

A1 in Northumberland: Morpeth to Ellingham

Scheme Number: TR010059

7.20 Consultation Statement for Change Request

Rule 8(1)(c)

Infrastructure Planning (Examination Procedure) Rules 2010

Planning Act 2008

March 2021

Infrastructure Planning

Planning Act 2008

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

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

Development Consent Order 20[xx]

Consultation Statement for Change Request

Rule Reference:	8(1)(c)
Planning Inspectorate Scheme Reference:	TR010059
Document Reference:	7.20
Author:	A1 in Northumberland: Morpeth to Ellingham Project Team, Highways England

Version	Date	Status of Version
Rev 0	March 2021	Deadline 4

CONTENTS

1	INTRODUCTION	1
1.1	PURPOSE OF THE CONSULTATION STATEMENT	1
1.2	CONSULTATION CONTEXT	4
2	CONSULTATION	7
2.1	OVERVIEW OF CONSULTATION	7
2.2	ENGAGEMENT WITH RELEVANT PARTIES ON THE PROPOSED CHANGES	10
3	OVERVIEW OF CONSULTATION RESPONSES	19
3.1	CONSULTATION RESPONSES RECEIVED	19
3.2	DETAILS OF RESPONSES AND APPLICANT'S RESPONSE	19
4	CONCLUSION	27

TABLES

Table 2-1 - Summary of Engagement with relevant stakeholders prior to consultation	12
Table 3-1 - Responses to Consultation	20

APPENDICES

APPENDIX A

LIST OF CONSULTEES AND AFFECTED PERSONS

APPENDIX B

PLAN OF CONSULTATION AREAS

APPENDIX C

COVERING LETTERS

APPENDIX D

PRE-CONSULTATION RESPONSES TABLE 2-2 ENVIRONMENT AGENCY AND
NATURAL ENGLAND

APPENDIX E

FORMAL CONSULTATION TABLE 3-2 ENVIRONMENT AGENCY AND NATURAL
ENGLAND

1 INTRODUCTION

1.1 Purpose of the Consultation Statement

- 1.1.1. This Consultation Statement (this “Statement”) relates to an application made by Highways England (the “Applicant”) to Secretary of State for Transport via the Planning Inspectorate (the “Inspectorate”) under the Planning Act 2008 (the “2008 Act”) for a Development Consent Order (DCO). If made, the DCO would grant consent for the A1 in Northumberland: Morpeth to Ellingham (the “Scheme”). The Applicant submitted the Application on 07 July 2020 (Reference: TR010059) and on 04 August 2020, the Inspectorate confirmed that the Application had been accepted for examination. The examination commenced on 22 February 2021.
- 1.1.2. The Scheme is formed of two parts known as Part A (Morpeth to Felton) and Part B (Alnwick to Ellingham). A detailed description of the Scheme can be found in **Chapter 2: The Scheme** of the Environmental Statement (ES) [APP-037]
- 1.1.3. Following Application, the Applicant has continued to develop the Scheme to bring about design benefits and efficiencies. As a result, the Applicant wishes to amend the Application as follows:

CHANGE 1 - EARTHWORKS AMENDMENTS

- 1.1.4. Changes to temporary and permanent earthworks within the Order limits along both Part A and Part B in order to reduce earthwork movement. The Earthwork Amendments would consist of the following:
- a. Utilising borrow pits in Part B to exchange and win additional material suitable for construction.
 - b. Maximising use of soil bunds already specified within the Figure 7.8: Landscape Mitigation Masterplan Part A [REP3-008], Figure 7.10 Landscape Mitigation Plan Part B [APP-144] and Figure 7.14: Landscape Mitigation Plan including Assessment Parameter 3 for Part B [APP-148], for disposal of excess site material, in Part A.
 - c. Maximising of fill within slopes, already specified within Figure 7.8: Landscape Mitigation Masterplan Part A [REP3-008], Figure 7.10 Landscape Mitigation Plan Part B [APP-144] and Figure 7.14: Landscape Mitigation Plan including Assessment Parameter 3 for Part B [APP-148], for re-use of site material, in Part A.
 - d. Creation of new soil bunds within Part B to maximise re-use of excess site material.
 - e. Maximising of slopes for re-use of excess Site material, in Part B.
 - f. Laying down additional material increasing some localised ground levels.
 - g. Raising levels of junction "bowls" (level or rounded rather than dished).
 - h. Creating new, temporary soil storage areas within both Part A and Part B.
- 1.1.5. There would be no change to the Order limits as a result of the Earthworks Amendments.
- 1.1.6. The construction methodology outlined in **Chapter 2: The Scheme** of the ES) [APP-037] and the **Outline Construction Environmental Management Plan (Outline CEMP)** [REP3-

013 and 014] would remain the same as originally proposed. The main contractor would prepare a Materials Management Plan containing the updated material quantities as part of the Construction Environmental Management Plan (CEMP) prior to commencement of the Scheme.

- 1.1.7. These changes to the earthworks strategy would not involve additional land and, as explained in Section 1.2 of this Statement, it is not considered that there would be any new or changed environmental impacts as a result.

CHANGE 2 - STABILISATION WORKS

- 1.1.8. The Stabilisation Works include works on the north bank of the River Coquet in order to stabilise the proposed bridge and existing bridge within Part A. The works would consist of the following:

The installation of three rows of piles in the north bank of the River Coquet; which would require the Order limits to be extended;

The installation of temporary river training and permanent erosion protection measures on the north bank;

A total of 0.28 ha of land outside the existing Order limits of Part A would be required as a working area for the installation of the piles and access to works, as well as for the carrying out of the erosion protection measures; This area of land would be planted in accordance with the revised Ancient Woodland Strategy Part A [APP-247] for the proposed changes to the Scheme (as submitted at Deadline 4 of the Examination), and therefore, as a worst-case, would be required permanently to enable appropriate management and maintenance of the woodland; and

As the installation works would lead to the loss of 0.28 ha of woodland within the Coquet River Felton Park Local Wildlife Site (LWS), there would also be a requirement for 3.1 ha of additional permanent land to facilitate compensatory habitat outside the existing Order limits of Part A.

It has been determined that there is a requirement to protect the bridge foundations from hydraulic action and that scour protection measures are required to maintain the integrity of the proposed design.

- 1.1.9. The scour protection would extend beyond the existing Order limits of Part A, requiring an extension to the Order limits.
- 1.1.10. The construction works associated with the Stabilisation Works would last approximately six months, with the piling works taking place in summer 2022. During this time, the construction works would include the formation of access to the work area (including any site clearance required) and the preparation of piling platforms and access routes to these, for the installation of the Stabilisation Works. The Stabilisation Works would also involve the creation of a dry area to allow reparation of the riverbed to accept river training works. The installation of temporary river training works is expected to take approximately four weeks and would likely be in place for approximately 16 months (July 2022 until November 2023).

- 1.1.11. Further details of the stabilisation works are described in Chapter 2: Stabilisation Works of ES Addendum: Stabilisation Works for Change Request (submitted at Deadline 4 of the Examination).

CHANGE 3 - SOUTHERN ACCESS WORKS

- 1.1.12. The Southern Access Works include the provision of a temporary access to the southern bank of the River Coquet by crossing the river from the temporary working area on the northern bank, as extended in order to accommodate the Stabilisation Works. This would be instead of creating an access track down the southern river embankment as described in Chapter 2: The Scheme of the ES [APP-037]. In addition, it is anticipated that there would be some temporary river training works along the southern riverbank. Additional permanent rights outside the existing Order limits of Part A would be required to facilitate the river crossing. In addition, the Applicant has determined the need for additional permanent scour protection on the southern bank in light of the latest ground investigation information and taking into account the presence of scour protection for the existing pier and the results of a preliminary hydraulic assessment of distributed design flows and velocities within the river corridor.
- 1.1.13. The Southern Access Works would involve the creation of a dry area to allow reparation of the riverbed to accept the temporary river training works and the permanent scour protection. Additional permanent acquisition within the existing Order limits currently identified as temporary land take would be required. It is expected that the works would begin in July 2022, with removal of the temporary works, including the temporary bridge and the temporary river training works, following construction being completed by early 2024.
- 1.1.14. Further details of the Southern Access Works are described in **Chapter 2: Southern Access Works** of **ES Addendum: Southern Access Works** (submitted at Deadline 4 of the Examination).
- 1.1.15. The purpose of this Statement is to provide evidence to the Inspectorate that the Applicant has carried out appropriate and proportionate non-statutory consultation in relation to the changes. This is in line with the consultation guidance in the Inspectorate's *Advice Note Sixteen (AN16): How to request a change that may be material*.
- 1.1.16. The Applicant has also taken into consideration the Examining Authority's advice in its Response to Proposed Changes to DCO letter issued on 11 January 2021 [PD-007] which stated:

"The ExA is aware of your stated intention to carry out non-statutory consultation on all Proposed Changes with all persons prescribed under Section 42 (a) to (d) of the 2008 Act. This should include any 'section 42' persons not originally consulted on the application but who may now be affected by the Proposed Changes. You should give a minimum of 28 days for responses to your consultation, and newspaper and site notices should be posted. Please ensure that consultation responses are sent to you as the Applicant and not to the Planning Inspectorate.

In your Summary of Proposed Changes [AS-018] you propose that this non-statutory consultation will be carried out from 29 January 2021 to 25 February 2021.

In preparing your change request you should also take account of the submissions received by the Planning Inspectorate in response to your initial letter [PDA-001] outlining your intention to submit a request to make changes to the Scheme from the Environment Agency [PDB—001], from Natural England [AS-019] and from the West End Anglers Club [AS-020].

When submitting the change request, it is recommended that you submit a statement encompassing a non-statutory consultation report setting out the detail and methodology of the undertaken consultation.”

1.1.17. This Statement responds to and meets the Examining Authority’s requests in its Response to Proposed Changes to DCO letter [PD-007]. It sets out:

- a. A summary of the context for the non-statutory consultation and why the process has been undertaken (Section 1.1 and 1.2 of this Statement);
- b. Overview of the non-statutory consultation process undertaken; section 42(1)(d) interests consulted (Appendix A Table A-3) and justification for publicity undertaken (Section 2.1);

1.1.18. c. Engagement with relevant parties on the proposed changes prior to the consultation (Table 2-1 of Section 2.2), (Table 2-2, Appendix D (Environment Agency and Natural England));

- d. The responses to the non-statutory consultation, along with the Applicant’s response (Table 3-1 of Section 3.2), (Table 3-2, Appendix E (Environment Agency and Natural England));
- e. Conclusion (Section 4); and
Appendices including;

i. Appendix A

- Table A-1- List of Section 42 (1)(a) consultees – prescribed persons;
- Table A-2 – List of Section 42(1)(b) consultees - local authorities;
- Table A-3 – List of Affected Persons under the Compulsory Acquisition Regulations;

ii. Appendix B

- Plan 1 - Consultation Area for Earthwork Amendments (Change 1);
- Plan 2 – Consultation Area for Stabilisation Works (Change 2);
- Plan 3 – Consultation Area for Southern Access (Change 3); and

iii. Appendix C - Covering letters sent to consultees.

1.2 Consultation Context

1.2.1. The changes that the Applicant seeks to make to the Application were set out in the Summary of Proposed Changes to Application [AS-018] which was submitted to the Inspectorate on 10 December 2020 ahead of the Preliminary Meeting on 15 December 2020. The Applicant has followed the guidance in Paragraphs 3.3 to 3.5 of AN16 in respect of consultation for a material change request. This recommends that ‘*applicants*’ consult all

those persons prescribed in section 42(a) to (d) of the 2008 Act, who would be affected by the proposed change; giving a minimum of 28 days. It is advised that if a targeted approach to the identification of those affected by the request to materially change the application is adopted then detailed justification should be provided why it is deemed unnecessary to consult all of the prescribed persons. Applicants should also consult those parties who are materially affected by the proposed change but not necessarily those who are affected by the original application. How the Applicant has met these requirements is set out in this Statement at **Chapter 2** and **Appendix A**.

- 1.2.2. The Applicant's reasoning for concluding the changes is material or non-material is discussed further in the Change Request Cover letter submitted alongside this Consultation Statement at Deadline 4 of the Examination.
- 1.2.3. The Applicant decided that consultation on Change 1 would be appropriate despite this change not considered by the Applicant to be material. The proposed change to the earthworks would not require additional land and therefore the changes would not be likely to generate new or materially different environmental impacts. Nevertheless, affected landowners may have an opinion on the earthworks strategy and the Applicant considered it appropriate to undertake consultation in order that they have the opportunity to make representations.
- 1.2.4. The Applicant decided that consultation on Change 2 would be required due to additional land requirements and potential new or changed environmental impacts associated with the stabilisation works on the north bank of the River Coquet. This is in line with guidance in the Inspectorate's Advice Note 16 in respect of consultation for a material change request.
- 1.2.5. The Applicant concluded therefore that Change 2 would be a material change as the changes would give rise to permanent land required outside of the current Order limits and therefore requirements under the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 (the "CA Regulations") would need to be considered. The amendments to the land affected by permanent acquisition as a result of the changes sought are: The amendments to the land affected by compulsory acquisition as a result of the changes sought are:

The addition of approximately 0.316 hectares (ha) of permanent land (plots marked 9/2i, 9/13h, 9/13i and 9/13j on the Land Plans [APP-06], revision 1. which accompany this submission for Deadline 4) located on the north and south banks of the river Coquet
- 1.2.6. The Applicant decided that consultation on Change 3 would be required as additional permanent rights outside the existing Order limits of Part A would be required to facilitate the river crossing.
- 1.2.7. The Applicant concluded that the acquisition of permanent rights in respect of the Land would be a material change, because it will require an extension to the current Order limits. Therefore requirements under the CA Regulations would need to be considered. Consultation would be required that responds to the Inspectorate's Advice Note 16 in

respect of consultation for a material change request. The amendments to the land affected by permanent acquisition of rights as a result of the changes sought are:

The addition of approximately 3.2 hectares (ha) or acquisition of permanent rights (plots marked 9/1a on the Land Plans [APP-06], revision 1. which accompany this submission for Deadline 4) located south of the River Coquet.

- 1.2.8. The CA Regulations provide a procedure to include additional land outside of the Order limits, within the compulsory acquisition powers sought in an ongoing application and a statutory consultation process where affected landowners do not consent to compulsory powers being extended over additional land. As this change includes an amendment to the compulsory acquisition powers sought, there is the potential for the statutory consultation requirement to be triggered but this would only take place after the change request is submitted.

2 CONSULTATION

2.1 Overview of Consultation

- 2.1.1. The Applicant carried out non-statutory consultation in relation to the proposed changes relating to the Earthwork Amendments (Change 1), Stabilisation Works (Change 2) and Southern Access Works (Change 3).
- 2.1.2. The consultation period commenced on 29 January 2021 and ended on 25 February 2021 allowing consultees a period of 29 days in which to respond. Late responses were accepted up until 1 March 2021 to allow time for the Applicant to update this Statement for submission at Deadline 4 of the Examination. No late responses were received.
- 2.1.3. During this period, the following activities were undertaken:
- Letters were sent out by post on 27 January 2021 to consultees considered by the Applicant to be directly affected by Changes 1, 2 and 3. Consultees whose land would be directly affected by the changes were identified by cross referencing the extent of affected land for each change to the plots on the Land Plans (document reference 2.2). The relevant land interests were then added to the consultation mailing list. In addition, where the Order limits were increased, the Applicant identified the affected land parcels using the existing land referencing data and the relevant land interests were added to the consultation mailing list.
 - Consultees received a USB stick with the relevant ES Addendum Non-Technical Summary if they owned land interests; or a USB stick with all ES Addendum Non-Technical Summaries if they were section 42(1)(a) prescribed persons or section 42(1)(b) local authorities.
 - Contact made with those relevant landowners and prescribed consultees directly associated with Changes 2 and 3.
 - The Applicant published the ES Addendums and Non-Technical Summaries on the Scheme webpage [<https://highwaysengland.co.uk/our-work/yorkshire-and-north-east/a1-morpeth-to-ellingham-dualling/>] on 29 January 2021.
 - Follow up emails were sent to the relevant section 42(1)(a) and section 42(1)(b) consultees, requesting that responses were provided by email or telephone rather than by post, due to the closure of offices in response to government measures to prevent the spread of Covid-19

CONSULTEES

- 2.1.4. A total of 108 consultees were consulted on Changes 1, 2 and 3. This included persons categorised under section 42 of the 2008 Act. These are summarised below. Plans of the Consultation Areas consulted on is provided in **Appendix B** of this Statement.
- 2.1.5. Section 42(1)(a) consultees are those prescribed persons defined in Schedule 1 of the Infrastructure Planning (Application: Prescribed Forms and Procedure) Regulations 2009

(‘APFP Regulations’). A list of the consultees and justification for their inclusion or otherwise from the consultation is provided in **Appendix A** (Table A-1) of this Statement. A copy of the covering letter to prescribed persons is provided in **Appendix C1** of this Statement.

- 2.1.6. Section 42 (1)(b) consultees are the local authorities, defined in section 43 of the 2008 Act. Northumberland County Council is the host local authority under which the Scheme sits and was included in the consultation and included in **Appendix A** (Table A-2) of this Statement as they were also defined as prescribed persons. The scale and nature of Changes 1, 2 & 3 was considered to be of relevance to Northumberland County Council as the host local authority.
- 2.1.7. Section 42(1)(c) requires an Applicant to consult the Greater London Authority if the land in question is in Greater London. As the Scheme is located in Northumberland, this requirement is not relevant.
- 2.1.8. Section 42(1)(d) are persons within one or more of the categories set out in section 44 of the 2008 Act.
- 2.1.9. There were 66 section 42(1)(d) land interests contacted as part of the consultation who are identified in **Appendix A** (Table A-3).
- 2.1.10. The boundary for the Change 1 consultation area was drawn up to include land interests of land directly affected by the temporary and permanent earthworks. The extent of the land affected is all contained within the existing Order limits.
- 2.1.11. The boundary for Changes 2 and 3 consultation areas were drawn up to include the land interests of the land directly affected by the stabilisation works on the north bank of the River Coquet, the compensatory habitat and the southern access works to the southern bank of the River Coquet.
- 2.1.12. Plans showing the extent of the consultation areas for Changes 1, 2 and 3 are provided in **Appendix B**.

CONSULTATION MATERIAL

- 2.1.13. The Applicant sent out a total of 108 cover letters with supporting environmental information to consultees by post on 27 January 2021. Details of the environmental impact assessment (EIA) were provided to consultees, in form of the ES Addendums or the associated Non-Technical Summaries to help them understand the proposed changes and any predicted change in significant effects from the ES (**Application Document Reference: TR010041APP/6.1**) submitted with the Application.
- 2.1.14. A tailored approach was taken to the consultation so that consultees received a proportionate and relevant level of information. Prescribed persons received the ES Addendum Non-Technical Summary which was most relevant to their function and interests and in order to provide comments on any environmental impacts in their role as statutory consultees. Land interests received the Non-Technical Summary in relation to the proposed

change which was most relevant to their property; although some consultees received all three because their location was relevant to all three changes.

2.1.15. A summary of the consultation materials provided to consultees and confirmation of the numbers sent is listed below.

29 Prescribed consultees and 4 landowners (All changes)

Cover letter for all Changes (**Appendix C1** of this Statement)
ES Addendum Non-Technical Summaries for Changes 1, 2 and 3
ES Addendums for Changes 1, 2 and 3 provided on a USB stick:

- i. ES Addendum Additional and Temporary Earthworks
- ii. ES Addendum Land stabilisation north of the River Coquet ES Addendum Construction access to south bank of River Coquet

11 Prescribed consultees and 54 landowners (Change 1 only)

Cover letter for Change 1 (**Appendix C2** of this Statement)
ES Addendum Non-Technical Summary for Change 1
ES Addendum for Change 1 provided on a USB stick:

- ii. ES Addendum Additional and Temporary Earthworks

3 Prescribed consultees and 5 landowners (Changes 2 and 3 only)

Cover letter for Changes 2 and 3 (**Appendix C3** of this Statement)
ES Addendum Non-Technical Summaries for Changes 2 and 3
ES Addendums for Changes 2 and 3 provided on a USB stick:

- i. ES Addendum Land stabilisation north of the River Coquet
- ii. ES Addendum Construction access to south bank of River Coquet

2.1.16. The cover letter requested that consultees provide their comments to the Applicant via the following:

By email: peter.henson@wsp.com

By post: FREEPOST WSP A1iN

By phone: 0191 298 1039

2.1.17. Emails were also sent to the relevant prescribed persons identified in **Table A-1** of **Appendix A** of this Statement. As a precautionary measure, all relevant prescribed persons were provided a PO box address for all postal responses so that any postal responses could still be picked up and included in the non-statutory consultation. No postal responses were received during the non-statutory consultation period or up to Deadline 4 submission on 12 March 2021.

PUBLICITY

2.1.18. Any bodies which might have an interest in Changes 1, 2 and 3 have been notified in a way which reflects The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

- 2.1.19. The Applicant reviewed whether newspaper notices were required for the proposed changes, in particular in relation to Regulations 7 and 8 of the CA Regulations in relation to the compulsory acquisition for the additional land (Changes 2 & 3). As this was a targeted consultation, the Applicant concluded that the changes were substantial enough to require a wider general public consultation and that newspaper and site notices were required. The non-statutory consultation was published in the London Gazette and a National newspaper on January 28th 2021 and two local newspapers for two consecutive weeks starting Thursday 28th January 2021.
- 2.1.20. The Applicant's approach to consultation responds to and meets the Examining Authority's requests in its Response to Proposed Changes to DCO letter [PD-007] in that site notices were posted allowing a 29 day consultation period for responses.
- 2.1.21. The Applicant is confident that all relevant parties and statutory bodies have been captured in the non-statutory consultation.
- 2.1.22. The Applicant has considered whether, without re-consultation on the proposed changes, any of those entitled to be consulted or who were consulted on the original Application (including persons who are not an Interested Party in the Examination) would be deprived of the opportunity to make any representations on the changed application.
- 2.1.23. Given the nature of Changes 1, 2 and 3, their anticipated environmental impact and that they do not alter the substance of the Scheme, the Applicant considers that there are no persons who would be affected by the proposed changes who would be deprived of the opportunity to make representations on the changes. By making the change request at Deadline 4 of the Examination, other parties also have an opportunity to comment at Deadline 5 of the Examination.
- 2.1.24. The Applicant also acknowledges that publishing a consultation notice, and providing notices on lampposts across the scheme, provided a further opportunity for comments on the scheme to be received.

2.2 Engagement with Relevant Parties on the Proposed Changes

- 2.2.1. The aim of the non-statutory consultation was to give relevant parties an opportunity to respond to the changes the Applicant is proposing and take their views into consideration as part of the DCO examination process. A summary of the engagement undertaken with stakeholders and relevant parties prior to consultation on Changes 1, 2 and 3 is summarised in **Table 2-1 and Table 2-2, Appendix D (Environment Agency and Natural England)**.
- 2.2.2. Negotiations are ongoing with the Affected Persons in relation to Changes 2 and 3 on the additional land plots. The Applicant has been liaising with the Affected Persons and is seeking to obtain consent in terms of Article 4 of the CA Regulations for the inclusion of the permanent land use of the additional land in Article 32 of the draft DCO [REP3-004 and 005] However, due to the current COVID-19 government restrictions, the Applicant is seeking to obtain approval by email as face-to-face meetings are unable to take place.

BLANK PAGE

Table 2-1 - Summary of Engagement with relevant stakeholders prior to consultation

Consultee	Summary of discussion topics raised	Outcome
Local Authorities – section 42(1)(b)		
Northumberland County Council (NCC) – Landscape Officer – Landscape and Visual	The Applicant presented to NCC the Earthworks Amendments (Change 1).	The NCC Landscape Officer was generally in support of the changes to the earthwork strategy. However, raised concerns regarding the temporary storage proposed near West Moor, Causey Park Bridge and small hamlets which would result in additional temporary adverse visual impacts experienced by residential receptors during the construction phase.
Northumberland County Council (NCC) – Landscape Officer – Landscape and Visual	The Applicant presented to NCC the proposed Stabilisation Works (Change 2).	The NCC Landscape Officer did not raise any concerns in relation to the Stabilisation Works.
Northumberland County Council (NCC) and Historic England – Cultural Heritage	Presentation of the proposed amendments to the Scheme and assessment of the impacts on the Historic Environment relating to the Earthworks Amendments (Change 1).	<p>Potential for adverse impacts on Scheduled Monument Ellsnook Round Barrow (NHL 1006564) from excavation of borrow pits on land immediately adjacent would be mitigated through the design measures (reduction of the size of the borrow pit) and by ensuring it is backfilled with appropriate material.</p> <p>Potential for adverse impacts on any currently unknown heritage assets outside of the Order limits at Charlton Mires from the excavation of borrow pits would be evaluated during the post-consent trial trenching. Mitigation measures, including changing the design of borrow pits, would be determined following the completion of the trial trenching.</p> <p>Assessment has established that there would no additional impacts and no change in the reported effects on the setting of heritage assets as a result of the earthwork amendments.</p>
Northumberland County Council (NCC) – Cultural Heritage	An email was issued to NCC containing a draft of the updated Written Scheme of Investigation and confirming that an additional 14 trial trenches in the area of the additional compensatory habitat (Change 2).	The Applicant confirmed that the Written Scheme of Investigation for an Archaeological Trial Trench Evaluation had been updated to include the additional land take required for the additional compensatory habitat to the south-west of the River Coquet (submitted at Deadline 4). The Applicant proposed an additional 14 trial trenches in the area of the additional compensatory habitat.
Northumberland County Council – Road Drainage and the Water Environment	Silt provision when working in and adjacent to a watercourse (Change 1).	<p>NCC confirmed that silt provision (e.g. silt fencing, matting, etc) would be required when working in and adjacent to a watercourse. As set out in the Outline CEMP [REP3-013 and 014], silt mitigation measures would be implemented during the construction of the Scheme.</p> <p>No other mitigation measures were identified by NCC.</p>
Northumberland County Council - Biodiversity	The Applicant stated that it is intended to compensate the loss of woodland within the Coquet River Felton LWS using the same approach as detailed within the Ancient Woodland Strategy Part A [APP-247] (revised Ancient Woodland Strategy for the proposed changes to the Scheme has been submitted	NCC’s Ecologist confirmed agreement with the approach to woodland compensation. It was also agreed by both parties that the significance of effect would remain the same, given the same impacts and mitigation would occur, only over a slightly larger area.

Consultee	Summary of discussion topics raised	Outcome
	<p>at Deadline 4). This was agreed following consultation with Natural England (16/12/2020). NCC's Ecologist requested confirmation that the baseline ecological surveys covered the proposed additional land take areas. NCC's Ecologist requested confirmation that pre-commencement surveys are in place relating to protected species and the proposed additional land take (Change 2).</p>	<p>The Applicant confirmed that baseline ecological surveys extended beyond the Order limits by at least 100 m. The Applicant confirmed that existing baseline survey data has been used to inform Environmental Statement Addendum: Stabilisation Works (submitted at Deadline 4) and Environmental Statement Addendum: Southern Access Works (submitted at Deadline 4).</p> <p>The Applicant confirmed that existing mitigation, detailed in Section 9.9, Chapter 9: Biodiversity Part A of the ES [APP-048] includes pre-commencement surveys for otter, badger, bats and great crested newts (of relevance to the Stabilisation Works). NCC raised no other queries in relation to biodiversity.</p>
<p>Northumberland County Council – Landscape and Visual</p>	<p>The Applicant presented to NCC the proposed temporary access to the southern of the River Coquet (Change 3).</p>	<p>The NCC Landscape Officer did not raise any concerns in relation to the Southern Access Works.</p>
<p>Northumberland County Council - Biodiversity</p>	<p>The Applicant stated that it is intended to compensate the loss of woodland within the Coquet River Felton LWS using the same approach as detailed within Appendix 9.21: Ancient Woodland Strategy Part A of the ES [APP-247] (revised Ancient Woodland Strategy for the proposed changes to the Scheme has been submitted at Deadline 4). This was agreed following consultation with Natural England (16/12/2020). NCC's Ecologist requested confirmation that the baseline ecological surveys covered the proposed additional land take areas. NCC's Ecologist requested confirmation that pre-commencement surveys are in place relating to protected species and the proposed additional land take (Change 3).</p>	<p>NCC's Ecologist confirmed agreement with the approach to woodland compensation. It was also agreed by both parties that the significance of effect would remain the same, given the same impacts and mitigation would occur, only over a slightly larger area.</p> <p>The Applicant confirmed that baseline ecological surveys extended beyond the Order limits by at least 100 m. The Applicant confirmed that existing baseline survey data has been used to inform Environmental Statement Addendum: Stabilisation Works (submitted at Deadline 4) and Environmental Statement Addendum: Southern Access Works (submitted at Deadline 4).</p> <p>The Applicant confirmed that existing mitigation, detailed in Section 9.9, Chapter 9: Biodiversity Part A of the ES [APP-048] includes pre-commencement surveys for otter, badger, bats and great crested newts (of relevance to the Stabilisation Works). NCC raised no other queries in relation to biodiversity.</p>
<p>Prescribed persons – section 42(1)(a)</p>		
<p>Natural England (NE) and Environment Agency (EA)- Road Drainage and the Water Environment</p>	<p>The Applicant presented to the EA and NE the Earthworks Amendments (Change 1).</p>	<p>No issues or concerns were raised in relation to the Earthworks Amendments.</p>
<p>Natural England (NE) and Environment Agency (EA) - Biodiversity</p>	<p>The Applicant presented to Natural England and the Environment Agency the Stabilisation Works. The proposed Stabilisation Works would result in the loss of woodland within the Coquet River Felton Park Local Wildlife Site (LWS), for which mitigation and compensation would be required. The Applicant presented a proposed approach and, in acknowledgement of proposed soil salvage efforts and replanting</p>	<p>Natural England confirmed that, in relation to loss of woodland, they would prefer the approach detailed within the Ancient Woodland Strategy Part A [APP-247] (revised Ancient Woodland Strategy for the proposed changes to the Scheme as submitted at Deadline 4) to be applied. This would constitute a 1:12 (loss/creation) ratio for the purpose of woodland compensation. The Applicant agreed to this approach.</p>

Consultee	Summary of discussion topics raised	Outcome
	<p>post-construction, woodland creation (compensation) at a ratio of 1:6 (loss:creation) was proposed.</p> <p>Natural England raised concern regarding the proposed scour protection of the north bank. Natural England stated the River Coquet and Coquet Valley Woodlands Site of Special Scientific Interest (SSSI) is designated for its morphology, form and function. Natural England see the use of scour protection as a permanent loss of bank habitat that would require compensation.</p> <p>The Environment Agency raised that in addition to construction impacts, operational impacts should also be considered in relation to the scour protection as there is the potential for materials to enter the river over the lifespan of the scour protection. This was supported by Natural England.</p> <p>The Environment Agency stated that the control of run-off entering the watercourse during the works should be considered and mitigation developed (Change 2).</p>	<p>Regarding the proposed scour protection, it has been determined that there is a requirement to protect the bridge foundations from hydraulic action and that scour protection measures are required to maintain the integrity of the proposed design. The currently preferred scour protection solution is a rock armour revetment which maintains the existing channel cross section profile. This protects the bridge foundation and also prevents scour from outflanking the solution through erosion of the banks in the downstream reach. The Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.</p> <p>The Applicant has considered the operational impacts from the proposed scour protection in this ES Addendum.</p> <p>The Applicant has considered mitigation to control run-off entering the river during construction.</p>
Natural England - Biodiversity	<p>The Stabilisation Works would result in the loss of an additional 0.04 ha of woodland to the west of the existing A1 road bridge that falls within the zone of influence assessed within the draft great crested newt licence previously reviewed by Natural England (Appendix 9.24 Great Crested Newt Method Statement River Coquet Part A of the ES [APP-250]).</p> <p>The additional area of woodland is between approximately 130 m and 190 m from great crested newt pond A19, which supported a small population of great crested newts (peak count of four adults during the 2017 survey). The additional area of woodland would be cleared to facilitate construction and replanted as woodland upon completion of construction. As such, for the purpose of the future licence application, the Stabilisation Works would result in the temporary loss of an additional 0.04 ha of woodland within the Intermediate impact zone (50 to 250 m from pond). The additional area of woodland to be cleared would be included within the area surrounded by temporary exclusion fencing and subject to the same capture and exclusion period and protocols as detailed within the existing method statement.</p> <p>A Letter of No Impediment (LONI) with caveats was previously issued by Natural England in May 2020 for the existing draft licence [APP-250]. The existing LONI includes a number of caveats that Natural England confirmed would need to be addressed before the licence application is formally submitted (which have been accepted by the Applicant). The caveats already include changes to the areas of permanent and temporary habitat loss. As the Stabilisation Works result in a very minor amendment to the existing draft licence documentation, the Applicant proposed that agreement be captured through an updated LONI rather than requiring a review of an updated draft licence (Change 2).</p>	<p>Natural England provided a response within a meeting dated 05/02/2021- see below.</p>
Natural England – Biodiversity	<p>Further to the email dated 03/02/2021 (see above), the Applicant requested comment on the proposed approach to capturing agreement with the changes to the draft great crested newt licence in response to the Stabilisation Works (Change 2).</p>	<p>Natural England agreed that this could be captured within an updated Letter of No Impediment (LONI) rather than requiring a review of an updated draft licence.</p>

Consultee	Summary of discussion topics raised	Outcome
<p>Natural England (NE) and Environment Agency (EA) – Road Drainage and the Water Environment</p>	<p>The Applicant presented the approach to the environmental assessment reported in this ES Addendum. Natural England raised concern regarding the proposed scour protection of the north bank. Natural England confirmed the River Coquet and Coquet Valley Woodlands SSSI is designated for its river type, and flora and fauna (Change 2).</p>	<p>Natural England see the use of scour protection as a permanent loss of bank habitat that would require compensation. The Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.</p>
<p>Environment Agency (EA) – Road Drainage and the Water Environment</p>	<p>The Applicant presented the results of an initial scour assessment undertaken to further inform the nature and extent of the permanent scour protection required for the North and South banks of the River Coquet.</p> <p>Consideration given by the Applicant to a range of potential habitat compensation measures was presented. Points raised by the Environment Agency in their consultation response to ES Addendum: Earthworks Amendments for Change Request, ES Addendum: Stabilisation Works for Change Request and ES Addendum: Southern Access Works for Change Request with respect to the Water Framework Directive (WFD) were discussed. The Applicant presented current progress with the River Coquet hydraulic modelling and timescales for completion and review were discussed.</p> <p>The points raised by the Environment Agency in their consultation and the Applicant's responses are provided in the Consultation Statement (submitted at Deadline 4).</p>	<p>An update to Appendix 10.2: Water Framework Directive Assessment Part A of the ES [APP-255] would be required to reflect the changes described in ES Addendum: Stabilisation Works for Change Request and in this ES addendum.</p> <p>The need for compensation referred to by the Environment Agency in their consultation response to ES Addendum: Earthworks Amendments for Change Request, ES Addendum: Stabilisation Works for Change Request and ES Addendum: Southern Access Works for Change Request relates to compensation for the loss of SSSI habitat. The Applicant has not concluded that compensatory provision for the loss of riverbank is necessary. The timescales allocated for Environment Agency review of the River Coquet hydraulic model are reasonable, with consideration to be given to whether any opportunities for feedback during the review process is possible.</p>
<p>Natural England (NE) and Environment Agency (EA) – Biodiversity</p>	<p>The Applicant presented to Natural England and the Environment Agency the Southern Access Works and the Stabilisation Works assessment. The Stabilisation Works would result in the loss of woodland within the Coquet River Felton Park Local Wildlife Site (LWS), for which mitigation and compensation would be required. The Applicant presented a proposed approach and, in acknowledgement of proposed soil salvage efforts and replanting post-construction, woodland creation (compensation) at a ratio of 1:6 (loss:creation) was proposed.</p> <p>Natural England raised concern regarding the proposed scour protection of the north bank. Natural England stated the River Coquet and Coquet Valley Woodlands Site of Special Scientific Interest (SSSI) is designated for its morphology, form and function. Natural England see the use of scour protection as a permanent loss of bank habitat that would require compensation.</p> <p>The Environment Agency raised that in addition to construction impacts, operational impacts should also be considered in relation to the scour protection as there is the potential for materials to enter the river over the lifespan of the scour protection. This was supported by Natural England.</p> <p>The Environment Agency stated that the control of run-off entering the watercourse during the works should be considered and mitigation developed (Change 3).</p>	<p>Natural England confirmed that, in relation to loss of woodland, they would prefer the approach detailed within Appendix 9.21: Ancient Woodland Strategy Part A of the ES [APP-247] (revised Ancient Woodland Strategy for the proposed changes to the Scheme has been submitted at Deadline 4) to be applied. This would constitute a 1:12 (loss:creation) ratio for the purpose of woodland compensation. The Applicant agreed to this approach.</p> <p>Regarding the proposed scour protection, it has been determined that there is a requirement to protect the bridge foundations from hydraulic action and that scour protection measures are required to maintain the integrity of the proposed design. The currently preferred scour protection solution is a rock armour revetment which maintains the existing channel cross section profile. This protects the bridge foundation and also prevents scour from outflanking the solution through erosion of the banks in the downstream reach. The Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.</p> <p>The Applicant has considered the operational impacts from the proposed scour protection in this ES Addendum.</p> <p>The Applicant has considered mitigation to control run-off entering the river during construction.</p>

