – Summary of Consultation in Chapter 7: Landscape and Visual Part A [APP-044], and evidenced on page 41 of Appendix 4.2 Environmental Consultation 1 of 2 [APP-193], Viewpoint 36 was not included within those taken forward. The location not being considered substantially more sensitive than other viewpoints. The viewpoint is located to the west of the Scheme, and was selected for its representation of views experienced by the users of

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		PRoW 423/001 and the eastern facing elevations of properties within the small cluster of houses that form Fenrother. The assessment in Appendix 7.3 Residential Visual Effects Schedule - Part A [APP-218] identified that there would be significant effects during construction and that for the occupants of some of the residential receptors this would remain in winter year 1. The assessment considers the mitigating effect of the proposed bund in limiting views north of the Fenrother Junction, alongside the provision of new hedgerows and woodland associated with Fenrother Junction itself, which would mature over time and by Year 15 provide a greater degree of screening and as such the effect would no longer be significant. The maturation of the mitigation planting has been assumed to be in line with 7.5.1(c) of Chapter 7: Landscape and Visual Part A [APP-044], which is that all hedgerows would have reached a height of 2 m and be subject to ongoing management to maintain this height, with woodland blocks reaching a minimum height of 6 m.
	Causey Park Bridge	
6.5.31	This community consists of a small number of homes and a pub clustered along a loop road off the A1 and along the existing A1. The new dual carriageway would pass within 150m of this small settlement on 4.5m embankment topped by a 3m noise fence with proposed mitigation consisting of 'individual trees.	1. The Applicant agrees with NCCs description of Causey Park Bridge as a cluster of residential and commercial (pub) accessed via a local loop road off the existing A1. NCC's description of the proposals in this location is also accurate, with the exception of the reference to "individual trees". 2. NCC have stated that the mitigation provided comprises individual trees, however on Figure 7.8 Landscape Mitigation Masterplan Part A [APP-095] (latest version submitted at Deadline 3) and which has been agreed with NCC and is evidenced in the SoCG (latest version submitted at Deadline 3), provision is also identified as a hedgerow, with individual trees set within it. Once mature, this is expected to substantially reduce the awareness of the embankment slope, with individual trees reducing and breaking up views of the noise fence and awareness of traffic beyond..
6.5.32	Houses to the east of the group closer to the existing A1 and the existing A1 and footpath 423/008 have views which are largely screened in the direction of the site, whereas houses on the western edges of the group would have more open views towards the new road, and similar open views would be seen from the loop road between and beyond the houses and footpath 423/013.	1. NCC are correct in confirming that for some of the residential receptors the occupants would not have direct views towards the Scheme, the orientation of the buildings combining with the landform to limit views to the west. Whilst for those with westerly facing elevations, including the Oak Inn, or from PRoW 423/013, there would be more direct views of the Scheme in relatively close proximity. NCC's comments as to these receptors are addressed below.
6.5.33	The assessments of effects on views from the nearest homes and from the local road and footpath 423/013 indicate significant effects during construction and early completion, with some (but not all) of these effects reducing to become not significant as vegetation matures.	1. The assessment as set out in Chapter 7 Landscape and Visual Part A [APP-044] and supported within Figure 7.6 Visual Effects Drawings Residential Properties Part A [APP-093], Figure 7.7 Visual Effects Drawings Public Rights of Way Part A [APP-094], Appendix 7.3 Residential Visual Effects Schedule - Part A [APP-218], Appendix 7.4 Public Rights of Way Visual Effects Schedule Part A [APP-219], reflects NCC's assertion that significant effects during construction and in winter of Year 1 would arise. 2. Three receptors (R58 – R60) would be subject to a large adverse effect (significant) during construction and winter Year 1, due to the views experienced of the Scheme to the west. For R58 and R59, this would remain a permanent effect in Year 15, whilst for R60 and the remainder of the residential receptors, along with the Oak Inn, the effect is anticipated to have reduced or remain slight adverse (non-significant) in summer Year 15 due to the establishment of mitigation

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		measures combining with the intervening vegetation, refer to Appendix 7.3 Residential Visual Effects Schedule - Part A [APP-218].
6.5.34	It is judged that in some instances the mitigation provided by the planting has been overestimated in the assessment and that permanent effects would not be mitigated by the planting of 'occasional trees' as the ES indicates. Whilst the approach of planting individual trees rather than a woodland belt in order to respect local character is valid (as suggested in the Applicant's response to our concerns); the mitigation could be enhanced by more carefully considering their position in views of the embankment and fence as seen from the closest point and more widely by tactically including some additional tree groups at varied distances closer to the settlement (e.g. within the conservation grassland) to take advantage of perspective to provide further screening.	1. NCC have suggested that in some instances the degree to which the identified mitigation has been overestimated, suggesting that the Applicant has only provided individual trees. However, NCC has not identified specific instances for which they consider there to be an overestimation. Further, on Figure 7.8 Landscape Mitigation Masterplan Part A [APP-095] (latest version submitted at Deadline 3) and which has been agreed with NCC and is evidenced in the SoCG (latest version submitted at Deadline 3), there is the requirement to plant a hedgerow, in combination with individual trees set within it. Once mature, this is expected to substantially reduce the awareness of the embankment slope, with individual trees reducing and breaking up views of the noise fence and awareness of traffic beyond. As a result, the effects, particularly for R58 and R59, refer to Figure 7.6 Visual Effects Drawings Residential Properties Part A [APP-093], would in part be mitigated in year 15 in comparison to those experienced during construction and in winter Year 1, however, the effect would remain significant (moderate adverse), refer to Appendix 7.3 Residential Visual Effects Schedule - Part A [APP-218]. 2. Nevertheless, the Applicant has been in discussion with NCC, and considered whether further opportunities exist to reinforce screening in and around the Causey Park Bridge area, and an updated mitigation strategy in Figure 7.8: Landscape Mitigation Masterplan Part A is submitted at Deadline 3, that has been agreed with NCC as evidenced in the SoCG (latest version submitted at Deadline 3). This has incorporated greater clarity on the locations of the individual trees and tree groupings, including within the area of conservation grassland associated with the drainage attenuation feature; in line with the response to the ExA's question about whether more could be done to mitigate the effects at Causey Park Bridge (refer to the Applicant's response to LV.1.13 in Applicant's Response to ExA's First Written Questions [REP-032]).
	Causey Park	
6.5.35	This community consists of a small number of homes and large groups of farm buildings along a local road which heads west from the existing A1. The new dual carriageway would pass between the main group of houses and the two further east with the local road being taken over an overbridge as shown in the photomontages for viewpoint 31.	1. The Applicant agrees with NCCs description of the dispersed nature of the Causey Park settlement and its relationship with the Scheme. NCC note the two receptors which lie to the east of the Scheme (R48 – R49), refer to Figure 7.6 Visual Effects Drawings Residential Properties Part A [APP-093], and those to the west (R50-R54) which, with the exception of R50 are substantially screened from having direct views of the Scheme by associated woodland planting and built form in the intervening landscape.
6.5.36	Most of the houses have views which face perpendicular to the proposed route and/or have screening by trees such that effects would be limited, but the assessments of effects on views from the local road and footpaths indicate significant effects during construction and early completion, with these effects reducing to become not significant as vegetation matures.	1. The Applicant agrees with NCC's description of the orientation of the views, although R50 (Causey Park Hag), refer to Figure 7.6 Visual Effects Drawings Residential Properties Part A [APP-093], is orientated in a southerly direction, with views running broadly parallel with the Scheme. 2. Within Appendix 7.3 Residential Visual Effects Schedule - Part A [APP-218] the Applicant has appropriately assessed those receptors with direct views of the Scheme (R48 and R50) as being subject to a significant effect (moderate adverse) during construction and in the winter Year 1. These reducing to slight adverse (not significant) in summer Year 15 with the establishment of roadside hedgerows and individual trees along the highway boundary. 3. As identified in Appendix 7.2 Viewpoints Visual Effects Schedule Part A [APP-217] the effects on local road users is described by reference to Viewpoint 31. Users, particularly those travelling

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		towards the Scheme, would be subject to a significant effect (moderate adverse) during construction, and this would remain into winter year 1. However, with the establishment of the associated planting on the embankment slopes and roadside hedgerows, the effect would reduce and become non-significant (slight adverse) in the summer of year 15. 4. The PRoW 423/013, as referred to by NCC, is crossed by the Scheme, and is subject to a diversion along the eastern side of the Scheme, with the section to the west of the Scheme being stopped up. The assessment of effects has identified that as a result of the stopping up of part of the PRoW, the effects during construction and in the winter of Year 1 would be significant (large adverse), refer to Appendix 7.4 Public Rights of Way Visual Effects Schedule Part A [APP-219], in addition and extending into the summer of Year 15, the effect would remain significant (moderate adverse) due to the presence of the Scheme immediately to the west and the diversion to the north.
	West Moor	
6.5.37	This community consists of a small number of homes including some which are recently constructed (and would experience effects similar to those assessed for group R37), along a local road which heads west from the existing A1. The new dual carriageway would pass nearby to the west with a proposed grade-separated junction within 100m of the nearest homes.	1. The Applicant agrees with NCCs description of the cluster of dwellings that forms the community of West Moor (R35 – R39, refer to Figure 7.6 Visual Effects Drawings Residential Properties Part A [APP-093]), immediately west of the existing A1. NCC have identified that the number of dwellings has increased recently with the replacement of farm buildings that formed part of the previous cluster, with newly constructed houses., The new buildings were not present during the assessment of effects on these receptors, but from aerial imagery it is a reasonable assumption that due to their orientation and proximity to adjacent built form (located between R35 and R37), that their outlook is comparable to R37.
6.5.38	As noted within the assessment of effects for the nearest homes and viewpoint 27, the proposed junction would be very visible during construction and early completion, giving rise to significant effects which would not be notably mitigated by the proposed planting even at maturity. As can be seen from the 'design year' photomontage and the Landscape Mitigation Masterplan, the alignment of the local road as it approaches the junction and the positioning of the proposed woodland on the far side of the junction to the settlement means that open views of the junction would remain.	1. The Applicant confirms that the assessment of effects on R35, R36 and R37 (including the new dwellings) would be significant (large adverse) during construction and would remain significant, but would reduce in its effect rating to moderate adverse in summer of Year 15, refer to Appendix 7.3 Residential Visual Effects Schedule - Part A [APP-218]. 2. The Applicant disagrees with NCCs conclusion that open views of the junction would remain at maturity of the proposed planting, for those buildings in a north south orientation, particularly for R37 (including the new dwellings) that face directly onto West Moor Road. The photomontage prepared from Viewpoint 27 (refer to Figure 7.11 Photomontages Part A 2 of 2 [APP-099]) is taken from the edge of the road to the west of the R37, and is orientated to look directly towards the Scheme. Whilst it is agreed that the West Moor Junction slip road and realignment of West Moor Road would be visible during construction and in winter Year 1, the proposed mitigation, as identified on Figure 7.8 Landscape Mitigation Masterplan Part A [APP-095] (latest version submitted at Deadline 3), would reduce awareness of the junction and slip roads in the summer of Year 15. Nevertheless, awareness of a change in the landform as a result of the proposed embankment slope, albeit wooded, would result in the moderate adverse effect (significant) remaining, but with a reduced magnitude of associated change. The woodland associated with the embankment slopes to the west of the junction would also continue to mature, gradually reducing further the awareness of the slip roads, traffic and structure of the overbridge.
6.5.39	It is not clear from the assessment or mitigation description why these effects have not been better mitigated, given that there is an area inside	1. The area to the north of West Moor Road has been identified as being required for the construction of the Scheme, and particularly for the construction of West Moor Junction. However, following construction it was considered that for receptors R35 and R37 (including the new

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	the red line (indicated for 'topsoil storage' which could have been proposed for woodland planting to improve long-term mitigation.	dwellings that face directly onto West Moor Road) the openness of the views was important to retain. A block of woodland in the area identified by NCC would substantially curtail the open aspect currently afforded to the receptors, particularly R35. Were a block of woodland to be included at this location it would, in the summer of Year 15, screen the majority of views of the slip road to the West Moor Junction, however in so doing the open aspect would also be screened and in itself would represent a potentially significant effect. It was therefore considered that whilst an awareness of the junction would remain, the significant effect would be acceptable given the retention of the open aspect. Further, the woodland associated with the embankment slopes to the west of the junction would continue to mature, gradually reducing further, the awareness of the slip roads, traffic and structure of the overbridge. 2. Nevertheless, in discussion with NCC the Applicant has included additional tree planting within an updated Figure 7.8 Landscape Mitigation Masterplan Part A [APP-095] submitted at Deadline 3, within the proposed hedge line that runs along the north side of West Moor Road, to reinforce the screening capacity of the proposed hedgerow and trees in views approaching West Moor Junction from the west, without substantially reducing the open aspect for those receptors that currently have open views to the north.
	Part B	
	Local Road Users	
6.5.40	Local road users are scoped out of the assessment for Part B with ES Table 7.19 noting that they "would experience close proximity views of the Part B Main Scheme Area. However, as the receptors would be travelling at speed and would be focussed on their route rather than the wider landscape".	1. NCC is correct in stating that the Applicant has scoped out of the assessment of visual effects the majority of users of local roads, on the basis that they would experience transient views due to a combination of speed and their focus on the road ahead, rather than experiencing wider views of the landscape. The scoping out of the assessment of road users was proportionate to the assessment of potentially significant effects for the reasons identified in Table 7.19 of Chapter 7: Landscape and Visual Part B [APP-045].
6.5.41	This assumption downplays the importance of views for users of what are generally quiet and relatively slow road routes and disregards passengers of vehicles or other road users such as cyclists for which views are an intrinsic part of the experience. There is also an inconsistent approach to the sensitivity of these receptors within the Part B ES, with paragraph 7.7.63 stating "Due to the principal focus being on the road ahead, sensitivity of road users is considered as being low" while the sensitivity assessment in Appendix 7.4 identifies the majority of local road users as being of Moderate sensitivity. NCC judge that, as a result of this approach, the ES assessment fails to properly consider potentially significant effects on these receptors, particularly in regard to the B6341.	1. The Applicant does not agree with NCC's assertion that the assessment downplays the importance of views to the users of local roads, the local roads (B6341, B1340, and B6347) are predominantly at the national speed limit, and form fast sweeping bends. They are predominantly marked as a 'Clearway', along which there is no stopping. Whilst this does not prevent other users, such as cyclists and horse riders from using these roads, their focus would remain on the road and passing traffic, apart from locations where they join or leave the local roads. However, the vast majority of users would be motorists and the assessment has been undertaken on that basis in line with IAN 135/10. The Applicant therefore maintains that it was appropriate to scope these specific receptors from the assessment, outlined in Table 7-19 – List of Visual Receptors Scoped Out of the Assessment in Chapter 7: Landscape and Visual Part B [APP-045]. 2. In relation to the approach to the sensitivity of users of local roads, paragraph 7.7.63 of Chapter 7: Landscape and Visual Part B [APP-045] states that sensitivity for users of transport corridors is typically low. This is as a result of the transient, often fleeting nature of the views afforded from movement, particularly by motorists, along a corridor. However, within Appendix 7.4 Landscape and Visual Sensitive Receptors Part B [APP-289] the value, susceptibility and sensitivity associated with the users of specific roads is qualified, including the B6341, B1340, and B6347,

