

Outstanding Responses

		Response
	Biodiversity & Habitats Regulation	
BIO2.4	The Applicant submitted an Updated Biodiversity Air Quality Assessment at D3 [REP3-010]. NE is asked to comment on the report generally and particularly in respect of the impacts on the River Coquet and Coquet Valley Woodlands SSSI. Are NE's concerns resolved and if not, what are the consequences? NCC is also asked to comment on the findings of the report	<p>With regard to the Updated Biodiversity Air Quality DMRB Sensitivity Assessment [REP3-010] we would defer to NE who are the technical specialists.</p> <p>We understand that there is new guidance upcoming which would resolve the disparity between NE and HE on air quality impact assessment (SOCG REP5-016). The impact of increased traffic is likely to be offset by overall downward trends in vehicle emissions driven by cleaner technologies.</p> <p>The impact is likely to be localised in the vicinity of the new crossing on the R. Coquet and Coquet Valley Woodlands SSSI.</p> <p>In advance of new agreed national guidance bespoke approach is likely to be required here. Mitigation is not possible/practicable.</p> <p>It is for NE and the applicant to mutually agree this bespoke approach to impact assessment and appropriate compensation for that impact.</p> <p>Strategic compensation to reduce atmospheric concentration of N in other sectors likely suitable compensation with HE working with other delivery partners with links to e.g. catchment schemes with agriculture.</p> <p>The need for compensation arises as the site is already over the critical load for N.</p> <p>The ASNW and neighbouring non ASNW woodland at Coquet crossing is already impacted by emissions from the existing road – baseline consideration. How much the change is significant against this baseline when considered against the system</p>

		<p>being over capacity for N (critical load)</p> <p>We understand there is also some discussion with NE/HE over the need for ammonia deposition modelling but again (as we are for normal planning cases) we would look to NE's technical specialists for guidance.</p> <p>Other woodlands – offset improvement schemes being investigated (small scale localised improvements on heavily used sites around the R. Blyth and Wansbeck) – detail required but general approach is accepted.</p> <p>However, the scheme's air quality impacts are best addressed through a strategic compensation scheme which reduces atmospheric pollutants (N) via agriculture. Questions in discussion on and practicability of those however a commitment to fund e.g. work with farmers via delivery partners would be welcome (presumably with reporting/monitoring mechanisms to demonstrate. Figures are available giving robust and widely accepted data on reduction achieved through e.g. covered muck stores which could be used to quantify the impacts of such a scheme. (DEFRA RAPIDS project Appendix 3)</p>
BIO2.5	<p>In its LIR [REP1-071] NCC stated (paragraph 5.48) that it was considered far from clear that the loss of ancient woodland was being addressed satisfactorily from a spatial point of view in terms of the wording of Policies ENV1 and QOP 4 in the emerging Northumberland Local Plan. It was recognised by NCC that while the policies cannot be given full weight, neither of the parts quoted is the subject of significant outstanding objections. The Applicant responded to the LIR at D3 [REP3-025]. NCC is</p>	<p>We agree that the applicant's response at D3 Rep [REP3-025] addresses the issue of 'exceptional circumstances' and that the woodland strategy as agreed with NE (subject to some fine detail) is acceptable compensation. We also agree that the applicant has addressed the mitigation hierarchy and that the crossing at this point is the 'least harm' option. Therefore we consider that the reasons for this development and the compensation strategy (12:1 replacement, soil translocation and 50 year management strategy of a new woodland contiguous with the SSSI) are appropriate and in accordance with emerging plan policies.</p>

	<p>asked to comment on the Applicant's response within the context of NCC's statement that the overall ancient woodland strategy is welcomed (LIR 6.7.10).</p>	
<p>BIO2.6</p>	<p>The Applicant's Comments on the LIR [REP3-025] responding to paragraph 6.7.1 of the LIR indicate that the Applicant has issued additional assessment information comprising Updated HRA Reports [REP1-012 and REP1-013] and HRA Addendum Report [REP1-043]; Biodiversity No Net Loss Assessment for the Scheme [REP2-009]; Annex A – Approach to the Assessment of Losses and Gains of Watercourse [REP2-010]; and Updated Biodiversity Air Quality DMRB Sensitivity Assessment [REP3-010]. NCC has not yet commented on these documents and is asked to do so.</p>	<p>Updated HRA Reports [REP1-012 and REP1-013] – NE agreement January 2021. We agree with scope (10km) and agree with the conclusions (NO LSE) .</p> <p>HRA Addendum Report [REP1-043]; We agree with the conclusions (NO LSE).</p> <p>Biodiversity No Net Loss Assessment for the Scheme [REP2-009]; We would prefer to see an improvement via landscaping and habitat creation but biodiversity net gain (BNG) is not currently mandatory (and exemption for NSIP) nationally or in Northumberland (ENV 2 of ELP secures in general terms rather than via BNG). We agree that the principles of BNG have been applied, but would continue to request additional offsets where practicable (may be opportunities linked to air quality impacts/catchment level offsets). Ancient semi-natural woodland and SSSI impacts cannot be included in a biodiversity net gain assessment and must be considered separately under current guidance and DEFRA metric for BNG.</p> <p>Annex A – Approach to the Assessment of Losses and Gains of Watercourse [REP2-010] – in this case would defer to EA but provided that connectivity is maintained via the watercourses, the culverted/diverted sections sections are designed sympathetically (gravel beds and ledges) no objections based on the loss of watercourses given the nature of the scheme. Offset via catchment improvement is desirable.</p> <p>Updated Biodiversity Air Quality DMRB Sensitivity Assessment [REP3-010]. – see above response to BIO2.4.</p>

		<p>No major change to previous comments although would continue to request improvements on no net loss where practicable. We would support every possible opportunity to maximise gains for biodiversity within the order limits, zone of influence (ZOI) for the scheme and catchments.</p>
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