Consultee	Summary of discussion topics raised	Outcome
Natural England (NE) and Environment Agency (EA)- Road Drainage and the Water Environment	The Applicant presented the approach to the environmental assessment reported in this ES Addendum. Natural England raised concern regarding the proposed scour protection of the north bank and along with Environment Agency queried the requirement for scour protection on the south bank. Natural England confirmed the River Coquet and Coquet Valley Woodlands SSSI is designated for its river type, flora and fauna (Change 3).	Natural England see the use of scour protection as a permanent loss of bank habitat that would require compensation. The Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.
Land Interests (Affected Persons under the CA Regulations)		
Matthew Williamson (Galbraith Group) representing Viscount Matthew White Ridley	Viscount Matthew White Ridley is the landowner of the River Coquet Valley and section of the river affected by the proposed change. A series of slides were presented to Mr Williamson to describe the slope failure and the extents of the proposed remedial works that will require additional land take on the northern bank.	Mr Williamson confirmed he would be speaking to his client but did not have any concerns with the additional land required for the slope stabilisation and its re-planting.
Tim Michie representing Vernal Agricultural Enterprises Limited	Vernal Agricultural Enterprises Limited are the landowner of the existing plot of land to be increased for the compensation woodland planting area	A meeting was held with Vernal Agricultural Enterprises Limited's Land Agent (Brockthorpe Consultancy Ltd) on 23 rd November 2020 where the requirements for additional permanent land take were discussed prior to the formal consultation.
Other Interests		
West End Anglers	I write as an affected party on behalf of West End Anglers. We own the bed and banks of the River Coquet immediately upstream of the A1 and have easements that allow us to access this across land owned by others.	West End Anglers Club are the freeholders of the riverbed and banks of the River Coquet, to the west of the existing A1. The Applicant is seeking to acquire permanent rights over part of the River Coquet to access the existing bridge. This is shown by plot 9/12a on the Land Plans [APP-006] .
	<p>The changes proposed to the river crossing outlined in the "Summary of Proposed Changes to Application" recently submitted by Highways England have potential to adversely affect our interests and I would like to register our concerns.</p> <p>The proposed bank stabilisation works are on land owned by others but one of our access routes descends to the river underneath the existing A1 viaduct and crosses the area in which piling is proposed. We would like assurance that traversing this area will be possible once the piling is complete and to know whether it will be possible during the works.</p>	<p>Responses to the specific concerns raised are set out below.</p> <p>During construction of the Stabilisation Works it would be necessary to restrict and divert access to the River Coquet in the vicinity of the works as it would present a significant safety risk to allow unrestricted access by the West End Anglers Club. Access during construction would be facilitated through agreed and demarked access routes only and would be restricted to areas outside of the proposed works boundary. The outline Construction Traffic Management Plan [REP-015 and 016] Table 4 confirms that existing accesses and egresses will only be stopped up once temporary or permanent alternative accesses are in place. The outline CEMP [REP3-013 and 014] S-PH1 and S-PH6 confirms that the Scheme will either retain an existing standard or improve access arrangements for residential and commercial properties and measures in place for any temporary diversionary works or closures for WCH users would be undertaken following consultation and advanced information communicated.</p>

Consultee	Summary of discussion topics raised	Outcome
	<p>The armouring of the banks proposed has potential to affect the river's hydraulic characteristics, particularly in higher flows, and we would like assurance that this will not affect fish passage.</p>	<p>Following construction, the proposed bank stabilisation piles would be cut off below ground level and would not restrict access to the River Coquet on completion.</p> <p>The rock armouring of the banks is not anticipated to cause any impacts to fish passage as the channel would remain unobstructed. We are proposing to undertake hydraulic assessments to fully understand any environmental effects as result of the proposed works on the River Coquet. We expect the hydraulic assessment to be completed by Deadline 8 of the Examination (25 May 2021).</p> <p>The application for development consent, including the Outline Construction Environmental Management Plan (CEMP) [REP3-013 and 014] (and as updated at Deadline 4), outlines a number of mitigation measures for works in and around the River Coquet to mitigate the effects on fish, including: seasonal restrictions and daily timing of works to avoid migratory periods (A-B29 of the Outline CEMP); supervision of all works by an Ecological Clerk of Works (ECoW) (Table 2-1 and A-B29 of the Outline CEMP); control of light, noise and vibration to mitigate disruption (S-G5 and A-B29 of the Outline CEMP). These proposals remain unchanged with the proposed changes to the Scheme. Further details of mitigation measures proposed can be found in the Outline CEMP [REP3-013 and 014] (and as updated at Deadline 4), Chapter 9 Biodiversity Part A [APP-048] and Chapter 10 Road Drainage and the Water Environment [APP-050].</p> <p>installation of river training measures to create a dry working area. During these works, a fish rescue plan would be implemented (standard practice). Supervision would be provided by an Ecological Clerk of Works (ECoW) or fish biologist with sufficient experience of fish rescue plans, who would temporarily suspend works should evidence be obtained to suggests the works are having a negative impact on fish migration / spawning. The river training measures may be in situ for approximately 16 months. During in-channel works and whilst river training measures are in place, the works would incur a temporary obstruction to an area along the banks of the river that may be used by fish. However, works would not result in an obstruction to migration as river training measures would be located close to the riverbank.</p> <p>The operational geomorphology assessment presented within Chapter 9: Road Drainage and the Water Environment of the Environmental Statement Addendum: Stabilisation Works for Change Request and Chapter 9: Road Drainage and the Water Environment of the Environmental Statement Addendum: Southern Access Works for Change Request has been updated. In summary, the geomorphology assessments conclude that whilst there may be local effects on the dynamics of water flow, water velocity, sediment regime and natural fluvial processes as a result of the proposed scour protection, impacts are predicted to be minor adverse or negligible. As such, an impact to fish is not predicted during the operation as a result of the proposed scour protection.</p> <p>As a result, it is not considered that there would be a detrimental effect on fish passage as a result of these works, during construction or operation.</p>

Consultee	Summary of discussion topics raised	Outcome
	<p>Similarly, while a temporary bridge is probably an acceptable means of accessing the work area on the south bank, poor design of this and its construction and removal may also adversely affect fish passage. There is insufficient detail in the “Proposed Changes” to satisfy us that the work will be done without detriment.</p>	<p>As stated in Section 2.4 of the ES Addendum: Southern Access Works for Change Request, the proposed temporary bridge would be an open span structure with supports at the riverbank only. As such, it is not anticipated that the temporary bridge would present a physical barrier to fish migration.</p> <p>The application for development consent, including the Outline Construction Environmental Management Plan (CEMP) [REP3-013 and 014] (and as updated at Deadline 4), outlines a number of mitigation measures for works in and around the River Coquet to mitigate the effects on fish, including: seasonal restrictions and daily timing of works to avoid migratory periods (A-B29 of the Outline CEMP); supervision of all works by an Ecological Clerk of Works (ECoW) (Table 2-1 and A-B29 of the Outline CEMP); control of light, noise and vibration to mitigate disruption (S-G5 and A-B29 of the Outline CEMP). These proposals remain unchanged with the proposed changes to the application. Further details of mitigation measures proposed can be found in the Outline Construction Environmental Management Plan [REP3-013 and 014] (and as updated at Deadline 4), Chapter 9 Biodiversity Part A [APP-048] and Chapter 10 Road Drainage and the Water Environment [APP-050].</p>

3 OVERVIEW OF CONSULTATION RESPONSES

3.1 Consultation Responses Received

- 3.1.1. This section provides an overview of non-statutory consultation responses received in relation to Changes 1 to 3 between 29 January 2021 and 25 February 2021.
- 3.1.2. The Applicant received 9 responses by email within the non-statutory consultation period. Key themes included:
- a. Access arrangements to the A1 from Rock South post construction;
 - b. Earthworks;
 - c. Construction works around the River Coquet, including proposed bank stabilisation works;
 - d. Ancient Woodland, loss of trees and proposed habitat mitigation; and
 - e. Access rights to the River Coquet for fishing during construction and potential impact of bank stabilisation works on the migration of Salmon and Sea Trout.
- 3.1.3. No late responses were received.

3.2 Details of Responses and Applicant's Response

- 3.2.1. The consultation responses received, along with the Applicant's response, are presented in **Table 3-1 and Table 3-2, Appendix E (Environment Agency and Natural England)**.

Table 3-1 - Responses to Consultation

Ref	Consultee	Matter Raised	Applicant's response
1	Coal Authority	<p>We have no additional comments to make in respect of the amendments proposed. We would however reiterate our previous comments, that where areas of coal mining legacy are encountered along the route appropriate investigations and any remedial works necessary to ensure the safety and stability of the scheme should be carried out.</p> <p>Intrusive site investigations should be designed and undertaken by competent persons and should be appropriate to assess the ground conditions on the site in order to establish the coal-mining legacy present and the risks it may pose to the development and inform any remedial works and/or mitigation measures that may be necessary.</p> <p>It should be noted that Permission is required from the Coal Authority Permit and Licensing Team before undertaking any activity, such as ground investigation and ground works, which may disturb coal property.</p>	<p>The Applicant notes that the Coal Authority has no additional comments to make.</p> <p>With regards to comments made as part of previous discussions, the Applicant would reiterate that where areas of coal mining legacy are encountered along the route appropriate investigations and any remedial works necessary to ensure the safety and stability of the Scheme would be carried out. This is also stated within the Outline Construction Environmental Management Plan (CEMP) [REP3-013 and 014] (reference S-GS1) that the 'final Scheme design will dictate the most appropriate ground stability mitigation measures to minimise risks associated with ground collapse and ground related structural damage'.</p> <p>The Outline CEMP [REP3-013 and 014] (reference S-GS2) also states that '<i>All geotechnical related works will be undertaken in accordance with DMRB guidance document HD 22/08 – Managing Geotechnical Risk</i>'. This will include the production of a Geotechnical Design Report, which sets out geotechnical parameters to facilitate the safe design of the Scheme from a ground engineering perspective to manage geotechnical risk.</p>
2	Historic England	<p>I write further to your letter of 27th January 2021.</p> <p>We have examined the proposed amendments, and the assessment work undertaken to examine potential changes to impacts on heritage assets within Historic England's statutory remit.</p> <p>Having done so, I can confirm that Historic England has no comments to make on the proposed amendments.</p>	<p>Historic England's response is acknowledged and noted.</p>
3	Northumberland Wildlife Trust	<p>We are disappointed that the amendments to the scheme will result in the loss of a further area of ancient woodland from a protected site (Coquet River – Felton Park LWS). The National Planning Policy Framework recognises in Paragraph 175C the irreplaceable nature of this important habitat.</p>	<p>As detailed in paragraph 3.1.1 of the ES Addendum: Stabilisation Works, a review of the geological and geotechnical information, including the reporting of ground investigation works undertaken between January and March 2020, has identified that the north slope of the River Coquet valley is suffering from instability. Without treatment this could cause a failure in the slope during the construction and operation of the new bridge and could also have a detrimental impact on the existing bridge structure. Whilst a number of options have been considered to address the instability, it has not been possible to confine these to the existing Order limits. As such, the additional loss of 0.28ha of woodland habitat from within the Coquet River Felton Park LWS is necessary to ensure the safety of road users of the existing bridge and proposed new bridge. Further, should the bank destabilise and collapse, this may also result in the further damage/loss of woodland within the LWS and potentially significant damage to the River Coquet.</p> <p>The Applicant confirms that the Coquet River Felton Park LWS is not designated as ancient woodland but treated as ancient woodland within the assessment for the purpose of mitigation and compensation, as detailed in paragraph 2.1.2(b) of Appendix 9.21: Ancient Woodland Strategy Part A [APP-247] (revised Ancient Woodland Strategy for the proposed</p>

Ref	Consultee	Matter Raised	Applicant's response
		<p>With respect to the proposed mitigation habitat, we remain concerned about the duration of the commitment to protect this habitat. Only 15 years of maintenance for mitigation areas to compensate lost habitat that is likely to be hundreds of years old is very disappointing, and does not secure the biodiversity value of the mitigation habitat in perpetuity. The Trust is also disappointed by the fragmented nature of the mitigation areas. Although different habitats are to be created, the greatest benefit to biodiversity would come from a single contiguous area, not split by the A1 and associated road infrastructure.</p>	<p>changes to the Scheme submitted at Deadline 4). Nevertheless, the Applicant acknowledges that ancient woodland habitat is irreplaceable. In accordance with paragraph 175C of the National Planning Policy Framework (NPPF), the Applicant is in compliance due to wholly exceptional reasons i.e. that the Scheme is a Nationally Significant Infrastructure Project (NSIP) where the public benefit would clearly outweigh the loss of the habitat as set out in footnote 58 to paragraph 175C. In addition, in accordance with paragraph 175C, a suitable “compensation strategy” has been developed to address the impacts of the Scheme on ancient woodland habitat (Appendix 9.21: Ancient Woodland Strategy Part A [APP-247] (revised Ancient Woodland Strategy for the proposed changes to the Scheme submitted at Deadline 4)).</p> <p>The Applicant can confirm that the additional loss of woodland within the Coquet River Felton Park LWS as a result of the proposed changes to the Scheme is addressed within a revised Appendix 9.21: Ancient Woodland Strategy Part A [APP-247] submitted at Deadline 4. As such, the compensatory woodland habitat would be managed, by the Applicant, for a minimum of 50 years (paragraph 4.5.12 of Appendix 9.21: Ancient Woodland Strategy Part A [APP-247]. This proposal remains the same for the additional land required as a result of the proposed changes to the Scheme and is set out in the revised Ancient Woodland Strategy submitted at Deadline 4.</p> <p>The compensation for the additional loss of 0.28ha of woodland within the Coquet River Felton Park LWS comprises the replanting of the area lost (0.28ha) and the creation of approximately 3.1ha of compensatory woodland habitat, an expansion to the Woodland Creation Area located to the south-west of the existing bridge over the River Coquet(as detailed in Appendix 9.21: Ancient Woodland Strategy Part A [APP-247]. This proposal to provide loss/creation equates to a ratio of 1:12 for the proposed changes. This is set out the revised Ancient Woodland Strategy submitted at Deadline 4. The Applicant disagrees that the proposed compensation area is fragmented and confirms that a single area has been identified for the Woodland Creation Area which is contiguous with the woodland corridor of the River Coquet valley. This includes the proposed extension to the Woodland Creation Area as a result of the proposed changes to the Scheme. The location of the Woodland Creation Area, on the west of the existing A1, has been specifically chosen in consultation with Natural England. The location has been chosen as it is adjacent to the existing woodland corridor and because it is west of the prevailing winds meaning the site is not susceptible to increased nitrogen deposition levels from increased road traffic. Natural England have confirmed agreement with the size and location of the Woodland Creation Area within their response to BIO.1.5 of the Examining Authority’s first written questions [REP2-020].</p>
4	Mr. Paul Cousins, Northumbrian Water	<p>Just a quick note to confirm that NWL will still require access to Denwick Sewage Treatment Works. The current access which is legally documented from Duke of Northumberland will be severed. The documented access will need to be varied to reflect change on the ground. In addition, the proposed revisions on the ground will need to be subject to NWL’s requirements and approval</p>	<p>The Applicant has confirmed that the Scheme does not propose any alterations to the highway network within the near vicinity of the Denwick Sewage Treatment Works and as such it does not foresee any impact on the continued operation of the NWL asset during construction or post completion of the Scheme.</p>

Ref	Consultee	Matter Raised	Applicant's response
		<p>I would suggest that Detailed design of the revised access into Denwick STW should not proceed until NWL's requirements are known and can be factored into design.</p>	
5	<p>Rennington Parish Council</p>	<p>I refer to the consultation letter and attached documentation, issued on 27th January, which Rennington Parish Council discussed at their meeting last week.</p> <p>The parish council wishes to make the following comment.</p> <p>"It is still unclear where the proposed connection road between South Farm and Rock Midsheads corner to permit access to the A1 is going to be located." Clarification on this issue would be appreciated ASAP</p>	<p>The Applicant has provided a copy of plans to Rennington Parish Council which show the route between South Farm and Rock Midshead. The Applicant has subsequently confirmed that the existing access from South Farm to the A1 would be stopped up.</p>
6	<p>Northumberland County Council (NCC)</p>	<p>ES Addendum Southern Access works</p> <p>Two documents appear to have been submitted with this document title. Version 1 is a 16-page document with no reference to cultural heritage or archaeology, the other 159-page document looks at the need for assessment.</p> <p>The 159-page document highlights that the proposed additional works have the potential to have an indirect impact on both the setting of heritage assets and a direct impact on below ground archaeological remains which requires further assessment for the construction and operational phases (Tables 1, 3 and 5 and section 2.2.21). I will not comment on the impact on the setting of listed properties as this is outside my archaeological remit. I can, however, confirm that the additional groundworks required for this scheme (including the area of the additional compensatory habitat) would need to be included in the Written Scheme of Investigation for archaeological evaluation with the requirement for subsequent archaeological mitigation work, dependent on results.</p> <p>ES Addendum – Earthwork Amendments</p> <p>Two documents appear to have been submitted with this document title.</p> <p>In the 5-page document, paragraph 1.2.2 states that Appendix C Summary of proposed changes to Application has indicated that the earthwork amendments have the potential to change the conclusions of Chapter 8 Cultural Heritage parts A and B. However, paragraph 1.3.1 Table 1.1 states that there is no change to</p>	<p>NCC's response was acknowledged and noted.</p> <p>The Written Scheme of Investigation for an Archaeological Trial Trench Evaluation has been updated to include the additional land take, required for the additional compensatory habitat to the south-west of the River Coquet, and is submitted at Deadline 4.</p> <p>NCC's response is acknowledged and noted. As detailed in Appendix D: Register of Environmental Actions and Commitments of ES Addendum: Earthworks Amendments for</p>

Ref	Consultee	Matter Raised	Applicant's response
		<p>the assessment of significance or assessment methodology and that consultation will be undertaken with Historic England and NCC for heritage issues with further details to be submitted in the Consultation Statement. That meeting was held on 1/2/2021.</p> <p>The 238-page document goes into the Cultural Heritage issues in detail in Chapter 6. It looks at the potential issues of physical impact on below ground archaeological remains, the impact on the change in hydrology in the proposed borrow pit close to the Scheduled Monument of Ellsnook Round Barrow and the impact of setting on various listed buildings. I will not comment on the impact on setting of the listed properties as this is outside my archaeological remit. Based on the information provided in Chapter 7: Road Drainage and the Water Environment, I can confirm that I have no objections to the location of the proposed borrow pit over 35m away from the scheduled barrow at Ellsnook as it is unlikely to impact on the hydrology of archaeological remains within the barrow. The physical impact on below ground archaeological remains within the road scheme will be assessed as part of the programme of trial trenching with the requirement for subsequent archaeological mitigation work, dependent on results.</p> <p>ES Addendum: Stabilisation Works</p> <p>The Cultural Heritage section considers the potential impacts and effects often stabilisation works (including the additional compensatory habitat) on archaeological remains, historic buildings or structures, conservation areas and historic landscapes. The potential to impact on below ground archaeological remains is highlighted with the potential effects varying from significant to non-significant dependent on the importance of the archaeological remains revealed during evaluation which is no different to the conclusions drawn in the original ES.</p> <p>Advice</p> <p>Having read the documents listed above, I can confirm that I have no objections to the proposed amendments to the A1 dualling scheme, providing that:</p> <ul style="list-style-type: none"> • A buffer of at least 35m is maintained between borrow pits and the Scheduled Monument of Ellsnook Round Barrow to prevent any changes in hydrology impacting on nationally important remains • The physical impact of the additional groundworks along the length of the scheme (including the area of the additional compensatory habitat associated with the southern access works) are adequately assessed by including these areas in the Written Scheme of Investigation for 	<p>Change Request (submitted at Deadline 4), the borrow pits would be located over 35m from the Order Limits and the Scheduled Monument of Ellsnook Round Barrow. If the Earthwork Amendments are accepted by the Examining Authority, then measures in Appendix D: Register of Environmental Actions and Commitments Table D-1 will be incorporated into the Outline CEMP.</p> <p>NCC's response is acknowledged and noted. The Written Scheme of Investigation for an Archaeological Trial Trench Evaluation has been updated to include the additional land take required for the additional compensatory habitat to the south-west of the River Coquet.</p> <p>The Applicant can confirm that:</p> <ul style="list-style-type: none"> • As detailed in ES Addendum: Earthworks Amendments for Change Request, a buffer of at least 35m would be maintained between borrow pits and the Scheduled

Ref	Consultee	Matter Raised	Applicant's response
		<p>archaeological trial trenching with the requirements for subsequent archaeological mitigation work dependent on results.</p> <ul style="list-style-type: none"> • These requirements are included in the Consultation Statement submitted at Deadline 4 (12 March 2021) of the Examination. 	<p>Monument of Ellsnook Round Barrow to prevent any changes in hydrology impacting on nationally important remains</p> <ul style="list-style-type: none"> • The Written Scheme of Investigation for an Archaeological Trial Trench Evaluation has been updated to include the additional land take, required for the additional compensatory habitat to the south-west of the River Coquet, is submitted at Deadline 4.
7	West End Anglers	<p>The Proposed Land Stabilisation north of the River Coquet and the Proposed temporary access to the southern bank of the River Coquet would impact upon us, both by a) affecting our access and b) potentially affecting the migratory fish that are our principal target species.</p>	<p>West End Anglers response is acknowledged and noted.</p>
		<p>We access our land by easements which allow us to cross land owned by others and our habitual route to and from the downstream limit of our fishing crosses the bare ground under the existing viaduct. This will be within the proposed working area and we understand that access via this route will not be possible while these works are in progress.</p>	<p>During construction of the Stabilisation Works it would be necessary to restrict and divert access to the River Coquet as it would present a significant safety risk to allow unrestricted access by the West End Anglers Club. Access during construction would be facilitated through agreed and demarked access routes only and would be restricted to areas outside of the proposed works boundary. Following construction, the proposed bank stabilisation piles would be cut off below ground level and would not restrict access to the River Coquet on completion.</p>
		<p>Our agreed parking area is alongside the track to the west of and parallel to the existing A1, close to the gate where that track joins the St Oswald's Way footpath. We expect to be compensated for the restriction of our rights while our access is blocked.</p>	<p>It is the intention to maintain access to the River Coquet for West End Anglers as far as possible throughout the construction phase. There may be occasions when access needs to be restricted for periods of time. Any such restrictions will be communicated to West End Anglers in advance. There may also be occasions when the current parking location is unavailable. The Applicant will work with West End Anglers to find a suitable alternative where practical. Discussions over compensation for any losses will be progressed with the professional representative for West End Anglers.</p>
		<p>We fish primarily for salmon and sea trout. The Environmental Statement Addenda touch upon impacts on resident fish and their habitat and the aquatic invertebrates upon which they prey but not upon possible effects to migration of anadromous fish. Modifications to the channel could adversely affect the upstream migration of adult salmon and sea trout (which generally occur episodically during modestly elevated flows between April and November and are what we fish for) and could compromise the survival of juveniles during their seaward migration as smolts (which typically occurs in April or May). The likelihood and severity of such impacts would depend upon the detail of the design</p>	<p>The impacts to fish, including salmon and trout, as a result of the proposed changes to the Scheme have been assessed. As outlined in Section 7.9 of the ES Addendum: Southern Access Works for Change Request and Section 8.9 of the ES Addendum: Stabilisation Works for Change Request, to protect migratory salmon <i>Salmo salar</i> and brown trout <i>Salmo trutta</i>, mitigation measures EM014 and EM017 detailed within Table 9-23, Chapter 9: Biodiversity Part A of the ES [APP-048], and complimentary measures detailed within the Outline CEMP [REP3-013 and 014], would be applied to the installation of scour protection, temporary river training measures and works associated with the installation of the temporary bridge and bankside supports.</p>

Ref	Consultee	Matter Raised	Applicant's response
		<p>and method of construction of the proposed scour protection and temporary river crossing.</p>	<p>Mitigation measures EM014 and EM017 detailed within Table 9-23, Chapter 9: Biodiversity Part A of the ES [APP-048] includes restricting the timing of the works outside the 'in river works' period where possible, restriction of works to daylight hours and implementation of a fish rescue plan during dewatering activities. In relation to the north bank, night works may be required in relation to the formation of an access off the A1 carriageway into the works area. However, these works would be away from the river at the top of the northern bank. As such, there are no anticipated disturbance impacts predicted as a result of these night works.</p> <p>The scour protection along the banks of the river would require the installation of river training measures to create a dry working area. During these works, a fish rescue plan would be implemented (standard practice). Supervision would be provided by an Ecological Clerk of Works (ECoW) or fish biologist with sufficient experience of fish rescue plans, who would temporarily suspend works should evidence be obtained to suggest the works are having a negative impact on fish migration / spawning. The river training measures may be in situ for approximately 16 months. During in-channel works and whilst river training measures are in place, the works would incur a temporary obstruction to an area along the banks of the river that may be used by fish. However, works would not result in an obstruction to migration as river training measures would be located close to the riverbank.</p> <p>Following the removal of the temporary river training measures, the riverbed would be restored to a comparable pre-works condition, as outlined in Appendix E: Register of Environmental Actions and Commitments of ES Addendum: Southern Access Works of the Change Request.</p> <p>As the works are located near and within a main river that is also designated as a Site of Special Scientific Interest (SSSI), the work would be subject to an environmental permit from the Environment Agency during which Natural England would also be consulted. As such, this mechanism would ensure that appropriate mitigation is in place to avoid or reduce the impacts of the proposed works on the river and the species it supports (including migratory fish).</p> <p>Therefore, it is not considered that there would be a detrimental effect on fish migration as a result of these works.</p>
		<p>In principle, a clear span temporary bridge to allow access to the south bank from the north bank should have no impact. However, the works necessary to install it have potential to affect the channel significantly, particularly if the chosen method is to track plant and materials across the river rather than use the suggested alternative of a crane.</p>	<p>The ES Addendum: Southern Access Works of the Change Request states that the temporary bridge has been designed to be single span in order to reduce bed impacts, and that the maximum feasible span would be used to minimise constriction to channel width. Section 2.4 of the ES Addendum: Southern Access Works of the Change Request states that initial access to the south bank for machinery/equipment would either be via crane or tracking across the river. The temporary bridge would be delivered to the north bank of the River Coquet and assembled adjacent to the river, before being lifted into position using a 750 tonne crane situated on the north bank. The construction methodology has been designed to minimise its effects, and therefore it is considered that this methodology would not significantly affect the channel.</p> <p>To protect fish, particularly migratory salmon <i>Salmo salar</i> and brown trout <i>Salmo trutta</i>, mitigation measures EM014 and EM017 detailed within Table 9-23, Chapter 9: Biodiversity</p>

Ref	Consultee	Matter Raised	Applicant's response
			<p>Part A of the ES [APP-048], and complimentary measures detailed within the Outline CEMP [REP3-013 and 014], would also be applied to the installation of scour protection, temporary river training measures and works associated with the installation of the temporary bridge and bankside supports. Mitigation measures EM014 and EM017 includes restricting the timing of the works outside the 'in river works' period where possible, restriction of works to daylight hours and implementation of a fish rescue plan during dewatering activities. Supervision would also be provided by an Ecological Clerk of Works (ECoW) or fish biologist with sufficient experience of fish rescue plans, who would temporarily suspend works should evidence be obtained to suggests the works are having a negative impact on fish migration / spawning.</p>
		<p>We believe it should be possible to design and construct the scour protection and temporary bridge so that the works have no impact on the passage of migratory fish and we seek assurance that this will be done. The Environmental Statement Addenda do not provide this assurance, partly because there is insufficient detail and certainty of the method of construction and partly because the impacts on fish migration are not covered adequately.</p>	<p>See response at Item 4 above. Appropriate mitigation is proposed to ensure that the works do not negatively impact migratory fish.</p> <p>Further development of the design and construction methods since consultation is outlined in ES Addendum: Stabilisation Works for Change Request and ES Addendum: Southern Access Works of the Change Request, submitted at Deadline 4.</p>

4 CONCLUSION

- 4.1.1. The Applicant has undertaken non-statutory consultation in relation to the earthwork's amendments (Change 1), stabilisation works (Change 2) and southern access works (Change 3) it has sought to make to its DCO Application for the Scheme.
- 4.1.2. The non-statutory consultation ran from 29 January 2021 to 25 February 2021. In total, 9 responses to the consultation were received by the Applicant within the consultation period. No late responses were received. The Applicant has carefully reviewed all consultation responses received and provided a response as set out in **Table 3-1** of **Chapter 3** and **Table 3-2** of **Appendix E** (Environment Agency and Natural England) of this Statement.
- 4.1.3. The Applicant considers that it has publicised the proposed changes in a way that responds to the Examining Authority's Response to Proposed Changes to DCO letter [PD-007] and Inspectorate's Advice Note 16, as well as the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

Appendix A

LIST OF CONSULTEES AND AFFECTED PERSONS

Table A-1 - List of section 42(1)(a) consultees – prescribed persons

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
1	The Welsh Ministers	All proposed application likely to affect land in Wales	N	Excluded as Changes do not affect land in Wales.	N/A
2	The Scottish Executives	All proposed applications likely to affect land in Scotland	N	Excluded as Changes do not affect land in Scotland	N/A
3	The relevant Northern Ireland Department	All proposed application likely to affect land in Northern Ireland	N	Excluded as Changes do not affect land in Northern Ireland	N/A
4	The Health and Safety Executive	All cases	Y	The Health & Safety Executive were consulted in line with the requirement to consult in all cases.	Dave Adams (MHPD) NSIP Consultations Health and Safety Executive Building 2.2 Redgrave Court Merton Road Bootle Merseyside L20 7HS Email: NSIP.applications@hse.gov.uk
5	The National Health Service Commissioning Board and the relevant clinical commissioning group (CCG)	All proposed applications likely to affect land in England and Wales	Y	NHS England were consulted as the National Health Commissioning Board as the proposed changes affect land in England	NHS England Waterfront 4 Golden Way Newcastle upon Tyne NE15 8NY NHS England NHS Commissioning Board PO Box 16728

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
					Redditch B97 9PT Email: england.contactus@nhs.net NHS Northumberland Clinical Commissioning Group County Hall Morpeth Northumberland NE61 2EF Email: norccg.enquiries@nhs.net
6	The Relevant Health Board	All proposed applications likely to affect land in Scotland	N	Excluded as Changes do not affect land in Scotland. The Relevant Health Board in England is NHS Northumberland as set out at row 5 above.	N/A
7	Natural England	All proposed applications likely to affect land in England	Y	Natural England were consulted as the proposed changes affect land in England	Andy Whitehead Team Leader – Sustainable Development, Marine & Wildlife Licensing Northumbria Area Team, Natural England, Lancaster House, Hampshire Court, Newcastle upon Tyne NE4 7YH

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
					Email: Andrew.Whitehead@naturalengland.org.uk Email: Robert.Cussen@naturalengland.org.uk Email: Michael.Miller@naturalengland.org.uk Natural England Consultation Service Hornbeam House Electra Way Crewe Business Park Crewe Cheshire CW1 6GJ Email: consultations@naturalengland.org.uk
8	The Historic Buildings and Monuments Commission for England	All proposed applications likely to affect land in England	Y	The Historic Buildings and Monuments Commission for England (now known as Historic England) were consulted as the changes affect land in England	Mike Collins Historic England Bessie Surtees House 41-44 Sandhill Newcastle upon Tyne NE1 3JF Stephen Allott Historic England

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
					Bessie Surtees House 41-44 Sandhill Newcastle upon Tyne NE1 3JF Email: Mike.Collins@HistoricEngland.org.uk Email: Stephen.Allott@HistoricEngland.org.uk Email: shane.gould@HistoricEngland.org.uk
9	The relevant fire and rescue authority	All cases	Y	Northumberland Fire & Rescue were consulted as the relevant fire and rescue authority in line with the requirement to consult in all cases.	Lee Buckingham Group Manger Northumberland Fire and Rescue Service Headquarters West Hartford Business Park Cramlington Northumberland NE23 3JP Email: lee.buckingham@northumberland.gcsx.gov.uk
10	The relevant police and crime commissioner	All cases	Y	The Police & Crime Commissioner for Northumbria was consulted as the relevant Police & Crime Commissioner in line with the requirement to consult in all cases.	Kim McGuinness Office of the Police and Crime Commissioner for Northumbria 2nd Floor Victory House Balliol Business Park Benton Lane Newcastle upon Tyne

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
					NE12 8EW Email: enquiries@northumbria-pcc.gov.uk
11	The relevant parish councils	All cases	Y	Denwick Parish Council was consulted as the relevant Parish Council in line with the requirement to consult in all cases.	Denwick Parish Council Golden Moor Farm Denwick Alnwick Northumberland NE66 3RB Email: Andrew.Robson@northumberlandstates.co.uk
				Eglington Parish Council was consulted as the relevant Parish Council in line with the requirement to consult in all cases.	Eglington Parish Council c/o Lesley Long 5 Meadow Riggs Alnwick Northumberland NE66 1AP Email: eglingtonclerk@gmail.com
				Ellingham Parish Council was consulted as the relevant Parish Council in line with the requirement to consult in all cases.	Ellingham Parish Council c/o Virginia Mayes-Wright 1 Chathill Farm Cottages Chathill Northumberland

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
				<p>Felton Parish Council was consulted as the relevant Parish Council in line with the requirement to consult in all cases.</p>	<p>NE67 5DE</p> <p>Email: amycartmell@googlemail.com</p> <p>Mrs Clair Lewis Parish Clerk Felton Parish Council 65 Main Street Felton Northumberland NE65 9PT</p> <p>Email: feltonparishcouncil@gmail.com</p>
				<p>Hebron Parish Council was consulted as the relevant Parish Council in line with the requirement to consult in all cases.</p>	<p>Mrs Sheila Rowley Parish Clerk Hebron Parish Council Thistledene Fulbeck Morpeth Northumberland NE61 3JU</p> <p>Email: Shelia_rowley@btinternet.com</p>
				<p>Longhoughton Parish Council was consulted as the relevant Parish Council in line with the requirement to consult in all cases.</p>	<p>Longhoughton Parish Council Rivendell Steppey Lane</p>

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
					<p>Lesbury Alnwick Northumberland NE66 3PU</p> <p>Email: parishclerk@hotmail.com</p> <p>Newton-on-the-Moor and Swarland Parish Council was consulted as the relevant Parish Council in line with the requirement to consult in all cases.</p> <p>Newton-on-the-Moor and Swarland Parish Council 16 Newton-On-The-Moor Morpeth Northumberland NE65 9JY</p> <p>Email: janandersonpc@gmail.com</p> <p>Rennington Parish Council was consulted as the relevant Parish Council in line with the requirement to consult in all cases.</p> <p>Rennington Parish Council c/o Lesley Long 5 Meadow Riggs Alnwick Northumberland NE66 1AP</p> <p>Email: amycartmell@googlemail.com</p> <p>Tritlington & West Chevington Parish Council was consulted as the relevant Parish Council in line</p> <p>Tritlington & West Chevington Parish Council 13 Matthew Road</p>