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		which are considered to be of moderate sensitivity due to their more rural outlook and opportunity to enjoy views of the wider countryside. 3. NCC suggest that as a result, Chapter 7: Landscape and Visual Part B [APP-045] does not adequately identify potentially significant effects on the users of these local roads. The Applicant does not accept this. While the Applicant has appropriately identified sensitivity for the relevant roads in Appendix 7.4 Landscape and Visual Sensitive Receptors Part B [APP-289], it has then concluded in Table 7-19 – List of Visual Receptors Scoped Out of the Assessment in Chapter 7: Landscape and Visual Part B [APP-045]. that due to the nature of the roads and relatively transient views it was proportionate and appropriate to scope these out from further assessment.
6.5.42	The B6341 runs broadly parallel to the A1 between Charlton Mires and the junction at Broom House and provides the main road access for dispersed settlement to the immediate west of the A1. This 5.5km section of the route is entirely within 1km of the existing A1 (around half of it is within 500m) and the ZTV illustrated on ES Figure 7.2 indicates that the proposed development would be potentially visible from the majority of it.	1. The Applicant agrees with NCC's observations about the location and extent of the B6341 and its position within the ZTV, illustrated on Figure 7.2 Visual Receptors Plan Part B [APP-136], which indicates that much of the Scheme would in theory be visible from the local road. However, as stated in paragraph 7.4.13 of Chapter 7: Landscape and Visual Part B [APP-045] the ZTV has been generated using a digital terrain model, which does not take account of other features within the landscape such as woodland, hedgerows and buildings. The reality is that there are substantial sections of the B6341 where no view of the Scheme would be afforded. Additionally, the parallel nature of the B6341 alongside the existing A1 results in forward views typically maintaining a focus in the direction of travel, away from the existing A1, rather than oblique or acute views to the east that capture views of moving traffic.
6.5.43	The northern end of the route, between its junction with the A1 and Heiferlaw Bridge, lies closer to the A1 but sits at a relatively low elevation which, combined with frequent roadside hedgerows (along the B6341) and other intervening vegetation tends to limit views east towards the A1. South of here, the B6341 rises up over a number of low hilltops allowing more open and elevated views to the east which increase in frequency due to a reduction in the extent of roadside vegetation.	1. The Applicant agrees with NCC's observations about how the B6341 reflects local landform, and its hedgerow boundaries along much of its length, which for some sections of the local road limits views to the east and towards the Scheme. However, the Applicant maintains that views from the B6341 are not as frequently open and direct as NCC suggests, with roadside hedgerows and intervening landform, occasionally combining with woodland in the intervening landscape, screening extensive sections of the Scheme from view, particularly in the southern sections of the local road. Where more expansive views to the east do arise, the focus of the view tends to be on the distant horizon, with the existing A1 typically being set on lower ground in the middle distance, and screened by roadside vegetation.
6.5.44	Views of the existing A1 are generally well screened by roadside vegetation (alongside the A1), as illustrated by viewpoints 4, 5, 6 and 20. This would be entirely removed during the construction stage resulting in a stark change to the outlook of from the B6341 and open views of the road, construction works and traffic. Once construction is complete, a view of a substantially larger road would remain.	1. As identified on Figure 7.3 Viewpoint Locations Plan Part B [APP-137], viewpoints 4, 5, 6 are from varying distances to the A1, and as such the construction activity, and clearance of roadside vegetation would have varying impacts for each of these viewpoints. However, it is inevitable that during construction and in the winter of Year 1 the Scheme would comprise a perceptible change in the landscape within views from the B6341. As a result, the assessment of effects on associated receptors has concluded that those associated with viewpoints 4, 5 and 6 would be subject to a large adverse effect curing construction and in winter Year 1, reducing to moderate adverse in summer year 15, refer to Appendix 7.2 Visual Effects Schedule - Part B [APP-287]. 2. A photomontage from Viewpoint 20 was produced, refer to Figure 7.13 Photomontages Part B [APP-147], and is located on the B6341 to illustrate the view to the east, including the area around the Heckley Fence overbridge. 3. The Applicant acknowledges that where views to the existing A1 do arise for the users of the B6341, they are frequently screened by existing roadside vegetation. It is this screening effect that the Applicant intends to replicate with the provision of roadside vegetation, in the form of hedgerows and blocks of woodland, as outlined on Figure 7.10 Landscape Mitigation Plan Part B

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		[APP-144] or Figure 7.14 Landscape Mitigation Plan including Assessment Parameter 3 Part B [APP-148], formed through Landscape Element 4.4, as outlined in DMRB, Volume 10, Part 0, Section 3 refer to REP2-022.
6.5.45	Elevated views from the southern section of the B6341 would take in extensive sections of the new road and would be particularly open between Heifer Law and Heckley House, as illustrated by the opening year montage at viewpoint 20, where the proposed Heckley Fence overbridge would also be in open view. Similar views would occur for users descending the northern side of Heifer Law where the proposed Charlton Mires junction is likely to be openly visible. Views from the lower lying, closer proximity, northern section would be more limited although where possible are likely to be similar to that illustrated by the opening year montage at viewpoint 2.	1. The Applicant acknowledges that from the B6341 between Heckley House and Heifer Law bridge there are oblique and acute views for drivers and passengers to the east, towards the Scheme which sits within an expansive landscape. The photomontage from Viewpoint 20, refer to Figure 7.13 Photomontages Part B [APP-147], indicates how proposed roadside vegetation in the summer of Year 15 would substantially screen the Scheme, with only the top of the Heckley Fence Overbridge visible above the establishing woodland, and a similar screening of the carriageway and the majority of traffic movements is anticipated to occur where the views of the Scheme do arise. In contrast and to the northern section NCC are correct in suggesting that the opportunity for views of the Scheme, including the carriageway and traffic movements, is more limited, and likely effects have been represented in the photomontage from Viewpoint 2, refer to Figure 7.13 Photomontages Part B [APP-147].
6.5.46	The proposals would result in a Large\Medium scale of change to views from an Intermediate extent of this route, through the construction stage at least up until the design year (year 15), a Long-term duration. This would result in a Major\Moderate magnitude of change and, considering the Moderate sensitivity identified in the ES Appendix 7.4, effects would be Large\Moderate Adverse which would be Significant.	1. The Applicant has acknowledged within the assessment outlined in Chapter 7: Landscape and Visual Part B [APP-045] that the Scheme would give rise to localised effects. The effects on receptors that are physically aligned with the B6341 comprise receptors 2-8, and the effects on these typically comprise a large adverse (significant) effect during construction and in winter Year 1, reducing to a moderate adverse effect in summer Year 15, refer to Appendix 7.2 Visual Effects Schedule - Part B [APP-287]. Appendix 7.4 Landscape and Visual Sensitive Receptors Part B [APP-289] identifies that the users of the B6341 (receptor 39) are of moderate sensitivity, however the magnitude of impact would vary depending upon the nature of the view and the degree to which the Scheme would be visible. As a result, the majority of views would be subject to a minor to moderate magnitude of impact, resulting in a slight to moderate adverse effect. In contrast and along the northern section of the B6341, north of Rock Lodge the B6341 runs close to the Scheme over a short distance (approximately 300m) and the magnitude of impact would be moderate to major, as evidenced in the associated visual receptors (receptors 6 and 7) and described in Appendix 7.2 Visual Effects Schedule - Part B [APP-287], the resulting effect would be large adverse .
6.5.47	In time, proposed mitigation planting would mature to provide a more notable degree of screening. The design year montage at viewpoint 20 illustrates that where woodland planting is proposed as mitigation this would provide a notable degree of screening in summer (no winter montage is provided). However, the majority of mitigation proposed comprises roadside hedgerows only and the management of these would have a considerable influence on their effectiveness as mitigation. If they were regularly trimmed and maintained at a relatively modest height (e.g. 1.5 – 2m) then they would be unlikely to provide any meaningful screening. It is not clear from the application material what the intended management of roadside hedgerows entails and assuming a worst-case scenario of limited screening, the permanent effects on users of the B6341 would potentially remain significant. NCC would prefer to see	1. The proposed mitigation strategy, as set out in Figure 7.10 Landscape Mitigation Plan Part B [APP-144] or Figure 7.14 Landscape Mitigation Plan including Assessment Parameter 3 Part B [APP-148] provides for substantial planting of woodland, frequently associated with the overbridges and junction at Charlton Mires. It also provides for extensive roadside hedgerows to be established, identified as Landscape Elements 4.3 Native Species Hedgerows and 4.4 Native Hedgerows with Trees. As outlined in DMRB Volume 10, Part 0, Section 2 (refer to REP2-022) these hedgerows would be untrimmed, and allowed to grow out. As such, the capacity to screen the Scheme would be good, and by the summer of the Year 15 would establish sufficiently to substantially screen views of the majority of the Scheme, as evidenced in Viewpoint 7 and 20, refer to Figure 7.13 Photomontages Part B [APP-147]. 2. In providing NCC with a copy of the now superseded DMRB Volume 10, Part 0, Section 2 (refer to REP2-022) the Applicant has provided additional information relating to how the management of the hedgerows i.e. untrimmed, would contribute to the capacity to screen the Scheme. This is in line with NCC's stated preference to see hedgerows to be allowed to grow out. Therefore, the

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	management measures included to ensure that the hedgerows be permitted to grown larger – both to provide more effective visual mitigation, but also to be more in character with other hedgerows in this area.	Applicant has provided greater certainty of the future management such that the effects on the users of the B6341 would be substantially mitigated and by summer Year 15 and beyond, permanent and significant effects would be avoided.
	Night-time Effects	
6.5.48	Night-time effects were scoped out of the assessment for Part B, with paragraph 7.1.6 noting: "A night time assessment was not undertaken for Part B as there is no lighting proposed and the impact of traffic headlights would not substantially increase the effect on currently unlit landscape areas."	1. The Applicant scoped out the assessment of night-time effects in line with paragraph 7.1.6 of Chapter 7: Landscape and Visual Part B [APP-045], and this is expanded on in paragraph 7.4.31, within which the nature of the Scheme as an online widening along which there is some existing awareness of car headlights, the absence of proposed permanent roadside lighting and the reformation of the roadside vegetation would substantially reduce the potential of a significant effect on the night-time environment to arise, such that the Applicant considered it proportionate and appropriate that this was scoped out. This is in line with the Scoping Opinion Part B [APP-341] received by NCC that states 'The impact from illumination of the carriageway during the operational phase will not be required.' As evidenced in Table 1-5 – Part B Consultee Comments within the Scoping Opinion (Appendix 2 of Scoping Opinion) of Appendix 4.1 Scoping Opinion Response Tracker [APP-192].
6.5.49	As set out in the preceding section, the proposals involve complete removal of existing roadside vegetation which provides a considerable degree of screening of the existing road; this includes screening or heavy filtering of views of headlights at night. The proposed development would result in a notable change to the night-time impacts of the A1 compared to those of the current road, with vehicle headlights along the route becoming more of a focal point of the night-time environment.	1. The Applicant acknowledges that for the majority of the corridor the existing and immediate roadside vegetation would be removed during construction, and for sections of the corridor this would be a noticeable change, and car headlights would be more perceptible travelling within the same corridor as the existing A1. However, the effects of the car headlights would only represent a change where the existing views are currently screened, and this is not the case for the entire length of Part B, there being substantial sections (approximately 3.75km) where there are open sections of the existing corridor on one or both sides of the existing A1, whilst night-time traffic flows and frequency of associated headlights are not anticipated to be substantially greater than currently experienced are not anticipated to be substantially greater than currently experienced.
6.5.50	In this context, effects on landscape character are almost exclusively concerned with perceptions of darkness and the absence of development as the key characteristic constituent elements of landscapes are generally obscured after dark. The proposed development would result in a Medium-term, Localised increase in the influence of headlights along the route but would not change the existing pattern of artificial lighting within the study area and would have no wider influence on night-time character. Effects on night-time character would be Slight Adverse or less.	1. The Applicant has not undertaken an assessment of night-time effects, in line with the Scoping Opinion Part B [APP-341] received by NCC that states '*The impact from illumination of the carriageway during the operational phase will not be required*.' This is evidenced in Table 1-5 – Part B Consultee Comments within the Scoping Opinion (Appendix 2 of Scoping Opinion) of Appendix 4.1 Scoping Opinion Response Tracker [APP-192] . Nevertheless, and in so much as the Scheme for Part B is an online widening, and whilst there may be some increased awareness of car headlights during construction and in winter Year 1, this would impact only as it is currently experienced, with some awareness of car headlights in areas where the A1 is unscreened. As such, and in the absence of an assessment of night-time effects the Applicant would agree with NCC's assertion that the effects are unlikely to represent a potentially significant effect.
6.5.51	For visual receptors, the value attached to night-time views is considered to be low unless there is a particular feature that can be best appreciated in the hours of darkness, which is not the case here. The susceptibility of visual receptors also differs at night reflecting the different activities people undertake in the hours of darkness.	1. The Applicant agrees with NCC's assertion that there are no particular features of the night-time environment that would be best appreciated during the hours of darkness, and that susceptibility of visual receptors also differs at night, reflecting the different activities undertake in the hours of darkness. .

