

# **A66 Northern Trans-Pennine Project**

## **4.5 Statement of Common Ground Durham County Council (Rev 3)**

**APFP Regulations 5(2)(q)**

**Planning Act 2008**

**Infrastructure Planning (Applications: Prescribed Forms and  
Procedure) Regulations 2009**

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A66 Northern Trans-Pennine Project  
Development Consent Order 202X

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**4.5 STATEMENT OF COMMON GROUND WITH  
DURHAM COUNTY COUNCIL**

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## **1 Introduction**

### **1.1 Purpose of this document**

- 1.1.1 This Statement of Common Ground ("SoCG") has been prepared in respect of the proposed A66 Northern Trans-Pennine project ("the Application") made by National Highways Limited ("National Highways") to the Secretary of State for Transport ("Secretary of State") for a Development Consent Order ("the Order") under section 37 of the Planning Act 2008 ("PA 2008").
- 1.1.1 This SoCG seeks to summarise and explain the respective parties' positions on issues but does not seek to replicate in full information which is available elsewhere within the Application documents. All Application documents are available on the Planning Inspectorate website.
- 1.1.2 The SoCG has been produced to confirm to the Examining Authority where the Applicant understands agreement has been reached between the parties to it and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the examination.
- 1.1.3 This SoCG has been prepared by the Applicant and in its view provides an accurate record of discussions to date and a summary of the issues that are either agreed, subject to further discussion or not agreed. Previous iterations of the SoCG have been the subject of discussion between the parties to this SoCG. The Applicant will work to agree and submit joint working drafts of the SoCG as the examination progresses. Prior to the end of the examination, the Applicant intends to submit jointly on behalf of both parties a final SoCG confirming what matters have been agreed and have not been agreed, and if any remain under discussion.

### **1.2 Parties to this Statement of Common Ground**

- 1.2.1 This SoCG has been prepared by National Highways as the Applicant. It has been shared with Durham County Council for comment prior to the submission of the DCO, at DCO submission and in advance of Deadline 5. Feedback has been sought from Durham County Council between 20 February and 6 March to update the Deadline 5 version. Durham County Council have been unable to formally confirm feedback prior to 6 March, but the subject of the SoCG and changes proposed since Deadline 3 have been shared during the period between Deadline 3 and Deadline 5.
- 1.1.2 The Applicant has set out the detail of the issues raised by Durham County Council to date and each of the SoCG parties' respective positions. This is intended to assist the Examining Authority in understanding where discussions have reached to date. The Applicant intends to narrow the issues and level of detail in this SoCG as the examination progresses and further matters are agreed.

- 1.2.2 National Highways (formerly Highways England) became the Government-owned Strategic Highways Company on 1 April 2015. It is the highway authority in England for the strategic road network and has the necessary powers and duties to operate, manage, maintain and enhance the network. Regulatory powers remain with the Secretary of State.
- 1.2.3 Durham County Council (DCC) will be responsible for the new and improved local highway network and are the Local Planning Authority for Bowes Bypass and Cross Lanes to Rokeby schemes of the A66 Northern Trans-Pennine project.

### **1.3 Terminology**

- 1.3.1 In the table in the Issues section of this SoCG:
- “Agreed” indicates area(s) of agreement from the Applicant’s perspective;
  - “Under discussion” indicates area(s) of current disagreement from the Applicant’s perspective, where resolution remains possible, and where parties continue discussing the issue to determine whether they can reach agreement by the end of the examination
  - “Not agreed” indicates a final position for area(s) of disagreement from the Applicant’s perspective, where the resolution of differing positions will not be possible, and parties agree on this point
- 1.3.2 It can be assumed that any matters not specifically referred to in the Issues section of this SoCG are not of material interest or relevance to DCC, and therefore have not been the subject of any discussions between the parties. As such, those matters can be read as agreed, unless otherwise raised in due course by DCC.

## 2 Record of Engagement

2.1.1 A summary of the key meetings that has taken place between National Highways and DCC in relation to the Application is outlined in Table 2.1.