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
				with the requirement to consult in all cases.	Blyth Northumberland NE24 3ET Email: sarajayne87@live.co.uk
				Thirston Parish Council was consulted as the relevant Parish Council in line with the requirement to consult in all cases	Mrs L Hamlin Parish Clerk Thirston Parish Council The Arches Felton Northumberland NE65 9QJ Email: thirstonparishcouncil@gmail.com
12	The Environment Agency	All proposed applications likely to affect land in England	Y	The Environment Agency were consulted as the proposed changes affect land in England.	Lucy Mo Planning Technical Specialist, Sustainable Places, North East Environment Agency Horizon House Deanery Road Bristol Somerset BS1 5AH Email: lucy.mo@environment-agency.gov.uk

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
					Email: Northeast-newcastle@ environment-agency.gov.uk Email: simonc.sutherland@environment-agency.gov.uk
13	The Scottish Environment Protection Agency	All proposal applications likely to affect land in Scotland	N	The Scottish Environment Protection Agency were not consulted as the proposed changes will not affect land in Scotland.	N/A
14	The Equality and Human Rights Commission	All proposed applications likely to affect land in England and Wales	N	Excluded as the Applicant does not consider that the proposed changes would be likely to have an impact on the functions or interests of the Equality and Human Rights Commission.	N/A
15	The Scottish Human Rights Commission	All proposed applications likely to affect land in Scotland	N	The Scottish Human Rights Commission were not consulted as the proposed application will not affect land in Scotland.	N/A
16	For projects in England: the relevant AONB Conservation Boards.	All proposed applications likely to affect an AONB that is managed by a Conservation Board	N	Excluded as the proposed changes do not affect an AONB that is managed by a Conservation Board.	N/A

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
17	Royal Commission on Ancient and Historical Monuments of Wales	All proposed applications likely to affect land in Wales	N	Royal Commission on Ancient and Historical Monuments in Wales were not consulted as the proposed changes will not affect land in Wales	N/A
18	The Natural Resource Body for Wales (NRW)	All proposed applications likely to affect land in Wales	N	The Natural Resource Body for Wales were not consulted as proposed changes will not affect land in Wales	N/A
19	Homes England	All proposed applications likely to have an effect on its areas of responsibility	N	The proposed changes are not likely to have an effect on Homes England's areas of responsibility.	N/A
20	The Joint Nature Conservation Committee (JNCC)	All proposed applications likely to affect the marine environment	N	The Joint Nature Conservation Committee were not consulted as the proposed changes will not affect the marine environment.	N/A
21	Scottish Natural Heritage	All proposed applications likely to affect land in Scotland	N	Scottish Natural Heritage were not consulted as the proposed changes will not affect land in Scotland	N/A
22	The Maritime and Coastguard Agency	All proposed applications likely to affect the maritime or coastal environment, or the shipping industry	N	The Maritime and Coastguard Agency were not consulted as the proposed changes will not affect the maritime or coastal environment, or the shipping industry.	N/A
23	The Marine Management Organisation (MMO)	All proposed applications likely to affect the marine area in England and Wales	N	The Marine Management Organisation were not consulted as the proposed changes will not affect the marine area in England or Wales.	N/A

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
24	The Scottish Fisheries Protection Agency (Marine Scotland)	All proposed applications likely to affect the fisheries industry in Scotland	N	The Scottish Fisheries Protection Agency were not consulted as the proposed changes will not affect the fisheries industry in Scotland	N/A
25	The Civil Aviation Authority	All proposed applications relating to airports or which are likely to affect an airport or its current or future operation	Y	The Civil Aviation Authority were consulted as the proposed changes are likely to affect an airport or its current future operation	Directorate of Airspace Policy Civil Aviation Authority Westferry Circus London E14 4HD Email: airspace@caa.co.uk
26	The Secretary of State for Transport	All proposed applications likely to affect road or transport operation and/or planning on roads for which the Secretary of State for Transport is the highway authority	Y	The Secretary of State for Transport was consulted as the proposed changes will affect road or transport operations and/or planning on roads for which the Secretary of State is the highway authority	The Secretary of State for Transport Department for Transport House of Commons London SW1A 0AA Email: shappsg@parliament.uk
27	North East Combined Authority	All proposed applications likely to affect transport within, to or from the relevant integrated transport area of the ITA or PTE	Y	The North East Combined Authority were consulted as the proposed changes is likely to affect transport within, to or from the relevant transport areas of the ITA or PTE.	North East Combined Authority c/o Head of Planning Quadrant The Silverlink North Cobalt Business Park North Tyneside NE27 0BY Email:

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
					gavin.armstrong@northeastca.gov.uk
28	The relevant Highways Authority	All proposed applications likely to have an impact on the road network or the volume of traffic in the vicinity of the proposal	Y	Northumberland County Council were consulted as the relevant Highways Authority as the proposed changes are likely to have an impact on the road network or the volume of traffic in the vicinity of the proposals	David Laux Head of Technical Services Northumberland County Council County Hall Morpeth Northumberland NE61 2EF Email: David.Laux@northumberland.gov.uk Email: highwaysplanning@northumberland.gov.uk
29	The relevant strategic highways company	All proposed applications likely to affect road or transport operation and/or planning on roads for which the strategic highways company is the highway authority	Y	Highways England were consulted as the relevant strategic highways authority as the proposed changes are likely to affect road or transport operations and/or planning on roads for which the strategic highways company is the highway authority. Highways England is the Applicant.	Highways England Bridge House 1 Walnut Tree Close Guildford GU1 4LZ
30	Transport for London	All proposed applications likely to affect transport within, to or from Greater London	N	Transport for London were not consulted as the proposed changes will not affect transport within, to or from Greater London.	N/A
31	The Passengers Council	All proposed applications likely to affect rail passenger transport or road passenger transport services or facilities	N	Transport Focus were not consulted as the proposed changes are not likely to affect road passenger transport	N/A

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
32	The Disabled Persons Transport Advisory Committee	All proposed applications likely to affect access to transport for disabled people	N	The Disabled Persons Transport Advisory Committee were not consulted, as the proposed application will not affect transport access for disabled people.	N/A
33	The Coal Authority	All proposed applications that lie within areas of past, present or future coal mining	Y	The Coal Authority were consulted as the proposed changes lie within areas of past, present or future coal mining	The Coal Authority 2 Lichfield Lane Mansfield Nottinghamshire NG18 4RG Email: planningconsultation@coal.gov.uk
34	The relevant internal drainage board	All proposed applications likely to increase the risk of flooding in that area or where the proposals relate to an area known to be an area of flood risk	N	The relevant internal drainage board were not consulted as no relevant internal drainage board was identified covering the area of the proposed changes.	N/A
35	The Canal and River Trust	All proposed applications likely to have an impact on inland waterways or land adjacent to inland waterways	Y	The Canal and River Trust were consulted as the proposed changes are likely to have an impact on inland waterways or land adjacent to inland waterways.	The Canal and River Trust Station House 500 Elder Gate Milton Keynes MK9 1BB Email: customer.services@canalrivertrust.org.uk
36	Trinity House	All proposed applications likely to affect navigation in tidal waters	N	Trinity House were not consulted as the proposed changes will not affect navigation in tidal waters.	N/A

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
37	Public Health England, an executive agency of the Department of Health	All proposed applications likely to involve chemicals, poisons or radiation which could potentially cause harm to people and likely to affect significantly public health	Y	Public Health England were consulted as the proposed changes are likely to involve chemicals, poisons or radiation which could potentially cause harm to people and likely to affect significantly public health	Public Health England Wellington House 133-155 Waterloo Road London SE1 8UG Email: NSIPconsultations@PHE.gov.uk
38	The relevant local resilience forum	All cases	Y	Northumbria Local Resilience Forum as the relevant local resilience forum were consulted as a requirement to consult in all cases	Northumbria LRF Coordinator, Newcastle City Council Civic Centre Barras Bridge Newcastle upon Tyne NE1 8QN Email: joe.gallant@newcastle.gov.uk
39	Relevant statutory undertakers Historical Railways Estate	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the functions of the Historical Railway Estate as a statutory undertaker.	
40	Relevant statutory undertakers NATS En-Route Safeguarding	All proposed applications likely to affect their functions as statutory undertakers	Y	NATS En-Route Safeguarding were consulted as the proposed changes are likely to affect their functions as statutory undertakers.	NATS En-Route Safeguarding 4000 Parkway Whiteley Fareham Hampshire PO15 7FL

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
					Email: natssafeguarding@nats.co.uk
41	Relevant statutory undertakers (Universal Service Provider) Royal Mail Group	All proposed applications likely to affect their functions as statutory undertakers	Y	Royal Mail Group as the Universal Service Provider were consulted as the proposed changes are likely to affect their functions as statutory undertakers.	Royal Mail 100 Victoria Embankment London EC4Y 0HQ Email: daniel.parry-jones@bnpparibas.com Email: holly.trotman@royalmail.com
42	Relevant statutory undertakers Northumbrian Water	All proposed applications likely to affect their functions as statutory undertakers	Y	Northumbrian Water were consulted as the proposed changes are likely to affect their function as statutory undertakers.	Northumbrian Water Limited Abbey Road Durham DH1 5FJ Email: webbill@nwl.co.uk Email: Andrew.bradley@nwl.co.uk
43	Relevant statutory undertakers Cadent Gas Limited	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the function of Cadent Gas Limited as a statutory undertaker.	N/A
44	Relevant statutory undertakers	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the function of	N/A

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
	Energetics Gas Limited			Energetics Gas Limited as a statutory undertaker.	
45	Relevant statutory undertakers Energy Assets Pipelines Limited	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the function of Energy Assets Pipeline Limited as a statutory undertaker.	N/A
46	Relevant statutory undertakers ES Pipelines Ltd	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the function of ES Pipelines Ltd as a statutory undertaker.	N/A
47	Relevant statutory undertakers Fulcrum Pipelines Limited	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the function of Fulcrum Pipelines Limited as a statutory undertaker.	N/A
48	Relevant statutory undertakers GTC Pipelines Limited	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the function of GTC Pipelines Limited as a statutory undertaker.	N/A
49	Relevant statutory undertakers Independent Pipelines Limited	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the function of Independent Pipelines Limited as a statutory undertaker.	N/A
50	Relevant statutory undertakers Indigo Pipelines Limited	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the function of Indigo Pipelines Limited as a statutory undertaker.	N/A

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
51	Relevant statutory undertakers Quadrant Pipelines Limited	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the function of Quadrant Pipelines Limited as a statutory undertaker.	N/A
52	Relevant statutory undertakers National Grid Gas Plc	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the function of National Grid Gas Plc as a statutory undertaker.	N/A
53	Relevant statutory undertakers Scotland Gas Networks Plc	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the function of Scotland Gas Networks Plc as a statutory undertaker.	N/A
54	Relevant statutory undertakers Northern Gas Networks Limited	All proposed applications likely to affect their functions as statutory undertakers	Y	Northern Gas Networks Limited were consulted as the proposed changes are likely to affect their function as statutory undertakers	Northern Gas Networks Limited 1100 Century Way Thorpe Park Business Park Colton Leeds LS15 8TU Email: BeforeYouDig@northerngas.co.uk Email: GFulwood@northerngas.co.uk
55	Relevant statutory undertakers Energetics Electricity Limited	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the function of Energetics Electricity Limited as a statutory undertaker.	N/A
56	Relevant statutory undertakers	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the function of	N/A

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
	Energy Assets Power Networks			Energy Assets Power Networks as a statutory undertaker.	
57	Relevant statutory undertakers ESP Electricity Limited	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the function of ESP Electricity Limited as a statutory undertaker.	N/A
58	Relevant statutory undertakers G2 Energy IDNO Limited	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the function of G2 Energy IDNO Limited as a statutory undertaker.	N/A
59	Relevant statutory undertakers Harlaxton Energy Networks Limited	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the function of Harlaxton Energy Networks Limited as a statutory undertaker.	N/A
60	Relevant statutory undertakers Independent Power Networks Limited	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the function of Independent Power Networks Limited as a statutory undertaker.	N/A
61	Relevant statutory undertakers Leep Electricity Networks Limited	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the function of Leep Electricity Networks Limited as a statutory undertaker.	N/A
62	Relevant statutory undertakers The Electricity Network Company Limited	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the function of The Electricity Network Company Limited as a statutory undertaker.	N/A

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
63	Relevant statutory undertakers UK Power Distribution Limited	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the function of UK Power Distribution Limited as a statutory undertaker.	N/A
64	Relevant statutory undertakers Utility Assets Limited	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the function of Utility Assets Limited as a statutory undertaker.	N/A
65	Relevant statutory undertakers Utility Distribution Networks Limited	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the function of Utility Distribution networks Limited as a statutory undertaker.	N/A
66	Relevant statutory undertakers Northern Powergrid (Northeast) Limited	All proposed applications likely to affect their functions as statutory undertakers	Y	Northern Powergrid (Northeast) Limited were consulted as the proposed changes are likely to affect their function as statutory undertakers.	Northern Powergrid (Northeast) Limited Lloyds Court 78 Grey Street Newcastle Upon Tyne NE1 6AF Email: nick.oliver@northernpowergrid.com
67	Relevant statutory undertakers Northern Powergrid Holdings Company	All proposed applications likely to affect their functions as statutory undertakers	Y	Northern Powergrid Holdings Company were consulted as the proposed changes are likely to affect their function as statutory undertakers.	Northern Powergrid Holdings Company Lloyds Court 78 Grey Street Newcastle Upon Tyne NE1 6AF Email: cus.serv@northernpowergrid.com

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
					Email: colin.potts@northernpowergrid.com
68	Relevant statutory undertakers National Grid Electricity Transmission Plc	All proposed applications likely to affect their functions as statutory undertakers	N	The proposed changes are not likely to affect the function of National Grid Electricity Transmission plc as a statutory undertaker.	N/A
69	Relevant statutory undertakers Arqiva Limited	All proposed applications likely to affect their functions as statutory undertakers	Y	Arqiva Limited were consulted as the proposed changes are likely to affect their function as statutory undertakers.	Arqiva Limited Crawley Court Crawley Winchester SO21 2QA Email: enquiries@arqiva.com Email: estates&property@arqiva.com Email: howard.bland@arqiva.com
70	Relevant statutory undertakers Openreach Limited	All proposed applications likely to affect their functions as statutory undertakers	Y	Openreach Limited were consulted as the proposed changes are likely to affect their function as statutory undertakers.	Openreach Limited Kelvin House 123 Judd Street London WC1H 9NP Email: nnhc@openreach.co.uk

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
					Email: maps.by.email@openreach.co.uk
71	Relevant statutory undertakers Sky UK Limited	All proposed applications likely to affect their functions as statutory undertakers	Y	Sky UK Limited were consulted as the proposed changes are likely to affect their function as statutory undertakers.	Sky UK Limited Grant Way Isleworth TW7 5QD Email: nrswa.nrswa@sky.uk
72	Relevant statutory undertakers Hutchinson 3G UK Limited	All proposed applications likely to affect their functions as statutory undertakers	Y	Hutchinson 3G UK Limited were consulted as the proposed changes are likely to affect their function as statutory undertakers.	Hutchinson 3G UK Limited c/o Property Legal Team Star House 20 Grenfell Road Maidenhead Berkshire SL6 1EH Email: robert.finnegan@three.co.uk
73	Relevant statutory undertakers Northumberland Tyne & Wear NHS foundation	All proposed applications likely to affect their functions as statutory undertakers	Y	Northumberland Tyne & Wear NHS foundation were consulted as the proposed changes are likely to affect their function as statutory undertakers.	Northumberland Tyne & Wear NHS foundation Jubilee Road Gosforth Newcastle upon Tyne Tyne and Wear NE3 3XT
74	Relevant statutory undertakers	All proposed applications likely to affect their functions as statutory undertakers	Y	Virgin Media Limited were consulted as the proposed	Virgin Media Limited

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
	Virgin Media Limited			changes are likely to affect their function as statutory undertakers.	500 Brook Drive Reading Berkshire RG2 6UU Email: press@virginmedia.co.uk Email: Jeff.Dodds@virginmedia.co.uk
75	Relevant statutory undertakers Vodafone Limited	All proposed applications likely to affect their functions as statutory undertakers	Y	Vodafone Limited were consulted as the proposed changes are likely to affect their function as statutory undertakers.	Vodafone Limited Vodafone House The Connection Newbury RG14 2FN Email: OSM.enquiries@atkinsglobal.com
76	The Crown Estate Commissioners	All proposed applications likely to impact on the Crown Estate	N	The proposed changes are not likely to impact on the Crown Estate Commissioners.	N/A
77	The Forestry Commission	All proposed applications likely to affect the protection or expansion of forests and woodlands	Y	The Forestry Commission were consulted as the proposed changes are likely to affect the protection or expansion of forests and woodlands.	Forestry Commission Foss House King Pool 1-2 Peasholme Green York YO1 7PX

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
					Email: yorkshirenortheast@forestry.gsi.gov.uk Email: nationalenquiries@forestrycommission.gov.uk Email: jim.c.smith@forestry.gsi.gov.uk
78	The Natural Resources Body for Wales	All proposed applications likely to affect the protection or expansion of forests and woodlands in Wales	N	The Natural Resources Body for Wales were not consulted as the proposed changes will not affect the protection or expansion of forests and woodlands in Wales.	N/A
79	The relevant local health board	All applications likely to affect land in Wales	N	The relevant local health board were not consulted as the proposed changes will not affect land in Wales.	N/A
80	The National Health Service Trusts	All proposed applications likely to affect land in Wales	N	The National Health Service Trusts were not consulted as the proposed changes will not affect land in Wales.	N/A
81	The Secretary of State for Defence	All proposed applications likely to affect current or future operation of a site identified in a safeguarding map and all developments in the marine area	Y	The Secretary of State for Defence was consulted as the proposed changes are likely to affect current or future operation of a site identified in a safeguarding map	The Secretary of State for Defence Ministry of Defence Whitehall London SW1A 2HB Email: DIO-Safeguarding-Statutory@mod.uk

	Prescribed Consultee:	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Prescribed Consultee Contact Details:
82	The Office of Nuclear Regulation (the ONR)	All proposed applications likely to affect matters relevant to the ONR's purposes within the meaning of Part 3 of the Energy Act 2013	N	The Office of Nuclear Regulation were not consulted as the proposed changes will not affect matters relevant to the ONR's purposes within the meaning of Part 3 of the Energy Act 2013.	N/A
83	Relevant statutory undertaker (Ambulance Trusts)	All proposed applications likely to affect their functions as statutory undertakers.	Y	The North East Ambulance Service were consulted as the proposed changes are likely to affect their function as a statutory undertaker.	North East Ambulance Service Bernicia House The Waterfront Goldcrest Way Newcastle upon Tyne Tyne and Wear NE15 8NY Email: kevin.curry@neas.nhs.uk

Table A-2 - List of section 42(1)(b) consultees – local authorities

	Consultee	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Consultee Contact Details
1	Northumberland County Council		Y	Included as the Applicant considers that the changes are relevant to Northumberland County Council as the local planning authority. All changes are within their local authority boundary.	Northumberland County Council County Hall Morpeth NE61 2EF Email: planning@northumberland.gov.uk

Consultee	Circumstances when that person must be consulted about the proposed application:	Consulted (Y/N):	Reason for inclusion/exclusion:	Consultee Contact Details
				Email: graham.fairs@northumberland.gov.uk Email: Katherine.Robbie@northumberland.gov.uk

Table A-3 - List of Affected Persons under the Co

Name	Method of Contact	Status of Consultee	Change 1	Change 2	Change 3
Alan Beedle	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	No	Yes	Yes
Alison Drummond-Reddish	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Andrew John Kelcher	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Caroline Jane Hogg	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Causey Park Farms Limited	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Causey Park Shooting Syndicate	Post	Category 1 landowner identified as an 'Affected Person'	Yes	No	No

Name	Method of Contact	Status of Consultee	Change 1	Change 2	Change 3
		Previously consulted at section 42 statutory consultation as Category 1 landowner			
Charles Jay Bosanquet	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Charles Kenneth Henderson	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	Yes	Yes
Christine Anne Hogg	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Dan Whittle	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
David Maurice Dungait	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
David Renton	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
David Rochester Thompson	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
David Russell Brown	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
David Timothy Brown	Post	Category 1 landowner identified as an 'Affected Person'	Yes	No	No

Name	Method of Contact	Status of Consultee	Change 1	Change 2	Change 3
		Previously consulted at section 42 statutory consultation as Category 1 landowner			
Dorothy Brett	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	No	Yes	Yes
E Cuthbert	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Environment Agency	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner			
Felicity Mary Alison Hester	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Frederick Charles Bosanquet	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
George Gordon Beal	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Gillian Mary Davison	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Gladis Ann Beal	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No

Name	Method of Contact	Status of Consultee	Change 1	Change 2	Change 3
Highways England Company Limited	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	Yes	Yes
Ian Dobson	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Isabella Holdings Limited	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Jack Kelcher	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Jacqueline Ions	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	No	Yes	Yes
James Givens	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
James Ivor Renton	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
James Philip Murray Hester	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Jennifer Dawn Robinson	Post	Category 1 landowner identified as an 'Affected Person'	Yes	No	No

Name	Method of Contact	Status of Consultee	Change 1	Change 2	Change 3
		Previously consulted at section 42 statutory consultation as Category 1 landowner			
Joan Givens	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
John Dungait	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
John Paul Davison	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
John Stephen Hogg	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Judith Scott	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner			
Karen Margaret Purvis	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Kate Fenwick	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Kathryn Helen Kelcher	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No

Name	Method of Contact	Status of Consultee	Change 1	Change 2	Change 3
Linda Anderson	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Martin Beal	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Michael Brett	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	No	Yes	Yes
Michael Carter Brown	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Michelle Dobson	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Northumberland County Council	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner			
Northumberland Wildlife Trust	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Octavia Lucy Bosanquet	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Patrick Goodings	Post	Category 1 landowner identified as an 'Affected Person'	Yes	No	No

Name	Method of Contact	Status of Consultee	Change 1	Change 2	Change 3
		Previously consulted at section 42 statutory consultation as Category 1 landowner			
Paul Graham Bell	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Peter Maxwell Hogg	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Robert Hugh Thompson	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Rock farms Limited	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Rock Haulage Limited	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Roger Inverarity	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	No	Yes	Yes
Shaun Barrett Robinson	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Susan Hall	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No

Name	Method of Contact	Status of Consultee	Change 1	Change 2	Change 3
The Honourable George Dominic Percy	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
The Most Noble Ralph George Algernon Twelfth Duke of Northumberland	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
The University of Newcastle upon Tyne	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
The Welbeck Estates Company Limited	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Theodore William Bosanquet	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
Vernal Agricultural Enterprises Limited	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	Yes	Yes
Viscount Matthew White Ridley	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	Yes	Yes
William David Purvis	Post	Category 1 landowner identified as an 'Affected Person' Previously consulted at section 42 statutory consultation as Category 1 landowner	Yes	No	No
William Emmerson	Post	Category 1 landowner identified as an 'Affected Person'	Yes	No	No

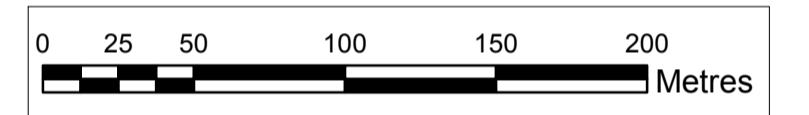
Name	Method of Contact	Status of Consultee	Change 1	Change 2	Change 3
		Previously consulted at section 42 statutory consultation as Category 1 landowner			

Appendix B

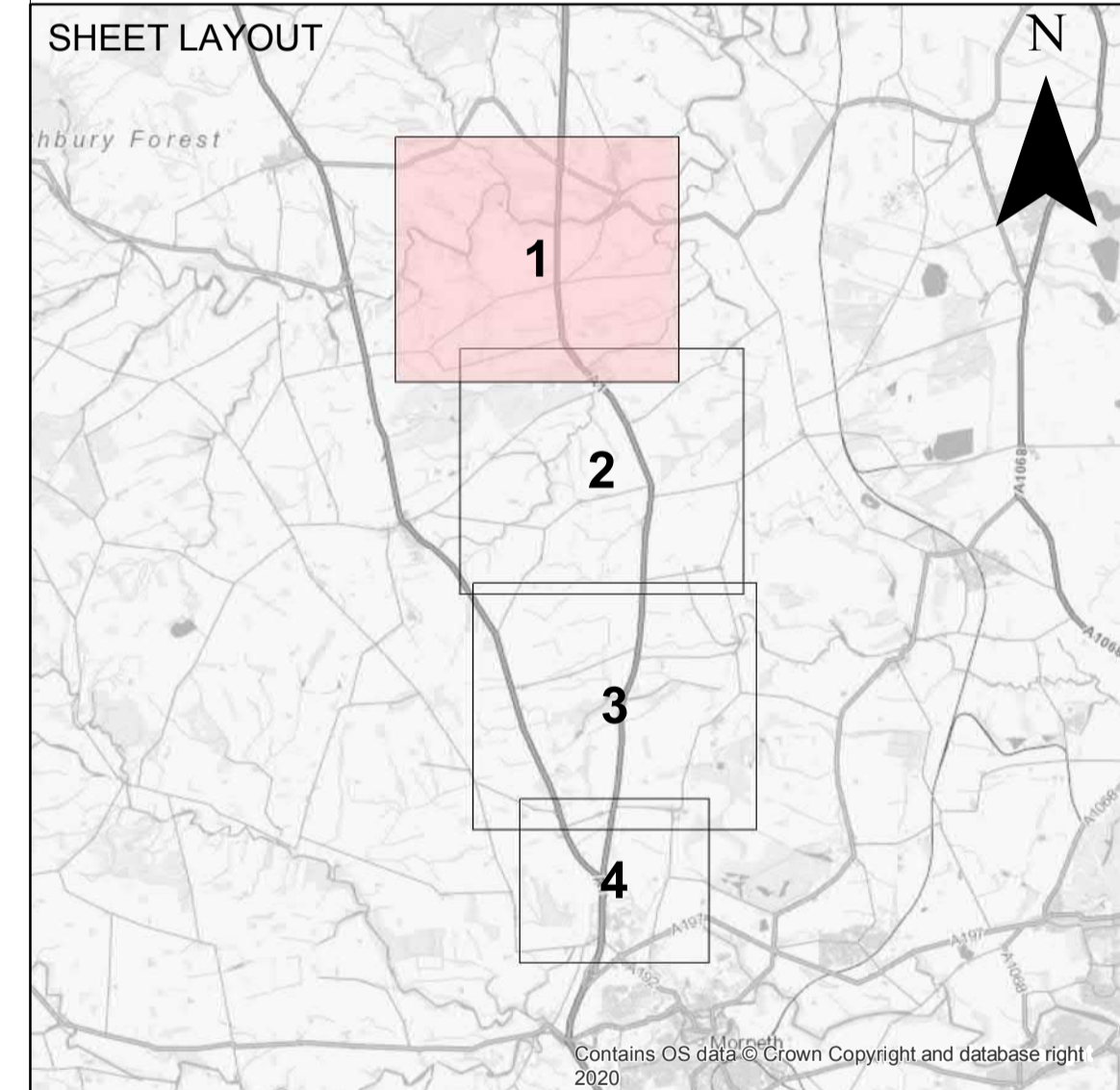
PLAN OF CONSULTATION AREAS

Key

- Order Limits
- Consultation Area



SHEET LAYOUT



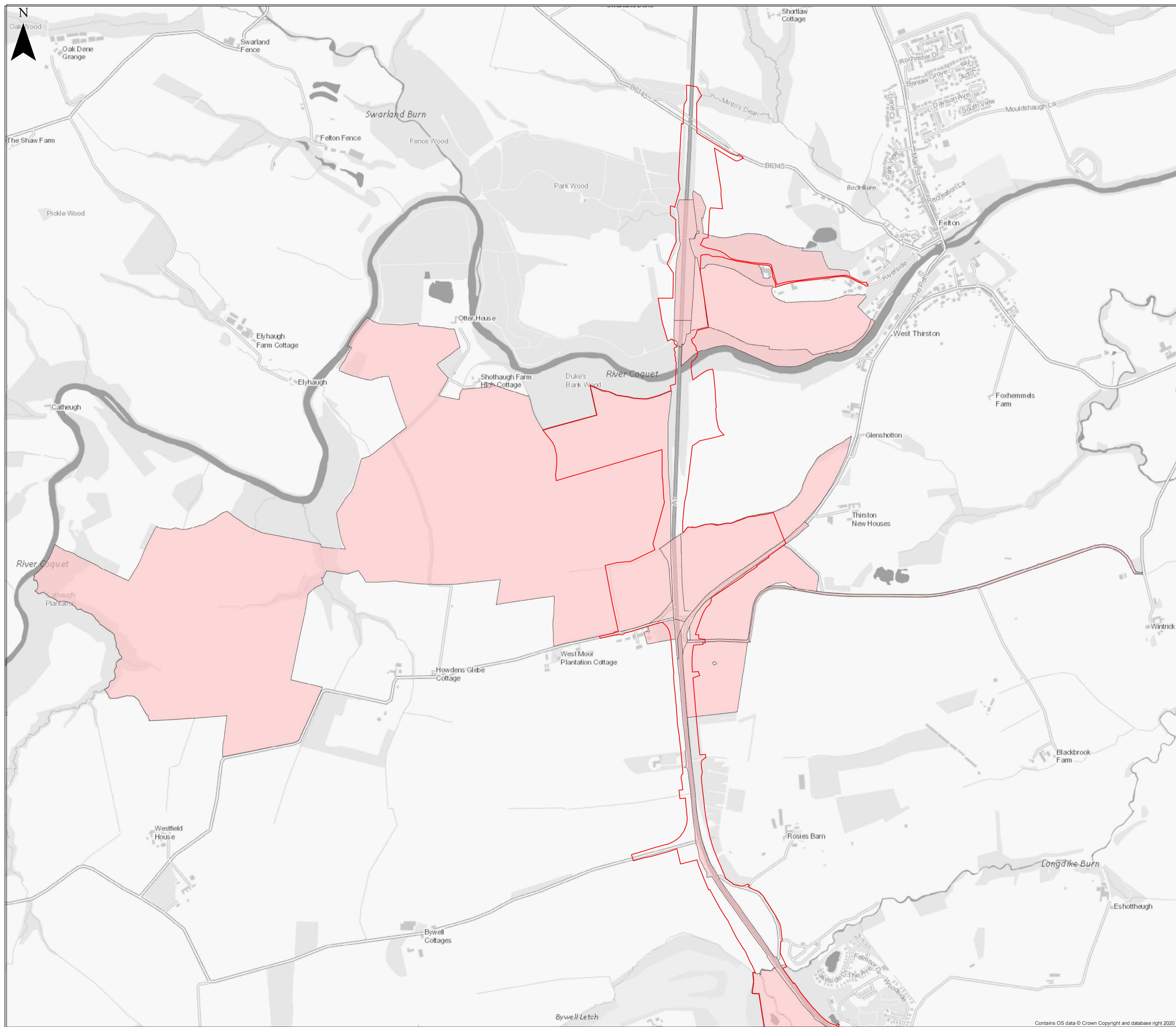
Suitability	Status
For Examination Deadline 4	S0

Project Title
A1 in Northumberland
Morpeth to Felton Scheme

Drawing Title
Consultation Area
for DCO Change 1
(Part A - Morpeth to Felton)
Sheet 1 of 4

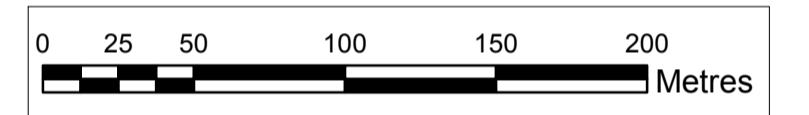
Scale	1:7,500	Drawn	RC	Eng. Check	AK	Approved	AJS	Authorised	SC
Original Size	A1	Date	12/03/2021	Date	12/03/2021	Date	12/03/2021	Date	12/03/2021

Drawing Number	Revision
HE551459-WSP-GEN-M2F-DR-CH-1742	P0
	PW Stage Code
	0

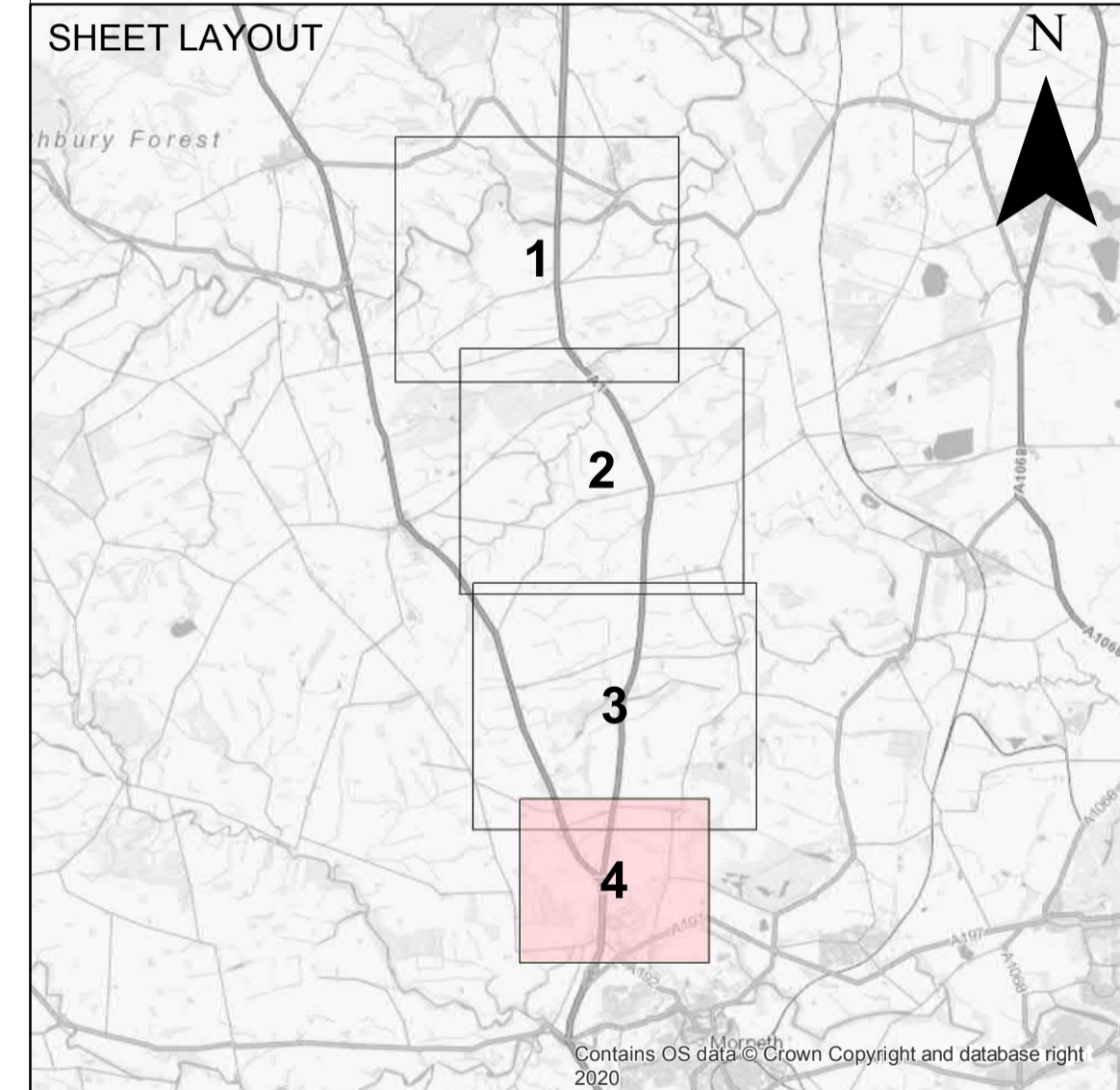


Key

- Order Limits
- Consultation Area



SHEET LAYOUT



Suitability	Status
For Examination Deadline 4	S0

Client

Project Title

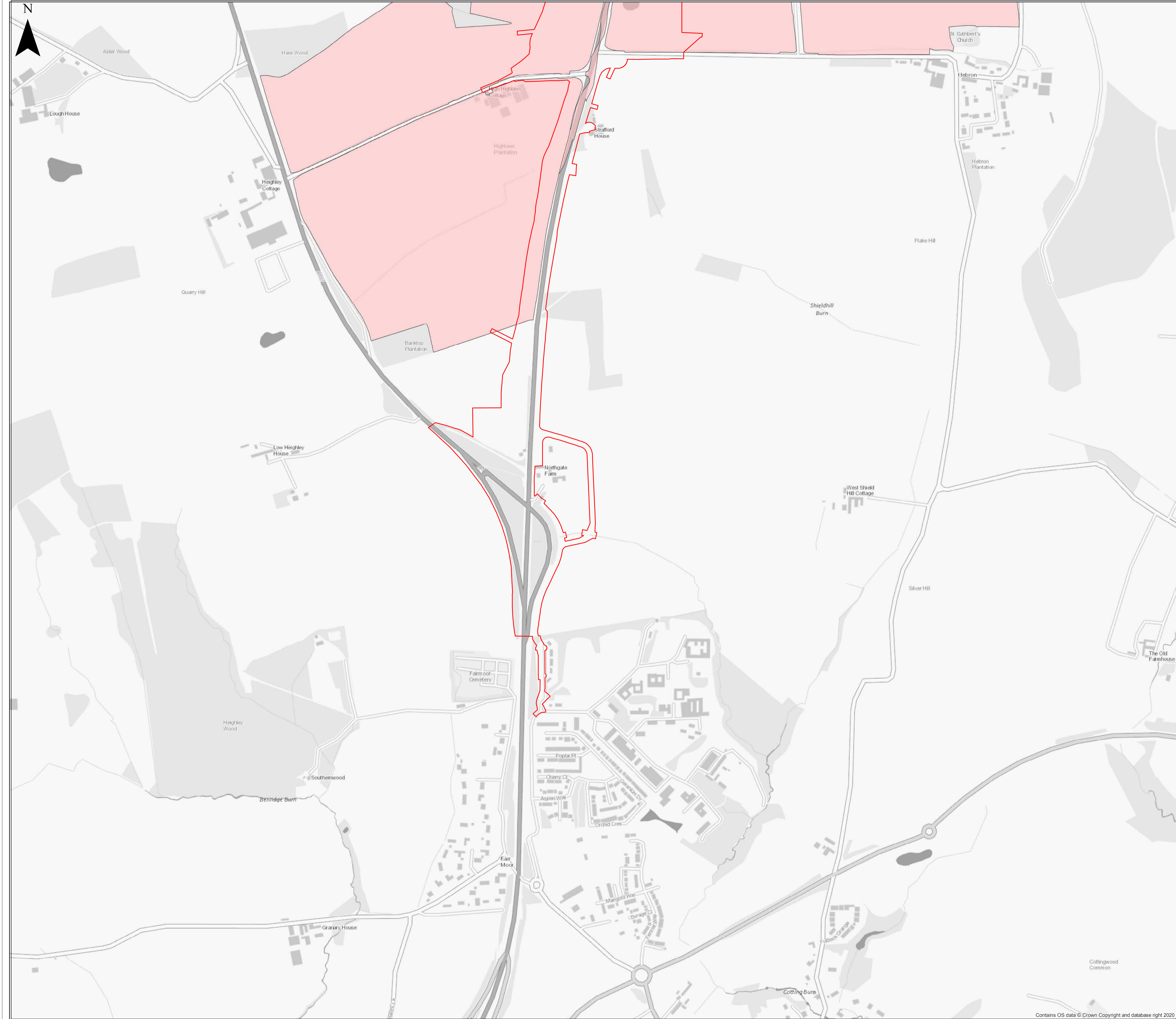
**A1 in Northumberland
Morpeth to Felton Scheme**