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6.5.52	In this case, the only receptors likely to be notable affected by the proposed development are users of local roads, particularly the B6341, who are considered to be of Low susceptibility, and thus Low sensitivity, given the influence of their own headlights and that views from these routes have no particular amenity value during hours of darkness. These users would experience increased views of headlights from the same locations identified at 3.3.18 - 3.3.21 above, particularly during construction and in early operational years. Headlights tend to be low level and, as such, proposed mitigation planting would begin to provide some screening/filtering relatively early on. Medium-term effect arising due the increase in vehicle headlights seen as a result of the proposed development would be Large\Medium scale over an intermediate extent of the B6341. This would result in a Moderate magnitude of change and overall effects of Moderate\Slight Adverse significance.	1. In line with the Scoping Opinion Part B received by NCC that states '*The impact from illumination of the carriageway during the operational phase will not be required'*, the Applicant has not undertaken an assessment of night-time effects, and this is evidenced in Table 1-5 – Part B Consultee Comments within the Scoping Opinion (Appendix 2 of Scoping Opinion) of Appendix 4.1 Scoping Opinion Response Tracker [APP-192]. 2. Nevertheless, NCC has determined within the LIR [REP1-071] that night-time visual effects would be limited to users of the B6341, a receptor that the Applicant has previously scoped out, refer to Table 7-19 – List of Visual Receptors Scoped Out of the Assessment of Chapter 7: Landscape and Visual Part B [APP-045]. Even assuming the B6341 was scoped in to the assessment, the users of the B6341 are of moderate sensitivity, as defined in Appendix 7.4 Landscape and Visual Sensitive Receptors Part B [APP-289]. During construction and in the winter of Year 1, night-time users are likely to experience some awareness of low level and transient lights sources from vehicles, however, the focus of drivers and passengers would remain the road ahead, and other road users are less likely to make use of these local roads during the hours of darkness. The magnitude of change would be low and the significance of effect no greater than slight adverse (non-significant). As the mitigation measures, comprising of hedgerows, trees and woodland, as identified on Figure 7.10 Landscape Mitigation Plan Part B [APP-144] or Figure 7.14 Landscape Mitigation Plan including Assessment Parameter 3 Part B [APP-148] establish, the impact of the headlights is likely to diminish, and by summer of Year 15 the degree to which headlights within the Scheme would impact on the users of the B6341 would remain of low magnitude, and the effects would be negligible. This supports the scoping out of night time effects, as detailed in the Scoping Opinion Part B.

Table 1-6 – Cultural Heritage

Ref. No.	Local Impact Report Statement:	Applicant's Response
6.6	**Cultural Heritage - Neutral Impacts**	
6.6.1	The Environmental Statement (ES) dated June 2020 (TR010041) has been produced by Highways England (HE). Chapter 8 of the ES (DCO documents APP-046 and APP-047) refers to Cultural Heritage.	1. No response required.
6.6.2	The County Archaeologist and the Council's Built Environment Conservation Officer have both been consulted by Highways England and are satisfied with the methodology used and the baseline assessments undertaken.	1. The Applicant notes that the Council is satisfied with the methodology and baseline assessments set out in Section 8.4 and Section 8.7 of Chapter 8: Cultural Heritage Part A [APP-468] and Section 8.4 and Section 8.7 of Chapter 8: Cultural Heritage Part B [APP-479].
	Built Heritage – Neutral Impact	
6.6.3	Due to the nature of the assessment process values are assigned to heritage assets such that impacts that might otherwise be considered significant are considered not significant within the terms of the EIA process. Thus, for	1. As set out at 6.6.2, above, the Applicant notes that the Council are satisfied with the methodology used for the assessment presented in Section 8.4 of Chapter 8: Cultural Heritage Part A [APP-468] and Section 8.4 of Chapter 8: Cultural Heritage Part B [APP-479].

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	example, the demolition of a non-designated heritage asset may be considered not significant in EIA terms although the loss is total.	2. The assessment adheres to the Design Manual for Roads and Bridges (DMRB), Volume 11, Section 3, Part 2. Accordingly, the effects assessed as moderate significance or above are deemed significant. Care is always required in Cultural Heritage Assessment because of the use of the term "significance", which relates both to the importance of an asset and the scale of an impact in terms of Environmental Impact Assessment (EIA). 3. The proposed assessment methodology for Cultural Heritage was presented in the Scoping Report Part A [APP-338], Scoping Report Part B [APP-339] and is set out in detail in Section 8.4 of Chapter 8: Cultural Heritage Part A [APP-468] and Section 8.4 of Chapter 8: Cultural Heritage Part B [APP-479]. NCC's representations in response to scoping did not comment on the proposed methodology and the approach to the assessment, although it is noted that the Council has now confirmed that it is satisfied with the methodology used for the assessment. 4. In the ES, the potential impacts are presented in Section 8.8 of Chapter 8: Cultural Heritage Part A [APP-046] and Section 8.8 of Chapter 8: Cultural Heritage Part B [APP-047] and the assessment of likely significant effects after the implementation of design and mitigation measures is provided in Section 8.10 Chapter 8: Cultural Heritage Part A [APP-046] and Section 8.10 of Chapter 8: Cultural Heritage Part B [APP-047]. The purpose of the design and mitigation measures is to reduce and remove, where possible, the magnitude of impacts and effects. The assessment of likely significant effects reported includes those which in EIA terms are deemed to be not significant (i.e. slight adverse). 5. Taking the non-designated heritage asset example of Charlton Mires Farm cited by the Council, the assessment established that, based on the currently available evidence, the asset is of low value (i.e. locally important), see paragraph 8.7.56 Chapter 8: Cultural Heritage Part B [APP-047]. The impact on the asset would be major adverse, due to its complete loss, as presented in paragraph 8.8.26 Chapter 8: Cultural Heritage Part B [APP-047]. Based on the EIA methodology, this would result in a moderate adverse effect before mitigation (as reported in Section 5 of Appendix 8.1 Historic Environment Desk Based Assessment Part B [APP-291]). However, with the use of mitigation through the preservation by record of the heritage asset, the impacts in this instance are reduced to moderate adverse, with a slight adverse effect (not significant). The full assessment in relation to Charlton Mires Farm is presented at paragraph 8.10.16 Chapter 8: Cultural Heritage Part B [APP-047].
6.6.4	For Part A (except for milepost reference 1153544 which is to be relocated) the impacts will be indirect to setting. New over junction structures will have a degree of impact on heritage assets. It is accepted that most of these impacts will be in the construction phase and that in operation the mitigation measures proposed would prove effective.	1. The Applicant agrees with the Council's summary of the assessment presented within Chapter 8: Cultural Heritage Part A [APP-468] and notes that the Council accepts that most of the impacts would be in the construction phase and that in operation the mitigation measures proposed would prove effective.
6.6.5	For Part B there would be a wider range of effects. Direct impacts to designated heritage assets would again be limited to the relocation of mileposts. One unlisted milepost, a NDHA, would also be relocated. The greatest direct impact would be to Charlton Mires Farm, also a NDHA, which would be demolished. This would be a major adverse impact but after mitigation by recording would be a slightly adverse effect (and therefore not significant in EIA terms).	1. The Applicant agrees with the Council's summary of the assessment presented within Chapter 8: Cultural Heritage Part B [APP-469] and notes that the Council does not consider the impact on Charlton Mires Farm to be significant in EIA terms.

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6.6.6	Indirect setting impacts would be experienced by West Lodge House, a NDHA and gatehouse to the Charlton Hall estate in that the road would move closer to it. The grade II listed Patterson's Cottage would be similarly impacted by roadway widening. However, the most significant indirect setting impact would be to the grade II listed Dovecote at Heckley Fence (NHL 1371059) due to the construction of an overbridge. Here the proposal would result in a permanent moderate adverse effect.	1. The Applicant agrees with the Council's summary of the assessment presented within Chapter 8: Cultural Heritage Part B [APP-469].
6.6.7	In terms of mitigation, measures that ensure the appropriate recording of the buildings to be demolished at Charlton Mires should be included in the CEMP and this is discussed further at paragraph 6.6.21.	1. Item B-CH4 of the Outline CEMP [REP1-023 and 024] (and as updated at Deadline 3) outlines the required mitigation for buildings at Charlton Mires prior to demolition through a Historic Building Recording. In addition, Appendix 8.6: Draft Written Scheme of Investigation (WSI) for Historic Building Recording Part B [APP-295] accompanies the application and was reviewed and approved by NCC prior to submission. Section 2.5 of Appendix 8.6: Draft Written Scheme of Investigation (WSI) for Historic Building Recording Part B [APP-295] includes the requirement for the archaeological contractor undertaking the Historic Building Recording to provide a detailed method statement (paragraphs 2.5.1 to 2.5.4) which would be reviewed by NCC prior to the works commencing.
6.6.8	The applicant is urged that all mileposts (whether designated or otherwise) to be subject to a method statement to cover their recording in situ, temporary safe storage for the duration of the works and subsequent relocation within the completed scheme.	1. The Applicant has established that there are six designated mileposts within Part A's Order limits, although two have been determined to be missing (NHL 1370646 Milepost at NGR NZ 19029485 (Causey Park) and NHL 1371021 (Milepost Approximately 55 Metres South West Of Thurston (sic) New Houses Farmhouse)). There is one non-designated milepost within Part B's Order limits. The assessment has determined that one designated milepost within Part A (NHL 115344 Milepost at NGR NZ 18468998 (Highlaws Junction) and the non-designated milepost within Part B (HER 16878 (Milepost north of Shipperton Bridge)) would be directly impacted. The remainder of the designated mileposts are located on the existing section of the A1 (Part A) which would be de-trunked and therefore the effects as a result of the Scheme operation would be neutral. 2. Requirement 10 of Schedule 2 to the draft DCO [REP2-004 and 005] requires the production of a written scheme (method statement) to detail how the milestones listed in the Requirement will be protected during construction. The written schemes must be submitted to NCC for approval prior to the commencement of development, and the authorised development must be carried out in accordance with the approved scheme. 3. Item S-CH6 of the Outline CEMP [REP1-023 and 024] (and as updated at Deadline 3) states the requirements and approach to protecting designated heritage assets from accidental damage during the construction phase of the Scheme, including milestones, and includes the requirement for these to be developed in the CEMP. 4. Item A-CH2 of the Outline CEMP [REP1-023 and 024] (and as updated at Deadline 3) outlines the approach to recording, protecting and relocating the Grade II Listed Milepost within Part A which would be directly impacted by the Scheme. Item B-CH3 of the Outline CEMP [REP1-023 and 024] (and as updated at Deadline 3) outlines the approach to recording, protecting and relocating of the non-designated milepost within Part B which would be directly impacted by the Scheme. 5. The Applicant will be responsible for providing detailed method statements to NCC which outline how the mileposts will be appropriately recorded in-situ prior to works commencing. The Applicant will also be responsible for preparing and providing a detailed method statement which outlines how the mileposts will be removed from their current location, protected and transported, together with the storage location, before construction commences. The method statement should also

