

		Response
7	EA, Northumberland County Council (NCC) and Applicant to provide Position Statement in relation to the presence of Otters	<p>We would defer to the EA although NCC recognise that otters are likely present on all watercourses in Northumberland as a general rule, and would support the application of the precautionary principle in maintaining and improving connectivity across the road, which will be doubled or more in width. There is no disagreement with the process or survey methodology per se although note the general rule in ecology that lack of proof of presence is not proof of absence. Otter do not always leave spraint or other field signs and male otters have a range of up to 30km overnight.¹</p> <p>It is considered that there is a credible risk of road casualties (with EA reporting additional records to those within an Environmental Records Information Centre North East (ERIC) increasing with the widening of the route.</p> <p>In Part A we strongly support the inclusion of crossing protection and safe crossing points for wildlife and support that on Part B also. Monitoring immediately prior to or post-construction is not the preferred option as retro-fitting such features would be considered excessively costly and disruptive and may have significant impacts on delivery. Our preferred option would be to have such features included in design from the start of the programme, benefiting a range of wildlife as well as otters. The position on otters also relates to that for culverts as these are features for which good design is paramount to ensure otters can continue to commute throughout the area.</p> <p>Where present (noting some evidence in early surveys in the ES Appendix 9.3 at APP-300) water vole are under-reported in recent years, considered rare in the County, and where pre-construction updating surveys confirm presence suitable mitigation will be required. It is acceptable for this to be included in the Schedule of</p>

		<p>Requirements.</p> <p>¹ Aberdeen Western Peripheral Route Appendix A40.5 - Otter Survey Report, Jacobs, December 2006 and references contained therein at 1.2.3 and 1.2.4</p>
8	NCC and Applicant to confirm position in relation to any further need to provide non-motorised user improvements.	<p>The Council's position in relation to the need to provide for non-motorised users for the scheme has been set out in previous written submissions; the most recent being to Deadline 4 (REP4-074). This matter was discussed in depth in the last Hearing Session where points of disagreement in relation to the applicant's response submitted at Deadline 5 (REP5-029) were debated. It is clear that the basic position remains divergent on this matter between the applicant and NCC and therefore, unless the ExA require, we see no benefit in preparing a rebuttal to the technical comments made by the applicant if the basic principle is not agreed. We are willing to make suggested amendments to the key elements of the dDCO in relation to ensuring future delivery of the suggested NMU route should the ExA consider this to be appropriate.</p>
9	NCC and EA to respond to the Applicant's approach to construction mitigation documents.	<p>We accept the Construction Environmental Management Plan (CEMP) as an outline document subject to further revision, but defer to EA and NE especially regarding impacts on the River Coquet and Coquet Valley Woodlands SSSI</p> <p>We would like to see a greater level of narrative added to the Outline CEMP in relation to the contents of a LEMP to be submitted at a later date. This should confirm the commitments that will be contained in the detailed LEMP, and set out the philosophy and timings of the proposed LEMP measures.</p> <p>Subject to the receipt of these details in some form, we are content that an Outline LEMP is not required as part of the DCO application.</p>