Drawing Title

**Consultation Area
for DCO Change 1
(Part A - Morpeth to Felton)
Sheet 4 of 4**

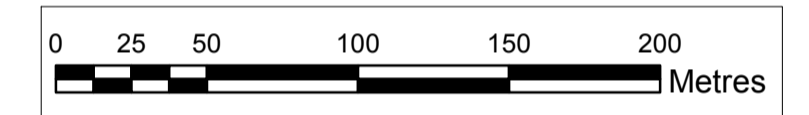
Scale	1:5,000	Drawn	RC	Eng. Check	AK	Approved	AJS	Authorised	SC
Original Size	A1	Date	12/03/2021	Date	12/03/2021	Date	12/03/2021	Date	12/03/2021

Drawing Number	Revision
HE551459-WSP-GEN-M2F-DR-CH-1742	P0
	PW Stage Code
	0

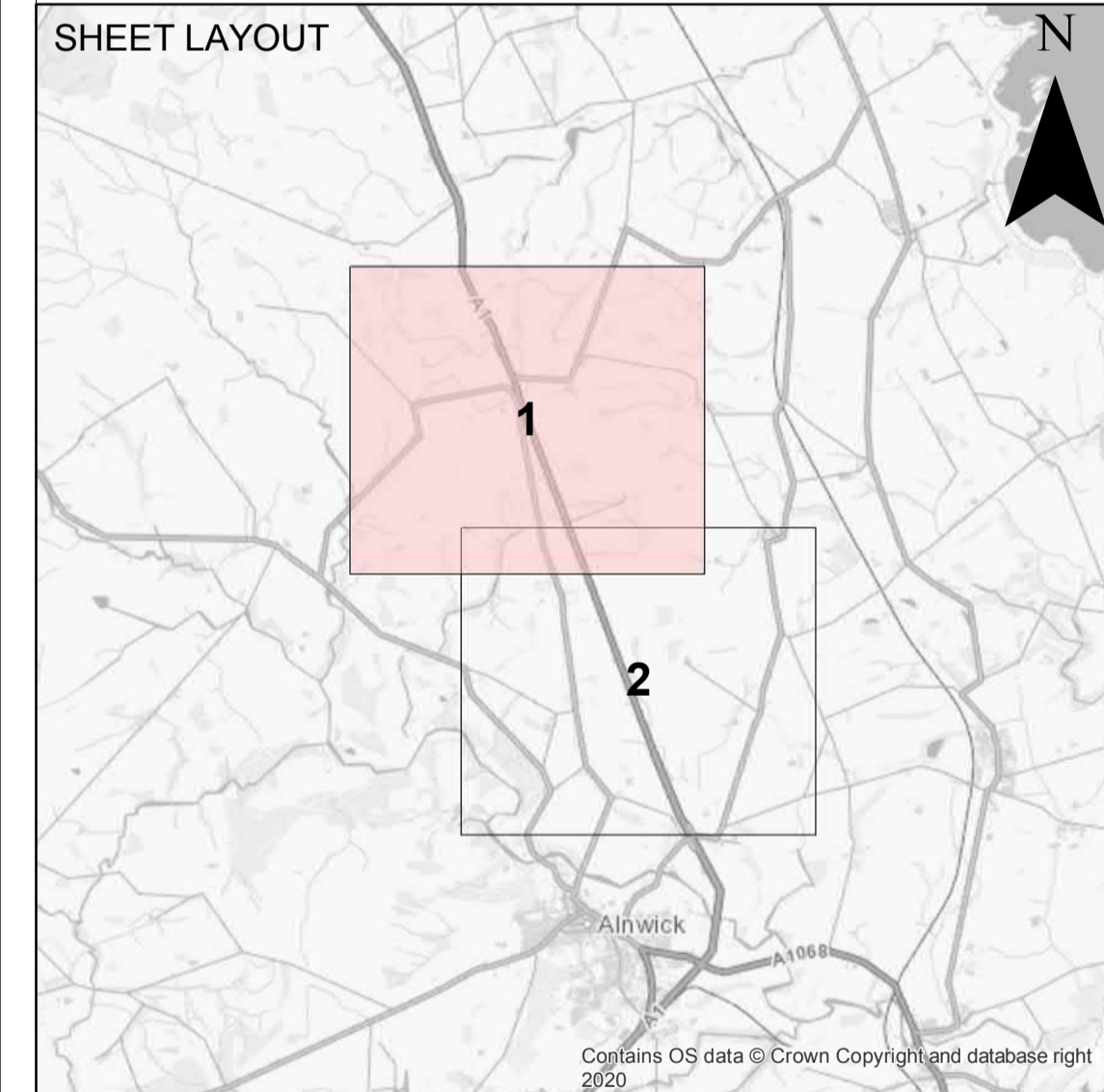


Key

- Order Limits
- Consultation Area



SHEET LAYOUT



Subsidiary	Status
For Examination Deadline 4	S0

Client

Project Title

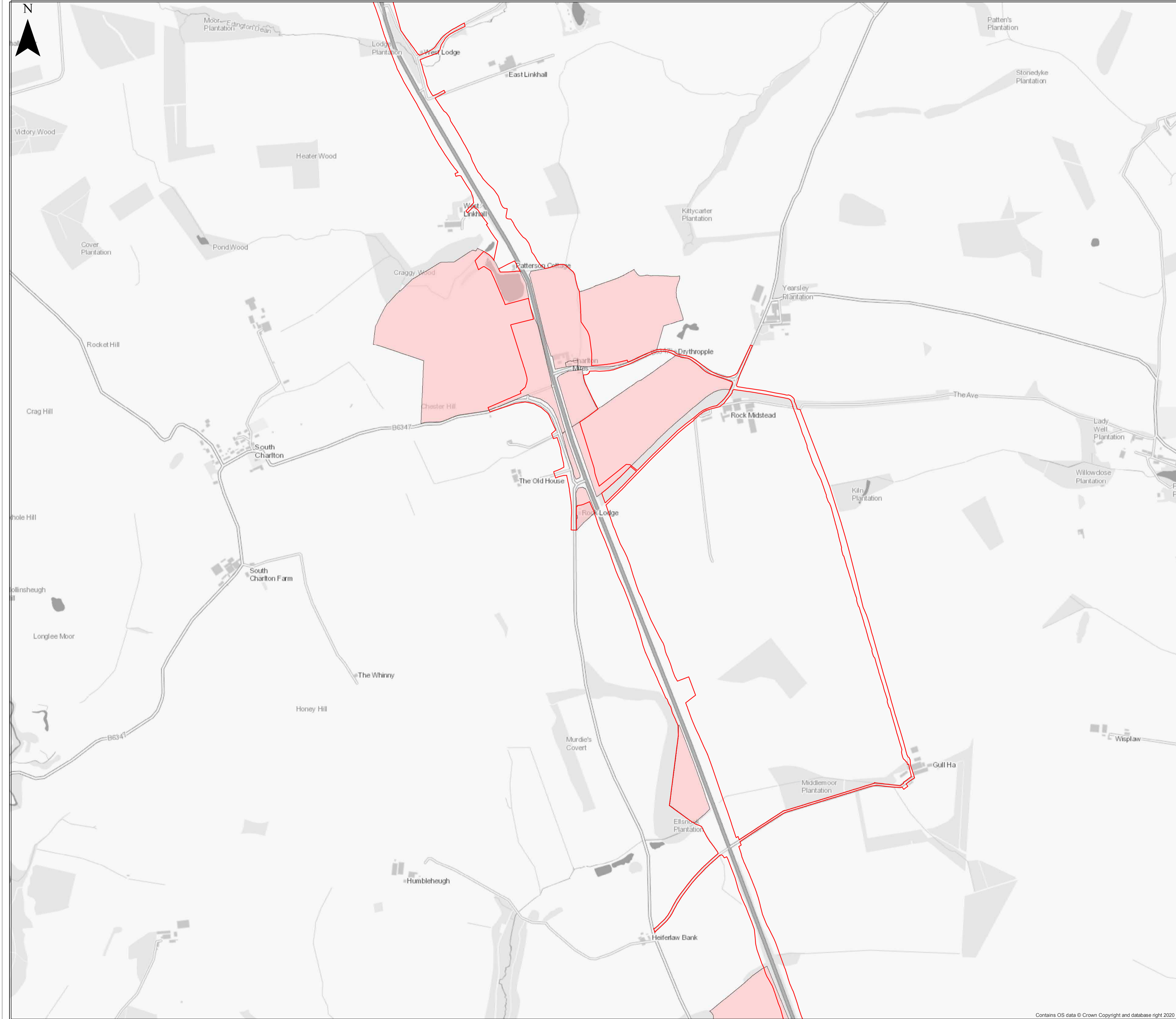
**A1 in Northumberland
Alnwick to Ellingham Scheme**

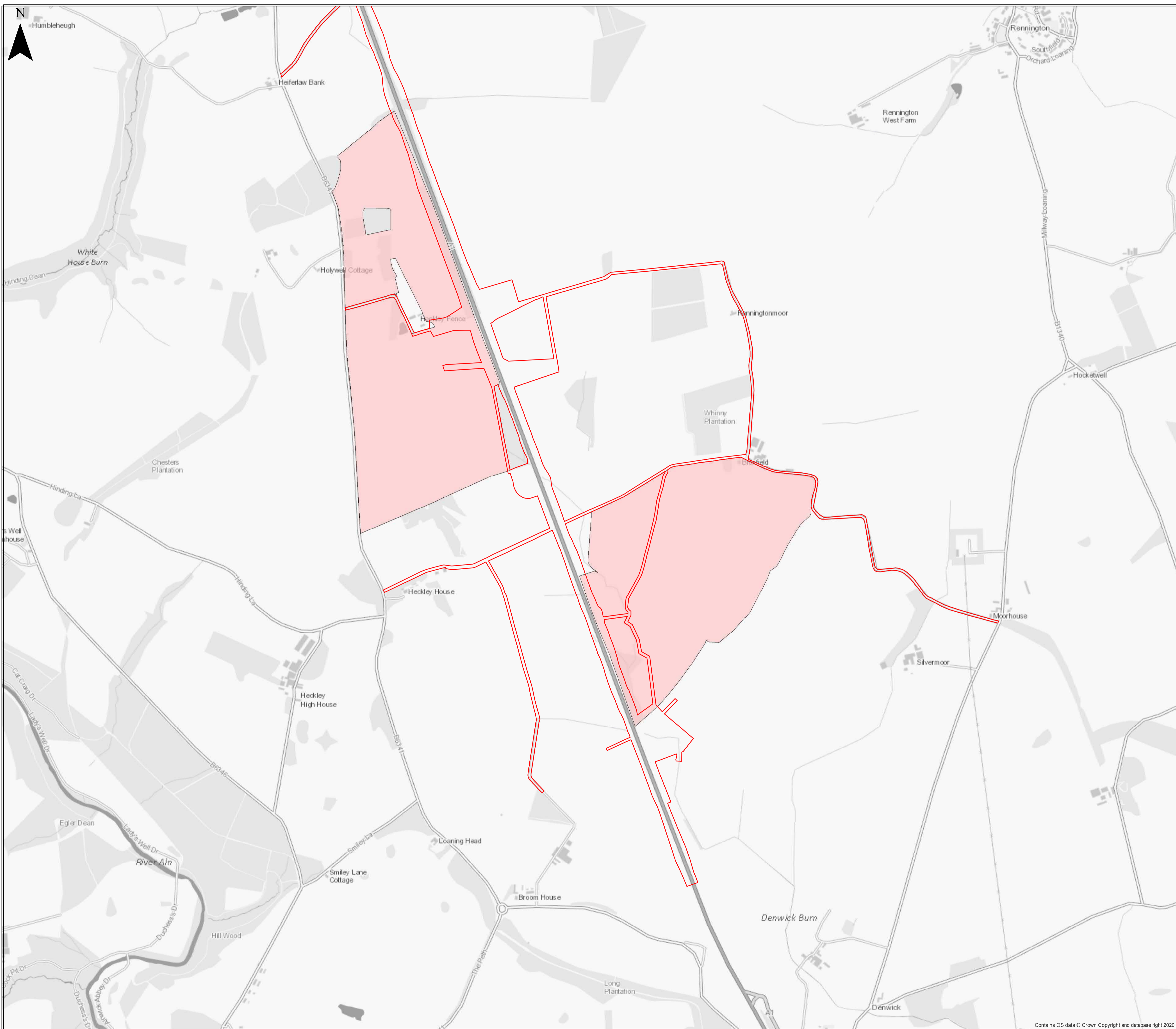
Drawing Title

**Consultation Area
for DCO Change 1
(Part B - Alnwick to Ellingham)
Sheet 1 of 2**

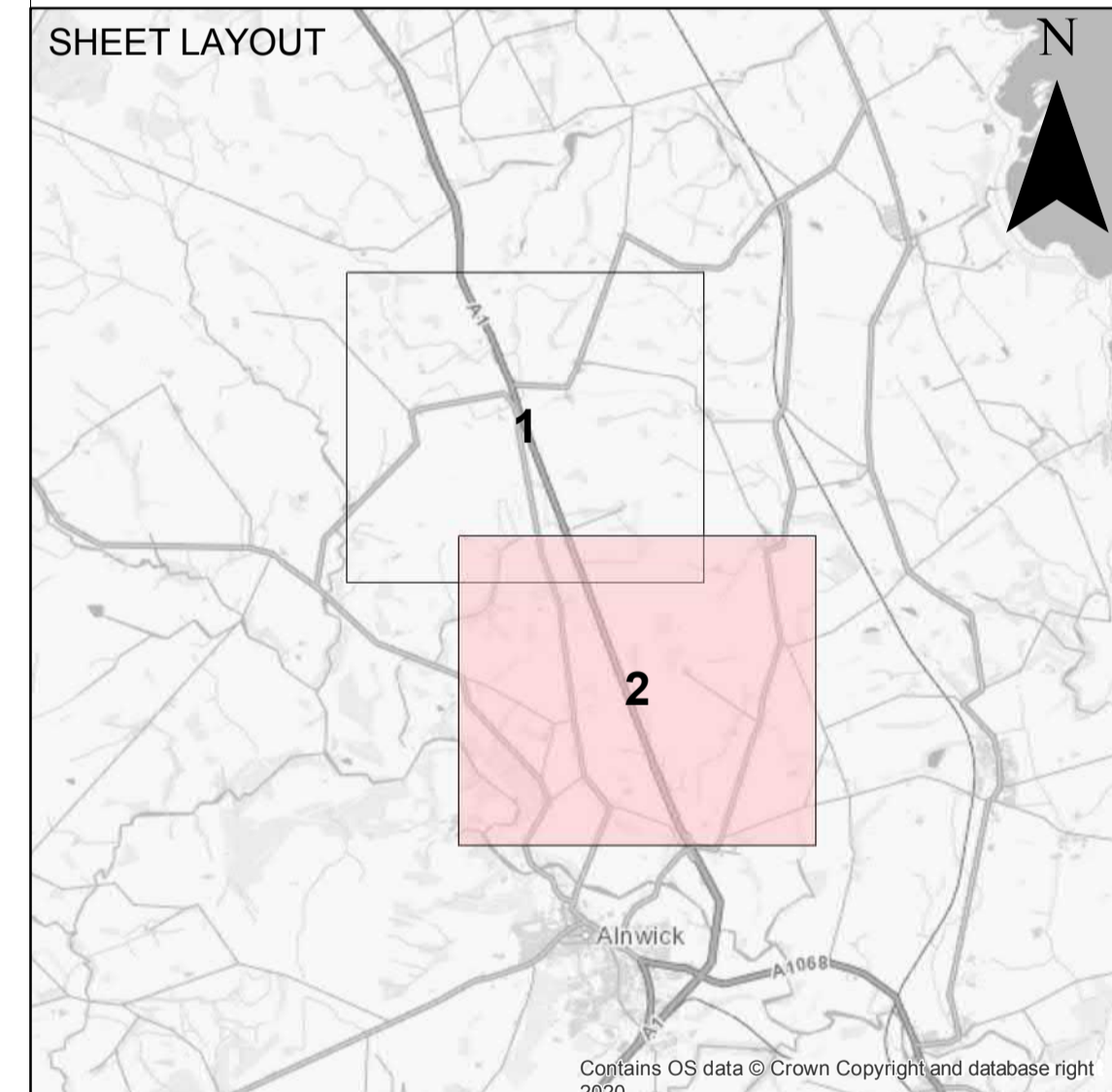
Scale	1:7,500	Drawn	RC	Eng. Check	AK	Approved	AJS	Authorised	SC
Original Size	A1	Date	12/03/2021	Date	12/03/2021	Date	12/03/2021	Date	12/03/2021

Drawing Number	Revision
HE551459-WSP-GEN-M2F-DR-CH-1742	P0
	PW Stage Code
	0





- Key**
- Order Limits
 - Consultation Area



Suitability	Status
For Examination Deadline 4	S0



Project Title

**A1 in Northumberland
Alnwick to Ellingham Scheme**

Drawing Title

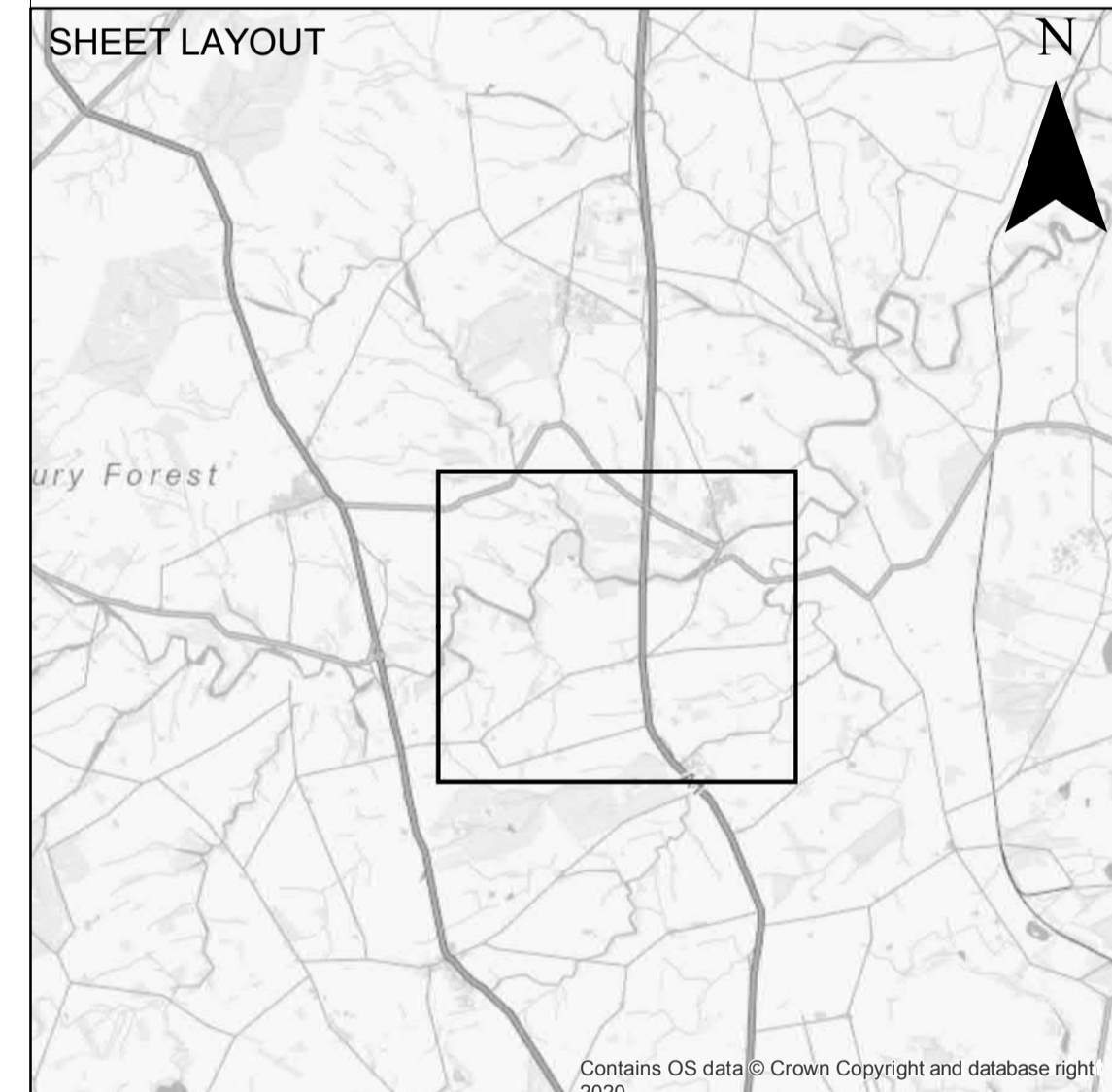
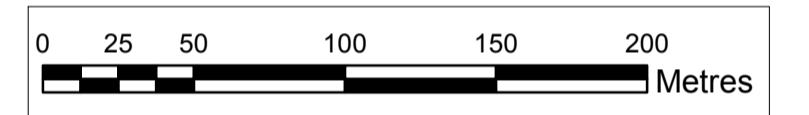
**Consultation Area
for DCO Change 1
(Part B - Alnwick to Ellingham)
Sheet 2 of 2**

Scale	1:7,500	Drawn	RC	Eng. Check	AK	Approved	AJS	Authorised	SC
Original Size	A1	Date	12/03/2021	Date	12/03/2021	Date	12/03/2021	Date	12/03/2021

Drawing Number	Revision
HE551459-WSP-GEN-M2F-DR-CH-1742	P0
	PW Stage Code
	0

Key

- Order Limits
- Consultation Area



Subality For Examination Deadline 4 Status S0

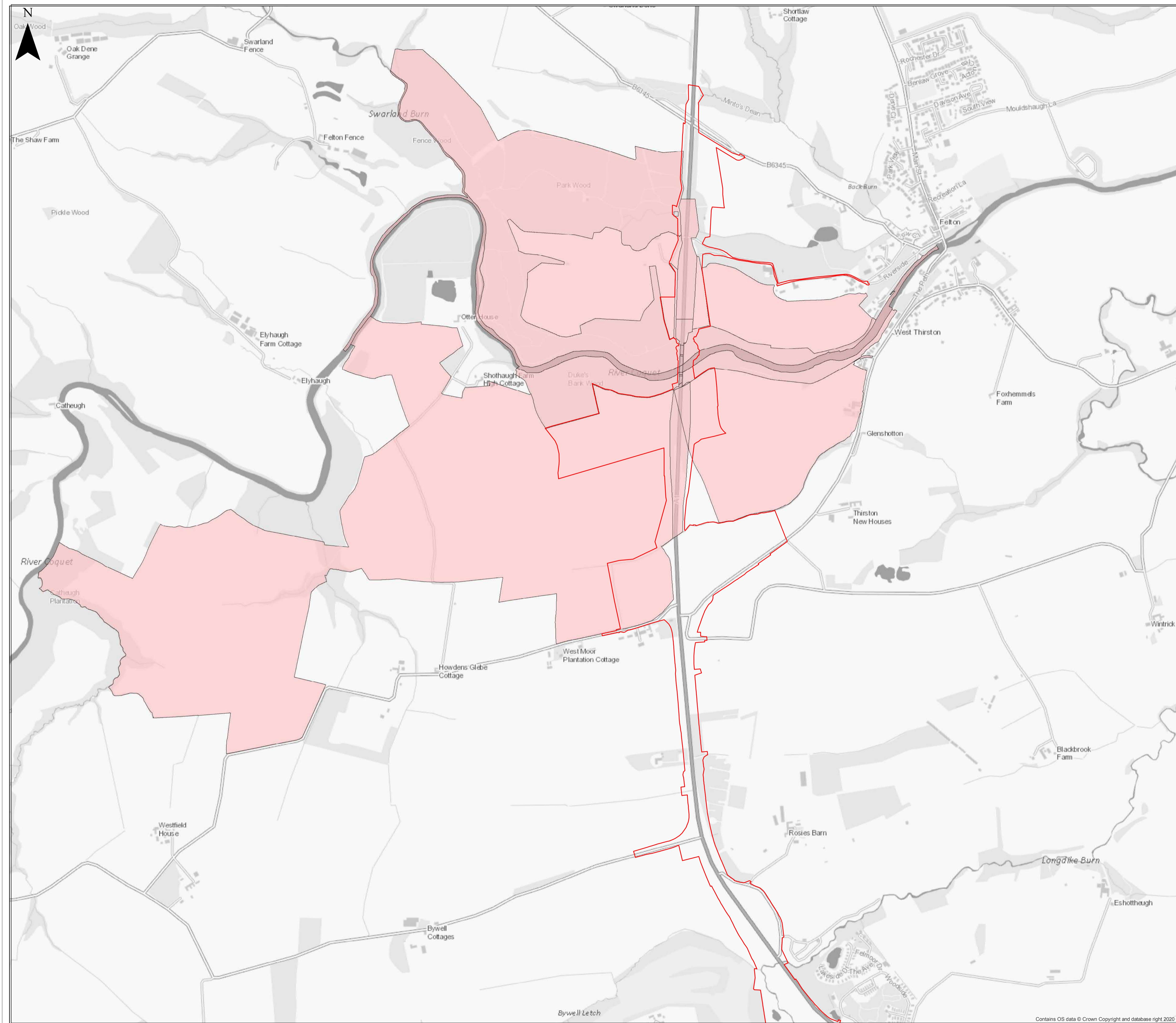


Project Title **A1 in Northumberland
Morpeth to Felton Scheme**

Drawing Title **Consultation Area
for DCO Changes 2 and 3
(Part A - Morpeth to Felton)**

Scale	1:7,500	Drawn	RC	Eng. Check	AK	Approved	AJS	Authorised	SC
Original Size	A1	Date	12/03/2021	Date	12/03/2021	Date	12/03/2021	Date	12/03/2021

Drawing Number **HE551459-WSP-GEN-M2F-DR-CH-1742** Revision **P0**
PW Stage Code **0**



Appendix C

COVERING LETTERS

Name


Address Line 1

Address Line 2

Address Line 3

Address Line 4

Address Line 5


Project Manager
Highways England
Lateral
8 City Walk
Leeds
LS11 9AT

27th January 2021

Dear **Sir or Madam**

A1 in Northumberland: Morpeth to Ellingham

Consultation on amendments to the Development Consent Order application – 29 January 2021 to 25 February 2021

I am writing to you regarding proposed amendments to the A1 in Northumberland: Morpeth to Ellingham (the “Scheme”) development consent application.

Highways England submitted a development consent order application on 7 July 2020 which was accepted for examination on 4 August 2020.

We have continued to review the Scheme design to identify efficiencies and we have identified three amendments to the application. We now wish to seek your views on the proposed amendment to the temporary and permanent earthworks as you may be directly affected. A summary of the proposed amendments are as follows:

Proposed amendments to temporary and permanent earthworks

Amendments to temporary and permanent earthworks within the existing Order Limits of the development consent application in order to reduce earthworks movements, which proposed changes do not require additional land.

Proposed Land Stabilisation north of the River Coquet

Works on the north bank of the River Coquet in order to ensure stability of the permanent bridge required to carry the new carriageway of the A1 over the River Coquet. Land outside of the Order Limits would be required temporarily as a working area for the installation of piles, access to the works and for the purpose of carrying out erosion protection measures to the north bank.

Proposed temporary access to the southern bank of the River Coquet

Provision of a temporary bridge to access the southern bank of the River Coquet from the north bank of the River Coquet. Additional temporary rights of access and a temporary working area would be required to facilitate installation of the temporary bridge. It is also anticipated that there would be some temporary river training works and additional erosion protection measures to the southern pier of the new permanent bridge over the River Coquet.

We are undertaking this additional consultation to provide you with an opportunity to respond to the amendments we are proposing. As noted in our previous correspondence to you on consultations, we strongly encourage you to provide your views to us now through this consultation period. This will enable us to take your views as part of the examination process for the development consent to construct, operate and maintain the Scheme.

In order to understand if there would be any significant environmental effects as a result of the above amendments, a sensitivity appraisal has been carried out. The outcome of this assessment can be found in the documents listed below, which are provided on the USB enclosed with this letter. These are provided to help you understand the proposals and share your views with us during this consultation period.

- **Environmental Statement Addendum:** Proposed amendments to temporary and permanent earthworks;

During the consultation period the project team will be available to talk to you about the Scheme and answer any questions you may have, please use the contact details provided. Any responses to this consultation in respect of the Scheme should be sent to any of the following:

By email: peter.henson@wsp.com

By post: **FREEPOST WSP A1iN**

By phone: 0191 2981039

To allow us time to collect and assess all responses to this consultation before presenting our findings to the Planning Inspectorate, please ensure your response reaches us by **11.59pm on Thursday 25 February 2021**. We will produce a Consultation Statement to set out how we have taken account of your views which will be submitted to the Planning Inspectorate on **12 March 2021**.

Further information about the Planning Act 2008 process and Development Consent Orders can be found on the Planning Inspectorate's National Infrastructure Planning website: <https://infrastructure.planninginspectorate.gov.uk/>



Project Manager
Highways England

Email:  [@highwaysengland.co.uk](mailto: [redacted]@highwaysengland.co.uk)



Name


Address Line 1

Address Line 2

Address Line 3

Address Line 4

Address Line 5


Project Manager
Highways England
Lateral
8 City Walk
Leeds
LS11 9AT

27th January 2021

Dear **Sir or Madam**

A1 in Northumberland: Morpeth to Ellingham

Consultation on amendments to the Development Consent Order application – 29 January 2021 to 25 February 2021

I am writing to you regarding proposed amendments to the A1 in Northumberland: Morpeth to Ellingham (the “Scheme”) development consent application.

Highways England submitted a development consent order application on 7 July 2020 which was accepted for examination on 4 August 2020.

We have continued to review the Scheme design to identify efficiencies and we have identified three amendments to the application. We now wish to seek your views on the proposed amendment to land stabilisation north of the River Coquet and temporary access to the southern bank of the River Coquet as you may be directly affected. A summary of the proposed amendments are as follows:

Proposed amendments to temporary and permanent earthworks

Amendments to temporary and permanent earthworks within the existing Order Limits of the development consent application in order to reduce earthworks movements, which proposed changes do not require additional land.

Proposed Land Stabilisation north of the River Coquet

Works on the north bank of the River Coquet in order to ensure stability of the permanent bridge required to carry the new carriageway of the A1 over the River Coquet. Land outside of the Order Limits would be required temporarily as a working area for the installation of piles, access to the works and for the purpose of carrying out erosion protection measures to the north bank.

Proposed temporary access to the southern bank of the River Coquet

Provision of a temporary bridge to access the southern bank of the River Coquet from the north bank of the River Coquet. Additional temporary rights of access and a temporary working area would be required to facilitate installation of the temporary bridge. It is also anticipated that there would be some temporary river training works and additional erosion protection measures to the southern pier of the new permanent bridge over the River Coquet.

We are undertaking this additional consultation to provide you with an opportunity to respond to the amendments we are proposing. As noted in our previous correspondence to you on consultations, we strongly encourage you to provide your views to us now through this consultation period. This will enable us to take your views as part of the examination process for the development consent to construct, operate and maintain the Scheme.

In order to understand if there would be any significant environmental effects as a result of the above amendments, a sensitivity appraisal has been carried out. The outcome of this assessment can be found in the documents listed below, which are provided on the USB enclosed with this letter. These are provided to help you understand the proposals and share your views with us during this consultation period.

- **Environmental Statement Addendum:** Proposed land stabilisation north of the River Coquet; and
- **Environmental Statement Addendum:** Proposed temporary access to the southern bank of the River Coquet.

During the consultation period the project team will be available to talk to you about the Scheme and answer any questions you may have, please use the contact details provided. Any responses to this consultation in respect of the Scheme should be sent to any of the following:

By email: peter.henson@wsp.com

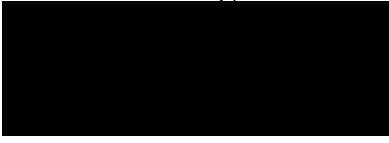
By post: **FREEPOST WSP A1iN**

By phone: 0191 2981039

To allow us time to collect and assess all responses to this consultation before presenting our findings to the Planning Inspectorate, please ensure your response reaches us by **11.59pm on Thursday 25 February 2021**. We will produce a Consultation Statement to set out how we have taken account of your views which will be submitted to the Planning Inspectorate on **12 March 2021**.

Further information about the Planning Act 2008 process and Development Consent Orders can be found on the Planning Inspectorate's National Infrastructure Planning website: <https://infrastructure.planninginspectorate.gov.uk/>

Yours sincerely,



Project Manager
Highways England

Email:  [@highwaysengland.co.uk](mailto: [redacted]@highwaysengland.co.uk)



Name

Address Line 1

Address Line 2

Address Line 3

Address Line 4

Address Line 5

[REDACTED]
Project Manager
Highways England
Lateral
8 City Walk
Leeds
LS11 9AT

27th January 2021

Dear Sir or Madam

A1 in Northumberland: Morpeth to Ellingham

Consultation on amendments to the Development Consent Order application – 29 January 2021 to 25 February 2021

I am writing to you regarding proposed amendments to the A1 in Northumberland: Morpeth to Ellingham (the “Scheme”) development consent application.