Table 2-1 Record of Engagement

Date	Form of correspondence	Key topics discussed and key outcomes
22.09.2020	Online Meeting	Meeting between DCC, National Highways and the A66 IPT to discuss A66 Project and ongoing future engagement. Meeting included discussions on future local plans for Durham County Council and principal contacts for both the NH/A66 IPT and the County Council.
14.10.2020	Online Meeting	Meeting between DCC and the A66 IPT to discuss the Project and ongoing actions. Meeting included discussions on general updates on the design of the scheme and environmental assessments.
14.12.2020	Online Meeting	Meeting between DCC, National Highways and the A66 IPT to discuss the project and ongoing actions. Meeting included discussions on PPA Agreement and future engagement with PINs. It was noted in the meeting that DCC did not intend to use a PPA.
14.01.2021	Online Meeting	Meeting between DCC and the A66 IPT to discuss the project and ongoing actions. Meeting included discussions on structures, culverts, PRow and WCH.
21.01.2021	Online Meeting	Meeting between DCC and the A66 IPT to discuss ongoing actions and Statement of Common Consultation. Meeting included discussions on which newspapers the Project Team were intending to advertise the consultation. It was noted in the meeting that the Teesdale Mercury and Northern Echo are used by DCC.
09.02.2021	Online Meeting	Discussions with DCC as part of the Heritage Technical Working Group (TWG) (Matters discussed in the Technical Working Groups are included within ES Appendix 1.1: Evidence Plan (Application Document Number 3.4)). Meeting includes discussions on the Evidence Plan, project overview, update on report for geophysics, design development and archaeological trenching.
11.02.2021	Online Meeting	Regular meeting between DCC and the A66 IPT to discuss the project and ongoing actions. Meeting included discussions around the design updates to Cross Lanes to Rokeby section.
02.03.2021	Online Meeting	Meeting of the Water TWG with DCC in attendance. (Matters discussed in the Technical Working Groups are included within ES Appendix 1.1: Evidence Plan (Application Document Number 3.4)). Meeting included discussions on works to be completed, watercourse Crossings and key SW receptors overview.
02.03.2021	Online Meeting	Meeting of the Water TWG with DCC in attendance. (Matters discussed in the Technical Working Groups are included within ES Appendix 1.1: Evidence Plan (Application Document Number 3.4)). Meeting included discussions on works to be completed and key GW receptors overview.
12.03.2021	Online Meeting	Discussions with DCC as part of the Heritage TWG (Matters discussed in the Technical Working Groups are included within

Date	Form of correspondence	Key topics discussed and key outcomes
		ES Appendix 1.1: Evidence Plan (Application Document Number 3.4)). Meeting includes discussions on the research agenda, designated funds opportunities, discussion of developing design at Brougham and archaeological trenching.
18.03.2021	Online Meeting	Meeting of the Habitats Regulations Assessment TWG with DCC in attendance. (Matters discussed in the Technical Working Groups are included within ES Appendix 1.1: Evidence Plan (Application Document Number 3.4)). Meeting included discussion on site and proximity to schemes, Biodiversity Survey Strategy and HRA Baseline, Baseline Surveys Strategy and introduction to SAC fluvial geomorphology.
25.03.2021	Online Meeting	Regular meeting between DCC and Project Team to discuss the project and ongoing actions. Meeting included discussions on programme and landscape.
26.04.2021	Online Meeting	Meeting between DCC and the IPT at the regular Landscape TWG (Matters discussed at the Technical Working Groups are included within ES Appendix 1.1: Evidence Plan (Application Document Number 3.4)). Meeting included discussions on Zone of Theoretical Visibility (ZTV), definition of North Pennine Area of Outstanding Natural Beauty (AONB) setting, special qualities of the Greta Bridge and Bowes Conservation Areas.
29.04.2021	Online Meeting	Meeting between DCC and the IPT at the regular Ecological Impact Assessment TWG. (Matters discussed in the Technical Working Groups are included within ES Appendix 1.1: Evidence Plan (Application Document Number 3.4)). Meeting included discussions on Badger Bait Marking, Otter Halt Monitoring, MoRPH, and Air Quality and Affected Road Network (ARN).
13.05.2021	Online Meeting	Regular meeting between DCC and the A66 IPT to discuss the project and ongoing actions. Meeting included discussions on the DCO process and additional engagement. It was noted in the meeting that there had been local changes but no overall changes to Barnard Castle seats.
24.05.2021	Online Meeting	Meeting between DCC and the IPT to at the regular Landscape TWG (Matters discussed at the Technical Working Groups are included within ES Appendix 1.1: Evidence Plan (Application Document Number 3.4)). Meeting included discussions on the M6 junction 40 Penrith, Kemplay Bank Roundabout, Penrith to Temple Sowerby (east and west), Temple Sowerby to Appleby, Appleby to Brough, Bowes Bypass, Cross Lanes to Rokeby, Stephen Bank to Carkin Moor and options appraisal.
08.06.2021	Online Meeting	Discussions with DCC as part of the Heritage TWG (Matters discussed in the Technical Working Groups are included within ES Appendix 1.1: Evidence Plan (Application Document Number 3.4)). Meeting discussions include research framework, option appraisal, Evidence and Survey Strategy and geoarchaeological modelling.
15.06.2021	Online Meeting	Meeting of the Water TWG with DCC in attendance. (Matters discussed in the Technical Working Groups are included within ES Appendix 1.1: Evidence Plan (Application Document Number 3.4)). Meeting included discussions on progress, works to be completed and design options.