Ref. No.	Local Impact Report Statement:	Applicant's Response
		include proposed locations for the replacement, timescales for replacement and a second phase of recording. The Outline CEMP [REP1-023 and 024] (and as updated at Deadline 3) was updated and submitted at Deadline 1.
	Archaeology - Neutral Impacts	
6.6.9	The proposed scheme is located in a wider archaeological landscape containing known sites from the prehistoric to the post-medieval periods. The study area has been the subject of a desk based assessment and geophysical survey which has identified the potential for previously unidentified archaeological remains to be present within the proposed development area.	1. The Applicant agrees with the Council's summary of the assessment baseline presented within Section 8.6 of Chapter 8: Cultural Heritage Part A [APP-468] and Section 8.6 of Chapter 8: Cultural Heritage Part B [APP-469]. 2. The detailed desk-based assessments are presented in Appendix 8.1 Historic Environment Desk Based Assessment Part A [APP-221] and Appendix 8.1 Historic Environment Desk Based Assessment Part B [APP-291]. The results of the Geophysical Surveys are presented in Appendix 8.2 Geophysical Survey Report – Part A [APP-222] and Appendix 8.2 Geophysical Survey Report – Part B [APP-292]. 3. The baseline was also informed by a Light Detection and Ranging (LiDAR) Assessment for Part A, presented in Appendix 8.3 [APP-223] and targeted trial trenching on Part B, presented in Appendix 8.3 West Linkhall Intrusive Survey Information – Part B [APP-293] and Appendix 8.4 North Charlton Intrusive Survey Information – Part B [APP-294]. 4. Requirement 9 of Schedule 2 to the draft DCO [REP2-004 and 005] outlines the required approach for mitigation on currently unknown archaeological remains within the Order limits that would be impacted during construction. Further detail is secured via the Outline CEMP in Items S-CH2, S-CH3, S-CH5 and S-CH7 [REP1-023 and 024] (and as updated at Deadline 3) which sets out the approach to further investigations and the preparation of a programme of mitigation.
6.6.10	The proposed scheme is located in close proximity to three scheduled monuments in the northern part of the scheme comprising North Charlton medieval village and open field system, a prehistoric burial mound, 420m north west of East Linkhall and West Linkhall Camp.	1. The Applicant agrees with the Council's summary of the assessment presented within Chapter 8: Cultural Heritage Part B [APP-469].
6.6.11	The Archaeology section of the NCC Conservation Team has been in discussion with WSP, the archaeological consultant for this scheme since 2018. The proposed scheme has been considered for both its indirect impact on the setting of designated heritage assets and its direct (physical) impact on archaeological remains and standing historic structures.	1. The Applicant confirms that consultation with the Council regarding Cultural Heritage matters has been ongoing since 29 March 2018, as presented in Table 8-4 in Chapter 8: Cultural Heritage Part A [APP-468] and Table 8-4 in Chapter 8: Cultural Heritage Part B [APP-469]. Further, the Applicant agrees with the Council's summary of the assessment presented within Section 8.10 of Chapter 8: Cultural Heritage Part A [APP-468] and Section 8.10 of Chapter 8: Cultural Heritage Part B [APP-469].
	Indirect Impact on the Setting of Scheduled Monuments	
6.6.12	The impact of the proposals on the designated heritage assets in the wider area has been assessed in detail in the assessment for both Parts A and B[7].	1. No response required.
6.6.13	Based on the discussion and conclusions in the assessment documents, the topography of the area and the current setting of the monuments, the County Archaeologist is in agreement with the conclusions in the assessment reports	1. The Applicant notes that the Council agrees with the conclusions set out in Section 8.8 and Section 8.10 of Chapter 8: Cultural Heritage Part A [APP-468] and Section 8.8 and Section 8.10 of Chapter 8: Cultural Heritage Part B [APP-469].

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	that the proposed scheme should not have an adverse impact in the setting of the scheduled monuments in the immediately adjacent and wider area.	
	Direct Impact on Heritage Assets	
6.6.14	Archaeological investigation comprises 3 broad categories of archaeological work – assessment, evaluation and mitigation.	1. No response required.
	Assessment	
6.6.15	In line with paragraphs 5.126 and 5.127 of the NPSNN and paragraph 189 of the NPPF, a detailed desk-based assessment including a walkover survey has been undertaken along the length of the proposed road scheme[8]. An assessment was undertaken of available LiDAR between Morpeth and Felton which transcribed a range of archaeological features and sites of potential historical interest[9]. There were insufficient existing LiDAR images for this work to be undertaken between Alnwick and Ellingham (Part B).	1. The Applicant agrees with the Council's summary of the methodologies used to support the baseline assessment, as presented within Section 8.6 of Chapter 8 Cultural Heritage Part A [APP-468] and Section 8.6 Chapter 8: Cultural Heritage Part B [APP-469]. The detailed desk-based assessments are presented in Appendix 8.1 Historic Environment Desk Based Assessment Part A [APP-221] and Appendix 8.1 Historic Environment Desk Based Assessment Part B [APP-291]. Light Detection and Ranging (LiDAR) Assessment for Part A is presented in Appendix 8.3 [APP-223]. 2. Paragraph 8.1.2 of Chapter 8: Cultural Heritage Part B [APP-469] presents the reasons why LiDAR assessment was not completed for Part B.
	Evaluation	
6.6.16	The assessment was followed by non-intrusive evaluation in the form of geophysical survey along the length of the scheme[10]. The reports identified a number of geophysical anomalies of potential archaeological origin and glaciofluvial deposits and later disturbance which may mask earlier archaeological remains. Further intrusive archaeological investigation is required by trial trenching in order to establish the nature, date and significance of the anomalies that have been identified and to test the apparent "blank" areas.	1. The Applicant agrees with the Council's summary of the methodologies used to the support the baseline assessment presented within Section 8.6 of Chapter 8 Cultural Heritage Part A [APP-468] and Section 8.6 of Chapter 8: Cultural Heritage Part B. 2. The results of the Geophysical Surveys are presented in Appendix 8.2 Geophysical Survey Report – Part A [APP-222] and Appendix 8.2 Geophysical Survey Report – Part B [APP-292]. These have been used to develop Draft Written Scheme of Investigations for further intrusive archaeological work in the form of trial trenching which will target anomalies of potential archaeological origin to confirm their nature, date and significance, and to test areas of the Scheme which appear to be "blank". These are presented in Appendix 8.5 Written Scheme of Investigation for an Archaeological Trial Trench Evaluation Part A [APP-226] and Appendix 8.5 Draft Written Scheme of Investigation for Post DCO-Consent Trial Trenching Part B [APP-295]. 3. Schedule 2 Requirement 9 of the Draft Development Consent Order [REP2-004 and 005] outlines the required approach for mitigation on archaeological remains within the Order limits that would be impacted during construction. Further detail is secured via the Outline CEMP in Items S-CH2, S-CH3, S-CH5 and S-CH7 [REP1-023 and 024] (and as updated at Deadline 3) which sets out the approach to further investigations and the preparation of a programme of mitigation.
6.6.17	Trial trenching was undertaken in two areas adjacent to the scheduled monuments of North Charlton medieval village and open field system[11] and West Linkhall Camp[12]. The evaluations were undertaken in line with a Written Scheme of Investigation (WSI) which I approved. The evaluation at North Charlton concluded that earlier archaeological remains, particularly those	1. The Applicant agrees with the Council's summary of the assessment presented within Chapter 8: Cultural Heritage Part A [APP-468] and Chapter 8: Cultural Heritage Part B [APP-469]. The WSI and reports detailing the results of the trial trenching investigations are presented in Appendix 8.3 West Linkhall Intrusive Survey Information – Part B [APP-293] and Appendix 8.4 North Charlton Intrusive Survey Information – Part B [APP-294].

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	associated with the nationally important medieval field system had been removed by later activity. At West Linkhall no archaeological remains of significance were revealed.	
6.6.18	Following the results of the assessment and geophysical surveys along the length of the scheme, two WSIs were produced by WSP for programmes of trial trenching, which I subsequently approved[13]. The trial trenching has not been undertaken to date but the results of both programmes of trial trenching will inform the nature and extent of any archaeological mitigation requirement for below ground archaeological remains affected by the proposed scheme	1. The Applicant agrees with the Council's summary of the assessment presented within [Chapter 8: Cultural Heritage Part A [APP-468] and Chapter 8: Cultural Heritage Part B [APP-469] and confirms that Draft Written Scheme of Investigations for further intrusive archaeological work in the form of trial trenching have been approved by NCC. These are presented in Appendix 8.5 Written Scheme of Investigation for an Archaeological Trial Trench Evaluation Part A [APP-226] and Appendix 8.5 Draft Written Scheme of Investigation for Post DCO-Consent Trial Trenching Part B [APP-295]. 2. Schedule 2 Requirement 9 of the draft DCO [REP2-004 and 005] outlines the required approach for mitigation on archaeological remains within the Order limits that would be impacted during construction. Further detail is secured via the Outline CEMP in Items S-CH2, S-CH3, S-CH5 and S-CH7 [REP1-023 and 024] (and as updated at Deadline 3) which sets out the approach to further investigations and the preparation of a programme of mitigation.
	Mitigation	
6.6.19	The mitigation requirement on this site can be broadly divided into two categories: – Fieldwork/recording work with an approved WSI – Mitigation work which requires a WSI	1. The Applicant agrees with the Council's summary of the categories of mitigation proposed within Section 8.9 Chapter 8: Cultural Heritage Part A [APP-468] and Section 8.9 Chapter 8: Cultural Heritage Part B [APP-469].
6.6.20	Two WSIs have been approved by the County Archaeologist for archaeological mitigation work. The first comprised a programme of Archaeological Strip, Map and Record on the site of a potential Iron Age/Romano-British enclosure identified by non-intrusive evaluation on land to the south of Causey Park[14]. Having taken into consideration the potential local or regional significance of the site and its location in relation to the proposed scheme which would prevent preservation in situ, it was agreed that the site could be preserved by record. The fieldwork has been completed which confirmed that an Iron Age enclosure was not present on the site. The report for this work will be provided in due course.	1. The archaeological mitigation (Strip, Map and Record) for the land to the south of Causey Park referred to by the Council related to the advanced works described Section 8.9 Chapter 8: Cultural Heritage Part A [APP-468] and in Appendix 8.6 Written Scheme of Investigation for an Archaeological Strip, Map and Sample Excavation (National Grid Diversion Works) Part A [APP-226]. These constituted the diversion of a National Grid high-pressure gas main, a Northern Gas Networks pipeline and a Northern Powergrid overhead electricity line to the south of Causey Park and the archaeological mitigation was undertaken in May and June 2020. The works were undertaken in line with the Appendix 8.6 Written Scheme of Investigation for an Archaeological Strip, Map and Sample Excavation (National Grid Diversion Works) Part A [APP-226]. No evidence for the presence of archaeological features was identified during the works. A report outlining results of the mitigation will be provided to NCC once finalised and submitted at Deadline 4.
6.6.21	The WSI for a programme of Historic Building Recording has also been approved for a complex of farm buildings at Charlton Mires which are of local importance and are proposed for demolition as part of this scheme[15]. The programme of historic building recording has yet to be carried out.	1. Appendix 8.6: Draft Written Scheme of Investigation (WSI) for Historic Building Recording Part B [APP-295] accompanies the application and was reviewed and approved by NCC prior to submission. In accordance with Appendix 8.6: Draft Written Scheme of Investigation (WSI) for Historic Building Recording Part B [APP-295] and the Outline CEMP Item B-CH4 [REP1-023 and 024] (and as updated at Deadline 3), the programme of historic building recording will be carried out prior to demolition of the building, during the construction phase.