Highways England submitted a development consent order application on 7 July 2020 which was accepted for examination on 4 August 2020.

We have continued to review the Scheme design to identify efficiencies and we have identified three amendments to the application. We now wish to seek your views on the proposed amendments. A summary of the proposed amendments are as follows:

Proposed amendments to temporary and permanent earthworks

Amendments to temporary and permanent earthworks within the existing Order Limits of the development consent application in order to reduce earthworks movements, which proposed changes do not require additional land.

Proposed Land Stabilisation north of the River Coquet

Works on the north bank of the River Coquet in order to ensure stability of the permanent bridge required to carry the new carriageway of the A1 over the River Coquet. Land outside of the Order Limits would be required temporarily as a working area for the installation of piles, access to the works and for the purpose of carrying out erosion protection measures to the north bank.

Proposed temporary access to the southern bank of the River Coquet

Provision of a temporary bridge to access the southern bank of the River Coquet from the north bank of the River Coquet. Additional temporary rights of access and a temporary working area would be required to facilitate installation of the temporary bridge. It is also anticipated that there would be some temporary river training works and additional erosion protection measures to the southern pier of the new permanent bridge over the River Coquet.

We are undertaking this additional consultation to provide you with an opportunity to respond to the amendments we are proposing. As noted in our previous correspondence to you on consultations, we strongly encourage you to provide your views to us now through this consultation period. This will enable us to take your views as part of the examination process for the development consent to construct, operate and maintain the Scheme.

In order to understand if there would be any significant environmental effects as a result of the above amendments, a sensitivity appraisal has been carried out. The outcome of this assessment can be found in the documents listed below, which are provided on the USB enclosed with this letter. These are provided to help you understand the proposals and share your views with us during this consultation period.

- **Environmental Statement Addendum:** Proposed amendments to temporary and permanent earthworks;
- **Environmental Statement Addendum:** Proposed land stabilisation north of the River Coquet; and
- **Environmental Statement Addendum:** Proposed temporary access to the southern bank of the River Coquet.

During the consultation period the project team will be available to talk to you about the Scheme and answer any questions you may have, please use the contact details provided. Any responses to this consultation in respect of the Scheme should be sent to any of the following:

By email: peter.henson@wsp.com

By post: **FREEPOST WSP A1iN**

By phone: 0191 2981039

To allow us time to collect and assess all responses to this consultation before presenting our findings to the Planning Inspectorate, please ensure your response reaches us by **11.59pm on Thursday 25 February 2021**. We will produce a Consultation Statement to set out how we have taken account of your views which will be submitted to the Planning Inspectorate on **12 March 2021**.

Further information about the Planning Act 2008 process and Development Consent Orders can be found on the Planning Inspectorate's National Infrastructure Planning website: <https://infrastructure.planninginspectorate.gov.uk/>

Yours sincerely,



Project Manager
Highways England

Email:  [@highwaysengland.co.uk](mailto: [redacted]@highwaysengland.co.uk)



Appendix D

PRE-CONSULTATION RESPONSES TABLE 2-2 ENVIRONMENT AGENCY AND NATURAL ENGLAND

Table 2-2 Environment Agency

Ref. No.	Response:	Applicant's Response:
1	We wish to highlight to the Examining Authority our concerns relating to the bridge design over the River Coquet, as outlined in the document titled 'Summary of Proposed Changes to Application Version 2'. These changes are considered to be significant changes, and thus we have some concerns with the proposed changes. We have concerns with the following design changes:	Noted. The Environment Agency's concerns are considered in the below responses.
	Proposed change 1: alteration of the location of the southern pier of the bridge: moving it 2m closer to the river's edge.	
2	This will have flood risk, ecology and geomorphology and Water Framework Directive (WFD) impacts, which will need to be assessed as part of the DCO. This may include the need for additional surveys to be undertaken.	<p>The movement of the southern pier of the bridge has also been assessed for all topics within Parameter 10 of the Environmental Statement [APP-035 to APP-336] and forms part of the existing Scheme before the ExA. It is not part of the proposed Change Request. No further surveys or assessment is therefore anticipated other than the following which have been submitted at Deadlines 1 and 3.</p> <p>Additional geomorphological assessment has been undertaken to assess potential impacts of the southern pier moving 2m closer to the river's edge. The results are presented within the Environmental Impact Assessment - River Coquet Geomorphology Modelling Assessment [REP3-009]. The results conclude that there is no significant change in fluvial processes of velocity, stream power, shear stress or Froude between baseline and proposed for a wide range of flood return periods including an extreme event of a 100 year plus 50% climate change scenario.</p> <p>As detailed in Annex B – Flood Risk Addendum [REP1-067], an additional flood risk qualitative assessment was undertaken to consider the movement of the southern pier of the bridge. The assessment indicated that the change in pier location would not change the results of the Flood Risk Assessment [APP-254].</p>
	Proposed change 2: installation of temporary bridge and river training works for approximately 15months)	
3	This is a significant change and consequently further flood risk, ecology, WFD and geomorphology information will need to be submitted as part of the DCO, including additional design information for the temporary bridge and river training measures. Additional surveys may need to be undertaken.	<p>An updated Water Framework Assessment for the Proposed Change has been submitted at Deadline 4.</p> <p>As part of the submission provided at Deadline 4, Environmental Statement Addendum: Stabilisation Works for Change Request and Environmental Statement Addendum: Southern Access Works for Change Request have been submitted and these cover assessment of all topics (including ecology) that were scoped into the assessment. In addition, they provide more design information into the nature of the measures required and how the design has developed as a result of consultation. Assessment of hydraulic modelling is ongoing and it is intended to submit detailed modelling at Deadline 8. Other than those related to the development of the Hydraulic model it is not anticipated that further surveys are required.</p>

Ref. No.	Response:	Applicant's Response:
4	The design of the temporary bridge will need to be supported with hydraulic modelling, in order to ensure that there is no increase in flood risk elsewhere. The hydraulic model will take between 6-8 weeks to review. The Flood Risk Assessment will also need to be updated to reflect the proposed changes to the permanent bridge structure (bridge pier locations) and the introduction of a temporary bridge and increased in-river works.	<p>A full hydraulic model is being developed and will be submitted at Deadline 8 in discussion with the Environment Agency and if required the FRA will be updated to reflect any changes that require reporting.</p> <p>However, the risk to construction workers will increase as a result of a temporarily constrained channel caused by the bank retaining structures and the risk of the Bailey bridge becoming blinded with debris. Notwithstanding this we consider that the flood risks associated with construction are suitably mitigated through a flood management plan and flood warning system/service involving evacuation of staff and equipment where safe and appropriate to do so.</p>
5	Any river training should not damage existing geomorphological features of value at the site or downstream. Any changes will need to be monitored and if impacts are experienced, they must be compensated for.	<p>As part of assessments to support the DCO, the Applicant are looking into potential changes to geomorphological features. Further any potential change have been assessed as part of supporting documentation submitted at Deadline 4 including the addendum to the WFD Assessment. With appropriate mitigation, risks to the water body can be negated. Compensation is not required under Water Framework Directive. Compensation is not a vehicle for recompensing for damage under WFD. WFD impacts are ameliorated through mitigation.</p>
	Proposed change 3: the installation of bank protection (potentially rock armour) on the north bank of the river to address the risk of fluvial erosion and instability of the sloping land north of the riverbank.	
6	This will have flood risk, ecology and geomorphology impacts, which will need to be assessed as part of the DCO. The proposed permanent use of bank protection may destroy/severely damage the bank habitat and geomorphological process along the River Coquet.	<p>Environmental Statement Addendum: Stabilisation Works for Change Request and Environmental Statement Addendum: Southern Access Works for Change Request have been submitted and these cover assessment of all topics (including ecology and geomorphology) that were scoped into the assessment.</p> <p>A full hydraulic model is being developed and will be submitted at Deadline 8 in discussion with the Environment that may Agency. If required the FRA will be updated to reflect any changes that require reporting.</p>
7	Rock armour is not favourable due to its visual and geomorphological impact and the limitations it can pose on ecology. Furthermore, it is also unlikely to have a lifespan to match that of the bridge. The River Coquet is largely unmodified and any increase in the heavily modification (as classed under WFD) will need to be compensated for, e.g. the removal of rock armour and renaturalisation in other areas.	<p>The Applicant has submitted an Preliminary Scour Assessment as detailed in Appendix F: Preliminary Scour Assessment of Environmental Statement Addendum: Stabilisation Works for Change Request. Scour protection is required to protect the bridge foundations and rock armour is a suitable scour protection system. It has some beneficial aspects for habitat and flow refugia for fish and macroinvertebrates. Visual impacts are likely to soften over time with colonisation and sedimentation but it should be noted that large rock is a feature of this reach of the river. Appropriately sized (currently dn50 of 800-1000mm) and placed rock has a suitable design life in line with the bridge (120 years). Other grey bank engineering solutions are less flexible but would have similar visual impacts. Green-grey bank solutions have unproven design life and the consequence of failure is a potential issue. On-going management and maintenance of any less robust scour protection is challenging and could lead to further environmental damage. Therefore, a robust and tested solution is preferred. The applicant</p>

Ref. No.	Response:	Applicant's Response:
		<p>is looking at further design development to minimise the extent of grey engineered solutions and will present the design in subsequent consultation.</p> <p>Compensation is not a requirement under WFD and the scale and extent of rock armour is unlikely to lead to a downgrade in the status of the water body. An addendum to the WFD Assessment has been provided as part of the submissions at Deadline 4. The addendum sets out an assessment of the potential impacts associated with the proposed changes to the Scheme on both the surface and groundwater bodies within the site. For a waterbody status to change owing to significant physical alterations, it has to be demonstrated that changes in hydromorphology are long-term and alter the morphological and hydrological characteristics in order to represent a significant change in character. The addendum to the WFD Assessment, concludes that on the basis of the proposed works, and the results of the impact assessment, it is argued that the Scheme would not have an effect on the non-heavily modified status of the waterbody.</p> <p>In relation to the loss of bankside habitat from within the SSSI, the Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.</p>
	<p>Proposed change 4: the addition of rock armour on the southern bank of the river for erosion control purposes where it is not clear where any significant erosion exists</p>	
8	<p>This will have flood risk, ecology, WFD and geomorphology impacts, which will need to be reassessed as part of the DCO. Additional geomorphological surveys may need to be undertaken and additional mitigation measures provided. Local factors need to be considered when assessing the need for rock armour, such as bedrock present at the pier location or whether green methods can be utilised</p>	<p>As part of the submission for Deadline 4, an updated Environmental Statement Addendum: Southern Access Works for Change Request was submitted. This covers assessment of ecology and geomorphology impacts as a result of the proposed changes to the Scheme. A full hydraulic model is being developed and will be submitted at Deadline 8 in discussion with the Environment that may Agency . If required the FRA will be updated to reflect any changes that require reporting.</p> <p>The Applicant has submitted an addendum to the WFD at Deadline 4. The addendum sets out an assessment of the potential impacts associated with the proposed changes to the Scheme.</p> <p>As part of these updates further information has been provided around the scour protection requirements. In line with Design Manual for Roads and Bridges (DMRB) guidance (DMRB CD356 'Design of Highways Structures for Hydraulic Action') the Applicant is required to determine the need for a scour protection system for the south bank pier This is demonstrated through the provision of scour assessments.</p> <p>Following results of preliminary scour assessments, it has been determined that there is a requirement to protect the southern pier from hydraulic action. The additional permanent scour protection takes into account the presence of scour protection for the existing pier and other local factors.</p> <p>The preliminary scour assessment is presented in Appendix E: Preliminary Scour Assessment of Environmental Statement Addendum: Southern Access Works for Change Request and this sets out why scour protection is required.</p>

Ref. No.	Response:	Applicant's Response:
	Proposed change 5: Larger area for construction required on the north bank, increasing pollution risk to River Coquet	
9	A larger area of exposed soils on the northern bank will result in a greater risk of the creation and accumulation of site water with a high sediment load. Due to the nature of the works, there will be limited area to treat the water through standard methods such as settlement lagoons. A bespoke plan for treating the anticipated volumes and chemistry of the water should be developed, this must take into account any permits that may be required taking into account the designated receiving waters if using chemical dosing.	<p>The mitigation measures covering the management and prevention of sediment delivery to watercourses presented in the DCO Application are applicable to the works associated with proposed changes to the Scheme.</p> <p>As part of the submission for Deadline 4 of the Examination, an updated Environmental Statement Addendum: Stabilisation Works for Change Request was submitted. In addition to referencing the previous mitigation measures a number of specific mitigation details are provided, including the need to develop a site-specific drainage management plan.</p> <p>These mitigations are outlined in Appendix E: Register of Environmental Actions and Commitments of Environmental Statement Addendum: Stabilisation Works for Change Request submitted at Deadline 4 of the Examination.</p>
	Proposed change 6: installation of two rows of spaced piles to the north side of the proposed pier location and a third row to the south side	
10	This could potentially create or a break groundwater pathways along the River Coquet. Therefore, the risk of the groundwater will need to be reassessed as part of the DCO and mitigation may need to be provided.	<p>As part of the submission for Deadline 4 of the Examination, an updated Environmental Statement Addendum: Stabilisation Works for Change Request was submitted. The potential impact to groundwater flooding was identified as a result of changes to the proposed Scheme. As such, mitigation was prescribed to minimise any potential effect. The design of any drainage requirements to prevent the build-up of groundwater behind the installed piles will be incorporated as the detailed design process evolves. During the construction phase consideration shall also be given to any drainage arrangements required to collect, attenuate, treat and discharge any groundwater seepage that may occur due to cuts into the slope.</p> <p>These mitigations are outlined in Appendix E: Register of Environmental Actions and Commitments of Environmental Statement Addendum: Stabilisation Works for Change Request submitted at Deadline 4 of the Examination.</p>
	Deadlines 1, 2 and 3	
11	The Environment Agency would support amendments to the timescales for deadlines 1 to 3, as outlined at the preliminary meeting.	No response required.

Table 2-2 Natural England

Ref. No.	Response:	Applicant's Response:
1	<p>Our main concerns relate to the proposed changes relating to the in the bridge design set out in Highways England's document titled A1 in Northumberland: Morpeth to Ellingham, Scheme No. TR010059 – Summary of Proposed Changes to Application. Natural England's main concerns relate to the following design changes:</p> <ol style="list-style-type: none"> 1. Alteration of the location of the southern pier of the bridge potentially move it 2m closer to the river's edge which will increase the structures impact on flow dynamics during high flow events. 	<p>The Applicant's responses are as follows:</p> <ol style="list-style-type: none"> 1. This response relates to Parameter 10 of the Environmental Statement (ES) as detailed in Chapter 2: The Scheme of the ES [APP-037]. It does not relate to the Change Request. Additional geomorphological assessment has been undertaken to assess potential impacts of the southern pier moving 2m closer to the river's edge. The results are presented within the document Environmental Impact Assessment - River Coquet Geomorphology Modelling Assessment [REP3-009]. The results conclude that there is no significant change in fluvial processes of velocity, stream power, shear stress or Froude between baseline and proposed for a wide range of flood return periods including an extreme event of a 100 year plus 50% climate change scenario.
	<ol style="list-style-type: none"> 2. The addition of a considerable length of bank protection (possibly rock armour although other solutions will be looked at) on the north bank of the river to address the risk of fluvial erosion and instability of the sloping land north of the riverbank. 	<ol style="list-style-type: none"> 2. The stabilisation of the north valley side is required to avoid potential excessive loading of the proposed northern pier foundation together with the loss of down slope support and lateral restraint to the foundation. To prevent failure of the valley side and to provide support to the north bridge pier, it is proposed to install a line of semi- continuous non-interlocking bored concrete piles (contiguous bored pile wall) close to the river bank. On the river side of these piles it is proposed to install a rock revetment system, to support and offer protection to the piles and prevent the loss of material from between individual piles. This rock revetment system would form the north river bank at this location. <p>The Applicant has undertaken a preliminary scour assessment as detailed in Appendix F: Preliminary Scour Assessment of Environmental Statement: Stabilisation Works for Change Request. The results of the preliminary scour assessment indicated that the preferred scour protection solution is a rock armour revetment which maintains the existing channel cross section profile and grey-green bank protection at the downstream end. The rock armour protects the stability piles and the bridge foundation and also prevents scour from outflanking the solution through erosion of the banks in the downstream reach. The green-grey solution protects the re-instated banks until they have re-colonised with vegetation. The Applicant is committed to undertaking additional work and analysis during the course of the examination to further assess the full extent of any bank protection required. This would be informed by conducting site visits, a geomorphological dynamics analysis and detailed hydraulic modelling. The conducting of these works in conjunction with the development of the detailed design would seek to reduce the extents of any bank protection required as much as reasonably practicable.</p>

	<p>3. The addition of rock armour on the southern bank of the river for erosion control purposes where it is not clear where any significant erosion exists.</p>	<p>3. The Applicant has determined the need for additional permanent scour protection on the southern bank in light of the latest ground investigation information and taking into account the presence of scour protection and river training works for the existing pier. The preliminary scour assessment is detailed in Appendix E: Preliminary Scour Assessment of Environmental Statement: Southern Access Works for Change Request and details the scour risk for the bridge pier. DMRB guidance (CD356 'Design of Highways Structures for Hydraulic Action') directs the designer to undertake scour assessments to inform the design of erosion protection systems for bridges and 'in-channel' structures. It should be noted that an element of erosion protection is already provided for in the DCO Application, relating to scour protection of the southern pier and southern bank. This is described in paragraph 2.8.125 of Chapter 2 of the ES [APP-037].</p>
	<p>4. Use of river training and a temporary bridge from the north to the south side of the river for approximately 15 months.</p>	<p>4. The scour protection along the banks of the river would require the installation of river training measures to create a dry working area. Mitigation for the installation of the river training measures includes restricting the timing of the works outside the 'in river works' period, restriction of works to daylight hours and implementation of a fish rescue plan during dewatering activities (as detailed in A-B29 of the Outline Construction Environmental Management Plan (CEMP) [REP3-013 and 014] (and as updated at Deadline 4)). Supervision would be provided by an Ecological Clerk of Works (ECoW) or fish biologist with sufficient experience of fish rescue plans (as detailed in paragraph 8.9.5, Environmental Statement Addendum: Stabilisation Works for Change Request issued at Deadline 4). The river training measures may be in situ for approximately 16 months. During in-channel works and whilst river training measures are in place, the works would incur a temporary obstruction to an area along the banks of the river that may be used by fish. However, works would not result in an obstruction to migration as river training measures would be located close to the riverbank (as shown on Figure 2 of the Environmental Statement Addendum: Southern Access Works for Change Request).</p>

2	<p>Natural England's main concerns relate to both the permanent loss of riverbank associated with the proposed areas of rock armouring and the impacts that this may have on the fluvial geomorphology of this relatively unmodified section of the river. All of the proposed works fall within the River Coquet and Coquet Valley Woodlands SSSI which is notified for both woodland and river interest features, the latter of which cover both the form and function of the bed and banks of the river. As the proposed permanent use of bank protection on this reach would destroy/severely damage the bank habitat and geomorphological process, the loss of these elements of the sites interest features would require suitable compensation elsewhere on the river system.</p>	<p>The baseline description for the River Coquet and Coquet Valley Woodlands SSSI is contained within the text of Section 9.7, Chapter 9: Biodiversity Part A of the ES [APP-048]. This description acknowledges that the SSSI is designated for its form and function as well as the species it supports; "<i>River Coquet is an unmodified, fast-flowing upland river of importance to migratory and spawning salmon.</i>"</p> <p>The Applicant acknowledges that the proposed changes to the Scheme would involve the permanent loss of 62m of bankside habitat on the north bank and 28m of bankside habitat from the south bank from within the SSSI as a result of permanent rock armour scour protection (as detailed in Chapter 2 of the Environmental Statement Addendum: Stabilisation Works for Change Request and Chapter 2 of the Environmental Statement Addendum: Southern Access Works for Change Request). The operational geomorphology assessment presented within Chapter 9: Road Drainage and the Water Environment of the Environmental Statement Addendum: Stabilisation Works for Change Request and Chapter 8: Road Drainage and the Water Environment of the Environmental Statement Addendum: Southern Access Works for Change Request has been updated. In summary, the geomorphology assessments conclude that whilst there may be local effects on the dynamics of water flow, water velocity, sediment regime and natural fluvial processes as a result of the proposed scour protection, impacts are predicted to be minor adverse or negligible. As such, the Applicant concludes that the geomorphological processes would not be destroyed/severely damaged. The Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.</p>
3	<p>While the use of the temporary bridge (last bullet points above) will negatively impact on the SSSI, Natural England accepts that the impacts of this will largely be temporary in nature and we acknowledge that it's use would potentially reduce the need for a larger permanent foot print on the south bank of the river. Overall, we concur this would result in a reduction of works required within the ancient and semi-natural woodland interest feature of the SSSI on the south side of the river.</p>	<p>As noted in Chapter 7 Biodiversity of the Environmental Statement Addendum: Southern Access Works for Change Request, the installation of the temporary bridge would have a number of temporary adverse impacts on the SSSI. However, the use of the temporary bridge would reduce the impact on the ancient woodland of the southern bank of the River Coquet and Coquet Valley Woodland SSSI by removing the need for vehicular access from the south (although a pedestrian access may still be required).</p>

4	<p>In conclusion, Natural England are of the opinion that these changes to the crossing over the river constitute significant changes to the scheme which have the potential to have significant impacts on the designated sites at the River Coquet.</p>	<p>The Applicant acknowledges that the proposed changes to the Scheme have the potential to result in significant adverse effects on the designated sites at the River Coquet. An assessment is presented within Environmental Statement Addendum: Stabilisation Works for Change Request and Environmental Statement Addendum: Southern Access Works for Change Request issued at Deadline 4.</p> <p>The proposed changes to the Scheme would involve the permanent loss of bankside habitat from within the SSSI and woodland habitat of the Coquet River Felton Part LWS, both of which have been identified as a significant impact during construction (Moderate adverse). This does not change the significance of effects presented in Section 9.10, Chapter 9: Biodiversity Pat A of the ES [APP-048]. The Applicant has secured compensatory woodland planting. However, the Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.</p> <p>Mitigation has been developed to reduce the effects to other ecological receptors (protected and notable species) to either Neutral or Slight adverse (not significant) (as detailed in Section 8.9, Environmental Statement Addendum: Stabilisation Works for Change Request and Section 7.9, Environmental Statement Addendum: Southern Access Works for Change Request). Mitigation includes, as examples, assessment and monitoring of water quality, the design of river training measures and permanent scour protection using suitable materials and to provide shelter for aquatic invertebrates and juvenile fish, a site-specific drainage management plan, appropriate timing of works (with regards to nesting birds and migratory fish), implementation of fish rescue and a management and monitoring strategy post-construction. As a result, effects during construction remain unchanged from that presented within Section 9.10, Chapter 9: Biodiversity Pat A of the ES [APP-048].</p> <p>The permanent changes in morphology of the river would result in Slight Adverse (not significant) effects to biodiversity during operation (namely River Coquet watercourse (HPI), River Coquet and Coquet Valley Woodlands SSSI, fish and aquatic invertebrates). Whilst the significance of effects has increased from that reported in Section 9.10, Chapter 9: Biodiversity Part A of the ES [APP-048], the effects remain not significant.</p>
---	---	---

Appendix E

FORMAL CONSULTATION TABLE 3-2 ENVIRONMENT AGENCY AND NATURAL ENGLAND

Table 3-2 Environment Agency

Ref. No.	Question	Applicant's Response
	Flood Risk	
1	The Flood Risk Assessment would need to be updated to reflect the proposed amendments, and how flood risk can be satisfactorily addressed to ensure there are no adverse impacts on flood risk.	<p>There would be no impact on flood risk to 3rd parties associated with the proposed changes, either temporary or permanent. The nearest receptors are at such a distance from the area of change and at sufficiently high elevations that the gorge would have attenuated any localised effects (i.e. increases in flood level) before reaching them.</p> <p>With regards to the risk of flooding to the works themselves (i.e. during construction) then the change in construction method would change the risk. However, not substantially from what was proposed previously.</p> <p>The mitigation measures (as presented in the Flood Risk Assessment Part A [APP-254] and Outline Construction environmental Management Plan [REP3-013 and 014]) for the proposed changes will remain unchanged. The content of the monitoring plan would be developed post planning as the design and understanding of the construction methods are refined.</p> <p>Notwithstanding the above, a programme of hydraulic modelling is proposed to quantify the impact of the temporary and permanent works on flood risk and flow dynamics for a range of flow conditions on the River Coquet. The hydraulic modelling and evidence of flood risk implications will be made available in the Examination at Deadline 8.</p>
2	The proposed amendments to the scheme raises some flood risk concerns. The introduction of a temporary bridge raises the most concern with the potential for the bridge to exacerbate flood risk in certain scenarios, such as blockage during a high flow event.	The deck level of the temporary bridge is 38mAOD, with the soffit being some 200-300mm below this. The 1% AEP (100-year) flood level with the temporary crossing in place is 35.48mAOD, giving more than two metres freeboard to the bridge.
3	We appreciate that the flood risk implications are limited in this location. However, we would expect to see the Flood Risk Assessment updated to reflect these changes. The evidence base to support the Flood Risk Assessment should also be updated and hydraulic Modelling should be provided.	Noted. See response 1.
4	It should be noted that any works on the main river or within 8m of a main river will may require a Flood Risk Activity Permit from the Environment Agency. Once detailed designs and, more importantly, the method of works are known contact should be made with the Environment Agency's flood risk permitting team and an application made.	<p>Noted. Requirement to consult with the Flood Risk Permitting team once detailed designs are available is acknowledged.</p> <p>As detailed in Reference A-W15 of the Outline Construction Environmental Management Plan [REP3-013 and 014] (submitted at Deadline 4), a Flood Risk Activities Permit would be required prior to the start of construction works at the River Coquet.</p>
	Water Framework Directive (WFD)	
5	The WFD assessment must be updated to reflect the proposed amendments, specifically for the Coquet from Forest Burn to Tidal Limit. The WFD assessment must demonstrate the proposed scheme will not result in a WFD deterioration at waterbody scale.	Noted. An addendum to the WFD Assessment has been provided as part of the submission at Deadline 4.

Ref. No.	Question	Applicant's Response
6	The Coquet from Forest Burn to Tidal Limit waterbody is classified as NOT Heavily Modified under WFD. Therefore, consideration will need to be given as to whether the proposed changes to the scheme pose a risk to the waterbody's current NON Heavily Modified status.	Noted. An addendum to the WFD Assessment has been provided as part of the submission at Deadline 4. The addendum sets out an assessment of the potential impacts associated with the proposed changes to the Scheme on both the surface and groundwater bodies within the site. For a waterbody status to change owing to significant physical alterations, it has to be demonstrated that changes in hydromorphology are long-term and alter the morphological and hydrological characteristics in order to represent a significant change in character. The addendum to the WFD Assessment, concludes that on the basis of the proposed works, and the results of the impact assessment, it is argued that the Scheme would not have an effect on the non-heavily modified status of the waterbody.
7	Overarching objective 1 of the WFD is to prevent deterioration in the ecological status of the waterbody. Highway England need to show that the proposed changes will not cause or pose a deterioration risk to the waterbody in the future.	Noted. The addendum to the WFD assessment (submitted at Deadline 4) shows the proposed changes would not cause or pose a deterioration risk to the waterbody in the future.
8	Previous comments from the Environment Agency in relation to WFD have highlighted our concerns that Highway England have not provided sufficient mitigation and compensation for the localised impacts this scheme will have on the water environment. This should be considered when updating the WFD Assessment. We would be happy to discuss mitigation and compensation options with Highway England.	<p>Noted. The Applicant acknowledges that the proposed changes to the Scheme would involve the loss of bankside habitat from within the SSSI.</p> <p>There is no requirement for compensation to be provided under WFD. In relation to the loss of bankside habitat from within the SSSI, the Applicant has not concluded that compensatory provision for the loss of riverbank is necessary</p>
	Biodiversity	
9	With respect to the hard engineering to the banks, we are dissatisfied with the level of assessment and compensation for the hard engineering rock amour proposed on the northern bank.	<p>The Environmental Statement Addendum: Stabilisation Works for Change Request and Environmental Statement Addendum: Southern Access Works for Change Request which were submitted for consultation and the analysis changes to flow and sediment dynamics were based solely as a desk-based qualitative assessment. At the time of consultation, no hydraulic analysis or site visits had been conducted in support of the proposed changes. The case presented currently represents a worst-case scenario in terms of extents of bank protection required.</p> <p>As part of the submission provided at Deadline 4, updated Environmental Statement Addendum: Stabilisation Works for Change Request and Environmental Statement Addendum: Southern Access Works for Change Request have been submitted. The geomorphological assessment has been undertaken taking account of site visits and hydraulic calculations. During the site visits (26 January and 26 February 2021), channel form, features, processes and flow types were mapped. Furthermore, the presence and extent of any existing modifications with the reach were mapped. Hydraulic calculations of water level, velocity, stream power and shear stress were carried out to assess potential changes in sediment transport, erosion and deposition. This has allowed a refinement in the quantification of the bank protection extents.</p> <p>Further detailed hydraulic modelling is anticipated as part of submissions for the Examination. This will allow investigation of the spatial extents (upstream and downstream) of any changes in water levels, velocities, stream power and shear stress.</p>

Ref. No.	Question	Applicant's Response
		<p>Investigation is also ongoing with regards to the proposals for any hard-engineered bank protection solutions, including the reduction in length of any extents. These additional works in conjunction with refinements to the proposals will seek to reduce the extents of any bank protection required as well as the type of protection to be used.</p> <p>The Applicant acknowledges that the proposed changes to the Scheme would involve the permanent loss of bankside habitat located within a SSSI. The Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.</p>
10	<p>The banks of the Coquet and the riparian habitat present are largely unmodified and therefore are a high value habitat that would likely class the Coquet as priority river habitat and be an important ecological corridor. The structure of the riparian zone is also a consideration within the WFD under the morphology assessments.</p>	<p>Site information collated by the Applicant would argue that the reach is more modified than is suggested. The north bank within the reach of the proposed works exhibits evidence of previous modification. This includes modifications associated with the construction of the existing crossing, including means for access, and a highway related drainage outfall (with associated rock armour protection). The south bank also exhibits modification with encroachment into the channel from river training works associated with the existing southern bridge pier. A total length of 35m, including the pier and the river training works upstream and downstream of the pier. Approximately 640m downstream of the proposed works, a river-wide weir impounds the river creating a backwater effect which extends approximately 300-350m upstream (to within 300-350m of the proposed works).</p> <p>The Applicant acknowledges that the banks of the Coquet riparian habitat are of high value and are classified as priority river habitat. The proposed changes to the Scheme would involve the permanent loss of an additional area of woodland on the north bank, within the Coquet River Felton Park LWS. Whilst efforts have been taken to reduce the area of impact and constrain construction activities, the proposed changes would result in the loss of 0.28ha of woodland of the LWS (in addition to the 0.41ha impacted by the Scheme). The loss of this habitat has been captured within an updated Ancient Woodland Strategy (issued at Deadline 4), which includes compensation at a ratio of 1:12 (loss:creation). In relation to the loss of bankside habitat from within the SSSI, the Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.</p>
11	<p>We are concerned that the inclusion of rock armour will result in the loss of natural vegetation interaction with the channel, impacting morphology. In our consultation letter reference NA/2020/115279/01-L01 dated 22 December 2020, we stated: "Rock armour is not favourable due to its visual and geomorphological impact and the limitations it can pose on ecology. Furthermore it is also unlikely to have a lifespan to match that of the bridge. The River Coquet is largely unmodified and any increase in the heavy modification (as classed under WFD) will need to be compensated for, e.g. the removal of rock armour and renaturalisation in other areas". However, the assessment presented within Environmental Statement Addendum – Stabilisation Works, section 6.26, and paragraph 1.10.6. states that 'If a hard-engineered structure is required, the permanent scour protection would be designed to be in keeping with existing natural rocky areas of the River Coquet (see Image 1 below as an example). Whilst the scour protection would result in the permanent loss of natural riverbank habitat, the design of the scour protection would provide suitable sheltering habitat for aquatic invertebrates and juvenile fish and would naturally become vegetated over time.'</p>	<p>The Applicant acknowledges the loss of bankside habitat as a result of the proposed changes to the Scheme. As part of the submission for Deadline 4, updated Environmental Statement Addendum: Stabilisation Works for Change Request and Environmental Statement Addendum: Southern Access Works for Change Request have been submitted. This includes updated design information regarding scour protection measures. The Applicant has considered softer, more natural alternatives to rock armour as part of preliminary scour assessments. These preliminary results indicate that the best scour protection solution in light of the bank velocities likely to be experienced is a rock armour revetment which maintains the existing cross-section profile and a green-grey bank protection solution at the downstream end. The preliminary scour assessment is presented in Appendix F: Preliminary Scour Assessment of Environmental Statement Addendum: Stabilisation Works for Change Request and Appendix E:</p>

Ref. No.	Question	Applicant's Response
		<p>Preliminary Scour Assessment of Environmental Statement Addendum: Southern Access Works for Change Request.</p> <p>Further detailed hydraulic modelling is anticipated as part of submissions for Deadline 8 of the Examination. This will allow investigation of the spatial extents (upstream and downstream) of any changes in water levels, velocities, stream power and shear stress, as well as better inform the design of any scour protection solutions.</p> <p>An addendum to the WFD Assessment has been provided as part of the submissions at Deadline 4. The addendum sets out an assessment of the potential impacts associated with the proposed changes to the Scheme on both the surface and groundwater bodies within the site. For a waterbody status to change owing to significant physical alterations, it has to be demonstrated that changes in hydromorphology are long-term and alter the morphological and hydrological characteristics in order to represent a significant change in character. The addendum to the WFD Assessment, concludes that on the basis of the proposed works, and the results of the impact assessment, it is argued that the Scheme would not have an effect on the non-heavily modified status of the waterbody.</p> <p>Finally, with respect to the comments raised about compensation, the Applicant responds by stating that compensation is not a vehicle for recompensing for damage under WFD. WFD impacts are ameliorated through mitigation. In relation to the loss of bankside habitat from within the SSSI, the Applicant has not concluded that compensatory provision for the loss of riverbank is necessary</p>
12	<p>Image 1 shows the existing rocky banks of the southern bank and does not demonstrate the existing habitat and geomorphology of the northern bank in question which is known to be different. As there is no specific mitigation proposed it can only be assumed that the mitigation for works to banks are being counted within the woodland replacement scheme.</p>	<p>The Applicant has provided photographs from site surveys showing the situation on the north bank in Environmental Statement Addendum: Stabilisation Works for Change Request (submitted at Deadline 4).</p> <p>The existing undisturbed natural bank on the north bank comprises of woodland, and also includes the presence of boulder sized material derived from rockfall.</p> <p>In relation to the loss of bankside habitat from within the SSSI, the Applicant has not concluded that compensatory provision for the loss of riverbank is necessary</p>
13	<p>The current mitigation only reflects the loss of broadleaved woodland, and does not acknowledge the riparian zone which is being lost and is classed as a different habitat type with different functions and value that is likely found on the banks and around the wetted channel. This is a quality element and therefore key consideration under the WFD. The provision of broadleaved woodland should not be compensation for riparian habitat, as it has a different function and riparian habitats play a vital role in the value of watercourses.</p>	<p>An addendum to the WFD Assessment has been provided at Deadline 4. The WFD assessment outlines impacts to the water body and notes the requirement for mitigation. A site-specific assessment of the Scheme against quality elements for biology, physico-chemical and hydromorphological elements has been undertaken against the waterbody affected by the Scheme. The findings of the assessment conclude that the proposed changes would not cause or pose a deterioration risk to the waterbody in the future.</p> <p>With respect to the comments raised about compensation, the Applicant responds by stating that compensation is not a vehicle for recompensing for damage under WFD. SSSI designations are irrelevant to WFD. WFD impacts are ameliorated through mitigation. In relation to the loss of bankside habitat from within the SSSI, the Applicant has not concluded that compensatory provision for the loss of riverbank is necessary</p>