Date	Form of correspondence	Key topics discussed and key outcomes
28.06.2021	Online Meeting	Meeting between DCC and the IPT at the regular Landscape TWG (Matters discussed at the Technical Working Groups are included within ES Appendix 1.1: Evidence Plan (Application Document Number 3.4)). Meeting included discussions on the M6 junction 40 Penrith, Kemplay Bank Roundabout, Penrith to Temple Sowerby (east and west), Temple Sowerby to Appleby, Appleby to Brough, Bowes Bypass, Cross Lanes to Rokeby and Stephen Bank to Carkin Moor.
16.08.2021	Online Meeting	Meeting between DCC and the IPT at the regular Landscape TWG (Matters discussed at the Technical Working Groups are included within ES Appendix 1.1: Evidence Plan (Application Document Number 3.4)). Meeting included discussions on the M6 junction 40 Penrith, Kemplay Bank Roundabout, Penrith to Temple Sowerby (east and west), Temple Sowerby to Appleby, Appleby to Brough, Bowes Bypass, Cross Lanes to Rokeby, Stephen Bank to Carkin Moor and Scotch Corner.
18.08.2021	Online Meeting	Discussions with DCC as part of the Heritage TWG (Matters discussed in the Technical Working Groups are included within ES Appendix 1.1: Evidence Plan (Application Document Number 3.4)). Meeting includes discussions on key PEI Report findings and a scheme-by-scheme review.
02.11.2021	Online Meeting	Discussions with DCC as part of the Heritage TWG (Matters discussed in the Technical Working Groups are included within ES Appendix 1.1: Evidence Plan (Application Document Number 3.4)). Meeting includes discussions on feedback to statutory consultation, updates on research framework, geoarchaeological modelling and surveys.
13.12.2021	Online Meeting	Meeting between DCC, National Highways and the A66 IPT to discuss the revised traffic modelling results related to the Durham options. Meeting included discussions on the high-level impact of the different options. It was noted in the meeting that there was an error to the original modelling that had been corrected.
17.12.2021	Online Meeting	Walking Cycling and Horse-riding Group meeting between DCC, NYCC, National Highways and the A66 IPT to discuss scheme and actions related to active travel. Meeting included discussions east-west connectivity, cycling and designated funds. It was also noted in the meeting by DCC that they had been approached by Cumbria CC for a joint east-west cycling infrastructure although DCC noted they did not see the need for it.
12.01.2022	Online Meeting	Meeting between DCC, National Highways and the A66 IPT to discuss Traffic Modelling following the provision of updated data. Meeting included discussions on the impact the different options have on traffic and on traffic signal specifications.
14.01.2022	Online Meeting	Meeting between DCC, National Highways and the A66 IPT to discuss the assessments been undertaken for the forthcoming DCO specifically focusing on Population and Human Health. Meeting included discussions around Equalities Impacts Assessment, Population Assessment and Human Health Assessment.
18.01.2022	Online Meeting	Discussions with DCC as part of the Heritage TWG (Matters discussed in the Technical Working Groups are included within