<table>
<tr><th>Ref. No.</th><th>Local Impact Report Statement:</th><th>Applicant's Response</th></tr>
<tr><td>6.6.23</td><td>The scheme of mitigation for below ground archaeological remains along the length of the scheme will be formulated once the outstanding programmes of trial trenching have been completed. The results of the trial trenching will define the nature and extent of the archaeological mitigation that will be required in defined areas. This may range from open area excavation or Strip, Map and Record in advance of development work commencing to a watching brief during the groundworks required for the development. Equally, some areas may not require archaeological mitigation work based on the results of the programme of trial trenching. A WSI will be produced and approved for this work in due course, based on the results of the programme of trial trenching required along the length of the scheme.</td><td>1. The Applicant agrees with the Council's summary of the scheme of mitigation for below ground archaeological remains, as presented in Section 8.9 of Chapter 8: Cultural Heritage Part A [APP-468] and Section 8.9 of Chapter 8: Cultural Heritage Part B [APP-469].
2. Schedule 2 Requirement 9 of the draft DCO [REP2-004 and 005] outlines the required approach for mitigation on archaeological remains within the Order limits that would be impacted during construction. The Applicant will prepare a suitable mitigation strategy for unknown archaeological remains in consultation with the Council (see Items S-CH2, S-CH3, S-CH5 and S-CH7 of the Outline CEMP [REP1-023 and 024] (and as updated at Deadline 3)). This would be prepared following the conclusion of the post-Consent trial trench evaluation, as presented in Appendix 8.5 Written Scheme of Investigation for an Archaeological Trial Trench Evaluation Part A [APP-226] and Appendix 8.5 Draft Written Scheme of Investigation for Post DCO-Consent Trial Trenching Part B [APP-295], and prior to the commencement of construction.</td></tr>
<tr><td>6.6.24</td><td>In addition, a methodology and a WSI are required for the recording, removal or protection and reinstatement of the listed and undesignated milestones present along the A1.</td><td>1. The Applicant agrees that directly impacted mileposts should be recorded, removed, stored and reinstated. Further details are provided at 6.6.8, above.</td></tr>
<tr><td>6.6.25</td><td>Given the range of archaeological work still required as part of this scheme, the requirements in relation to the Outline Construction Environmental Management Plan[16] and the Draft Development Consent Order[17] have been commented on by the County Archaeologist at this stage.</td><td>1. The Applicant agrees with the Council's summary of the range of archaeological works still required as presented in Section 8.9 of Chapter 8: Cultural Heritage Part A [APP-468], Section 8.9 of Chapter 8: Cultural Heritage Part B [APP-469] and the Outline CEMP [REP1-023 and 024] (and as updated at Deadline 3). Schedule 2 Requirement 9 of the draft DCO [REP2-004 and 005] outlines the required approach for mitigation on archaeological remains within the Order limits that would be impacted during construction.</td></tr>
<tr><td>6.6.26</td><td>The Draft Development Consent Order includes Schedule 2, part 1 requirements with point 9 dealing with below ground archaeological remains and point 10 dealing with the listed milestones.</td><td>1. No response required.</td></tr>
<tr><td>6.6.27</td><td>For ease of discussion, the archaeological requirements are summarised in a table below with the relevant reference from the Outline Construction Environmental Management Plan, Section 3 Register of environmental actions and commitments table 3-1</td><td>1. The Applicant agrees with the Council's summary of the requirements of the Outline CEMP [REP1-023 and 024] (and as updated at Deadline 3 in response to NCC comments) in relation to archaeology.</td></tr>
<tr><td></td><td><table><tr><th>Outstanding programme of archaeological work</th><th>Reference on table 3-1</th></tr><tr><td>Trial trenching along the length of the scheme (Parts A and B)</td><td>S-CH2, S-CH3</td></tr><tr><td>Mitigation for below ground archaeological remains (Parts A and B)</td><td>S-CH3; S-CH7</td></tr><tr><td>Potential preservation in situ of important archaeological remains identified during evaluation</td><td>S-CH5</td></tr><tr><td>Avoidance of impact on designated heritage assets</td><td>S-CH6</td></tr></table></td><td></td></tr>
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Ref. No.	Local Impact Report Statement:	Applicant's Response
	<table><tr><td>- the listed milepost</td><td>A-CH2</td></tr><tr><td>- the scheduled monuments</td><td>B-CH1</td></tr><tr><td>Non-designated milepost North of Shipperton Bridge (HER 16878)</td><td>B-CH3</td></tr><tr><td>Historic building recording of the buildings at Charlton Mires</td><td>B-CH4</td></tr><tr><td>Removal of historic field boundaries</td><td>S-CH4</td></tr><tr><td>Stripping of soil where archaeological remains are known or have the potential to be present</td><td>S-GS5</td></tr><tr><td>Potential changes to water hydrology impact in archaeological remains</td><td>A-CH1; B-CH2</td></tr></table>	
6.6.28	The County Archaeologist has identified a number of amendments or points for clarification which are required in the Outline Construction Environmental Management Plan which are detailed below:	
6.6.29	Section 2 - Scheme roles and responsibilities - Scheme Archaeologist - The production of a Written Scheme of Investigation (WSI) will also be needed for mitigation work, where required, not just evaluation.	1. The description of the Scheme Archaeologist (main contractor) role and responsibilities in Section 2 of the Outline CEMP [REP1-023 and REP1-024] was revised to include the preparation of a programme of archaeological mitigation, where required, in addition to the evaluation. This was submitted at Deadline 1.
6.6.30	Archaeologist (main contractor) – point b, the evaluation will establish the appropriate mitigation. This may be excavation, strip, map and record or watching brief dependant on the extent and significance of archaeological remains, this needs to be amended to reflect the range of potential mitigation.	1. The description of the Archaeologist (main contractor) role and responsibilities in Section 2 of the Outline CEMP [REP1-023 and REP1-024] was revised to include reference to appropriate mitigation (such as strip, map and record and watching brief) in point b. This was submitted at Deadline 1.
6.6.31	Reference S-CH3 it is useful to identify at this stage that mitigation work may not just happen during the construction phase but may be required prior to construction work commencing if excavation or strip map and record are required. Further work, as recommended by the results of the trial trench evaluation, will be determined in consultation with NCC and implemented by the main contractor during construction.	1. The Action column in Reference S-CH3 of the Outline CEMP [REP1-023 and 024] was revised to include pre-construction archaeological mitigation. This was submitted at Deadline 1.
6.6.32	Reference B-CH4 relates to Charlton Mires but has a reference to consultation with NCC and the Milestone Society, this text should be in references B-CH3 and A-CH2 Table 5-1 - Monitoring to be carried out during construction - clarification is required about which archaeologist is responsible for monitoring impacts on cultural heritage.	1. The Action column in Reference B-CH4 of the Outline CEMP [REP1-023 and 024] was revised to remove reference to Milestone Society. The Action column in Reference B-CH3 and A-CH2 was amended to include consultation with the Milestone Society. This was submitted at Deadline 1. Further to this, References S-CH6, A-CH2 and B-CH3 of the Outline CEMP [REP1-023 and 024] have been updated to include consultation with Historic England and submitted at Deadline 3. 2. Table 5-1 Monitoring to be Carried out During Construction (CEMP [REP1-023 and REP1-024]) was amended to clarify that it is the Scheme Archaeologist and the Environmental Manager who are the responsible persons to monitor the impacts on cultural heritage. This was submitted at Deadline 1.

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	Advice	
6.6.33	The proposed development is located within a wider archaeological landscape with the potential to impact on a range of known and previously unknown archaeological remains ranging in date from the prehistoric to post-medieval periods.	1. The Applicant agrees with the Council's summary of the assessment presented within Section 8.8 and Section 8.10 in Chapter 8: Cultural Heritage Part A [APP-468] and Section 8.8 and Section 8.10 in Chapter 8: Cultural Heritage Part B [APP-469].
6.6.34	The County Archaeologist has been directly involved in a number of detailed discussions with WSP, the archaeological consultant on this scheme and have approved various documents including Written schemes of investigation for both evaluation and mitigation work and monitoring the archaeological evaluations carried out to date.	1. No response required.
6.6.35	The archaeological schemes that have been developed for field evaluation and the potential range of archaeological mitigation work that may be required are appropriate for a scheme of this type in this location, based on the known and potential archaeological remains that may be impacted by the proposed development.	1. The Applicant notes that the Council considers the archaeological schemes and proposed mitigation to be appropriate.
6.6.36	Providing that the archaeological requirements remain within the Construction Environmental Management Plan and the Development Consent Order and are carried out in a timely manner, this scheme should progress smoothly investigating, recording and reporting the archaeological remains and historic standing buildings impacted by the road development in an appropriate and proportionate manner.	1. The Applicant notes that the Council considers the requirements in the Outline CEMP [REP1-023 and 024] (and as updated at Deadline 3) and dDCO [REP2-004 and 005] to be appropriate and proportionate.
6.6.37	The Council welcomes requirements 9 (Archaeological Remains) and 10 (Safeguarding of Listed Milestones) of the draft DCO.	1. The Applicant notes that the Council welcomes requirements 9 and 10 of Schedule 2 to the dDCO [REP2-004 and 005].

Table 1-7 – Biodiversity

Ref. No.	Local Impact Report Statement:	Applicant's Response
6.7	**Biodiversity - Negative Impacts**	
6.7.1	The Environmental Statement (ES) dated June 2020 (DCO document TR010041) has been produced by Highways England (HE). Chapter 9 of the Environmental Statement (DCO Documents APP-048 and APP-049) refers to the biodiversity impacts of the scheme.	1. The Applicant confirms that subsequent to the Local Impact Report (LIR) submitted by the Council at Deadline 1 [REP1-071], the Applicant has issued additional assessment information. This comprises: – Updated Habitats Regulations Assessment (HRA) Reports [REP1-012 and REP1-013] and HRA Addendum Report [REP1-043] issued at Deadline 1 in response to the Examining Authority's (ExAs) first written questions; – Biodiversity No Net Loss (BNNL) Assessment for the Scheme issued at Deadline 2 [REP2-009] (which supersedes the previous BNNL assessments for Part A [APP-246] and Part B [APP-309]); – Annex A – Approach to the Assessment of Losses and Gains of Watercourse issued at Deadline 2 [REP2-010] (a document to supplement the BNNL Assessment for the Scheme); and – Updated Biodiversity Air Quality DMRB Sensitivity Assessment issued at Deadline 3 (document reference 6.33) (which supersedes the previous Biodiversity DMRB sensitivity assessments for the Scheme [APP-333], Part A [APP-253] and Part B [APP-310]). 2. The Applicant invites the Council to provide comment on the additional assessment information. Further engagement will be captured within future iterations of the Statement of Common Ground with Northumberland County Council. The Applicant has not yet received comment on the above documents.
6.7.2	An overall assessment of the impact of the proposals on ecology and nature conservation is given using terminology specified in Interim Advice Note 130/10 Ecology and Nature Conservation: Criteria for Impact Assessment (IAN130/10), with Northumberland County Council accepting the methodology undertaken and baseline assessments. The Highways Agency has provided a detailed Habitats Regulations Assessment and 'No Net Loss' report both of which are comprehensive.	1. The Applicant notes that the Council accepts the methodology and baseline assessments set out in Chapter 9: Biodiversity for Part A [APP-048] and Part B [APP-049] and considers the Habitats Regulations Assessment (latest version prior to the LIR submission [AS-004 and AS-005] and 'No Net Loss' reports (Part A [APP-246] and Part B [APP-309] to be comprehensive.
6.7.3	The scheme area contains key ecological features such as protected nature conservation sites and other sensitive habitats including wetlands, scrub, semi-improved grassland, species poor hedgerows, watercourses and ditches. The scheme would result in some loss of habitats within the landscape that currently provide connectivity and dispersal routes for species (faunal and floral).	1. In relation to the presence of protected nature conservation sites, the Applicant confirms that the Scheme would pass through the River Coquet and Coquet Valley Woodlands Site of Special Scientific Interest (SSSI) and the Coquet River Felton Park Local Wildlife Site (LWS) to create a new bridge (to carry the new carriageways of the A1) over the River Coquet adjacent to the existing road bridge (which carries the existing A1 carriageway). As detailed in paragraph 3.3.8 of Chapter 3: Assessment of Alternatives [APP-038], alternative routes were considered but none were identified that would avoid crossing the SSSI and would still have required an entirely new bridge crossing to be constructed. Furthermore, other options to avoid the LWS would have required a significant length of additional dual carriageway (between 4 and 5 miles). As a result, no alignments to this effect were considered further and the option of a new bridge crossing the SSSI and LWS adjacent to the existing A1 road bridge was chosen. 2. The assessment of the impacts to the SSSI and LWS as a result of woodland habitat loss are presented in Appendix 9.21: Ancient Woodland Strategy Part A [APP-247]. The Applicant has worked closely with Natural England to develop the Ancient Woodland Strategy Part A [APP-247]

Ref. No.	Local Impact Report Statement:	Applicant's Response
		and can confirm that Natural England are in agreement with the Strategy and a 'without prejudice' version of the Statement of Common Ground with Natural England was submitted at Deadline 1 [REP1-029]. 3. The assessment of the loss of other sensitive habitats, including wetlands, scrub, semi-improved grassland, species poor hedgerows and watercourses, is presented in Chapter 9: Biodiversity Part A [APP-048] and Part B [APP-049]. The Applicant does not consider ditches to be a sensitive habitat as these were recorded as dry features. The Applicant agrees that the Scheme would result in some loss of habitats within the landscape that currently provide connectivity and dispersal routes for species (faunal and floral). The Applicant has produced Figure 7.8 Landscape Mitigation Masterplan Part A [APP-095] (and as updated and submitted at Deadline 3 (document reference 6.31)) and Figure 7.10 Landscape Mitigation Plan Part B [APP-144]. These plans include the retention, reinstatement and creation of linear features (hedgerows, tree lines, ditches) that would maintain and improve connectivity in response to the potential effects of habitat loss and fragmentation for protected species; such as bats and badger. The linear features would connect areas of habitat creation within the Landscape Mitigation Masterplans (such as areas of species-rich grassland and woodland), as well as providing connectivity to similar habitats adjacent to the Scheme and those in the wider landscape. These plans provide appropriate habitat retention, reinstatement and creation to mitigate and compensate for the loss of habitat.
6.7.4	The identified legally protected species present in the survey area include water vole, otter, bats and wintering and breeding birds including barn owl. The Council is satisfied that appropriate surveys have been carried out to assess the value of the habitat and the presence of any protected species.	1. In relation to legally protected species; bats, breeding birds and wintering birds (including barn owl), badger, red squirrel and fish are present within the survey area for both Parts A and B. In addition, otter and great crested newts are also present within the survey area of Part A only. 2. The Applicant confirms that water vole is considered likely absent from the survey area (see paragraphs 9.7.78 to 9.7.83; Chapter 9 Biodiversity Part A [APP-048] and paragraph 9.8.2(c); Chapter 9: Biodiversity Part B [APP-049]). 3. However, the Applicant notes that the Council is satisfied that appropriate surveys have been carried out to assess the value of the habitats and the presence of any protected species.
6.7.5	The Habitats Regulations Assessment assesses impacts within a 10km buffer to include European Sites at the coast and concludes that significant effects (direct or indirect) are not likely.	1. The Applicant confirms that the Habitats Regulations Assessment (HRA) Report [AS-004 (tracked changes) and AS-005 (clean)] assesses impacts to European Sites (Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or Ramsar sites) within 10km of the Scheme and/or located within 200m of the affected road network for air quality impacts where this extends beyond 10km and/or sites with a potential hydrological connection to the Scheme. The Applicant confirms that the HRA Report concludes that there are no likely significant effects as a result of the Scheme alone, or in combination. 2. Further, Natural England confirmed within an email dated 11 January 2021 that "Natural England has previously confirmed that it agreed with the HRA conclusions for both Part A (Morpeth to Felton) and Part B (Alnwick to Ellingham) separately and can also confirm that Natural England agrees with the conclusions of the HRA assessment (i.e. no likely significant effect) for the scheme as a whole for the proposed improvements to the A1 in Northumberland – Morpeth to Ellingham." This agreement with the conclusions of the HRA is captured within Statement of Common Ground with Natural England submitted at Deadline 1 [REP1-029].