Ref. No.	Question	Applicant's Response
14	The Environmental Statement Addendum: Stabilisation Works, section 6.26 appears to state that the rock armour will have the same ecological potential as a near natural northern river bank and therefore do not appear to have included any compensation for this limiting factor.	The reference to section 6.26 appears to be an error. The Applicant can confirm that rock armour will not have the same ecological potential as a near natural riverbank. It is assumed that this comment relates to paragraph 7.10.3 that design of the scour protection would aim to provide sheltering habitat for wildlife (including aquatic invertebrates and fish) and shall become naturally vegetated over time. In relation to the loss of bankside habitat from within the SSSI, the Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.
15	Furthermore, a second large structure above the banks will likely drastically reduce the direct light available to the vegetation that is currently present or will potentially establish post construction. This reduction in direct light has the potential to change the habitat suitability for large trees and may also limit the possibility for other dominant native species to develop. In turn, this may leave opportunities for undesirable species such as invasive non-native species to colonise the area, potentially reducing the biodiversity.	It is assumed that the reference to "a second large structure" relates to then new bridge over the River Coquet. Significant effects via increased shading have been considered within the assessment of Chapter 9: Biodiversity Part A of the ES [APP-048]. The proposed changes reported upon in Environmental Statement Addendum: Stabilisation Works for Change Request and Environmental Statement Addendum: Southern Access Works for Change Request would not alter this assessment.
16	The assessment claims that the rock armour will revegetate. However this does not appear to be justified or evidenced. On a modified bank where a large proportion of banks will be replaced with a hard surface, where silt and other potential substrates are deposited around the rock armour to act as a growing medium, it is possible that it will equally replace the existing natural substrate that support the plant communities present. It's likely that the rock armour will support a different vegetation community, likely taller ruderals that would be able to establish lower down and within the crevices and grow up taller through the gaps. This needs to be acknowledged, assessed and suitable mitigation or compensation provided.	The assessment does not assume that the rock armour will support the same vegetation community, although the rock armour would be designed to allow natural revegetation. Subsequent design development is exploring alternative options to rock armour but the proposal has required to be assessed on a reasonable worst case environmental scenario. The Applicant acknowledges that the proposed rock armour will result in the permanent loss of bankside habitat. In relation to the loss of bankside habitat from within the SSSI, the Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.
17	We would like clarity to whether the presence of trees near the rock armour would be acceptable from an engineering perspective due to the impacts roots may have to the stability, and if not, have this factored into the assessment.	<p>The rock armour required is large and has been sized at 0.8m -1m (dn50) to resist scour and weigh in excess of 2000kg. Trees close to the rock armour and associated roots would be acceptable and would not lead to instability in the protection system.</p> <p>As part of the submission for Deadline 4, updated Environmental Statement Addendum: Stabilisation Works for Change Request and Environmental Statement Addendum: Southern Access Works for Change Request have been prepared. This includes updated design information regarding scour protection measures. The Applicant is considering softer, more natural alternatives to rock armour as part of the scour design process and structural design of the bridge foundations.</p> <p>The preliminary scour assessment is presented in Appendix F: Preliminary Scour Assessment of Environmental Statement Addendum: Stabilisation Works for Change Request and Appendix E: Preliminary Scour Assessment of Environmental Statement Addendum: Southern Access Works for Change Request.</p>
18	We request that WFD is fully considered and that the biodiversity value of the riparian habitat is assessed independently of the broadleaved woodland in the wider valley, and an	An addendum to the WFD assessment has been undertaken and submitted at Deadline 4. Riparian habitat is a component of WFD that is assessed in terms of

Ref. No.	Question	Applicant's Response
	appropriate mitigation or compensation scheme be developed to reflect the change from natural banks to those with hard engineering rock armour.	<p>change to quality elements. Biodiversity value per se is not a WFD requirement but is acknowledged (although not specifically) as part of assessment to ecological (hydromorphological) elements.</p> <p>With respect to the comments raised about compensation, the Applicant responds by stating that compensation is not a vehicle for recompensing for damage under WFD. SSSI designations are irrelevant to WFD unless a GWTDE. WFD impacts are ameliorated through mitigation. In relation to the loss of bankside habitat from within the SSSI, the Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.</p>
	Otters	
19	It is stated in paragraph 1.10.13, "Following the successful implementation of mitigation to reduce disturbance impacts detailed within Section 9.9, Chapter 9: Biodiversity Part A of the ES [APP-048], the Stabilisation Works would not alter the assessment of significant effects detailed within Chapter 9: Biodiversity Part A of the ES [APP-048]. As such, it is considered Part A would result in a Neutral (not significant) effect to otter during construction.' Given works adjacent to, over and within the Coquet have increased significantly due to the amended design, we do not feel the potential impact to otters has been acknowledged sufficiently. The habitat adjacent to the works is highly valuable for otter, and therefore an addition of large structures over the river and increased activity near to the river may contribute to increased disturbance and therefore should be acknowledged and reassessed.	The Environmental Statement Addendum: Stabilisation Works for Change Request and Environmental Statement Addendum: Southern Access Works for Change Request acknowledge that the proposed changes have the potential to impact upon otter and an impact assessment has been completed. However, given the scale of the proposed changes and the mitigation measures already incorporated within the text of, Chapter 9: Biodiversity Part A of the ES [APP-048] it is not anticipated any additional likely significant effects on otter would be realised as a result of the proposed changes. With the exception of temporary preparatory works, construction would be undertaken during daylight hours, reducing the likelihood of disturbance to otter. The works would incur a partial obstruction to otter passage up and down the river, although would not result in a complete obstruction. Whilst otter are present along the Coquet, there are no known holts or resting places within a zone of influence of the works. Mitigation measures include a pre-commencement walkover survey for otter to confirm baseline conditions remain accurate, best practice for trench/void excavation to prevent entrapment of wildlife and measures to prevent deterioration in water quality (which may adversely affect the foraging success of otter).
	Geomorphology	
20	The proposals for slope stabilisation works and the southern access works represent a significant alteration to the plans originally proposed. Temporary works, including hard engineering, will encroach into the channel damaging and destroying riparian habitat. These works will alter the channel cross section and channel dynamics during high and low flows. This could result in changes to fluvial process and the distribution of erosional and depositional features. It needs to be acknowledged within the Development Consent Order (DCO) documents that these changes to flow or sediment dynamics could result in changes that are unlikely to be reversible. For example the long term stable bed deposits. Oncelost, they are unlikely to reform in the short to medium term.	<p>The Applicant acknowledges such potential impacts and that some of the effects may be unlikely to be reversed. As outlined above, further assessment work is ongoing to understand changes from the baseline conditions with respect to sediment transport, erosion and deposition.</p> <p>As part of the submissions provided at Deadline 4, updated Environmental Statement Addendum: Stabilisation Works for Change Request and Environmental Statement Addendum: Southern Access Works for Change Request have been submitted. These addenda (supported by site visits, a geomorphological assessment and hydraulic calculations) assess changes in sediment transport, erosion and deposition characteristics as a result of the proposed changes to the Scheme. The impact assessment looks at potential impacts to sediment regime, channel morphology and natural fluvial processes during both construction and operation phases. Where impacts have been identified, mitigations have been outlined to reduce any significant effects. It is concluded that during construction there may be minor adverse impacts on the channel morphology as a result of bedrock loss in the channel and during</p>

Ref. No.	Question	Applicant's Response
		<p>operation there may be minor adverse impacts on channel morphology as a result of the permanent loss of bank features. The extent of these impacts would be very localised to works themselves.</p>
21	<p>The temporary river training works will be replaced by scour protection works 3m wide, 4m high. The Environment Agency is not only concerned with the loss of riparian habitat associated with the scour protection works, but also how changes to the flow and sediment dynamics may alter in-stream habitats such as depositional features.</p>	<p>The Environmental Statement Addendum: Stabilisation Works for Change Request and Environmental Statement Addendum: Southern Access Works for Change Request which were submitted for consultation and the analysis changes to flow and sediment dynamics were based solely as a desk-based qualitative assessment. No hydraulic analysis or site visits had been conducted in support of the proposed changes. The case presented currently represents a worst-case scenario in terms of extents of bank protection required.</p> <p>As part of the submissions for Deadline 4, updated Environmental Statement Addendum: Stabilisation Works for Change Request and Environmental Statement Addendum: Southern Access Works for Change Request have been submitted. The Applicant is considering softer, more natural alternatives to rock armour as part of the scour design process and structural design of the bridge foundations. Currently, the scour protection solution is a rock armour revetment which maintains the existing cross-section profile and a green-grey bank protection solution at the downstream end. As detailed in the response above, these updates (supported by site visits, a geomorphological assessment and hydraulic calculations) assess changes in sediment transport, erosion and deposition characteristics as a result of the proposed changes to the Scheme. The impact assessment looks at potential impacts to sediment regime, channel morphology and natural fluvial processes during both construction and operation phases. Where impacts have been identified, mitigations have been outlined to reduce any significant effects.</p>
22	<p>We believe this package of works is a significant variation to the original proposals, and if implemented as outlined, will result in the loss of and/or significant damage to the riparian and in-channel habitats found within the study reach. The mitigation measures outlined in the two addendums only partially lessen the impact, and cannot be viewed as an alternative to a naturally functioning system.</p>	<p>The Applicant acknowledged the limitation in the assessment, which was presented for consultation as being only qualitative, and where presented as a worst case scenario.</p> <p>As part of the submissions for Deadline 4, updated Environmental Statement Addendum: Stabilisation Works for Change Request and Environmental Statement Addendum: Southern Access Works for Change Request have been submitted. The Applicant is considering softer, more natural alternatives to rock armour as part of the scour design process and structural design of the bridge foundations. Currently, the scour protection solution is a rock armour revetment which maintains the existing cross-section profile and a green-grey bank protection solution at the downstream end. As detailed in the response above, these updates (supported by site visits, a geomorphological assessment and hydraulic calculations) assess changes in sediment transport, erosion and deposition characteristics as a result of the proposed changes to the Scheme. The impact assessment looks at potential impacts to sediment regime, channel morphology and natural fluvial processes during both construction and operation phases. Where impacts have been identified, mitigations have been outlined to reduce any significant effects.</p> <p>Supported by observations following site visits conducted on 26 January and 26 February 2021, the Applicant would argue that the reach (as defined by the</p>

Ref. No.	Question	Applicant's Response
		<p>physiographic gorge section) is more modified than is being suggested. For example, on the north bank within the vicinity of the proposed works there is evidence of former modification. This includes modifications and made ground associated with the construction of the existing crossing, including means for access, and a highway related drainage outfall. The south bank also exhibits modification with encroachment into the channel from river training works associated with the existing southern bridge pier. A total modified bank length of approximately 35m, covering the southern pier and river training works upstream and downstream of the pier. At approximately 640m downstream of the proposed works, a river-wide weir impounds the river creating a backwater effect which extends approximately 300-350m upstream (to within 300-350m of the proposed works).</p>
23	<p>The proposals outlined in the two addendums will result in the deterioration of an unmodified, largely pristine section of river. Only a small percentage of England's rivers are still unmodified, and it is therefore unacceptable for Highway England to conclude that the proposals submitted do not require compensatory provision.</p>	<p>Site information collated by the Applicant would argue that the reach is more modified than is suggested. The north bank within the reach of the proposed works exhibits evidence of previous modification. This includes modifications associated with the construction of the existing crossing, including means for access, and a highway related drainage outfall (with associated rock armour protection). The south bank also exhibits modification with encroachment into the channel from river training works associated with the existing southern bridge pier. A total length of 35m, including the pier and the river training works upstream and downstream of the pier. Approximately 640m downstream of the proposed works, a river-wide weir impounds the river creating a backwater effect which extends approximately 300-350m upstream (to within 300-350m of the proposed works). In relation to the loss of bankside habitat from within the SSSI, the Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.</p>
24	<p>We request that the WFD is fully considered, the riparian and in-channel habitats, and the natural form and function of the river is assessed independent of the terrestrial Site of Special Scientific Interest (SSSI). A compensation scheme must be developed recognising that the proposals will lead to the deterioration of a largely unmodified priority river habitat.</p>	<p>An addendum to the WFD Assessment has been submitted as part of the submission for Deadline 4. A site-specific assessment of the Scheme against quality elements for biology, physico-chemical and hydromorphological elements has been undertaken against the waterbody affected by the Scheme. The findings of the assessment conclude that the proposed changes would not cause or pose a deterioration risk to the waterbody in the future. With respect to the comments raised about a compensation scheme, the Applicant responds by stating that compensation is not a vehicle for recompensing for damage under WFD. SSSI designations are irrelevant to WFD. WFD impacts are ameliorated through mitigation. In relation to the loss of bankside habitat from within the SSSI, the Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.</p>
25	<p>We welcome the commitment to undertake a quantitative geomorphological dynamics assessment, to assess potential changes in sediment transport, erosion and deposition, using additional topographic survey data and further hydraulic analysis. We would request that this enhance undertaking includes a fresh assessment of the mobile sediment within the study reach.</p>	<p>As part of the submissions provided at Deadline 4, updated Environmental Statement Addendum: Stabilisation Works for Change Request and Environmental Statement Addendum: Southern Access Works for Change Request have been submitted. The geomorphological assessment has been undertaken taking account of site visits and hydraulic calculations. During the site visits, channel form, features, processes and flow types were mapped. Furthermore, the presence and extent of any existing modifications within the</p>

Ref. No.	Question	Applicant's Response
		<p>reach were mapped. Hydraulic calculations of water level, velocity, stream power and shear stress were carried out to assess potential changes in sediment transport, erosion and deposition. The analysis supports the conclusions drawn in the updated assessments that there may be very localised, very minor changes in depositional features adjacent to the proposed scour protection and that there is unlikely to be a significant impact on depositional features away from the toe of the scour protection.</p> <p>Further detailed hydraulic modelling is anticipated as part of submissions for Deadline 8 of the Examination. This will allow investigation of the spatial extents (upstream and downstream) of any changes in water levels, velocities, stream power and shear stress.</p>
26	<p>We are however concerned that the final geomorphological assessment may not be completed until May 2021, and we'd like assurances from Highway England that the findings from the geomorphological study will be acted upon, where relevant.</p>	<p>Noted. All outcomes of the further assessment work will be considered and where relevant, an update to the assessment will be provided.</p>
27	<p>The greatest operational impact of the proposals centres on the scour protection. Given that the geomorphological report associated with Parameter 10 states that the channel is stable, has remained unchanged from the 1866 and that the risk of bank erosion is low to insignificant, it is unclear why there is a need for such extensive bank protection?</p>	<p>Although bank erosion is stated to be low on the north bank currently, the re-instated banks will not be consolidated in the same way as the natural banks and could potentially fail rapidly due to fluvial events. Climate change predictions also indicate significant uplifts in flow over the design life of the structure.</p> <p>Furthermore, The Applicant also needs to consider extreme situations, such as woody debris lodging in the channel and directing flows against the bank which could also promote bank failure. Toe velocities of 2.7m/s are currently predicted on the north bank based on Manning's calculations. These factors represent a significant risk to the bridge foundations irrespective of the perceived status of the banks currently.</p> <p>As part of the submission for Deadline 4, update Environmental Statement Addendum: Stabilisation Works for Change Request and Environmental Statement Addendum: Southern Access Works for Change Request have been submitted. As part of these updates further information has been provided around the scour protection requirements.</p> <p>In line with Design Manual for Roads and Bridges (DMRB) guidance (DMRB CD356 'Design of Highways Structures for Hydraulic Action') the Applicant is required to determine the need for an erosion protection system for any structures near watercourses. This is demonstrated through the undertaking of scour assessments.</p> <p>The Stabilisation Works on the slope would include scour protection along the north bank of the River Coquet to provide erosion protection to the lower stabilisation piles to avoid further maintenance works during the design life of the bridge structure (120 years).</p> <p>Following results of preliminary scour assessments, it has been determined that there is a requirement to protect the southern pier from hydraulic action. The additional permanent scour protection takes into account the presence of scour protection for the existing pier.</p> <p>The preliminary scour assessment is presented in Appendix F: Preliminary Scour Assessment of Environmental Statement Addendum: Stabilisation Works for Change Request and Appendix E: Preliminary Scour Assessment of</p>

Ref. No.	Question	Applicant's Response
		Environmental Statement Addendum: Southern Access Works for Change Request.
28	<p>The lack of detailed design drawings, hydrological data and flow mapping for the site means it is not possible at this stage to truly assess the risks and the suitability of the mitigation measures. An earlier submission indicated that the working platform for the southern pier was well inside the qmed outline, and the Southern Access Addendum suggests that the soffit level of the temporary bridge will be at or above the qmed. Given that the works will take a minimum of 16 months to complete, there is a high probability that working areas will be inundated at least once during works. Furthermore, it is not clear whether the mitigation works outlined in either of the Addendums takes this into account.</p>	<p>As part of the submission for Deadline 4, updated Environmental Statement Addendum: Stabilisation Works for Change Request and Environmental Statement Addendum: Southern Access Works for Change Request have been submitted. Further information has been provided in the form of drawings of the proposed changes related to the Scheme.</p> <p>The working level of the platforms is 38mAOD (as is the deck level of the temporary bridge is 38mAOD). For context, the 1% AEP flood level with the temporary crossing in place is 35.48mAOD, giving more than two metres freeboard to the bridge.</p> <p>As detailed in a previous response above, the risk of flooding to the works themselves (i.e. during construction) from the change in construction methods would change the risk. However, not substantially from what was proposed previously.</p> <p>The mitigation measures (as presented in the Flood Risk Assessment Part A [APP-254] and Outline Construction Environmental Management Plan [REP3-013 and 014]) for the proposed changes will remain unchanged. The content of the monitoring plan would be developed post planning as the design and understanding of the construction methods are refined.</p> <p>A programme of hydraulic modelling is proposed to quantify the impact of the temporary and permanent works on flood risk and flow dynamics for a range of flow conditions on the River Coquet. The hydraulic modelling will be made available at Deadline 8 of the Examination.</p>
29	<p><i>Environmental Statement Addendum - Southern Access Works</i> With respect to table 1-1 Summary of consultation - Biodiversity and Water Environment, this states that "The Environment Agency raised that in addition to construction impacts, operational impacts should also be considered in relation to the scour protection as there is the potential for materials to enter the river over the lifespan of the scour protection." We also stated that erosion control measures on the north and south bank may alter flow and sediment dynamics within the reach, resulting in a change or lose of in-stream habitat. This should be assessed.</p>	<p>Noted. As part of the submissions for Deadline 4, updated Environmental Statement Addendum: Stabilisation Works for Change Request and Environmental Statement Addendum: Southern Access Works for Change Request have been submitted. As detailed in the response above, these updates (supported by site visits, a geomorphological assessment and hydraulic calculations) assess changes in sediment transport, erosion and deposition characteristics as a result of the proposed changes to the Scheme. The impact assessment looks at potential impacts to sediment regime, channel morphology and natural fluvial processes during both construction and operation phases. Where impacts have been identified, mitigations have been outlined to reduce any significant effects. It is concluded that during construction there may be minor adverse impacts on the channel morphology as a result of bedrock loss in the channel and during operation there may be minor adverse impacts on channel morphology as a result of the permanent loss of bank features. The extent of these impacts would be very localised to works themselves.</p>
30	<p>This table also states that "The Applicant has not concluded that compensatory provision for the loss of riverbank is necessary". We believe the loss of riparian and in-channel habitat cannot be addressed solely through the use of softer measures. Therefore, we expect to see compensation to be provided.</p>	<p>An addendum to the WFD Assessment has been submitted as part of the submission for Deadline 4. A site-specific assessment of the Scheme against quality elements for biology, physico-chemical and hydromorphological elements has been undertaken against the waterbody affected by the Scheme. The</p>

Ref. No.	Question	Applicant's Response
		<p>findings of the assessment conclude that the proposed changes would not cause or pose a deterioration risk to the waterbody in the future.</p> <p>With respect to the comments raised about a compensation scheme, the Applicant responds by stating that compensation is not a vehicle for recompensing for damage under WFD. SSSI designations are irrelevant to WFD. WFD impacts are ameliorated through mitigation. The position remains the Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.</p>
31	<p>Paragraph 1.9.68 (Construction – River Coquet and Coquet Valley SSSI – riverine) states “d) Temporary damage of in-river habitat due to potential changes in geomorphological processes such as sediment transport, erosion and deposition”. It is considered that this sentence should read as “Temporary damage and/or loss of in-river and riparian habitat</p>	<p>Potential changes in geomorphological processes such as sediment transport, erosion and deposition as a consequence of the proposed changes to the Scheme have been examined in Chapter 8: Road Drainage and the Water Environment of the Environmental Statement Addendum: Southern Access Works for Change Request, submitted at Deadline 4 of the Examination.</p> <p>The change in morphology of the river and its impacts on biodiversity has been considered with reference to the updated geomorphology assessment. The updated biodiversity assessment presented within the Environmental Statement Addendum: Southern Access Works for Change Request issued at Deadline 4 has included appropriate cross referencing to the geomorphology assessment and the wording of this sentence has been updated as referenced by this comment.</p>
32	<p>With regards to paragraph 1.9.69 (Operation), this states “Proposals have been identified and assessed for the operational phase; adverse impacts to the River Coquet (SSSI and HPI) from materials of the scour protection entering the watercourse”. It is also likely that the scour protection will on both the north and south bank alter flow and sediment dynamics within the reach, resulting in a change or lose of in-stream habitat. This needs to be acknowledged, assessed and if necessary, mitigated or compensated for.</p>	<p>As part of the submission for Deadline 4, an updated Environmental Statement Addendum: Stabilisation Works and Environmental Statement Addendum: Southern Access Works for Change Request was been submitted.</p> <p>Any potential changes in geomorphological processes such as sediment transport, erosion and deposition as a consequence of the proposed changes to the Scheme are included in the updated assessments.</p> <p>As part of the submissions provided at Deadline 4, updated Environmental Statement Addendum: Stabilisation Works for Change Request and Environmental Statement Addendum: Southern Access Works for Change Request have been submitted. These addenda (supported by site visits, a geomorphological assessment and hydraulic calculations) assess changes in sediment transport, erosion and deposition characteristics as a result of the proposed changes to the Scheme. The impact assessment looks at potential impacts to sediment regime, channel morphology and natural fluvial processes during both construction and operation phases. Where impacts have been identified, mitigations have been outlined to reduce any significant effects. It is concluded that during construction there may be minor adverse impacts on the channel morphology as a result of bedrock loss in the channel and during operation there may be minor adverse impacts on channel morphology as a result of the permanent loss of bank features. The extent of these impacts would be very localised to works themselves.</p> <p>The updated biodiversity assessment (Chapter 7: Biodiversity) presented within the Environmental Statement Addendum: Southern Access Works for Change Request issued at Deadline 4 acknowledges the potential impacts on flow and</p>

Ref. No.	Question	Applicant's Response
		<p>sediment dynamics with appropriate cross referencing to Chapter 8: Road Drainage and Water Environment Chapter.</p> <p>In relation to the loss of bankside habitat from within the SSSI, the Applicant has not concluded that compensatory provision for the loss of riverbank is necessary</p>
33	<p>Within section 6.10, assessment of likely significant effects, paragraph 1.9.82, the Water Environment section of the addendum recognises that there will be changes to the flow and sediment regimes associated with the works, and this is likely to alter in-channel and riparian habitats. The Biodiversity section fails to acknowledge this in any detail and largely focuses on the role the bank protection may play on sediment supply.</p>	<p>The change in morphology of the river and its impacts on biodiversity has been considered with reference to the updated geomorphology assessment. In summary, the geomorphology assessment concludes that whilst there may be local effects on the dynamics of water flow, water velocity, sediment regime and natural fluvial processes as a result of the proposed scour protection, impacts are predicted to be minor adverse or negligible. It is therefore concluded that the impacts to biodiversity would also be comparable (minor adverse or negligible) in relation to geomorphology, leading to a Slight (not significant) effect. The updated biodiversity assessment (Chapter 7: Biodiversity) presented within the Environmental Statement Addendum: Southern Access Works for Change Request issued at Deadline 4 acknowledges the potential impacts on flow and sediment dynamics with appropriate cross referencing to Chapter 8: Road Drainage and Water Environment Chapter.</p>
34	<p>Within the road drainage and the water environment section, paragraph 1.9.117.d.ii this states that the "Potential for an increase in fluvial activity, such as erosion of mobile bed material and the banks downstream of the works" This statement needs to acknowledge that changes in fluvial activity will occur within the working area and not just downstream off.</p>	<p>Noted and updated within assessment in Environmental Statement Addendum: Southern Access Works for Change Request submitted as part of Deadline 4.</p>
35	<p>Table 7.2 and 7.3 and within the channel morphology or the natural fluvial processes, there needs to be recognition that changes to flow or sediment dynamics could result in changes that are unlikely to be reversible. For example the long term stable bed deposits. Once lost, they are unlikely to reform in the short to medium term.</p>	<p>Noted. As part of the submission for Deadline 4, an updated Environmental Statement Addendum: Southern Access Works for Change Request has been submitted. This point has been taken onboard and amended as suggested.</p>
36	<p>Paragraphs 1.9.143, 144 and 145 partially contradict each other. We suggest that paragraph 1.9.145 is dropped as the channel is largely stable, not mobile. Paragraph 1.9.144 suggests that in-channel depositional features may not readily reform.</p>	<p>Noted. As part of the submissions for Deadline 4, an updated Environmental Statement Addendum: Southern Access Works for Change Request has been submitted. This point has been taken onboard and amended as suggested.</p>
37	<p>Table 7.6 and 7.7, depositional features within a bedrock channel are infrequent, and locally important due to the habitat variability they provide. As mentioned in paragraph 1.9.144, they generally establish around large boulders, and once they start to breakdown, they are unlikely to reform in the short to medium term. This needs to be acknowledged with a "magnitude of impact" as moderate with a local significance of possibly major.</p>	<p>As part of the submission for Deadline 4, an updated Environmental Statement Addendum: Southern Access Works for Change Request has been submitted.</p> <p>With the mitigation proposed, the Applicant feels that the comment suggesting that a moderate magnitude of impact should be considered is not appropriate in line with the assessment criteria set out in Table 8-2 of Chapter 8: Road Drainage and the Water Environment of the Environmental Statement Addendum: Southern Access Works for Change Request. Within the updated addendum, it is stated that where in-channel depositional features may be affected by the proposed works of the Scheme mitigation has been provided to reduce any potential impact. This is a mitigation item which was not detailed in the Addendum submitted for consultation, which is stated as follows:</p> <p>"Prior to construction, any sedimentary bed features that may be disturbed would be mapped and photographed, and boulders (>0.5m) would be surveyed, numbered and marked to show orientation relative to the channel bed. At the onset of the construction phase, these sediments would be removed and stored. Following the completion of construction, the sedimentary bed features would be</p>

Ref. No.	Question	Applicant's Response
		reinstated where practicable, with boulders placed according to the surveyed data.”
38	The bedrock gorge over which the A1 crosses is an unique feature within the Coquet Catchment, and while it may account for a small percentage of the overall Site of Special Scientific Interest (SSSI), it's inaccessibility means that the channel is largely pristine in terms of anthropogenic influences. Pristine, or unaltered riverine habitat is a very rare resource in England. While the scale of these works are comparatively small, the fact that they will be degrading an unmodified reach of river is significant, and this point must be acknowledged.	Supported by observations following site visits conducted on 26 January and 26 February 2021, the Applicant would argue that the reach (as defined by the physiographic gorge section) is more modified than is being suggested. For example, on the north bank within the vicinity of the proposed works there is evidence of former modification. This includes modifications and made ground associated with the construction of the existing crossing, including means for access, and a highway related drainage outfall. The south bank also exhibits modification with encroachment into the channel from river training works associated with the existing southern bridge pier. A total modified bank length of approximately 35m, covering the southern pier and river training works upstream and downstream of the pier. At approximately 640m downstream of the proposed works, a river-wide weir impounds the river creating a backwater effect which extends approximately 300-350m upstream (to within 300-350m of the proposed works).
39	These works will lead to the loss of an unmodified, pristine reach of river. This should be viewed as a locally major adverse impact, and could be considered significant in terms of the overall SSSI.	As outlined in the response above, the Applicant would dispute the commentary regarding the pristine, unmodified reach of the river. The reach (as defined by the physiographic gorge section) is more modified than is being suggested. For example, on the north bank within the vicinity of the proposed works there is evidence of former modification. This includes modifications and made ground associated with the construction of the existing crossing, including means for access, and a highway related drainage outfall. The south bank also exhibits modification with encroachment into the channel from river training works associated with the existing southern bridge pier. A total modified bank length of approximately 35m, covering the southern pier and river training works upstream and downstream of the pier. At approximately 640m downstream of the proposed works, a river-wide weir impounds the river creating a backwater effect which extends approximately 300-350m upstream (to within 300-350m of the proposed works). In line with our assessment of the nature of the reach described above, the Applicant does not consider the magnitude of impact stated to be of merit. Rather, the assessments reported in Chapter 9: Road Drainage and the Water Environment of the Environmental Statement Addendum: Stabilisation Works for Change Request and Chapter 8: Road Drainage and the Water Environment of the Environmental Statement Addendum: Southern Access Works for Change Request describe a number of impacts with magnitudes of impact ranging from negligible to minor adverse.
40	Environmental Statement Appendix: slope stabilisation works. With respect to paragraph 1.10.4, point a) is misleading and should be removed. Failure of the slope is a natural process and should not be viewed as damaging to the SSSI.	As part of the submission for Deadline 4, an updated Environmental Statement Addendum: Stabilisation Works for Change Request has been submitted. This point has been taken onboard and deleted as suggested.
41	With respect to paragraphs 1.10.5 & 6, we would welcome the inclusion of evidence to justify the need for scour protection and riverbank protection. The Geomorphology Assessment – River Coquet Parameter 10 states that the planform of the River Coquet within the Study Area has remained stable since early mapping records from 1866” and there is localised evidence of bank undercutting and the development of point bar	The response provided here is a repeat of that provided in relation to a similar point above. Although bank erosion is stated to be low on the north bank currently, the re-instated banks will not be consolidated in the same way as the natural banks and

Ref. No.	Question	Applicant's Response
	<p>features where the valley is less confined. Some parallel flow erosion was observed on both banks. However, the presence of bedrock and the formation of shallow cohesive soils, due to the mudstone and siltstone underlying geology, result in banks that are resistant to erosion. Overall, bank erosion risk was assessed as low or insignificant.</p>	<p>could potentially fail rapidly due to fluvial events. Climate change predictions also indicate significant uplifts in flow over the design life of the structure.</p> <p>Furthermore, The Applicant also needs to consider extreme situations, such as woody debris lodging in the channel and directing flows against the bank which could also promote bank failure. Toe velocities of 2.7m/s are currently predicted on the north bank based on Manning's calculations. These factors represent a significant risk to the bridge foundations irrespective of the perceived status of the banks currently.</p> <p>As part of the submission for Deadline 4, Environmental Statement Addendum: Stabilisation Works for Change Request and Environmental Statement Addendum: Southern Access Works for Change Request have been submitted. As part of these addenda further information has been provided around the scour protection requirements.</p> <p>In line with Design Manual for Roads and Bridges (DMRB) guidance (DMRB CD356 'Design of Highways Structures for Hydraulic Action') the Applicant is required to determine the need for an erosion protection system for any structures near watercourses. This is demonstrated through the undertaking of scour assessments.</p> <p>The Stabilisation Works on the slope would include scour protection along the north bank of the River Coquet to provide erosion protection to the lower stabilisation piles to avoid further maintenance works during the design life of the bridge structure (120 years).</p> <p>Following results of preliminary scour assessments, it has been determined that there is a requirement to protect the southern pier from hydraulic action. The additional permanent scour protection takes into account the presence of scour protection for the existing pier.</p> <p>The preliminary scour assessment is presented in Appendix F: Preliminary Scour Assessment of Environmental Statement Addendum: Stabilisation Works for Change Request and Appendix E: Preliminary Scour Assessment of Environmental Statement Addendum: Southern Access Works for Change Request.</p>
42	<p>With regards to paragraph 1.10.2.e.ii, the sentence "Potential for an increase in fluvial activity, such as erosion of mobile bed material and the banks downstream of the works" it is considered that this statement needs to acknowledge that changes in fluvial activity will occur with the working area and not just downstream off.</p>	<p>As part of the submission for Deadline 4, an updated Environmental Statement Addendum: Stabilisation Works for Change Request has been submitted. This point has been taken onboard and amended as suggested.</p>
43	<p>With respect to Table 8.3 – Natural fluvial processes, this needs to acknowledge that the encroachment of the works into the channel would alter the channel dynamics under both low and high flow conditions. This could result in increased coarse sediment deposition upstream, bed scour and lateral erosion parallel with the works. These changes may locally change fluvial process and the distribution of erosional and depositional features. Depositional features within a bedrock channel are infrequent, and locally important due to the habitat variability they provide. They generally establish around large boulders, and once they start to breakdown, they are unlikely to reform in the short to medium term.</p>	<p>Noted. Comment has been taken onboard and consideration given to include low flow conditions. This has been captured within the updated Environmental Statement Addendum: Stabilisation Works for Change Request submitted for Deadline 4 of the Examination.</p>

Ref. No.	Question	Applicant's Response
44	Paragraphs 1.10.10, 11, 12 partially contradict each other. We suggest that paragraph 1.10.12 is removed as the channel is largely stable, not mobile, and paragraph 1.10.11 suggests that in-channel depositional features may not readily reform.	<p>Noted. Comment has been taken onboard and consideration given to include low flow conditions. This has been captured within the updated Environmental Statement Addendum: Stabilisation Works for Change Request submitted for Deadline 4 of the Examination.</p> <p>Where in-channel depositional features may be affected by the proposed works of the Scheme mitigation has been provided to reduce any potential impact. Prior to construction, any sedimentary bed features that may be disturbed would be mapped and photographed, and boulders (>0.5m) would be surveyed, numbered and marked to show orientation relative to the channel bed. At the onset of the construction phase, these sediments would be removed and stored. Following the completion of construction, the sedimentary bed features would be reinstated where practicable, with boulders placed according to the surveyed data.</p>
45	With regards to Table 8.6, lower north bank pilling - channel morphology, assuming the precautionary principle, we suggest this sentence is re-worded to "Channel bed impacts may be (rather than "likely to be") reversible following the end of construction", and that natural fluvial processes (as above change to) "Impacts may (rather than "are likely to") cease following the end of construction.	<p>Noted. As part of the submission for Deadline 4, updated Environmental Statement Addendum: Stabilisation Works for Change Request and Environmental Statement Addendum: Southern Access Works for Change Request have been submitted. This point has been taken onboard and amended as suggested.</p>
46	Table 7.6 and 7.7, depositional features within a bedrock channel are infrequent, and locally important due to the habitat variability they provide. As mentioned in paragraph 1.10.11, they generally establish around large boulders, and once they start to breakdown, they are unlikely to reform in the short to medium term. This needs to be acknowledged with a "magnitude of impact" as moderate with a local significance of possibly major .	<p>As per the response to the same point above covering the Environmental Statement Addendum: Southern Access Works as part of the submission for Deadline 4, an updated Environmental Statement Addendum: Stabilisation Works for Change Request has been submitted.</p> <p>With the mitigation proposed, the Applicant considers that the comment suggesting that a moderate magnitude of impact should be considered is not appropriate in line with the assessment criteria set out in Table 9-2 of Chapter 9: Road Drainage and the Water Environment of the Environmental Statement Addendum: Stabilisation Works for Change Request.</p> <p>Within the updated addendum, it is stated that where in-channel depositional features may be affected by the proposed works of the Scheme mitigation has been provided to reduce any potential impact. This is a mitigation item which was not detailed in the Addendum submitted for consultation, which is stated as follows:</p> <p>"Prior to construction, any sedimentary bed features that may be disturbed would be mapped and photographed, and boulders (>0.5m) would be surveyed, numbered and marked to show orientation relative to the channel bed. At the onset of the construction phase, these sediments would be removed and stored. Following the completion of construction, the sedimentary bed features would be reinstated where practicable, with boulders placed according to the surveyed data."</p> <p>Following implementation of this mitigation, the magnitude of impact is reported as minor adverse, with the resulting significance of effect being slight adverse.</p>
47	With respect to paragraphs 1.10.24-27, the bedrock gorge over which the A1 crosses is a unique feature within the Coquet Catchment, and while it may account for a small percentage of the overall SSSI, its inaccessibility means that the channel is largely	<p>In a repeat of previous responses, the Applicant would dispute the commentary regarding the pristine, unmodified reach of the river. The reach (as defined by the physiographic gorge section) is more modified than is being suggested. For</p>