Date	Form of correspondence	Key topics discussed and key outcomes
		ES Appendix 1.1: Evidence Plan (Application Document Number 3.4)). Meeting includes discussion on geoarchaeological modelling exercise, survey updates and design updates.
20.01.2022	Online Meeting	Meeting between DCC and the IPT at the regular Landscape TWG (Matters discussed at the Technical Working Groups are included within ES Appendix 1.1: Evidence Plan (Application Document Number 3.4)). Meeting included discussions on LVIA update and a scheme update.
26.01.2022	Online Meeting	Meeting between DCC, National Highways and the A66 IPT to discuss the proposed operational technology and operation structures being installed or retained as part of the scheme.
27.01.2022	Online Meeting	Meeting between DCC, National Highways and the A66 IPT to discuss the proposed ecological and environmental mitigation proposed as part of the scheme as well as the overall project design principles report. Meeting included an environmental mitigation walkthrough and discussions of the approach to Project Design Report.
03.02.2022	Online Meeting	Regular meeting between DCC, National Highways and the A66 IPT to discuss the project and ongoing actions. Meeting included discussions on the formal response to DCC consultation letter and Hulands Quarry Access.
09.02.2022	Online Meeting	Meeting between DCC and the A66 IPT to discuss the Materials and Waste Assessment methodology which forms part of the Environmental Statement. Meeting included discussions on resource banking and sterilisation and active sites for waste disposal. It was noted in the meeting that there are also other waste disposal sites within the County, although it was advised by the A66 IPT that those closer to the A66 would be preferred.
17.03.2022	Online Meeting	Regular meeting between DCC and A66 IPT to discuss the project and ongoing actions. Meeting included discussions on Draft EMP, SoCG and design updates.
24.03.2022	Online Meeting	Meeting between DCC and the A66 IPT to discuss the approach to Highways and Drainage Design. Meeting included discussions on project design updates, highways adoption, drainage and Tutta Beck.
06.04.2022	Online Meeting	Review and Comment meeting between DCC and the A66 IPT. The Legislation and Policy Compliance Statement were presented for discussion and for comments from DCC, prior to issue as part of the DCO.
06.04.2022	Online Meeting	Review and Comment meeting between DCC and the A66 IPT. The walking, cycling and horse riding proposals for the Scheme were presented for discussion and for comments from DCC, prior to issue as part of the DCO.
06.04.2022	Online Meeting	Review and Comment meeting between DCC and the A66 IPT. The Project Design Principles Report and the Tree Preservation Order and Important Hedgerow Plans were presented for discussion and for comments from DCC, prior to issue as part of the DCO.
06.04.2022	Online Meeting	Review and Comment meeting between DCC and the A66 IPT. The General Arrangement Drawings, Works Plans, Rights of

Date	Form of correspondence	Key topics discussed and key outcomes
		Way and Access Plans, Classification of Roads Plans, De-Trunking Plans, Traffic Regulation Measures (Clearways and Prohibitions) Plans, and Traffic Regulation Measures (Speed Limits) Plans were presented for discussion and for comments from DCC, prior to issue as part of the DCO.
17.05.2022	In Person Meeting	Meeting between DCC, National Highways and the A66 IPT to discuss the draft General Arrangement Plans and concerns regarding construction traffic and diversionary traffic routing.
23.06.2022	Online Meeting	Joint meeting between CCC, NYCC, DCC, EDC, RDC, Project Team and National Highways to discuss all Authority matters. Meeting included discussions on enabling works and TCPA applications.
25.07.2022	Online Meeting	Meeting to discuss and agree approach to SoCG Topics between July and August 2022.
08.08.2022	Online Meeting	Two Weekly SOCG Meeting focusing on Heritage and the positions of NH and DCC on Rokeby Junction
05.09.2022	Online Meeting	Two Weekly SOCG meeting and check in.
03.10.2022	Online Meeting	Two weekly SOCG Meeting discussing SOCG content.
17.10.2022	Online Meeting	Two weekly SOCG Meeting discussing relevant representation responses and SOCG content.
27.10.2022	Online Meeting	Joint meeting between CCC, NYCC, DCC, EDC, RDC, Project Team and National Highways to discuss all Authority matters. Meeting included a discussion and update on the DCO following Publication of the Examination Timetable, and an update on De-trunking and Stakeholder Engagement.
31.10.2022	Online Meeting	Two Weekly SOCG Meeting with representatives from DCC discussing on the examination process and agreeing future meeting topics ahead of examination.
14.11.2022	Online Meeting	Two Weekly SOCG Meeting with representatives from DCC discussing ongoing resolution of issues and agreeing future meeting topics ahead of examination.
24.11.2022	Online Meeting	Joint meeting between CCC, NYCC, DCC, EDC, RDC, Project Team and National Highways to discuss all Authority matters. Meeting included discussions on the freight study being undertaken by National Highways outside of the A66 NTP.
25.11.2022	Online Meeting	An Online All LA Meeting, including representatives from NYCC, to present the Environmental Management Plan and answer questions from attendees.
28.11.2022	Online Meeting	Two Weekly SOCG Meeting with representatives from DCC discussing ongoing resolution of issues and agreeing future meeting topics ahead of examination.
12.11.2022	Online Meeting	Two Weekly SOCG Meeting with representatives from DCC discussing ongoing resolution of issues and agreeing future meeting topics ahead of examination.
09.01.2023	Online Meeting	Two Weekly SOCG Meeting with representatives from DCC discussing future engagement session and the restructure of the SOCG prior to submission at deadline 3.