Ref. No.	Local Impact Report Statement:	Applicant's Response
6.7.6	Survey and mitigation for the protected species found along the route is also robust, and the provision of a number of animal crossing points for a range of species is welcome.	1. The Applicant notes that the Council approves of the survey and mitigation for protected species and the provision of animal crossing points.
6.7.7	Habitat creation and landscaping plans show a number of features which will replace lost habitats and prevent run off from the road (during construction and operation) entering watercourses.	1. The Applicant agrees with the Council's summary of the Landscape Mitigation Masterplans for Part A [APP-095] and Part B [APP-144].
6.7.8	A number of UK and European Protected Species are present within the road corridor and may be impacted by the development but the approach to mitigation and licensing is sound.	1. The Applicant has produced draft species licences for bats, badger and great crested newts that have been issued to and reviewed by Natural England. The Applicant can confirm that Natural England has provided Letters of No Impediment (LONIs) for both Part A (May 2020) and Part B (October 2020) for each of the draft species licences issued. The Applicant is currently liaising with Natural England to update a number of minor corrections. 2. The Applicant notes that the Council accepts the approach to mitigation and licensing.
6.7.9	The outline Construction Environmental Management Plan (CEMP) includes all of the mitigation requirements proposed and is comprehensive and robust, for this stage of the project. Further fine detail is required for works affecting watercourses including bridges, culverts and pollution prevention, although the detail provided so far is a good basis.	1. The Applicant notes that the Council approves of the present draft of the Outline CEMP [REP1-023 (clean) and REP1-024 (tracked)]. Where appropriate, the Outline CEMP [REP1-023 and REP1-024] identifies where mitigation will be developed further at detailed design. This includes, for example, a Biosecurity Method Statement (measure S-B8 of the Outline CEMP [REP1-023 and REP1-024]), finer details of the Ancient Woodland Strategy Part A [APP-247] (measure A-B3 of the Outline CEMP [REP1-023 and REP1-024]) and production of an Ecological/ Environmental Management Plan (measure S-B19 of the Outline CEMP [REP1-023 and REP1-024]). 2. The Applicant confirms that the Council will be consulted on the CEMP prior to the start of construction and prior to seeking approval by the Secretary of State as detailed in Requirement 4 of Schedule 2 to the draft DCO (dDCO) [REP2-004 and 005].
6.7.10	The key issue is the loss of 0.68ha of ancient woodland, of which 0.27ha is within the River Coquet and Coquet Valley Woodlands SSSI and 0.41ha in the Coquet River Felton Park LWS. A new area of 8.16ha of ancient woodland (agreed with Natural England) will be established adjacent to the lost woodland on the south west bank of the River Coquet, under a 50 year management plan. Whilst fine detail of that woodland creation is required (soil analysis of receptor site, translocation details of soils and young trees) the overall plan is welcomed	1. The Applicant notes that the Council welcomes the ancient woodland compensation proposals, as detailed in Appendix 9.21: Ancient Woodland Strategy Part A [APP-247]. As stated in the Executive Summary of the Ancient Woodland Strategy Part A [APP-247], the finer details of the strategy will be developed at detailed design and prior to the commencement of construction. However, the Applicant confirms that the Outline CEMP [REP1-023 and 024] (and as updated at Deadline 3) secures implementation of the strategy (see measures A-L6, A-B3 and A-B44) and also implementation of proposed further investigation, including soil analysis (measure A-B43) and detailed botanical assessment to inform species for collection and translocation (measure A-B42).
6.7.11	Given the extent of the scheme, it is expected that wildlife will be at risk of disturbance, direct mortality and pollution, as well as severance of habitat. Highways England have identified a number of design and mitigation measures to reduce the negative effects which include (in summary and not limited to): – Replacing the lost habitat which amongst other habitats will include 0.68ha of ancient woodland; – Habitat compensation for breeding birds – Installation of anti-glare fencing where appropriate; – Creation of detention basins along Part A;	1. The assessment of the potential effects of the Scheme on wildlife are presented in full in Chapter 9: Biodiversity Part A [APP-048] and Part B [APP-049]. The measures referred to in paragraph 6.7.11 of the Local Impact Report (LIR) are secured via the Outline CEMP [REP1-023 and REP1-024]. With reference to the items in paragraph 6.7.11 of the LIR, measures within the Outline CEMP [REP1-023 and 024] (and as updated at Deadline 3) include: – Replacing the lost habitat which amongst other habitats will include 0.68ha of ancient woodland – measures S-L2, S-L3, A-L6 and A-B3; – Habitat compensation for breeding birds – measure S-B1 – Installation of anti-glare fencing where appropriate – measures A-L4 and A-B14;

Ref. No.	Local Impact Report Statement:	Applicant's Response
	– Construction of wildlife culverts; – Timing of construction works to avoid the most sensitive times of year; – Relocating/displacement of relevant protected species before the start of works to move them from the area of the proposals; – Landscape planting designed to discourage bats and barn owls from hunting within the road corridor and provision of compensatory roosting features; – Minimising night-time working; – Pollution control measures to prevent damage and degradation to habitats; – Directional lighting to avoid illumination of habitats; – Management Plan for Japanese Knotweed and rhododendron (and other invasive species). – Appropriate stand-off distances implemented during construction; – Badger resistant fencing around compounds and storage areas; and – Landscape planting and newly created habitat to locally native species of local provenance and would comprise a mixture of species.	– Creation of detention basins along Part A – measures S-B3, S-W4, S-W5, S-GS3, S-GS4, A-L2, A-B46 and B-B6; – Construction of wildlife culverts – measures A-B8 and A-B10; – Timing of construction works to avoid the most sensitive times of year – measures S-B9 (nesting birds), S-B16 (bats, barn owl and badger); A-B22 and A-B23 (great crested newts); A-B24, A-B25 and B-B11 (bats); A-B21 and B-B7 (red squirrel); A-B26 and A-B37 and B-B10 (badger); A-B28 (barn owl); A-B29, A-B2, A-B32 and B-B24 (fish); – Relocating/displacement of relevant protected species before the start of works to move them from the area of the proposals – measures S-W12 and A-B33 (fish rescue/capture); S-B12 (wintering birds and brown hare), A-B22 (great crested newts); A-B25 and B-B16 (bats) and A-B26 (badger); – Landscape planting designed to discourage bats and barn owls from hunting within the road corridor and provision of compensatory roosting features – measures S-L3, A-B16 and B-B20 (landscape design); A-B24, A-B25, B-B15, B-B16 and B-B17 (compensatory bat roosting features) and A-B41 (compensatory barn owl nesting/roosting features); – Minimising night-time working – measure S-B16; – Pollution control measures to prevent damage and degradation to habitats – measures S-W1, S-W7, S-W8, S-W10, S-W11, S-GS4, S-GS8, S-GS9, S-GS13, A-B38, A-GS2, B-B6, B-B23 and B-B28; – Directional lighting to avoid illumination of habitats – measure S-G5; – Management Plan for Japanese Knotweed and rhododendron (and other invasive species) – measures S-B8, S-B13 and A-B3. – Appropriate stand-off distances implemented during construction – measures S-B14 and A-B3; – Badger resistant fencing around compounds and storage areas – measure S-B15; and – Landscape planting and newly created habitat to locally native species of local provenance and would comprise a mixture of species -measures S-B2, S-L9, A-B3, A-B39, B-L1 and B-B4.
6.7.12	It is considered that the indicated proposed mitigation identified in the CEMP reasonably considers construction and operational impacts of the project. However, some of the proposed mitigation will require time to establish and reach its full potential and this is why the Council considers the impacts on biodiversity overall to be a negative impact.	The Applicant agrees that the Scheme would result in adverse (negative impacts) but considers that the mitigation and compensation measures summarised within the Outline CEMP [REP1-023 and REP1-024] are sufficient to avoid significant residual impacts, with the exception of those identified in section 9.10 of Chapter 9: Biodiversity for Part A [APP-048] and Part B [APP-049].
6.7.13	Finally, the Council acknowledges that pursuant to requirement 7 of schedule 2 (Protected Species) of the draft DCO, Natural England must be consulted on the preparation of a scheme for protection and mitigation measures (such scheme to be approved by the Secretary of State) for protected species.	The Applicant agrees that Requirement 7 of Schedule 2 to the dDCO [REP1-005] provides for consultation with Natural England in certain circumstances.

Table 1-8 – Road Drainage and Flood Risk

Ref. No.	Local Impact Report Statement:	Applicant's Response
6.8	**Road Drainage and Flood Risk – Neutral Impacts**	
6.8.1	The Environmental Statement (ES) dated June 2020 (DCO document TR010041) has been produced by Highways England (HE). Chapter 10 of the ES (DCO documents APP-050 and APP-051) of the Environmental Statement document refers to flood risk and surface water disposal from the scheme.	1. No response required.
	Flood Risk Assessment – Neutral Impact	
6.8.2	Flood risk to and from the proposals can be separated into two main sources – fluvial and surface water. Fluvial flood risk being from watercourses, including ditches, whereas surface water (pluvial) being from overland flows.	1. No response required.
6.8.3	Fluvial flood risk can further be separated looking at designated main rivers and ordinary watercourses. Within the extent of this DCO – only one main river is crossed – the river Coquet. In this instance, we have been in regular dialogue with the Environment Agency who are the statutory consultee for main rivers. Throughout these discussions, we are satisfied with the proposals and mitigation in relation to flood risk and drainage.	1. The Applicant notes that NCC are satisfied with the proposals and mitigation in relation to flood risk and mitigation. 2. The Longdike Burn is also classified as a main river and is crossed by the Scheme. The Applicant has also consulted the Environment Agency regarding the Scheme proposals along the Longdike Burn. Appendix 10.1: Flood Risk Assessment Part A [APP-254] demonstrates negligible increase in flood risk along Longdike Burn as a result of the Scheme.
6.8.4	With regards to ordinary watercourses (all other watercourses i.e. stream, ditches, drains, etc.) which are not designated main rivers – Northumberland County Council as the Lead Local Flood Authority (LLFA) are the relevant statutory consultee. Regular communications between the LLFA and WSP who are the assigned flood risk and drainage consultants have continued.	1. The Applicant notes that NCC agree there have been regular consultation with them on flood risk and drainage.
6.8.5	The submitted documents and assessments have undertaken modelling of all the relevant watercourses for which the new highway will cross and will impact upon. All modelling has been in accordance with national policy and best practice guidance. This modelling shows that with appropriate design and mitigation flood risk will not increase on or off-site as a result of the development.	1. The Applicant notes that NCC agree that all flood modelling in relation to ordinary watercourses has been carried out in accordance with national policy and best practice guidance and that, with appropriate design and mitigation, flood risk will not increase on or off-site.
	Mitigation	
6.8.6	Appropriate mitigation and design is required to ensure flood risk will not increase. This includes ensuring the diameter of any new culvert is sufficient and that where existing culverts and bridges are being extended these match or are larger than the existing. The modelling undertaken has determined the appropriate sizing for each relevant culvert / bridge.	1. The assessment of the culverts are provided in Appendix 10.1 Flood Risk Assessment Part A [APP-254] and Appendix 10.1 Flood Risk Assessment Part B [APP-311]. The sizing of the culverts is set out in the Structures Engineering Drawings and Sections [APP-012]. Any departure from these would need to be authorised by the Secretary of State and would need to ensure that such a change did not give rise to any materially new or materially different environmental effects in comparison with those reported in the ES. This will ensure that the appropriate sizes of culverts are included to address flood risk.

Ref. No.	Local Impact Report Statement:	Applicant's Response
6.8.7	Reviewing the submitted information, we are satisfied with the proposed mitigation measures in this instance.	1. The Applicant notes that NCC are satisfied with the flood mitigation measures.
	Surface Water Flood Risk Assessment	
6.8.8	The impact of overland (pluvial) flows onto the new highway has been assessed within the submitted information. These detail that at certain locations, there is a possibility that either overland flows would enter onto the new highway or would be diverted elsewhere. The assessment further looks at this and provides necessary mitigation to ensure that this does not occur.	1. The Applicant notes that NCC agrees that the Scheme will provide appropriate mitigation for overland flows.
	Mitigation	
6.8.9	Appropriate mitigation and design is required to ensure flood risk will not occur on or off site. This mitigation will involve the provision of cut-off drains which will intercept overland runoff and diverted it to the nearest watercourse, which is within the relevant catchment.	1. No response required.
6.8.10	Reviewing the submitted information, we are satisfied with the proposed mitigation measures in this instance.	1. The Applicant notes that NCC is satisfied with the mitigation measures proposed for surface water.
	Road Drainage Assessment – Neutral Impact	
6.8.11	This particular aspect of the development looks at drainage from the new highway and its disposal. National policy and guidance have been referenced within the submitted documents. If unmitigated flood risk downstream will increase due to the significant increase of hardstanding generated and an increase in surface water flows and volumes. The assessment further looks at this and provides necessary mitigation to ensure that this does not occur.	1. The Applicant notes that NCC agrees that the Scheme will provide appropriate mitigation for flood risk downstream.
6.8.12	Northumberland County Council again as the Lead Local Flood Authority are the relevant statutory consultee for surface water drainage. Regular communications between ourselves and WSP who are the assigned surface water drainage consultants are on-going.	1. The Applicant notes that NCC agree there have been regular consultation with them on flood risk and drainage.
6.8.13	The submitted documents and assessments have looked at the disposal of surface water from the new highway. With this aspect it needs to be ensured that the rate and volume of water leaving the development / appropriate catchment is no greater than previous. Appropriate mitigation will be required in order to achieve this.	1. No response required.
	Mitigation	