Ref. No.	Question	Applicant's Response
	<p>pristine in terms of anthropogenic influences. Pristine, or unaltered riverine habitat is a very rare resource within England. While the scale of these works are comparatively small, the fact that they will be de-grading an unmodified reach of river is significant, and this point must be acknowledged. These works will lead to the loss of an unmodified, pristine reach of river. This should be viewed as a locally major adverse impact, and could be considered significant in terms of the overall SSSI.</p>	<p>example, on the north bank within the vicinity of the proposed works there is evidence of former modification. This includes modifications and made ground associated with the construction of the existing crossing, including means for access, and a highway related drainage outfall. The south bank also exhibits modification with encroachment into the channel from river training works associated with the existing southern bridge pier. A total modified bank length of approximately 35m, covering the southern pier and river training works upstream and downstream of the pier. At approximately 640m downstream of the proposed works, a river-wide weir impounds the river creating a backwater effect which extends approximately 300-350m upstream (to within 300-350m of the proposed works).</p> <p>In line with our assessment of the nature of the reach described above, the Applicant does not consider the magnitude of impact stated to be of merit. Rather, the assessments reported in Chapter 9: Road Drainage and the Water Environment of the Environmental Statement Addendum: Stabilisation Works for Change Request and Chapter 8: Road Drainage and the Water Environment of the Environmental Statement Addendum: Southern Access Works for Change Request describe a number of impacts with magnitudes of impact ranging from negligible to minor adverse.</p>
48	<p>With respect to the Assessment of Cumulative Effects, it is assumed that this section takes into account the southern access works, though it does not state this. We would welcome clarity on this matter.</p>	<p>Chapter 12: Assessment of Cumulative Effects of Environmental Assessment Addendum: Southern Access Works for Change Request considers the Southern Access Works. The assessment indicates that Southern Access Works would have a combined effect of Moderate Adverse on the Rivet Coquet.</p>
49	<p>Paragraph 1.10.79, the proposals for bank stabilisation and access to the southern bank will lead to the deterioration of an unmodified reach of the River Coquet, and while a number of mitigation measures have been proposed, these do not avoid the loss of a pristine reach of river. For this reason, it is considered that the impact should be major adverse.</p>	<p>Again, to repeat the previous responses, the Applicant would dispute the pristine, unmodified reach of the River Coquet which is being claimed. There are a number of man-made modifications within the scheme-defined reach (i.e. the physiographic gorge section). The proposed changes to the Scheme are to be located in geographic proximity and in places overlap with the pre-existing modifications present around the current A1 crossing.</p> <p>An updated Environmental Statement Addendum: Stabilisation Works for Change Request has been submitted as part of the submissions for Deadline 4 of the Examination. These updates (supported by site visits, a geomorphological assessment and hydraulic calculations) assess changes in sediment transport, erosion and deposition characteristics as a result of the proposed changes to the Scheme. The impact assessment looks at potential impacts to sediment regime, channel morphology and natural fluvial processes during both construction and operation phases. Where impacts have been identified, mitigations have been outlined to reduce any significant effects.</p> <p>In line with our assessment of the nature of the reach described above, the Applicant does not consider the magnitude of impact stated to be of merit. Rather, the assessments reported in Chapter 9: Road Drainage and the Water Environment of the Environmental Statement Addendum: Stabilisation Works for Change Request and Chapter 8: Road Drainage and the Water Environment of the Environmental Statement Addendum: Southern Access Works for Change</p>

Ref. No.	Question	Applicant's Response
		Request describe a number of impacts with magnitudes of impact ranging from negligible to minor adverse.
	Groundwater - proposed amendments to temporary and permanent works	
50	The changes in the proposed earthworks will result in substantial dewatering of groundwater. Whilst limited dewatering is exempt, the quantities that have been assessed in this case may be greater than those of the dewatering exemption, and as such may require a water resources abstraction licence from the Environment Agency.	The potential requirement for a water resources abstraction licence is captured in Appendix D: Register of Environmental Actions and Commitments of Environmental Statement Addendum: Earthworks Amendments for Change Request (submitted at Deadline 4).
51	The dewatering assessment should consider impacts to unknown licensed and private water supplies and groundwater dependent designations such as peat bogs if present. All borrow pits are below groundwater level but only inflows (for dewatering) have been calculated for 4 and 5 which range between 1835 m3/d –3670m3/d.	<p>The Applicant previously consulted with NCC (Lead Local Flood Authority) to ascertain private water supply information, and this was not available at this time. NCC would be further consulted at detailed design stage to identify any further information that could assist with the dewatering assessment.</p> <p>As detailed in Appendix 10.6: Road Drainage and the Water Environment DMRB Sensitivity Test Part A [APP-259] and Appendix 10.5: Road Drainage and the Water Environment DMRB Sensitivity Test Part B [APP-315], no impacts on groundwater dependent terrestrial ecosystems were identified due to lack of such ecosystems and lack of groundwater flow impacts.</p>
52	<p>Equally the duration of the dewatering may determine whether it is an activity exempt from water resources abstraction licensing. Note borrow pit 4 is to be retained as a detention pond. It was noted that the drainage strategy stated that all detention ponds were to be lined. Therefore, the dewatering should not be an issue long term, but the documents submitted do not make this clear. However, the lining proposals need to be provided to convert the borrow pit 4 into a detention basin or else long term dewatering will be necessary and may require licensing.</p> <p>Borrow pits 1 and 2 will be backfilled to surface with unknown methodology and it is unclear what will be done with borrow pits 3 and 5. As such further information is required.</p>	Paragraph 2.4.5 of Environmental Statement Addendum: Earthworks Amendments has been updated to include information on the restoration proposals. Borrow Pits A2E-CH590-SB-BPT-3 and A2E-CH569-NB-BPT-4 would be backfilled with suitable material and lined to form detention basins as set out in Appendix 10.5: Drainage Strategy Report Part A [APP-258] and Appendix 10.4: Drainage Strategy Report Part B [APP-314]. Borrow Pits A2E-CH586-SB-BPT-1, A2E-CH591-SB-BPT-2 and A2E-CH570-NB-BPT-5 would be backfilled with suitable materials as detailed in Appendix A: Proposed Amendment to Temporary and Permanent Earthworks Schedule of Environmental Statement Addendum: Earthworks Amendments.
53	The site investigation boreholes do not record peat. But all borrow pits have base elevations below groundwater level in the bedrock. A plan which identifies the borrow pits, which require dewatering and daily quantity and duration/ restoration proposals should be submitted as part of the DCO submission.	A plan showing the borrow pits, dewatering and daily quantity and duration / restoration proposals will be submitted at Deadline 5 of the Examination.
	Groundwater - proposed land stabilisation work to the north of the River Coquet	
54	There are no mapped superficial deposits. Therefore groundwater within the bedrock limestone unit (blue) and the stainmore formation (green) will be in hydraulic connectivity with the river and most likely providing baseflow. The groundwater is 0.6-4m below ground level in 6 piezometers where 5 are on the north bank, and only one on the south bank. Assuming that groundwater is 1m below ground and baseflow reduction to be not significant, localised alteration of flow path and or increased groundwater may still result from the development which may increase the flood risk, instability and erosion.	Noted. Within the Environmental Statement Addendum: Stabilisation Works for Change Request, this was acknowledged and presented as a potential impact to the Scheme. Mitigation in the form of a suitable design of drainage to prevent the build-up of groundwater behind the piles has been set out and outlined in Appendix E: Register of Environmental Actions and Commitments of Environmental Statement Addendum: Stabilisation Works for Change Request submitted at Deadline 4 of the Examination. With consideration of this mitigation it has been assessed that no significant effects would be expected. No further response is required.

Ref. No.	Question	Applicant's Response
55	Mitigation of a preferential drain behind the barrier/ piling (bridge footings) to redirect groundwater to a known and favourable location is accepted as a suitable and probably necessary mitigation.	<p>Noted. Within the Environmental Statement Addendum: Stabilisation Works for Change Request, this mitigation was prescribed. The design of any drainage requirements to prevent the build-up of groundwater behind the installed piles will be incorporated as the detailed design process evolves. During the construction phase consideration shall be given to any drainage arrangements required to collect, attenuate, treat and discharge any groundwater seepage that may occur due to cuts into the slope.</p> <p>These mitigations are outlined in Appendix E: Register of Environmental Actions and Commitments of Environmental Statement Addendum: Stabilisation Works for Change Request submitted at Deadline 4 of the Examination.</p>
Groundwater - temporary access to the southern bank of the River Coquet		
56	Significant change but mitigation has been identified. If the proposed amendments are to be formally submitted, further information is required in terms of groundwater flow and level. Additional mitigation should also be provided in the event that groundwater conditions are found to be different. It is noted that the only site investigation borehole is located on the south bank and an assumption has been made that conditions are same as north bank.	The limited information available on groundwater flows and levels for the south bank of the River Coquet is a function of the challenging logistics inherent in getting ground investigation plant down the southern valley slope. The assumption that groundwater level is comparable to that on the north bank it is a reasonable assertion. Due to the proximity to the River Coquet, groundwater flow would be directed towards the River Coquet and would be expected to be contributor to baseflows of the river and near the surface.
57	Any piling required should be spaced piles to mitigate impact of piling and to maintain groundwater flowpaths. Where groundwater flow is obstructed and or changed, additional drainage to divert groundwater around the pilings to its natural discharge point will be required to prevent groundwater level rising and causing flooding and or slope instability.	Noted. As responded to above for the Stabilisation Works, the provision of any additional drainage to prevent the build-up groundwater was acknowledged. The design of any drainage requirements will be considered and incorporated, where required, as the detailed design process evolves. This mitigation is outlined in Appendix E: Register of Environmental Actions and Commitments of Environmental Statement Addendum: Stabilisation Works for Change Request submitted at Deadline 4 of the Examination.
Use of waste on-site - authorisation or permit required		
58	If materials that are potentially waste are to be used on-site, the applicant will need to ensure they can comply with the exclusion from the Waste Framework Directive (WFD) (article 2(1)(c)) for the use of, 'uncontaminated soil and other naturally occurring material excavated in the course of construction activities, etc...' in order for the material not to be considered as waste. Meeting these criteria will mean waste permitting requirements do not apply. Where the applicant cannot meet the criteria, they will be required to obtain the appropriate waste permit or exemption from us.	<p>As noted in the Outline CEMP [REP3-013 and 014] (submitted at Deadline 4), Table 3-1 Register of Environmental Actions and Commitments (REAC), Action Ref S-M6 states that a CEMP, incorporating a Site Waste Management Plan (SWMP) and CL:AIRE compliant Materials Management Plan (MMP) will be implemented by the main contractor in order to identify, monitor and manage materials and arisings on site.</p> <p>As detailed in Action Ref S-M6 of Table 3-1 REAC of the Outline CEMP [REP3-013 and 014] (submitted at Deadline 4), the SWMP will set out the person(s) responsible for resource management on site and monitor:</p> <ul style="list-style-type: none"> ▪ Waste recovery and disposal facilities that will be used and their details of their permits, licences and exemptions, both on and off site. ▪ Waste recovery and disposal contractors that will be used and details of waste carriers' licence. ▪ Any waste exemptions that are in place in order to enable waste to be reused.

Ref. No.	Question	Applicant's Response
		<ul style="list-style-type: none"> Waste transfer notes (WTNs) and waste consignments notes to ensure that all waste movements are accompanied by a WTN and that all requisite information is provided. <p>Table 2-1 Responsibility Matrix of the Outline CEMP [REP3-013 and 014] (submitted at Deadline 4) sets out the main roles and responsibilities to be adhered to throughout construction of the Scheme. The Project / Contract Manager (main contractor) has overall responsibility for ensuring all elements in the DCO, CEMP and all environmental legal and other requirements are implemented on site. The Environmental Manager (main contractor) is responsible for liaising with relevant environmental bodies and other third parties as appropriate.</p> <p>Further, the Consents and Agreement Position Statement [APP-016] sets out the requirements for water and waste consents including, for example, waste exemptions and Environmental Permit.</p>
59	<p>A deposit of waste to land will either be a disposal or a recovery activity. The legal test for recovery is set out in Article 3(15) of WFD as:</p> <ul style="list-style-type: none"> a. any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy. 	<p>As noted in the Outline CEMP [REP3-013 and 014] (submitted at Deadline 4), Table 3-1 REAC, Action Ref S-M6 states that an MMP will be used to monitor the maximum reuse of both natural soils and made ground (contaminated or otherwise). The MMP forms part of the CL:AIRE code of practice to determine that the materials will not harm human health or pollute the environment and are no longer considered a waste.</p>
60	<p>We have produced guidance on the recovery test which can be viewed at https://www.gov.uk/guidance/waste-recovery-plans-and-permits#waste-recovery-activities.</p> <p>You can find more information on the Waste Framework Directive here: https://www.gov.uk/government/publications/environmental-permitting-guidance-the-waste-framework-directive</p> <p>More information on the definition of waste can be found here: https://www.gov.uk/government/publications/legal-definition-of-waste-guidance</p> <p>More information on the use of waste in exempt activities can be found here: https://www.gov.uk/government/collections/waste-exemptions-using-waste</p> <p>Non-waste activities are not regulated by us (i.e. activities carried out under the CL:ARE Code of Practice), however you will need to decide if materials meet Endof Waste or By-products criteria (as defined by the Waste Framework Directive). The 'Is it waste' tool, allows you to make an assessment and can be found here: https://www.gov.uk/government/publications/isitwaste-tool-for-advice-on-the-by-products-and-end-of-waste-tests</p>	<p>As noted in the Outline CEMP [REP3-013 and 014] (submitted at Deadline 4), Table 3-1 REAC, Action Ref S-M6 states that a SWMP and CL:AIRE compliant MMP will be implemented by the main contractor in order to identify, monitor and manage materials and arisings on site. The SWMP will be deployed to reduce waste disposal to landfill, and (therein) potential harm to the environment. The SWMP will set out the person(s) responsible for resource management on site and monitor:</p> <ul style="list-style-type: none"> Types and volumes of waste reused, recycled and landfilled. Where the materials and waste have been reused, recycled and landfilled, both on and off site. Waste recovery and disposal facilities that will be used and their details of their permits, licences and exemptions, both on and off site. Waste recovery and disposal contractors that will be used and details of waste carriers' licence. Any waste exemptions that are in place in order to enable waste to be reused. Waste transfer notes (WTNs) and waste consignments notes to ensure that all waste movements are accompanied by a WTN and that all requisite information is provided. Scheme performance objectives and targets to ensure they are met. <p>Action Ref S-M8 of the Outline CEMP [REP3-013 and 014] (submitted at Deadline 4) describes that, as far as possible, material resources produced during demolition will be re-used in the construction of the new road (e.g. kerbing elements, concrete fencing, culverts and signage foundations will be crushed on</p>

Ref. No.	Question	Applicant's Response
		<p>site for re-use in hardstanding). This action will be the responsibility of the main contractor and applied through the SWMP and MMP.</p> <p>Action Ref S-M10 of the Outline CEMP [REP3-013 and 014] (submitted at Deadline 4) states that earthworks material classified as unacceptable for reuse will be treated and reused on the Scheme in order to divert these arisings from landfill. This will be the responsibility of the main contractor and applied through the MMP.</p> <p>Table 2-1 Responsibility Matrix of the Outline CEMP [REP3-013 and 014] (submitted at Deadline 4) sets out the main roles and responsibilities to be adhered to throughout construction of the Scheme. The Project / Contract Manager (main contractor) has overall responsibility for ensuring all elements in the DCO, CEMP and all environmental legal and other requirements are implemented on site. The Environmental Manager (main contractor) is responsible for liaising with relevant environmental bodies and other third parties as appropriate.</p> <p>Further, the Consents and Agreement Position Statement [APP-016] sets out the requirements for water and waste consents including, for example, waste exemptions and Environmental Permit.</p>
	Movement of waste off-site - Duty of Care & Carriers, Brokers and Dealers Regulations	
61	<p>The Environmental Protection (Duty of Care) Regulations 1991 for dealing with waste materials are applicable to any off-site movements of wastes.</p> <p>The code of practice applies to you if you produce, carry, keep, dispose of, treat, import or have control of waste in England or Wales. The law requires anyone dealing with waste to keep it safe and make sure it's dealt with responsibly and only given to businesses authorised to take it. The code of practice can be found here: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/506917/waste-duty-care-code-practice-2016.pdf</p> <p>If you need to register as a carrier of waste, please follow the instructions here: https://www.gov.uk/register-as-a-waste-carrier-broker-or-dealer-wales</p>	<p>As noted in the Outline CEMP [REP3-013 and 014] (submitted at Deadline 4), Table 3-1 REAC, Action Ref S-M6 states that a SWMP and CL:AIRE compliant MMP will be implemented by the main contractor in order to identify, monitor and manage materials and arisings on site.</p>
	Waste on-site	
62	<p>The CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works is waste or has ceased to be waste. Under the Code of Practice:</p> <ul style="list-style-type: none"> • excavated materials that are recovered via a treatment operation can be reused on-site providing they are treated to a standard such that they are fit for purpose and unlikely to cause pollution • treated materials can be transferred between sites as part of a hub and cluster project • some naturally occurring clean material can be transferred directly between sites <p>Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.</p>	<p>As noted in the Outline CEMP [REP3-013 and 014] (submitted at Deadline 4), Table 3-1- REAC, Action Ref S-M6 states that a SWMP and CL:AIRE compliant MMP will be implemented by the main contractor in order to identify, monitor and manage materials and arisings on site. An MMP will be used to monitor the maximum reuse of both natural soils and made ground (contaminated or otherwise).</p> <p>Action Ref S-M9 of the Outline CEMP [REP3-013 and 014] (submitted at Deadline 4) refers to coal tar planings with the aim that these will only be sent to landfill if not possible to treat these arisings for reuse on the Scheme. Action Ref S-M10 of the Outline CEMP [REP3-013 and 014] (submitted at Deadline 4) states that earthworks material classified as unacceptable for reuse will be treated and reused on the Scheme in order to divert these arisings from landfill.</p>

Ref. No.	Question	Applicant's Response
	<p>We recommend that developers should refer to:</p> <ul style="list-style-type: none"> • the position statement on the Definition of Waste: Development Industry Code of Practice • The waste management page on GOV.UK 	<p>These actions will be the responsibility of the main contractor and applied through the MMP.</p> <p>As detailed in Action Ref S-M6 of the Outline CEMP [REP3-013 and 014] (submitted at Deadline 4), the SWMP will set out the person(s) responsible for resource management on site and monitor:</p> <ul style="list-style-type: none"> • Waste recovery and disposal facilities that will be used and their details of their permits, licences and exemptions, both on and off site. • Waste recovery and disposal contractors that will be used and details of waste carriers' licence. • Any waste exemptions that are in place in order to enable waste to be reused. • Waste transfer notes (WTNs) and waste consignments notes to ensure that all waste movements are accompanied by a WTN and that all requisite information is provided. <p>Table 2-1 Responsibility Matrix of the Outline CEMP [REP3-013 and 014] (submitted at Deadline 4) sets out the main roles and responsibilities to be adhered to throughout construction of the Scheme. The Project / Contract Manager (main contractor) has overall responsibility for ensuring all elements in the DCO, CEMP and all environmental legal and other requirements are implemented on site. The Environmental Manager (main contractor) is responsible for liaising with relevant environmental bodies and other third parties as appropriate.</p> <p>Further, the Consents and Agreement Position Statement [APP-016] sets out the requirements for water and waste consents including, for example, waste exemptions and Environmental Permit.</p>
	<p>Waste to be taken off-site</p>	
63	<p>Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:</p> <ul style="list-style-type: none"> • Duty of Care Regulations 1991 • Hazardous Waste (England and Wales) Regulations 2005 • Environmental Permitting (England and Wales) Regulations 2016 • The Waste (England and Wales) Regulations 2011 	<p>As noted in the Outline CEMP [REP3-013 and 014] (submitted at Deadline 4), Table 3-1 REAC, Action Ref S-M6 states that a SWMP and CL:AIRE compliant MMP will be implemented by the main contractor in order to identify, monitor and manage materials and arisings on site. An MMP will be used to monitor the maximum reuse of both natural soils and made ground (contaminated or otherwise).</p> <p>Action Ref S-M9 of the Outline CEMP [REP3-013 and 014] (submitted at Deadline 4) refers to coal tar planings with the aim that these will only be sent to landfill if not possible to treat these arisings for reuse on the Scheme. This will be the responsibility of the main contractor and applied through the MMP.</p> <p>Table 2-1 Responsibility Matrix of the Outline CEMP [REP3-013 and 014] (submitted at Deadline 4) sets out the main roles and responsibilities to be adhered to throughout construction of the Scheme. The Project / Contract Manager (main contractor) has overall responsibility for ensuring all elements in the DCO, CEMP and all environmental legal and other requirements are implemented on site. The Environmental Manager (main contractor) is responsible for liaising with relevant environmental bodies and other third parties</p>

Ref. No.	Question	Applicant's Response
		<p>as appropriate along with ensuring preparation of environmental permits, licences and consents and ensuring all associated conditions required are implemented.</p> <p>As detailed in Action Ref S-M6 of Table 3-1 REAC of the Outline CEMP [REP3-013 and 014] (submitted at Deadline 4), the SWMP will set out the person(s) responsible for resource management on site and monitor:</p> <ul style="list-style-type: none"> • Waste recovery and disposal facilities that will be used and their details of their permits, licences and exemptions, both on and off site. • Waste recovery and disposal contractors that will be used and details of waste carriers' licence. • Any waste exemptions that are in place in order to enable waste to be reused. • Waste transfer notes (WTNs) and waste consignments notes to ensure that all waste movements are accompanied by a WTN and that all requisite information is provided. <p>Further, the Consents and Agreement Position Statement [APP-016] sets out the requirements for water and waste consents including, for example, waste exemptions and Environmental Permit.</p>
64	<p>Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.</p>	<p>As noted in the Outline CEMP [REP3-013 and 014] (submitted at Deadline 4), Table 3-1 REAC, Action Ref S-M6 states that a SWMP and CL:AIRE compliant MMP will be implemented by the main contractor in order to identify, monitor and manage materials and arisings on site. Waste characterisation will be the responsibility of the main contractor and applied through the SWMP.</p> <p>As detailed in Action Ref S-M6 of Table 3-1 REAC of the Outline CEMP [REP3-013 and 014] (submitted at Deadline 4), the SWMP will set out the person(s) responsible for resource management on site and monitor:</p> <ul style="list-style-type: none"> • Waste recovery and disposal facilities that will be used and their details of their permits, licences and exemptions, both on and off site. • Waste recovery and disposal contractors that will be used and details of waste carriers' licence. • Any waste exemptions that are in place in order to enable waste to be reused. • Waste transfer notes (WTNs) and waste consignments notes to ensure that all waste movements are accompanied by a WTN and that all requisite information is provided <p>Table 2-1 Responsibility Matrix of the Outline CEMP [REP3-013 and 014] (submitted at Deadline 4) sets out the main roles and responsibilities to be adhered to throughout construction of the Scheme. The Project / Contract Manager (main contractor) has overall responsibility for ensuring all elements in the DCO, CEMP and all environmental legal and other requirements are implemented on site. The Environmental Manager (main contractor) is responsible for liaising with relevant environmental bodies and other third parties as appropriate.</p>

Ref. No.	Question	Applicant's Response
65	If the total quantity of hazardous waste material produced or taken off-site is 500kg or greater in any 12 month period, the developer will need to register withus as a hazardous waste producer. Refer to the hazardous waste pages on GOV.UK for more information.	The GOV.UK website states that this guidance was withdrawn in England on 4 April 2016: <i>"From 1 April 2016, you do not need to register your premises as a hazardous waste producer. This change affects the entire hazardous waste control system."</i>

Table 3-2 Natural England

Ref. No.	Question	Applicant's Response
	General comments	
1	The changes outlined in the ES Addendum: Proposed land stabilisation north of the River Coquet and ES Addendum: Proposed temporary access to the south bank of the River Coquet are not insignificant as they entail a considerable amount of in river works, both temporary and permanent, when compared with the original proposal which largely avoided the need for any works within the river.	See detailed responses to concerns in following sections.
2	The revised proposals involve loss of additional woodland on the north bank, three rows of piling on the north bank to address instability in the land form, temporary river training (entailing alteration of both river bank and bed profile), installation of a temporary bridge crossing and a significant length of permanent scour protection on both banks of the river in the area of the bridge crossings.	<p>Noted. The extents presented in the Addendums issued for consultation represents a worst-case scenario.</p> <p>As part of the submissions for Deadline 4, updated ES Addendums have been submitted. As part of the updates the extents of erosion protection have been refined and set out as follows, in the context of the physiographic reach and SSSI unit:</p> <p>The extent of permanent rock armour compared to the physiographic reach (i.e. the gorge channel typology) represents approximately 3% of the total bank length (north and south bank). The SSSI unit within which the Site is located, the extent of the permanent rock armour equates to approximately 0.2% of the total bank length (north and south bank).</p>
3	From the outset it needs to be noted that the River Coquet has been designated because it is example of a relatively unmodified fast flowing river system where the notification covers not only specific flora and fauna but also the form and function of the river type itself. When compared with other English river systems, the Coquet has relatively few anthropogenic modifications (weirs, flood banks and bank revetments) which is partly due to its highly mobile nature in the upper to mid catchment and the steep sided gorges along a number of reaches of its lower catchment. The river morphology and habitat in the reach with the proposed new bridge crossing is more or less pristine except for the slight encroachment of the southern pier of the existing A1 bridge which was constructed prior to the notification of the SSSI. And although the area directly impacted by the proposed changes is relatively small, when compared to the overall length of the SSSI unit in which it site sits, the magnitude of the proposed changes needs to be viewed in the context of alterations to a largely naturally functioning system.	<p>The baseline description for the River Coquet and Coquet Valley Woodlands Site of Special Scientific Interest (SSSI) is contained within the text of Section 9.7, Chapter 9: Biodiversity Part A of the ES [APP-048]. This description acknowledges that the SSSI is designated for its form and function as well as the species it supports.</p> <p>The Applicant would challenge the last sentence of the comment with the following remarks:</p> <p>The extent of permanent rock armour proposed compared to the physiographic reach (i.e. the gorge channel typology) represents approximately 3% of the total bank length (north and south bank). For the SSSI unit within which the Site is located, the extent of the permanent rock armour equates to approximately 0.2% of the total bank length (north and south bank). Supported by observations following site visits conducted on 26 January and 26 February 2021, the Applicant considers that the reach (as defined by the physiographic gorge section) is more modified than is being suggested. For example, on the north bank within the vicinity of the proposed works there is evidence of former modification. This includes modifications and made ground associated with the construction of the existing crossing, including means for access, and a highway related drainage outfall. The south bank also exhibits modification with encroachment into the channel from river training works associated with the existing southern bridge pier. A total modified bank length of approximately 35m, covering the southern pier and river training works upstream and downstream of the pier. At approximately 640m downstream of the proposed works, a river-wide weir impounds the river creating a backwater effect which extends approximately 300-350m upstream (to within 300-350m of the proposed works).</p>

Ref. No.	Question	Applicant's Response
		As a result, the proposed works do not materially alter the character of the River Coquet in terms of their proportionate size or the nature of the receiving environment
4	Natural England understands the necessity to install the rows of piling on the north bank to address the instability of the land form in this area following the results of ground investigations and acknowledges that Highways England is committing to compensate for the loss of the additional area of woodland at this location at the same ratio (1:12) that is being used to compensate for the Ancient and Semi-natural woodland lost from within the SSSI on the south bank of the river.	The Applicant notes that Natural England understands the necessity for the Stabilisation Works and acknowledges the proposed compensatory ratio for Ancient and Semi-natural woodland.
5	The use of a temporary bailey bridge to access the works area on the southside of the river is to be welcomed as it will reduce the need for some of the vegetation clearance and considerable work required to cut an access route through cliffs on the southside of the river within the SSSI boundary. This option will however require substantial in river structures which will need to be in place for a relatively long period time (16 months) and will necessitate significant river training works which, while temporary in nature, will require the alteration of the bank and bed structure as well as increasing the potential risk of a pollution event associated with the increased use of machinery in vicinity of the river.	<p>The Applicant acknowledges that Natural England welcomes the use of a temporary bridge.</p> <p>In setting out the change to the original proposal, the Applicant has considered the worst-case scenario for determining potential impacts on the water environment, with a view of refining and improving these as further design information and assessment has been undertaken. The initial design of the temporary bridge included the provision of abutments which protruded into the river channel at its edges.</p> <p>However, the Environmental Statement Addendum: Southern Access Works for Change Request (as submitted at Deadline 4) has been updated to include the provision of a wider span temporary bailey bridge across the River Coquet. This would allow the extent of encroachment into the river channel by the structure and associated abutments to be reduced to a point which minimises any bed disturbance. The extent of river training works is such that it captures the proposed works and no further, and are temporary whilst works are carried out.</p> <p>The potential for additional impacts relating to increased sedimentation and pollution risks have been considered within Environmental Statement Addendum: Southern Access Works for Change Request (as submitted at Deadline 4) and where previously provided mitigation requires enhancing these have been provided in Appendix D: Register of Environmental Commitments in Environmental Statement Addendum: Southern Access Works for Change Request (as submitted at Deadline 4). With due consideration of appropriate mitigation measures, a minor magnitude of impact may be realised from increases in sedimentation from close proximity working to the River Coquet, leading to a Slight significance of effect.</p>
6	However, perhaps the most significant part of the works from the SSSI perspective are the proposal to permanently protect both the northern and southern bank of the river in the area of the existing and proposed new bridge supports in order to prevent future erosion undermining the new and, by extension, the existing bridge supports.	<p>The Applicant acknowledges that the proposed changes to the Scheme would involve the permanent loss of bankside habitat from within the SSSI. Based on feedback received from consultees, the type of permanent scour protection proposed has been amended and the length of rock armour has been reduced from 80 m to 62 m, which would reduce the extent of hard bank (grey) protection and grey/green protection has been proposed as far as the assessed limits allow. On the north bank, outside the extent of the rock armour, where disturbance to the banks from temporary construction has occurred, a grey/green protection solution has been considered extending to a further 24 m.</p> <p>On the south bank, the length of rock armour has been reduced from 70 m to approximately 28 m, and up to a further 17 m requiring green-grey erosion controls. This is in addition to the river bank affected by the scour protection described in Chapter 2: The Scheme of the ES [APP-037]</p>

Ref. No.	Question	Applicant's Response
7	<p>It is acknowledged that Highways England have, at the request of both Natural England and the Environment Agency, agreed to look potential options for the use of soft (green) engineering techniques to achieve the proposed level of scour protection that they have indicated is required to ensure that the rows of piles mentioned above and the bridge foundations do not become undermined at a future date. The current worst-case scenario (from a river habitat and morphology perspective) would see rock armouring of approximately 3m wide and 4m high along a significant length of the riverbank on the north side of the river and a slightly shorter length along the south side.</p>	<p>It is correct that the details submitted within Environmental Statement Addendums for consultation were presented a worst-case scenario. As outlined in Paragraph 8.4.2 and 8.5.2 of Environmental Statement Addendum: Southern Access Works and Paragraphs 7.4.2 and 7.5.2 of Environmental Statement Addendum: Stabilisation Works, the analysis undertaken has been solely presented as a desk-based qualitative assessment. For these consultation versions of the Addendums, no hydraulic analysis or site visits had been conducted in support of the proposed changes. It was therefore acknowledged and accepted that the case presented represented a worst-case scenario in terms of extents of bank protection required.</p> <p>Updated Environmental Statement Addendum: Stabilisation Works for Change Request and Addendum: Southern Access Works for Change Request have been submitted at Deadline 4. The geomorphological assessment has been undertaken taking account of site visits and hydraulic calculations. During the site visits (26 January and 26 February 2021), channel form, features, processes and flow types were mapped. Furthermore, the presence and extent of any existing modifications with the reach were mapped. Hydraulic calculations of water level, velocity, stream power and shear stress were carried out to assess potential changes in sediment transport, erosion and deposition.</p> <p>Each Addendum also includes updated design information regarding scour protection measures. The Applicant has considered softer, more natural alternatives to rock armour as part of preliminary scour assessments. These preliminary results indicate that the best scour protection solution in light of the bank velocities likely to be experienced is a rock armour revetment which maintains the existing cross-section profile and a green-grey bank protection solution at the downstream end.</p> <p>The length of natural bank affected on the north bank by the proposed rock armour would be approximately 51 m. The length of disturbed bank affected on the north bank by the proposed rock armour would be approximately 11 m. A further 24 m of river bank disturbed during construction but outside of the footprint of the proposed rock armour would be as far as practicable reinstated to existing profiles following completion of the temporary works using green or green-grey erosion control methods.</p> <p>The existing south bank that would be affected includes approximately 35 m of bank already fronted by the existing pier and associated river training works which extends approximately 14 m upstream of the existing pier and approximately 12 m downstream of the existing pier, or by the proposed new southern pier. This leaves approximately 28 m of currently natural bank likely to require rock armour, and up to a further 17 m requiring green-grey erosion controls.</p> <p>Investigation is ongoing with regards to the proposals for any hard-engineered bank protection solutions.</p>
8	<p>This would have a significant negative impact on both the existing natural bankside habitat which would be destroyed and the morphology of the river in this reach which would be permanently altered.</p>	<p>The Applicant acknowledges that the proposed changes to the Scheme would involve the loss of bankside habitat from within the SSSI. The Applicant has not concluded that compensatory provision for the loss of riverbank is necessary. However it is worth noting that as described in Chapter 7: Biodiversity of the Environmental Statement Addendum: Southern Access Works for Change Request (as submitted at Deadline 4) that: the extent of impact to riverbank habitat represents approximately 0.2 % of the total bank length (both north and south banks) of the SSSI unit (Unit 5 – approximately 45 km total unit riverbank length). This represents a small proportion of the overall SSSI unit. Therefore, it is anticipated that impacts would be localised only. This assessment is consistent with the geomorphology assessment within Chapter 8: Road Drainage and the Water Environment of the Environmental Statement Addendum: Southern Access Works for Change Request (as submitted at Deadline 4) that concludes that the proposed works are unlikely to impact the form or function of the river upstream or downstream beyond the immediate locality of the works, contrary to the comment opposite.</p>