Date	Form of correspondence	Key topics discussed and key outcomes
06.02.2023	Online Meeting	Two Weekly SOCG Meeting with representatives from DCC to discuss the proposed updates to the format of the SOCG and review current under discussion issues.
10.02.2023	Online Meeting	Meeting with DCC and their sub consultants to discuss and agree under discussion topics related to Air Quality and Traffic Impact.
23.02.2023	Online Meeting	Joint meeting between CCC, NYCC, DCC, EDC, RDC, Project Team and National Highways to discuss all Authority matters. Meeting specifically focused on the EMP and the changes made since examination following comments from Interested Parties.
28.02.2023	Online Meeting	Meeting with DCC and their sub consultants to continue engagement on outstanding under discussion topics and agree actions to related to Air Quality and Traffic Impact.
06.03.2023	Online Meeting	Two-weekly SOCG Meeting with representatives from DCC to discuss the SOCGs ahead of submission at Deadline 5.

2.1.2 It is understood that this is an accurate record of the key meetings and other forms of consultation and engagement undertaken between (1) National Highways and (2) DCC and in relation to the issues addressed in this SoCG.

### 3 Issues

3.1.1 Tables 3-1, 3-2 and 3-3 provide a summary of the issues raised between the parties and the status. Appendix B provides further detail in relation to superseded positions set out by either party in discussing these issues, where relevant, to provide further context to the Examining Authority on the dialogue.

Table 3-1: Record of Issues – Agreed Issues

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status
3-1.1 Access & Rights of Way – footpath No. 5.6 Rokeby	Appendix 1 of DCC's Statutory Consultation response dated 05.11.2021	DCC consider that footpath (No. 5.6 Rokeby) is popular and important and connects Teesdale Way with Brignall and the River Greta would require large diversions (under both the black and blue options). DCC state that a grade-separated crossing of the new dualled section, on or in the near vicinity of the current footpath alignment, is the preferred solution. Officers are concerned that the prospect of the lengthy diversions currently proposed would tempt some people to try and take a more direct route across the dualled A66.	We understand your comments in relation to Public Footpath No. 5.6 Rokeby. The proposed Rokeby junction brings together several PRow's in the area for onward journeys, and further, provides a safe crossing point, which does not currently exist.	Agreed
3-1.2 Environmental Impacts – Minerals	Appendix 1 of DCC's Statutory Consultation response dated 05.11.2021	The proposed alignment of the dualling of the A66 and proposed junction improvements in County Durham in part overlie Mineral Safeguarding Areas as identified in the County Durham Plan (Adopted October 2020) as defined on the County Durham Plan Policies Map. Impacts on safeguarded mineral resources will need to be considered. Whenever possible the A66 upgrading should seek to minimise sterilisation	We welcome the engagement with DCC regarding the Minerals Safeguarding Areas and the ongoing works being undertaken to understand the impacts of emerging minerals policies. The impact of the project on the minerals sites are detailed within Chapter 11 (Minerals and Waste) of Volume 1 of the ES (Application	Agreed