Ref. No.	Local Impact Report Statement:	Applicant's Response
6.8.14	As above, appropriate mitigation is required in order to ensure flood risk does not increase on and off-site as a result of the works. In this instance, this mitigation involves a series of attenuation features which will store water in times of heavy rainfall, before slowly releasing it to a relevant watercourse at a controlled rate. These rates have been discussed between WSP and NCC. We are content with the proposed rates. On-going discussions over the required volumes is continuing.	1. The Applicant notes that NCC is satisfied with the proposed release rate from the attenuation ponds for surface water. In relation to volumes these have been determined in line with national guidance and are set out in Appendix 10.5 Drainage Strategy Report Part A [APP-258] and Appendix 10.4 Drainage Strategy Report Part B [APP-314]. Requirement 8 requires the details of the surface and foul water drainage system to be approved by the Secretary of State Further discussions with regulatory bodies will confirm the required volumes and this will feed into the details of the drainage scheme which are submitted for approval.
6.8.15	Further information will be required looking at the attenuation basins, looking at slope gradients, materials used, planting, access requirements for maintenance. It is believed that once the fundamental issues are resolved, that these remaining issues can be overcome via a condition / requirement of the DCO and that this will result in a neutral impact from this aspect.	1. The general characteristics of the attenuation basins with regard to these particular items will be to the design guidance in the Design Manual for Roads and Bridges (DMRB) document CD 532 Vegetated drainage systems for highway runoff. The document references The SuDs Manual C753. The Application shows basin maintenance laybys on the General Arrangement drawings [APP008]. Access to these is secured as permanent acquisition of rights over land as shown on the Land Plans [APP-006]. 2. Requirement 8 of the dDCO requires that details of the proposed surface water drainage system for each part of the Scheme must be approved by the Secretary of State before that part can be commenced. NCC requires to be consulted on the proposed drainage measures. This will ensure that the attenuation basins will be satisfactory prior to construction commencing.
	Water Quality – Neutral Impact	
6.8.16	The installation of a new highway can be detrimental to receiving watercourses due to an increase of oils, liquids and other solids which may occur. Looking at the receptor of watercourses where these are likely to wash into these could increase from existing. In order to ensure that the water quality within the receiving watercourses does not increase appropriate mitigation is required. This mitigation will consist of proprietary devices such as silt traps, but also filter trenches and attenuation basins. These will all provide an element of water quality treatment throughout the treatment train as is stipulated in best practice guidance.	1. Proposed treatment is set out in Appendix 10.3 Drainage Network Water Quality Assessment Part A [APP-257] and Appendix 10.3 Drainage Network Quality Assessment Part B [APP-313]. Requirement 8 of the dDCO [REP2-004 and 005] requires that details of the proposed surface water drainage system for each part of the Scheme must be approved by the Secretary of State before that part can be commenced. NCC requires to be consulted on the proposed drainage measures. This will ensure that the detailed design of the drainage measures such as filter trenches and attenuation basins will be satisfactory.
6.8.17	Providing that the flood risk, surface water and water quality requirements remain within the Flood Risk Assessment, Drainage Strategy and the Development Consent Order and the appropriate mitigation measures are carried out, with any outstanding information provided, this will result in a neutral impact.	1. The Applicant notes that NCC agrees that the Scheme will have a neutral impact on water quality provided that the appropriate mitigation is delivered. This will be secured by Requirement 8 of the dDCO [REP2-004 and 005].
6.8.18	The Council welcomes requirement 8 of schedule 2 (Surface and foul water drainage) within the draft DCO.	1. Requirement 8 will ensure that the required mitigation is delivered in relation to water quality which reflects the mitigation measures in the REAC.

Table 1-9 – Geology and Soils

<table>
<tr><th>Ref. No.</th><th>Local Impact Report Statement:</th><th>Applicant's Response</th></tr>
<tr><td>6.9</td><td colspan="2">Geology and Soils – Neutral Impacts</td></tr>
<tr><td>6.9.1</td><td>The Environmental Statement (ES) dated June 2020 (TR010041) has been produced by Highways England (HE) Chapter 11 of the Environmental Statement (ES) (DCO documents APP-052 and APP-053) refers to the Ground Condition assessments that have undertaken. The Council accepts the methodology used in the appraisal and agrees to the baseline assessments.</td><td>1. The Applicant notes that the Council accepts the methodology and baseline assessments set out in Chapter 11: Geology and Soils Part A [APP-052] and Part B [APP-053].</td></tr>
<tr><td>6.9.2</td><td>The site visits undertaken have quantified that the geological and geomorphological features of the local landscape are not highly sensitive to the effects of highway construction and operation. An assessment of agricultural land in the study area has shown it all falls predominantly into Agricultural Land Classification Grade 3b, which is of moderate quality.
<table>
<tr><th>Agricultural Land Class</th><th>Part A (ha)</th><th>Part B (ha)</th><th>Total (ha)</th></tr>
<tr><td>1 (Excellent)</td><td>-</td><td>-</td><td>-</td></tr>
<tr><td>2 (V. Good)</td><td>2.279</td><td>6.0</td><td>8.279</td></tr>
<tr><td>3a (Good)</td><td>12.843</td><td>50.3</td><td>63.143</td></tr>
<tr><td>3b (Moderate)</td><td>111.491</td><td>113.6</td><td>225.091</td></tr>
<tr><td>4 (Poor)</td><td>44.511</td><td>3.3</td><td>47.811</td></tr>
<tr><td>5 (V. Poor)</td><td>-</td><td>-</td><td>-</td></tr>
</table></td><td>1. The Applicant agrees with the Council's summary of the assessment presented within Chapter 11: Geology and Soils Part A [APP-052] and Part B [APP-053].</td></tr>
<tr><td>6.9.3</td><td>Given the extent of the scheme, the loss of agricultural land in both Parts A and B of the scheme will be predominately of Grade 3b agricultural land during/after construction. The Council is in agreement with the proposed mitigation identified in the outline CEMP (APP-0346) which references the soil handling strategy and standards of restoration for the return of the temporarily used areas to agricultural production to reduce the impacts.</td><td>1. The Applicant agrees with the Council's summary of the assessment presented within Chapter 11: Geology and Soils Part A [APP-052] and Part B [APP-053]and notes that the Council agrees with the mitigation identified in the Outline Construction Environmental Management Plan (Outline CEMP) [REP1-023 and 024] (and as updated at Deadline 3)].
2. The requirement for a soil handling strategy is included within reference S-GS5 within the Outline CEMP [REP1-023 and 024] (and as updated at Deadline 3). Prior to construction, as per Requirement 4 of Schedule 2 to the Draft DCO [REP2-004 and 005], Northumberland County Council will be consulted on the soil handling strategy prior to approval by the Secretary of State.</td></tr>
<tr><td></td><td colspan="2">Land Contamination- Neutral Impacts</td></tr>
<tr><td>6.9.4</td><td>A number of historic land uses have been identified by the applicant in a series of plans showing their locations along the routes of Part A and B of the sections to be dualled.</td><td>1. No response required.</td></tr>
<tr><td>6.9.5</td><td>No assessment of risk from contamination has been presented and it would be normal not to require on for such a development as it does not introduce any sensitive receptors to contamination (should it exist).</td><td>1. The Applicant agrees with the Council's confirmation that, given the nature of the Scheme, there would be no receptors likely to be sensitive to the limited identified contamination sources.
2. Potential sources of contamination, receptors potentially sensitive to contamination and pathways potentially linking the sources and receptors have been identified within Chapter 11: Geology and Soils Part A [APP-052] and Part B [APP-053]. It was recognised that although potential localised</td></tr>
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		sources of contamination exist within the Order limits, there are no significant sources of contamination which may pose a high risk to identified receptors. 3. Nevertheless, a Generic Quantitative Risk Assessment (GQRA) has been completed based on chemical laboratory results and Generic Assessment Criteria (GAC), the results of which are reported in the respective Ground Investigation Reports (GIRs) for Part A [APP-262] and Part B [APP-318]. 4. In addition to the above, the draft DCO [REP2-004 and 005] includes the requirement for a Contaminated Land Management Plan to be produced as part of the CEMP in Requirement 4 of Schedule 2. Further, Requirement 6 deals with contaminated land and groundwater in the event this arises during construction. This requires the preparation of a risk assessment and, where necessary, the preparation and execution of a scheme and programme of remediation.
6.9.6	On similar types of applications, the Public Health Protection Unit would normally recommend a condition for the applicant to deal with any unexpected contamination should it be discovered during development.	1. Reference is made within Chapter 11, Geology and Soils Part A [APP-052] (paragraph 11.9.8) and Part B [APP-053] (paragraph 11.9.9) to the requirement for a suitable remediation strategy to be formulated following consultation with the Local Authority and the Environment Agency if required, should any unexpected contamination be encountered as part of the works. This requirement has been secured in Table 3-1, reference S-GS7 of the Outline CEMP [REP1-023 and 024] (and as updated at Deadline 3). 2. Further requirements are imposed by Requirements 4 and 6 of Schedule 2 to the draft DCO [REP2-004 and 005], as detailed at 6.9.5 above.
6.9.7	There is a potential risk of ground instability from historic coal mining in the area of Causey Park, this would be a matter for the applicant to address and may require a licence from the Coal Authority should stabilisation works be required where entry in coal seams or historic coal workings is needed.	1. The Applicant notes that a licence from the Coal Authority is likely to be required for any works where entry into coal seams or historic coal workings is needed. 2. A Coal Mining Risk Assessment (CMRA) has been completed for Part A and forms part of the application at Appendix 11.4 Part A [APP-264]. It identifies the areas of Part A which lie within Coal Authority Development High Risk Areas (DHRA) and specifically assesses the risks associated with potential shallow coal workings at Causey Park and the DHRA shown along a section of the River Coquet valley. The CMRA concludes that there remains a risk of shallow workings in the vicinity of the route at Causey Park and that there is negligible risk associated with the DHRA shown along the River Coquet valley. The requirement for a Coal Authority permits when working within development high risk areas is recognised within the Coal Mining Risk Assessment [APP-264]. Any stabilisation works such as grouting would be required to be completed under a Coal Authority permit. Further intrusive works at detailed design stage are required to inform the requirement for and obtain sufficient information to design stabilisation requirements in high risk development areas. The requirement for further intrusive ground investigation works is set out at reference S-GS12 in the Outline CEMP [REP1-023 and 024] (and as updated at Deadline 3)].
6.9.8	It is likely that any risks from contamination or ground instability are more likely to be Health and Safety at Work issue for the contractors.	1. It is stated in reference S-GS7 and S-GS7 in the Outline Construction Environmental Management Plan (Outline CEMP) [REP1-023 and 024] (and as updated at Deadline 3) that the preparation of Risk Assessments and Method Statements (RAMS) should ensure the implementation of appropriate mitigation measures against potential risks associated with ground instability and encountering potential contamination during the construction phase.

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6.910	This is generally acceptable, and the Public Health Protection Unit would see the proposed dualling as not introducing any new, sensitive receptors to any contamination or risk of contamination.	1. The Applicant notes that the Council do not anticipate the Scheme introducing any new, sensitive receptors to any contamination or risk of contamination.
6.9.11	The Council welcomes requirement 6 (Contaminated Land and Groundwater) of the draft DCO.	1. The Applicant notes that the Council welcomes requirement 6 of Schedule 2 to the draft DCO [REP2-004 and 005].

Table 1-10 – Materials

Ref. No.	Local Impact Report Statement:	Applicant's Response
6.10	**Materials – Neutral Impact**	
6.10.1	The Environmental Statement (ES) dated June 2020 (TR010041) has been produced by Highways England (HE). Chapter 13 of the ES (DCO documents APP-056 and APP-057) refers to the material assessments that have undertaken. The Council is broadly in agreement with the methodology and the baseline data used.	1. The Applicant notes that NCC is broadly in agreement with the methodology and baseline data used in Chapter 13: Material Resources Part A [APP-056] and Part B [APP-057].
6.10.2	The scheme has the potential to consume materials in large quantities which may put pressure on the County's natural minerals resources, and produce and dispose of waste during the demolition, site preparation and construction phases of the carriageways and associated infrastructure. The associated potential impacts (both direct and indirect) would occur principally during construction, and potentially in the first year of operation. Potential impacts are associated with the production, processing, consumption and disposal of material resources and these will need to be managed carefully throughout the project.	1. The Applicant notes the comment made and agrees with the statement and its intent. In response to the comment, the Applicant has provided the following context to give confidence that appropriate action has and will continue to be taken to practicably reduce adverse environmental impacts and effects associated with material consumption: 2. To help manage and practicably reduce associated impacts, a Construction Environmental Management Plan (CEMP), incorporating a Site Waste Management Plan (SWMP) and CL:AIRE-compliant Materials Management Plan (MMP) will be implemented by the Applicant to formalise mitigation measures required to identify, monitor and manage materials and arisings on site in accordance with good and best practice. This will be developed from the Outline CEMP [REP1-023 and REP1-024]. 3. The MMP will be implemented to maximise the high value application reuse of site arisings. The majority of these arisings are forecast to be generated from earthworks activities; arisings are expected to be recovered for reuse on site. 4. The SWMP would be implemented to manage and monitor site waste, with the goal of reducing waste generation and disposal to landfill, and (hence) potential harm to the environment. Waste to landfill is currently expected to comprise only unsuitable and contaminated earthworks and hazardous waste, e.g. asbestos and coal tar. 5. In terms of material consumption, all practicable efforts will be made to achieve sustainable resource management. Information on achievements in this context will, where appropriate, be made available to NCC during detailed design.
6.10.3	Some discrepancies in the potential capacity for inert landfill in the county are noted in table 13-11, for example, at Merryshields Quarry (no extant permission	1. The data used to establish landfill capacity at the time of writing was taken from publicly available data information, as published by the Environment Agency.