Ref. No.	Question	Applicant's Response
9	<p>It is not clear to Natural England what the justification is for the proposed scour protection works at this location. The Geomorphology Assessment for the R. Coquet Parameter 10 indicates that the plan form of the R. Coquet in this area has remained stable for a significant period of time (since early mapping records in 1866) and that due to presence of bed rock formations and the underlying soil types the bank erosion risk was assessed as low or insignificant. At a joint meeting with Highways England and their consultants on 16th December 2020 Natural England and the Environment Agency requested that evidence was supplied to support the proposed scour protection but the ES addenda supplied do not appear to provide evidence to support the need for this intervention.</p>	<p>The Environmental Statement Addendum: Stabilisation Works for Change Request and the Environmental Statement Addendum: Southern Access Works for Change Request have been updated and submitted at Deadline 4. As part of these updates further information has been provided for the scour protection requirements.</p> <p>In line with Design Manual for Roads and Bridges (DMRB) guidance (DMRB CD356 'Design of Highways Structures for Hydraulic Action') the Applicant is required to determine the need for an scour protection system for any structure near watercourses. This is demonstrated through the undertaking of scour assessments.</p> <p>The Stabilisation Works on the slope would include scour protection along the north bank of the River Coquet to provide erosion protection to the lower stabilisation piles to avoid further maintenance works during the design life of the bridge structure (120 years).</p> <p>Following results of preliminary scour assessment, it has been determined that there is a requirement to protect the southern pier from hydraulic action. The additional permanent scour protection takes into account the presence of scour protection for the existing pier.</p> <p>The preliminary scour assessment is presented in Appendix F: Preliminary Scour Assessment of Environmental Statement Addendum: Stabilisation Works for Change Request and Appendix E: Preliminary Scour Assessment of Environmental Statement Addendum: Southern Access Works for Change Request.</p>
10	<p>Additionally, it is not clear why the significant piling works proposed to prevent the failure of the land form just north of the river bank would not be sufficient to prevent any risk of fluvial erosion from undermining either the piles or the bridge foundations on the north side of the river bank. My understanding of the situation on the south side of the river, having visited the site several times, is that the bed rock is exposed just below the river surface in this area and it is therefore unlikely that any limited lateral movement of the river in this area would undermine foundations that are anchored deep into the underlying bedrock.</p>	<p>In a repeat of the response provided above, the Applicant has provided additional information for the scour protection requirements as part of the Environmental Statement Addendum submissions for Deadline 4.</p> <p>The Stabilisation Works on the slope would include scour protection along the north bank of the River Coquet to provide erosion protection to the lower stabilisation piles to avoid further maintenance works during the design life of the bridge structure (120 years).</p> <p>Further detailed hydraulic modelling is anticipated as part of submissions for Deadline 8 of the Examination. This will allow investigation of the spatial extents (upstream and downstream) of any changes in water levels, velocities, stream power and shear stress. These outputs will also assist in the refinement of any scour protection systems required.</p>
11	<p>All parties agree that if the proposed scour protection works go ahead it will result in the permanent damage and destruction of Priority River Habitat and permanent alterations to the form and function through this reach of an SSSI river. From a Natural England perspective this is a clear case where, as it is not possible to mitigate for the impacts of the proposed works using the accepted mitigation hierarchy, compensation will be required to offset the loss of this habitat resource which forms part of the designated interest features of the SSSI.</p>	<p>The Environmental Statement Addendum: Stabilisation Works for Change Request and the Environmental Statement Addendum: Southern Access Works for Change Request have been updated and submitted at Deadline 4. These updates (supported by site visits, a geomorphological assessment and hydraulic calculations) assess changes in sediment transport, erosion and deposition characteristics as a result of the proposed changes to the Scheme. The analysis supports the conclusions drawn in the updated assessments that there may be very localised, very minor changes in depositional features adjacent to the proposed scour protection and that there is unlikely to be a significant impact on depositional features away from the toe of the scour protection. The Applicant does not agree on this basis that the form and function is materially and significantly altered in this reach.</p> <p>The impact assessment looks at potential impacts to sediment regime, channel morphology and natural fluvial processes during both construction and operation phases. Where impacts have been identified, mitigation has been outlined to reduce any significant effects. It is concluded that during construction there may be minor adverse impacts on the channel morphology as a result of bedrock loss in the channel and during</p>

Ref. No.	Question	Applicant's Response
		<p>operation there may be minor adverse impacts on channel morphology as a result of the permanent loss of bank features. The extent of these impacts would be very localised to works themselves.</p> <p>The Applicant acknowledges that the proposed changes to the Scheme would involve the permanent loss of bankside habitat from within the SSSI. The Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.</p>
12	<p>The ES addendum for the Stabilisation Works and the Southern Access Works both conclude that compensatory provision for the loss of riverbank is not necessary. Both Addenda identify that the operational impact of the proposed works on channel morphology is likely to be Moderate Adverse but they state that due to the relatively localised impacts and the relatively small length of reach impacted when considered in the context of the overall unit length, the overall impact is unlikely to be significant.</p>	<p>The Environmental Statement Addendum: Stabilisation Works for Change Request and the Environmental Statement Addendum: Southern Access Works for Change Request have been updated and submitted at Deadline 4. These updates (supported by site visits, a geomorphological assessment and hydraulic calculations) assess changes in sediment transport, erosion and deposition characteristics as a result of the proposed changes to the Scheme. The impact assessment looks at potential impacts to sediment regime, channel morphology and natural fluvial processes during both construction and operation phases. Where impacts have been identified, mitigation has been outlined to reduce any significant effects. It is concluded that during construction there may be minor adverse impacts on the channel morphology as a result of bedrock loss in the channel and during operation there may be minor adverse impacts on channel morphology as a result of the permanent loss of bank features. The extent of these impacts would be very localised to works themselves. For both the Stabilisation Works and the Southern Access this results in a slight significance of effect.</p> <p>The Applicant acknowledges that the proposed changes to the Scheme would involve the permanent loss of bankside habitat from within the SSSI. The Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.</p>
13	<p>Natural England strongly disagrees with this conclusion. The impacts of the proposal on what is a relatively unmodified reach are likely to be significant despite the fact that this reach is a relatively small proportion of the overall SSSI unit length. The impacts will be permanent and therefore constitute an irreversible loss of SSSI habitat, form and function which, in Natural England's opinion, either needs to be offset by a suitable compensation scheme elsewhere on the R. Coquet system, or the proposals should be altered to remove the need for works that will damage/destroy SSSI interest features.</p>	<p>The Environmental Statement Addendum: Stabilisation Works for Change Request and the Environmental Statement Addendum: Southern Access Works for Change Request have been updated and submitted at Deadline 4. These updates (supported by site visits, a geomorphological assessment and hydraulic calculations) assess changes in sediment transport, erosion and deposition characteristics as a result of the proposed changes to the Scheme.</p> <p>Findings from site visits conducted on 26 January and 26 February 2021 are presented in the updated Addendums (Baseline Conditions). The Applicant does not agree that the reach (as defined by the physiographic gorge section) is "relatively unmodified". For example, on the north bank within the vicinity of the proposed works there is evidence of former modification. This includes modifications and made ground associated with the construction of the existing crossing, including means for access, and a highway related drainage outfall. The south bank also exhibits modification with encroachment into the channel from river training works associated with the existing southern bridge pier. A total modified bank length of approximately 35m, covering the southern pier and river training works upstream and downstream of the pier. At approximately 640m downstream of the proposed works, a river-wide weir impounds the river creating a backwater effect which extends approximately 300-350m upstream (to within 300-350m of the proposed works).</p> <p>The extent of permanent rock armour compared to the physiographic reach (i.e. the gorge channel typology) represents approximately 3% of the total bank length (north and south bank). The SSSI unit within which the Site is located, the extent of the permanent rock armour equates to approximately 0.2% of the total bank length (north and south bank).</p> <p>Nevertheless, the Applicant acknowledges that the proposed changes to the Scheme would involve the loss of bankside habitat from within the SSSI, which would result in a Moderate adverse effect (in the context of</p>

Ref. No.	Question	Applicant's Response
		the impact assessment, a significant effect). The Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.
14	<p>It is Natural England's view that the proposed damage/destruction of the river bank habitat and the permanent impacts on the morphology of the river are not in line with Highways England's general duty under section 28G of the Wildlife and Countryside Act 1981 (as amended) to 'take reasonable steps, consistent with the proper exercise of its functions, to further the conservation and enhancement of the flora, fauna geological or physiographical features by reason of which the site is of special scientific interest'. It is also at odds with Highways England's general duty to conserve biodiversity under the Natural Environment and Rural Communities Act 2006. Additionally, it would also be contrary to Highways England's stated aim that the proposed scheme would result in No Net Loss to biodiversity. Overall, prior to the proposed changes set out in the above addenda, the scheme is already set to miss this target with respect to river habitat and these amended proposals, if accepted, would further increase the net loss for this habitat type.</p>	<p>It is not accepted that the approach to engineering in this location is at odds with s28G WCA 1981 since the approach to engineering in this location is reasonable and proportionate consistent with the fulfilment of the role of the Applicant as the Strategic Highway Authority in England.</p> <p>Further to responses detailed above, the Applicant acknowledges that the proposed changes to the Scheme would involve the loss of bankside habitat from within the SSSI. The Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.</p> <p>The Environmental Statement Addendum: Stabilisation Works for Change Request and the Environmental Statement Addendum: Southern Access Works for Change Request have been updated and submitted at Deadline 4. These updates (supported by site visits, a geomorphological assessment and hydraulic calculations) assess changes in sediment transport, erosion and deposition characteristics as a result of the proposed changes to the Scheme. The analysis supports the conclusions drawn in the updated assessments that there may be very localised, very minor changes in depositional features adjacent to the proposed scour protection and that there is unlikely to be a significant impact on depositional features away from the toe of the scour protection. It is concluded that during construction there may be minor adverse impacts on the channel morphology as a result of bedrock loss in the channel and during operation there may be minor adverse impacts on channel morphology as a result of the permanent loss of bank features. The extent of these impacts would be very localised to works themselves.</p> <p>It should be noted that in accordance with the good practice principles for the biodiversity no net loss assessment, impacts to statutory designated sites (including SSSIs) are excluded from the no net loss. The Applicant acknowledges that the proposed changes to the Scheme would involve the permanent loss of bankside habitat from within the SSSI. The Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.</p>
	Specific comments relating to ES Addendum – Stabilisation Works	
15	<p>Table 1.1 indicates that Highways England does not conclude that compensatory provision for loss of riverbank is necessary. This was listed under both the biodiversity and the road drainage and water environment sections of the table and as indicated for the reasons given above Natural England strongly disagrees with this conclusion.</p>	<p>The Applicant acknowledges that the proposed changes to the Scheme would involve the loss of bankside habitat from within the SSSI. The Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.</p> <p>Please see the response to reference 14.</p>
16	<p>2.2.4 a) Indicates that the piling would protect SSSI from large amount of material being deposited resulting from slope movement. The river is subject to natural change and deposition of material in the river due to the natural process of land slumping is not necessarily seen as a negative issue from a designated site perspective as it is part of the geomorphological function of a river to transport material eroded from the surrounding landscape. Therefore, from a designated sites perspective, we do not consider this to be a beneficial outcome of the proposed works.</p>	<p>This comment has been acknowledged and the statement referred to has been removed from the updated Environmental Statement Addendum: Stabilisation Works for Change Request submitted at Deadline 4.</p>

Ref. No.	Question	Applicant's Response
17	2.3.5 Loss of additional woodlands (0.28ha) on the northern bank out with the Order Limits would be compensated for at a 1:12 ration in accordance with Appendix 9.21: Ancient Woodland Strategy Part A. Natural England accepts that this level of compensation is sufficient.	The Applicant notes that Natural England agree with the proposed compensation ratio for the loss of additional woodland on the northern bank as a result of the proposed change to the Scheme.
18	2.4.5 Identifies that the scour protection along the river's edge is to provide erosion protection to the lower stabilisation piles to avoid further maintenance works during the design life of the structure i.e. 120 years. If the piles are going down to a sufficient depth is there a need for additional protection from fluvial erosion? The rock strata in this area are visible on the riverbed and the downward incision of the riverbed is likely to be small which would limit the impact of any bank erosion on the foundations. Furthermore, the northern bank appears to be relatively stable in this area with little evidence of recent erosion and it is not clear if the erosion problem that the scour is designed to protect against is currently an issue at this site. The schemes geomorphological report indicates that the channel has been stable for a very long period of time and that the risk of erosion is low to insignificant. Also, the scour protection, by its very nature if subject to the erosive forces of the river and is therefore likely to require regular inspection and maintenance during the lifetime of the structure.	<p>The design details within Environmental Statement: Addendum: Stabilisation Works for Change Request submitted for consultation was presenting a worst-case scenario. Since then the Applicant has explored opportunities to a) reduce the extent of any required scour protection works along the north bank and b) whether protection is indeed required at the toe of the slope.</p> <p>As part of the submission for Deadline 4, update Environmental Statement Addendum: Stabilisation Works for Change Request and Environmental Statement Addendum: Southern Access Works for Change Request have been submitted. As part of these updates further information has been provided around the scour protection requirements.</p> <p>The stabilisation of the north valley side is required to avoid potential excessive loading of the proposed northern pier foundation together with the loss of down slope support and lateral restraint to the foundation. To prevent failure of the valley side and to provide support to the north bridge pier, it is proposed to install a line of semi- continuous non-interlocking bored concrete piles (contiguous bored pile wall) close to the river bank. On the river side of these piles it is proposed to install a rock revetment system, to support and offer protection to the piles and prevent the loss of material from between individual piles. This rock revetment system would form the north river bank at this location. The rock revetment is sized to be stable and has a design life commensurate with the structure. The applicant has a responsibility to inspect and maintain the bridge structure and the scour protection system forms an element of the structure. It should be noted that maintenance and access is challenging and has the potential for further environmental impact and therefore a robust solution is preferred.</p> <p>Alternative solutions are being considered and if viable will be presented at the Examination.</p> <p>The Applicant acknowledges that the downward incision is likely to be very small due to the presence of bedrock but maintains that erosion of the bank (which is not bedrock) is a design risk which could impact on the stability and safety of the bridge pier foundations. It should be noted that the banks will be reinstated ground and therefore not consolidated as per the current bank forms and therefore require protection until re-established with vegetation.</p> <p>The preliminary scour assessment is presented in Appendix F: Preliminary Scour Assessment of Environmental Statement Addendum: Stabilisation Works for Change Request and Appendix E: Preliminary Scour Assessment of Environmental Statement Addendum: Southern Access Works for Change Request.</p>
19	2.4.6 Indicates that if the erosion protection measures are only to be installed along the riverside within the existing Order limits of Part A, it is highly likely that further significant engineering interventions, such as additional piling, and erosion protection measures would be required in the future in order to protect the new bridge foundations from undermining and slope instability. Where is the evidence for this? If the proposed piling and foundations	<p>A preliminary scour assessment accompanies this submission and demonstrates why scour protection would be required in this location.</p> <p>The Applicant is undertaking works to evaluate and quantify and thereby confirm the extents of any erosion protection measures required along the north bank. The details provided in Environmental Statement Addendum: Stabilisation Works for Change Request submitted for consultation were preliminary and based on the worse-case scenario.</p>

Ref. No.	Question	Applicant's Response
	<p>are sufficiently tied into the underling bed rock is the river likely to erode the foundations given the geology of the site?</p>	<p>The stabilisation of the north valley side is required to avoid potential excessive loading of the proposed northern pier foundation together with the loss of down slope support and lateral restraint to the foundation. To prevent failure of the valley side and to provide support to the north bridge pier, it is proposed to install a line of semi-continuous non-interlocking bored concrete piles (contiguous bored pile wall) close to the river bank. On the river side of these piles it is proposed to install a rock revetment system, to support and offer protection to the piles and prevent the loss of material from between individual piles. This rock revetment system would form the north river bank at this location. The rock revetment is sized to be stable and has a design life commensurate with the structure. Alternative solutions are being considered and if viable will be presented at Deadline 8.</p>
20	<p>7.8.4 Indicates that following consultation with Natural England and the Environment Agency the only impact identified and assessed for the operational phase related to the adverse impacts to the River Coquet (SSSI and HPI) from materials of the scour protection entering the watercourse. This is strictly not correct. This fails to assess the permanent impact on morphology and the potential impact this has on biodiversity. The impact on morphology were raised by Natural England and the EA during a meeting on 16 Dec 2020 as set out in the minutes of this meeting issued by WSP, the environmental consultants for Highways England. It is acknowledged that impacts on geomorphology are dealt with separately under the Road Drainage and Water Environment section of the addendum but, in the context of the consultations held previously, the linkage between the habitat and morphology issues is clear and needs to be cross referenced here.</p>	<p>The effects of habitat loss associated with the impacts on morphology of the river have been captured within the construction stage impact assessment. The operational geomorphology assessment presented within the Road Drainage and Water Environment section has been updated. The updated assessment is presented within Chapter 9: Road Drainage and the Water Environment of the Environmental Statement Addendum: Stabilisation Works for Change Request issued at Deadline 4. In summary, the geomorphology assessment concludes that whilst there may be local effects on the dynamics of water flow, water velocity, sediment regime and natural fluvial processes as a result of the proposed scour protection, impacts are predicted to be minor adverse or negligible. It is therefore concluded that the impacts to biodiversity would also be comparable (minor adverse or negligible) in relation to geomorphology, leading to a Slight (not significant) effect. The updated biodiversity assessment presented within the Environmental Statement Addendum: Stabilisation Works for Change Request issued at Deadline 4 cross refers to the geomorphology assessment.</p>
21	<p>7.9.6 Sets out that if any hard-engineered structure is required, the permanent scour protection would be designed to be in keeping with existing natural rocky areas of the River Coquet and that whilst the scour protection would result in the permanent loss of natural riverbank habitat, the design of the scour protection would provide suitable sheltering habitat for aquatic invertebrates and juvenile fish and would naturally become vegetated over time. Natural England agrees that if hard engineered structures are required then sympathetic design is best but there is still the loss of natural bank habitat and ability of bank to support trees and shrubs which are unlikely to be appropriate for the structural integrity of the any erosion control measures that may be required. The establishment of vegetation on the erosion control measures will be dictated by the size of the stones in the hard defence and if large stone sizes are required then vegetation establishment will be limited.</p>	<p>The Applicant confirms that a sympathetic design approach is proposed for the hard engineered scour protection. The Applicant acknowledges that the proposed changes to the Scheme would involve the loss of bankside habitat from within the SSSI. The Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.</p>

Ref. No.	Question	Applicant's Response
22	<p>7.10.7 States The loss of riverbank habitat represents an adverse impact to an ecological receptor of National importance. As such, in strict accordance with the DMRB, the loss of riverbank habitat as a result of the Stabilisation Works might be considered to result in a Very Large adverse effect to the SSSI. However, the extent of impact to riverbank habitat as a result of the land stabilisation north of the River Coquet represents approximately 0.2% of the total bank length of the SSSI unit (Unit 5) within which the Stabilisation Works are located and is unlikely to affect the integrity of the SSSI or its ecological function. Therefore, the significance of effect is downgraded. The loss of riverbank habitat of the SSSI as a result of the Stabilisation Works would result in a direct, permanent Moderate Adverse effect. This does not exceed the Very Large adverse effect to the SSSI as a result of the loss of ancient woodland habitat within the SSSI, as detailed in paragraph 9.10.2, Chapter 9: Biodiversity Part A of the ES [APP-048].</p>	<p>The Applicant agrees and confirms that this text is an extract from the Environment Statement Addendum: Stabilisation Works for Change Request, paragraph 8.10.6 in the version issued at Deadline 4.</p>
23	<p>Natural England's position on permanent damage/destruction of designated sites is that it must be avoided at all costs but that if it is not possible then compensatory habitat should be provided. In this instance it is not only the permanent loss of natural bankside habitat but also the permanent impact that scour protection will have on the morphology and flow dynamics in this area. It is a net loss of habitat and river function which will need to be compensated for.</p>	<p>The Applicant acknowledges that the proposed changes to the Scheme would involve the permanent loss of 62m of bankside habitat from within the SSSI that would result in a Moderate adverse effect (paragraph 8.10.6, Environment Statement Addendum: Stabilisation Works for Change Request). The Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.</p> <p>In relation to the impacts of the scour protection on the morphology and flow dynamics, the operational geomorphology assessment presented within Chapter 9: Road Drainage and the Water Environment of the Environmental Statement Addendum: Stabilisation Works for Change Request has been updated. In summary, the geomorphology assessment concludes that whilst there may be local effects on the dynamics of water flow, water velocity, sediment regime and natural fluvial processes as a result of the proposed scour protection, impacts are predicted to be minor adverse or negligible. As such, the Applicant concludes that the change in morphology would result in Slight (not significant) adverse effects to biodiversity.</p>
24	<p>7.10.14 Fish rescue outlined needs to include search at the bank river interphase for lamprey ammocoetes (larvae) which may be present at the site.</p>	<p>A search for lamprey ammocoetes has been included within the fish rescue mitigation, detailed within Chapter 8: Biodiversity of Environmental Statement Addendum: Stabilisation Works for Change Request and Chapter 7: Biodiversity Environmental Statement Addendum: Southern Access Works for Change Request submitted at Deadline 4.</p>
25	<p>7.10.20. As stated above in the general comments Natural England does not agree with the assessment that the predicted impact on the R. Coquet and Coquet Woodland SSSI would be neutral.</p>	<p>Chapter 8: Biodiversity of Environmental Statement Addendum: Stabilisation Works for Change Request and Chapter 9: Road Drainage and the Water Environment provide a robust assessment of the likely significant operational effects in relation to the potential materials of the scour protection entering the watercourse. However, as detailed within Response 20 of this document above, the permanent change in morphology of the river and its impacts on biodiversity has been considered with reference to the updated geomorphology assessment. In summary, the geomorphology assessment concludes that whilst there may be local effects on the dynamics of water flow, water velocity, sediment regime and natural fluvial processes as a result of the proposed scour protection, impacts are predicted to be minor adverse or negligible. It is therefore concluded that the impacts to biodiversity would also be comparable (minor adverse or negligible) in relation to geomorphology, leading to a Slight Adverse (not significant) effect. The updated biodiversity assessment</p>

Ref. No.	Question	Applicant's Response
		<p>presented within the Environmental Statement Addendum: Stabilisation Works for Change Request issued at Deadline 4 cross refers to the geomorphology assessment.</p> <p>In addition, the Applicant acknowledges that the proposed changes to the Scheme would involve the permanent loss of 62m of bankside habitat from within the SSSI that would result in a Moderate adverse effect (paragraph 8.10.6, Environment Statement Addendum: Stabilisation Works for Change Request). The Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.</p>
26	<p>Table 8.2 Indicates that removal of some bed material including bedrock may be required. This is a permanent alteration of the channel morphology which is likely to impact natural fluvial processes and while it may be possible to reverse the impacts of alterations to the river bank, it will not be possible to reverse the impacts of removal of bedrock from the river.</p>	<p>The Applicant acknowledges the permanent alteration of bed morphology as a result of the works required during construction and that this may not be reversible, particularly in relation to bedrock removal. This factor has been considered within the assessment of effects in natural fluvial processes detailed in Chapter 9: Road Drainage and the Water Environment of the Environmental Statement Addendum: Stabilisation Works for Change Request issued at Deadline 4. A significant effect of slight has been attributed to this potential impact. Where sedimentary bed features may be directly impacted by construction activities, these would be mapped prior to construction and sediment removed, stored and reinstated where practicable following construction. Specific measures would be implemented to ensure that any in-channel boulders, affected by the works, that are over 0.5 m are placed back in the same location, with the same orientation.</p> <p>The Applicant agrees that it may be possible to reverse the impacts of alterations to the riverbank. Areas outside of the permanent works would be reinstated to their baseline cross-sectional profile, as such, impacts to natural fluvial processes and sediment regime are considered localised, short-term and reversible.</p>
27	<p>Table 8.4 Mitigation measures for construction – highlights that the river training walls will be lined with geotextile to prevent release of construction aggregate associated with the piling platform, to the channel. Any aggregate released to the river would need to be retrieved so mitigation measures will need to be sufficient to ensure that loss of aggregate to the river does not occur.</p>	<p>Chapter 8: Biodiversity of Environmental Statement Addendum: Stabilisation Works for Change Request has been updated to include measures such as silt curtains and a suitable geomembrane between the river training works and piling platform to minimise the release of construction aggregate associated with the piling platform. These measures are documented in Appendix E: Register of Environmental Actions and Commitments of the Environmental Statement Addendum: Stabilisation Works for Change Request issued at Deadline 4.</p>
28	<p>Table 8.6 indicates that works either in or in close proximity to the River Coquet could lead to increased suspended solids and turbidity. This potential impact is classed as negligible and not significant but given the works will take approximately 16 months to complete, Natural England does not agree with this assessment and believes that due to the scale and duration of the proposed works the risk to the SSSI river habitat cannot be classed as negligible. No sediment control and mitigation measures are 100% successful and the long duration of the proposed works further increases the risk to the designated site. This risk does not appear to have been fully acknowledged or the potential significance of effect recognised.</p>	<p>Noted and magnitude of potential impact will be updated within assessment in Environmental Statement Addendum: Stabilisation Works for Change Request submitted as part of Deadline 4.</p>
29	<p>This table also indicates that the impacts of the piling platform and retaining wall/river training works will alter the cross section of the channel but are likely to be reversible following the end of construction. However, if there is any requirement to remove bedrock (as indicated</p>	<p>An updated Environmental Statement Addendum: Stabilisation Works for Change Request has been submitted at Deadline 4. This update (supported by site visits, a geomorphological assessment and hydraulic calculations) assesses changes in sediment transport, erosion and deposition characteristics as a result of the proposed changes to the Scheme. The impact assessment looks at potential impacts to sediment regime, channel morphology and natural fluvial processes during both construction and operation phases. Where</p>

Ref. No.	Question	Applicant's Response
	in table 8.2) the changes will be permanent, and the significance of effect may need to be reviewed for this element of the works.	<p>impacts have been identified, mitigation has been outlined to reduce any significant effects. It is concluded that during construction there may be minor adverse impacts on the channel morphology as a result of bedrock loss in the channel and during operation there may be minor adverse impacts on channel morphology as a result of the permanent loss of bank features, leading to a slight significance of effect. The extent of these impacts would be very localised to works themselves.</p> <p>The Applicant acknowledges the permanent alteration of bed morphology as a result of the works required during construction and that this may not be reversible.</p>
30	8.10.27 The assessment indicates that the localised moderate adverse impact on the geomorphology, but it effectively downgrades this to an insignificant effect due to the localised impacts within the context of the SSSI. As indicated above, Natural England acknowledges that while the impacts are likely to be localised the fact that the reach is relatively unmodified increases the significances of any works that would impact on the interest features of the SSSI at this location and this has not been taken into account by the assessment provided.	<p>An updated Environmental Statement Addendum: Stabilisation Works for Change Request has been submitted at Deadline 4. This update (supported by site visits, a geomorphological assessment and hydraulic calculations) assesses changes in sediment transport, erosion and deposition characteristics as a result of the proposed changes to the Scheme. The impact assessment looks at potential impacts to sediment regime, channel morphology and natural fluvial processes during both construction and operation phases. Where impacts have been identified, mitigation has been outlined to reduce any significant effects. It is concluded that during construction there may be minor adverse impacts on the channel morphology as a result of bedrock loss in the channel and during operation there may be minor adverse impacts on channel morphology as a result of the permanent loss of bank features. The extent of these impacts would be very localised to works themselves.</p> <p>Site information collated by the Applicant and presented in the updated Addendums (Baseline Conditions) demonstrates that the reach is more modified than is suggested. The north bank within the reach of the proposed works exhibits evidence of previous modification. This includes modifications associated with the construction of the existing crossing, including means for access, and a highway related drainage outfall (with associated rock armour protection). The south bank also exhibits modification with encroachment into the channel from river training works associated with the existing southern bridge pier. A total length of 35m, including the pier and the river training works upstream and downstream of the pier. Approximately 640m downstream of the proposed works, a river-wide weir impounds the river creating a backwater effect which extends approximately 300-350m upstream (to within 300-350m of the proposed works).</p> <p>As such, the assessment of the impact on the sediment regime and natural fluvial processes are assessed to be negligible and the impact on channel morphology is considered minor adverse as presented at paragraph 9.10.34 of Chapter 9: Road Drainage and the Water Environment of the ES Addendum in line with the magnitude criteria set out in Table 9-2.</p>
	Additional comments specifically relating to ES Addendum – Southern Access Works	
31	Please note that many of the comments given above for ES Addendum - Stabilisation Works are relevant to this Addendum but I have tried to avoid replicating them here as much as possible.	Detailed responses to the points raised in relation to the Environmental Statement Addendum: Stabilisation Works for Change Request are set out at paragraphs 15 to 30, above.
32	6.10.6. Indicates that the loss of riverbank habitat might be considered to result in a Very Large Adverse effect to the SSSI but that as this represents approximately 0.35 % of the SSSI unit length the significance of effect is downgraded to Moderate Adverse effect and following the successful implementation of mitigation, the loss and damage to the SSSI would result in a direct, temporary Slight Adverse effect (not significant). As stated above	<p>The design details within Environmental Statement: Addendum: Stabilisation Works for Change Request submitted for consultation was presenting a worst-case scenario.</p> <p>The Environmental Statement Addendum: Stabilisation Works for Change Request and the Environmental Statement Addendum: Southern Access Works for Change Request have been updated and submitted at Deadline 4. As part of the updates the extents of erosion protection have been refined and set out as follows, in the context of the physiographic reach and SSSI unit:</p>

Ref. No.	Question	Applicant's Response
	Natural England does not agree with is assessment and points out that mitigation can be used as a substitute for compensation.	<p>The extent of permanent rock armour compared to the physiographic reach (i.e. the gorge channel typology) represents approximately 3% of the total bank length (north and south bank). The SSSI unit within which the Site is located, the extent of the permanent rock armour equates to approximately 0.2% of the total bank length (north and south bank).</p> <p>The Applicant acknowledges that the proposed changes to the Scheme would involve the loss of bankside habitat from within the SSSI. The Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.</p>
33	6.10.7. Natural England acknowledges that the proposed access to the south bank via a temporary bridge will reduce the potential impacts of the proposed scheme on the SSSI Ancient Woodland on the south bank of the river.	The Applicant notes that Natural England acknowledges the reduction in the potential impacts of the Scheme on the SSSI Ancient Woodland on the south bank of the River Coquet.
34	6.10.19. Given the general comments above, Natural England questions whether the prediction of neutral (non-significant) impact at the operation stage remains valid for both River Coquet water course (HPI) and River Coquet and Coquet Valley Woodlands SSSI.	<p>Chapter 7: Biodiversity of Environmental Statement Addendum: Southern Access Works for Change Request and Chapter 8: Road Drainage and the Water Environment provide a robust assessment of the likely significant operational effects in relation to the potential materials of the scour protection entering the watercourse. As detailed within Response 20 of this document above, the permanent change in morphology of the river and its impacts on biodiversity has been considered with reference to the updated geomorphology assessment. In summary, the geomorphology assessment concludes that whilst there may be local effects on the dynamics of water flow, water velocity, sediment regime and natural fluvial processes as a result of the proposed scour protection, impacts are predicted to be minor adverse or negligible. It is therefore concluded that the impacts to biodiversity would also be comparable (minor adverse or negligible) in relation to geomorphology, leading to a Slight Adverse (not significant) effect. The updated biodiversity assessment presented within the Environmental Statement Addendum: Stabilisation Works for Change Request issued at Deadline 4 cross refers to the geomorphology assessment.</p> <p>In addition, the Applicant acknowledges that the proposed changes to the Scheme would involve the loss of bankside habitat from within the SSSI. The Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.</p>
35	7.10.8. Indicates that the natural bed and banks will be reinstated once the in-channel works are completed and the impacts are considered localised and reversible. While the impacts may be seen as localised, they are unlikely to be fully reversable if the bedrock of the river was altered to allow for the river training works.	The Applicant acknowledges the permanent alteration of bed morphology as a result of the works required during construction and that this may not be reversible. However, as noted in Chapter 8: Road Drainage and the Water Environment of Environmental Statement Addendum: Southern Access Works for Change Request, the natural bed and banks outside the extent of any permanent works would be reinstated to the baseline cross-sectional profile. As such, impacts to the sediment regime and natural fluvial processes are considered localised, short term and reversible with the commitment to reinstatement following completion of the works. The loss of bedrock in the channel may not be reversible, however, any loss is to be minimised as much as practicable. At detailed design due consideration shall be given to the installation method of the river training works as well as consideration of any practicable bedrock reinstatement options.
36	7.10.9. Natural England notes that the loss of some bed and bank features are unlikely to be reversable through natural process in the short to medium term and this	An updated Environmental Statement Addendum: Southern Access Works for Change Request has been submitted at Deadline 4. This update (supported by site visits, a geomorphological assessment and hydraulic calculations) assesses changes in sediment transport, erosion and deposition characteristics as a result of the proposed changes to the Scheme. The impact assessment looks at potential impacts to sediment regime,

Ref. No.	Question	Applicant's Response
	<p>further reinforces the need to compensate for these losses.</p>	<p>channel morphology and natural fluvial processes during both construction and operation phases. Where impacts have been identified, mitigation has been outlined to reduce any significant effects.</p> <p>The loss of some bank features is unlikely to be reversible through natural processes in the short term. Bank features such as exposed roots, undercut banks, and exposed bedrock would have developed over a long period of time through the balance between fluvial bank erosion and stabilisation by tree growth.</p> <p>Some bed deposits show indications of long-term stability and may only be transported small distances during rare large magnitude flow events. These features also act to promote deposition of finer sediments through sheltering. Where impacted, such deposits are unlikely to reform in the short term through natural deposition but over time would develop, if boulders exhibiting long-term stability can be replaced or reinstated at their original locations.</p> <p>Sedimentary bed features that may be directly impacted by construction activities would be mapped prior to construction and sediment removed, stored and reinstated where practicable following construction. Specific measures would be implemented to ensure that any in-channel boulders, affected by the works, that are over 0.5 m are placed back in the same location, with the same orientation.</p> <p>The Applicant acknowledges that the proposed changes to the Scheme would involve the loss of bankside habitat from within the SSSI. The Applicant has not concluded that compensatory provision for the loss of riverbank is necessary.</p>
37	<p>Table 7-7 – Assessment of Effects During Operation highlights that the impact of the proposed works on channel morphology are likely to be Moderate Adverse in terms of significance of effect due to the loss of some bank and near bank features within the works footprint which may increase local erosion rates which is ironically what the scour protection works are proposed to protect against in the first place.</p>	<p>An updated Environmental Statement Addendum: Southern Access Works for Change Request has been submitted at Deadline 4. This update (supported by site visits, a geomorphological assessment and hydraulic calculations) assesses changes in sediment transport, erosion and deposition characteristics as a result of the proposed changes to the Scheme. The impact assessment looks at potential impacts to sediment regime, channel morphology and natural fluvial processes during both construction and operation phases. Where impacts have been identified, mitigation has been outlined to reduce any significant effects.</p> <p>As noted in Chapter 8: Road Drainage and the Water Environment of Environmental Statement Addendum: Southern Access Works for Change Request (Table 8-7), some alterations to channel roughness may occur, a reduction in roughness compared to the existing tree-lined bank may locally increase erosion rates. However, the impacts are likely to be small, very localised to the channel margins and limited to the extent of the scour protection. Crucially, the bank which is lost does not provide an important source of sediment for the channel. The magnitude of this impact is assessed as minor adverse, giving rise to a slightly adverse significance of effect.</p>
38	<p>Additionally, with regard to the comments relating to natural fluvial processes, the designs impact would be to reduce the channels ability to naturally adjust but the impact of this is thought to be negligible and not significant in terms of impact. As stated previously, confining the river in such a way has a negative impact on the sites designated morphological interest feature of the SSSI and while the impact may be localised to this reach the fact that the reach is largely unmodified increases the significance of the impact of the proposed works.</p>	<p>An updated Environmental Statement Addendum: Southern Access Works for Change Request has been submitted at Deadline 4 of the Examination. This update (supported by site visits, a geomorphological assessment and hydraulic calculations) assesses changes in sediment transport, erosion and deposition characteristics as a result of the proposed changes to the Scheme. The impact assessment looks at potential impacts to sediment regime, channel morphology and natural fluvial processes during both construction and operation phases. Where impacts have been identified, mitigation has been outlined to reduce any significant effects. It is concluded that during construction there may be minor adverse impacts on the channel morphology as a result of bedrock loss in the channel and during operation there may be minor adverse impacts on channel morphology as a result of the permanent loss of bank features. The extent of these impacts would be very localised to works themselves.</p>

Ref. No.	Question	Applicant's Response
		<p>Site information collated by the Applicant and presented in the Baseline Conditions demonstrates that the reach is more modified and is not "largely unmodified". The north bank within the reach of the proposed works exhibits evidence of previous modification. This includes modifications associated with the construction of the existing crossing, including means for access, and a highway related drainage outfall (with associated rock armour protection). The south bank also exhibits modification with encroachment into the channel from river training works associated with the existing southern bridge pier. A total length of 35m, including the pier and the river training works upstream and downstream of the pier. Approximately 640m downstream of the proposed works, a river-wide weir impounds the river creating a backwater effect which extends approximately 300-350m upstream (to within 300-350m of the proposed works). The Applicant disagrees with the significance of impact being suggested on this basis.</p> <p>Further detailed hydraulic modelling is anticipated as part of submissions for the Examination. This will allow investigation of the spatial extents (upstream and downstream) of any changes in water levels, velocities, stream power and shear stress.</p> <p>Investigation is also ongoing with regard to the proposals for any hard-engineered bank protection solutions, including the reduction in length of any extents. These additional works in conjunction with refinements to the proposals will seek to reduce the extents of any bank protection required as well as the type of protection to be used.</p>
39	7.10.24. Please see 8.10.27 above for comment.	See response at corresponding comment.

© Crown copyright 2020.

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

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

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

Kew, London TW9 4DU, or email

psi@nationalarchives.gsi.gov.uk.

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

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

or call **0300 470 4580***.