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	for landfill), Alcan Ash Lagoons (not available for inert waste landfill) and Hollings Hill (capacity lower than stated).	2. By removing the availability of landfill capacity from Merryshields Quarry (190,908m^3) and Alcan Ash Lagoons (7,442m^3) this would reduce the total available regional capacity by less than 200,000m^3. 3. As the reduction in available capacity at Hollings Hill has not been provided in the Local Impact Report, the associated reduction has not at this time been calculated. 4. Therefore, taking into account the changes to assessment data resulting from the Merryshields Quarry and Alcan Ash Lagoons clarifications, the total available capacity in the region would reduce from 26,456,539m^3 to 26,258,189m^3 (0.7% capacity reduction). 5. In accordance with these revised data, the Applicant does not consider the associated reduction in available capacity will materially affect the findings of the assessment. This is compounded by the fact that good and best practice design and mitigation measures have been implemented to reduce the amount of waste sent to landfill as a result of Scheme activities.
6.10.4	The Council will continue to negotiate with Highways England to undertake close monitoring of the transported materials to ensure that there are limited impacts to the temporary storage areas and ensure that waste materials are disposed of in the most appropriate way, ensuring that no pollution to the environment both in proximity to the scheme or at the point of disposal occurs. The Council supports the production of a Materials Management Plan (MMP) and a Site Waste Management Plan (SWMP) as identified in the CEMP.	1. Comment noted. Section 3 (Register of Environmental Actions and Commitments) of the Outline CEMP [REP1-023 and 024] (and as updated at Deadline 3) provides detail of the committed measures in *Table 3-1: Register of Environmental Actions and Commitments: The Scheme*, specifically within references S-GS7, S-M6, S-M7, S-M8, S-M9 and S-CC7. These include measures to mitigate risks to human health, the requirement for Site Waste Management Plan and the re-use of materials and site arisings. 2. Section 5.1 (Monitoring) of the Outline CEMP [REP1-023 and 024] (and as updated at Deadline 3) *Table 5-1: Monitoring to be Carried out During Construction,* specifies that the SWMP and MMP would be updated and reviewed by the Environmental Manager on a monthly basis.
6.10.5	With respect to the transport of materials and waste during construction, the Council will discuss with Highways England the need to produce a traffic management plan to minimise the effects on amenity but is otherwise satisfied with the approach taken.	1. Section 2.2.4 of the Construction Traffic Management Plan (CTMP) [REP1-025 and REP1-026] has identified Rendezvous Points (RVP) in the appendix drawings as access point for deliveries from the A1 carriageway directly into the works. These will be developed further by the Applicant prior to commencement of construction of the Scheme to manage transportation impacts relating to materials and waste in the area of the Scheme 2. Section 2.5.4 of the CTMP [REP1-025 and 026] also acknowledges that an estimate has been made of the likely disposal method and destination.The final Construction Traffic Management Plan (CTMP) is secured at Section 1.2 of the Outline CEMP [REP1-023 and 024 (and as updated at Deadline 3)]. The revision of the Outline CTMP [REP1-025 and 026] as submitted at Deadline 3 commit the Applicant to consult with NCC.

Table 1-11 – Construction Traffic

Ref. No.	Local Impact Report Statement:	Applicant's Response
6.11	**Construction Traffic – Neutral Impact**	
6.11.1	Any construction project will have an impact upon the surrounding network due to the additional traffic movements associated with the construction of the scheme. These impacts are temporary and will only last throughout the	1. The potential impacts upon the environment, as a result of the construction of the Scheme, are reported in the relevant technical chapters of the Environmental Statement (ES) [APP-040 to APP-062]. Where relevant mitigation is proposed to minimise the potential impacts associated with additional traffic movements during construction of the Scheme, and is secured through

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	construction phase and are summarised in the Environmental Impact Assessment. Whilst they are temporary, they should be mitigated and minimised where possible to reduce the impact upon the highway network.	references S-G4, S-A2, S-N2, S-N3, S-B11, S-PH5, S-PH8 of Table 3-1: Register of Environmental Actions and Commitments: The Scheme of the Outline Construction Environmental Management Plan (Outline CEMP) [REP1-023 and 024] (and as updated at Deadline 3).
6.11.2	The DCO submission includes an Outline Construction Environmental Management Plan (APP-365) that sets out the practical measures that will be used to minimise the impacts of construction traffic and the diversion of non-construction traffic during road closures during the construction phase.	1. The Outline CEMP [REP1-023 and 024] (and as updated at Deadline 3) was originally referenced as [APP-346]. The Applicant agrees that it sets out measures to minimise the impacts of traffic movement during construction of the Scheme, within references S-G4, S-A2, S-N2, S-N3, S-B11, S-PH5, S-PH8 of Table 3-1: Register of Environmental Actions and Commitments: The Scheme.
6.11.3	A review of this document has been made by NCC Officers and a number of points of clarification have been sent to Highways England for comment and we are in dialogue with their consultant and contractor partners to resolve these queries. As such we are not in a position at this time to confirm whether the negative impacts of the construction phase can be fully minimised.	1. The Applicant continues to liaise with NCC regarding the Outline CEMP [REP1-023 and REP1-024]. Mitigation measures for diversion routes are set out in S-N2.n S-N2.o S-N2.p and S-PH5. 2. The Applicant also continues to liaise with NCC regarding the Construction Traffic Management Plan (CTMP) [REP1-025 and 026]. Clarifications on the points raised by the NCC Officers was shared back with NCC on 03/02/2021 and a follow up meeting is planned with the relevant officers and the Applicant on 15/02/2021. The outcome of these discussions will be set out as agreed in the Statement of Common Ground with NCC [REP1-028] and any subsequent updates to the CTMP as required at future deadlines.
6.11.4	There are particular concerns in respect to the potential for additional traffic to use the Local Highway Network during the construction phase as a result of actual or perceived delays on the A1 as non-construction traffic travels through the scheme. Particular concerns relate to the A697 corridor and the villages on this route, but the impacts could be felt on any diversionary route taken by non-construction traffic on both formal and informal diversions made by vehicles. We are in dialogue with Highways England to seek assurances that the impacts will be minimal and minimised throughout the construction phase.	1. The Applicant continues to liaise with NCC regarding the impact of redistributed traffic on the local road network and provided the following comments to NCC's response to written question TT1.18 at Deadline 2 (see Table 1-5 of [REP2-020]): 2. As described in the Case for the Scheme [APP-344], traffic modelling of the construction scenario was undertaken using the SATURN model, in order to calculate the monetised disbenefits associated with delays during the construction works. The model forecasts that the majority of A1 traffic (around 90%) will remain on the A1 during the construction works, with a small forecast increase in traffic flows along the A697. During the morning peak hour, the model forecasts an additional 29 vehicles northbound and 84 vehicles southbound on the A697 passing through Longhorsley and Longframlington. During the evening peak hour the model forecasts an increase of 30 vehicles northbound and 40 vehicles southbound. Given that the forecast increase is below two vehicles per minute, this is not considered likely to have a significant adverse impact at these locations. 3. Section 2.6.43 of the CTMP [REP1-025 and 026] confirms that Mobile Variable Message Signs (VMS) will be deployed and give actual durations to pass through the road works and times to remote destinations to reduce the likelihood of traffic diverting onto the Local Highway Network based on perceived delays. In addition, section 2.6.36 of the CTMP confirms that signage will be erected to confirm the official diversion route and deter traffic from passing through sensitive areas.
6.11.5	Whilst we accept that there will be negative impacts due to construction traffic and on non-construction traffic during the construction period, at this stage it is not clear whether these have been minimised. We will continue to work with Highways England and their consultant and construction partners to address our concerns and seek to reduce the impacts accordingly.	1. The Applicant has minimised the potential traffic impacts upon the environment, as a result of the construction of the Scheme. These are reported in the relevant technical chapters of the ES [APP-040 to APP-062]. Where relevant, mitigation is proposed to minimise the potential impacts associated with additional traffic movements during construction of the Scheme, and is secured through references S-G4, S-A2, S-N2, S-N3, S-B11, S-PH5, S-PH8 of Table 3-1: Register of Environmental Actions and Commitments: The Scheme of the Outline CEMP [REP1-023 and 024] (and as submitted at Deadline 3).

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		2. Along with the CTMP [REP1-025 and 026], these measures address working times, managing construction traffic on the strategic and diversions on the local road networks, to minimise emissions, noise, damage to habitats and disruption to local residents and the travelling public. As explained in 6.11.4, Mobile Variable Message Signs will be used to give information on actual journey times to as to reduce the likelihood of drivers diverting onto the local road network due to perceived delays. Signage will be added to set out diversion routes and deter traffic from sensitive areas.

Table 1-12 – Road Safety

Ref. No.	Local Impact Report Statement:	Applicant's Response
6.12	**Road Safety – Positive Impact**	
6.12.1	The scheme will result in road safety impacts for traffic that will use the new dual carriageway section of the A1 over the current single carriageway section. This is because dual carriageways primarily allow for safer overtaking by removing the potential head-on conflict for vehicles in particular. The scheme also allows for slower moving vehicles to be overtaken more frequently without crossing into the path of oncoming traffic. Conflict points on the network are also reduced through the scheme by removing numerous side road junctions, private access junctions and reducing the number of at grade Public Rights of Way crossings of the Trunk Road. Furthermore, the design of the new route is in accordance with modern highway design standards.	1. The Applicant notes that NCC agrees that the new dual carriageway will have positive road safety impacts by allowing safer overtaking and removing conflict points on the network. Further details of the road safety and accident analysis are set out in paragraphs 4.10.1 to 4.10.27 of The Case for the Scheme [APP-344]. Overall, the COBALT assessment forecasts that the Scheme will provide an accident reduction benefit of £32.489 million and that the Scheme will save 414 accidents when compared to the without Scheme scenario. This reduction in accidents is forecast to reduce the number of casualties by 708 over the 60-year period, of which 17 are predicted to be fatal.
6.12.2	In relation to the impact on road safety away from the Strategic Road Network, the proposals will make the A1 a more attractive travel option and those travellers who wish to avoid actual or perceived delays, especially in the summer months, will use the upgraded sections removing traffic from unsuitable routes on the Local Road Network.	1. The Applicant notes that NCC agree that the upgraded A1 will remove traffic from unsuitable routes on the local road network. Extensive traffic modelling has been undertaken in order to forecast the effects of the Scheme on vehicular traffic. The development of the model is described in more detail in section 4.5 and the forecast future performance is described in sections 4.7 to 4.9 of the Case for the Scheme [APP-344]. The model outputs demonstrate that the Scheme will reduce traffic from the local road network, including the A697, the de-trunked A1, the B1337 and many of the unclassified routes which pass through small settlements.
6.12.3	In relation to Morpeth to Felton section (Part A), the de-trunked section of the A1 will experiences reduced levels of traffic and therefore the retained junctions will have reduced risk of conflict. However, we continue to engage with Highways England in relation to the cross-section of the de-trunked sections both to improve NMU access and connectively but additionally in respect to the road safety implications of retaining the existing carriageway widths where excessive width can be detrimental to road safety.	1. The Applicant notes that NCC agrees that the de-trunked section of the A1 will experience reduced traffic and reduced risk of conflict. As noted in the Table 1-2, reference 1.2.4 of the Applicant's Response to Relevant Representations submitted at Deadline 1 [REP1-064], the Applicant has undertaken traffic modelling of the Scheme and this is described in Chapter 4 of the Case for the Scheme [APP-344]. The Scheme is forecast to significantly reduce traffic flows on the de-trunked sections of the A1. 2. The Application does not detail any works to the existing cross-section of the A1 to be de-trunked to accommodate walking, cycling and horse-riding. As a significant proportion of the existing traffic using the A1 will be removed it is expected that the de-trunked carriageway could be shared by

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		vehicles and cyclists and it does not warrant the specific creation of a separate cycle track. . The Applicant continues to investigate separate funding options with NCC for NMU works on the de-trunked section. 3. The Applicant acknowledges that the de-trunked carriageway consists of wide carriageways, wide verges, hatching within the centre and long sweeping horizontal curves and that when de-trunked traffic speeds could increase through reduced traffic volumes and thereby a reduction in queues and convoys. However, the national speed limit would still apply, the reduced traffic volumes should reduce the need for overtaking manoeuvres and reduce the potential conflicts with right turn movements and there should generally be a much greater proportion of local traffic using the de-trunked section who are familiar with the road layout. The Applicant therefore does not consider that additional measures are required on the de-trunked A1` as a result of the Scheme.
6.12.4	In relation to the Alnwick to Ellingham section (Part B), there are road safety benefits from removing the local traffic from the Strategic Road Network in particular through the provision of the new Local Access Roads to East and West Linkhall as well as new road to Rock South Farm.	1. The Applicant notes that NCC agrees that safety benefits would accrue from Part B of the Scheme, Noted and agreed.
6.12.5	These positive impacts upon Road Safety can only be fully confirmed once all additional points of clarification and additional information in relation to the development as requested from Highways England and their consultant and contractor partners is received and agreed.	1. The Applicant considers that the Scheme (including Part B) in its current form will result in positive road safety impacts. Details of the road safety and accident analysis are set out in paragraphs 4.10.1 to 4.10.27 of The Case for the Scheme [APP-344]. Overall, the COBALT assessment forecasts that the Scheme will provide an accident reduction benefit of £32.489 million and that the Scheme will save 414 accidents when compared to the without Scheme scenario. This reduction in accidents is forecast to reduce the number of casualties by 708 over the 60-year period, of which 17 are predicted to be fatal. 2. The Applicant will continue to work closely with NCC in order to provide full clarification and all additional information requested.

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