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status
		<p>of economically important mineral resources where this can be avoided. DCC held a call for new minerals and waste sites in early 2021. Impacts on mineral operator proposed allocations for new mineral working will need to be considered, specifically the proposed Boldron Cross Lanes site which lies on land to the west and east of the B6277.</p> <p>The A66 Northern Trans-Pennine Project will have significant mineral and waste management requirements. Sufficient detail should be included in the ES to assist the Council in understanding the impact of the A66 Northern Trans-Pennine Project on material resources and waste management.</p>	Document Reference 3.2, APP-054).	
3-1.3 Environmental Impacts - Climate	Jacobs Impact Report – Appendix 2 of DCC's Statutory Consultation response dated 05.11.2021	No likely significant effects anticipated.	Thank you for confirming this.	Agreed
3-1.4 Technology and Operations - VMS Signage Connection	A66 . DCC: Technology and Operations Meeting (26.01.2022)	Currently DCC have a link / connection to the VMS signs on the A1(M) so that any issues can be known and managed on the DCC network. Is it possible for a similar link connection be provided for the new VMS signs on the A66.	This will be developed as part of the detailed design post DCO and the request has been passed to the operations lead to consider as part of the design.	Agreed
3-1.5 Woodland Planting	A66 . DCC Approach to Project Design Principles (27.01.2022)	The replacement planting of woodland removed as part of the Bowes Bypass	We are grateful for confirming this opportunity.	Agreed

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status
		Scheme can be replaced within the Cross Lanes to Rokeby Scheme.		
3-1.6 Hulands Quarry Access	DCC Regular Meeting (03.02.2022) also in DCC's response to SUPPLEMENTARY CONSULTATION – 28 January 2022 to 27 February 2022 Hulands Quarry access arrangements Bowes Cross Farm accommodation works dated 18 February 2022	Concerns were raised regarding the access requirements for Hulands Quarry and the interactions between their approved scheme and our proposed amendments.	The access improvements for the Hulands Quarry will be included as part of the red line boundary for the DCO and discussions are progressing with the quarry owners.	Agreed
3-1.7 The additional east-west cycle track/footway, providing a continuous connection between Cross Lanes and Greta Bridge	SUPPLEMENTARY CONSULTATION Walking, cycling and horse-riding provision, Landform and Compounds (Dated 18.03.22)	The additional east-west cycle track/footway, providing a continuous connection between Cross Lanes and Greta Bridge, is welcomed as it enhances the overall network. Officers are unsure how much demand there really is for a route following the A66 at this location, and although it does help to link various north-south public rights of way, it does not address the more fundamental issue of the very limited safe crossing points that will be available, and the distances walkers in particular will have to travel to reach those crossing points. There is no objection to the additional 250m of shared-use path parallel to the A66 in County Durham.	Whilst we appreciate that the Rokeby junction would require walkers to divert via the junction to cross the new dualled A66, adding a distance of approximately 700m to their journey, the proposals are designed to provide a safe crossing point for walkers, with the intention of connecting Public Rights of Ways (PRoWs) together, which are currently severed.	Agreed

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status
3-1.8 The additional east-west cycle track/footway - Archaeology	SUPPLEMENTARY CONSULTATION Walking, cycling and horse-riding provision, Landform and Compounds (Dated 18.03.22)	In terms of archaeology, it is noted that a programme of assessment, evaluation and reporting is underway in accordance with nationally recognised best practice.	Thank you for confirming that the programme for assessment is being undertaken in accordance with national recognised best practice.	Agreed
3-1.9 Inclusion of relevant legislation	Legislation and Policy Compliance Statement review session (06.04.2022)	Within Section 3.5 (Other legislation) there are no relevant legislation identified on Noise and Vibration. EHO suggest that Part III of the Control of Pollution Act 1974 remains pertinent in relation to the construction works, as does Part III of the Environmental Protection Act 1990 in relation to Statutory Nuisance.	Noted. This has been included within the Legislation and Policy Compliance Statement (Application Document Reference 3.9, APP-242) which was submitted with the DCO.	Agreed.
3-1.10 Hulands Quarry	Walking, Cycling and Horse-Riding Proposals review session (06.04.2022)	Hulands Quarry Public Exhibition took place on 22.03.22. During the course of the DCO the application may be submitted to DCC and potentially one to keep an eye on.	We have consulted with Hulands Quarry and are aware of the proposed infrastructure. Expansion is generally proposed eastwards so the impact on the new infrastructure will be limited.	Agreed
3-1.11 AF04 Principal Inclusion	Project Design Principles & Tree Preservation Order Document review session (06.04.2022)	Looking at the principles that applied to the scheme, AF04 was not defined in the document.	This was incorrect and has been removed from the Project Design Principles Report (Application Document Reference 5.11, APP-302).	Agreed
3-1.12 Bowes Bypass Road Classification	Design Drawing Review Session (06.04.2022)	DCC raised no objection with the extension of the unclassified road at Low Road . The Street as part of the Schemes Road Classification.	It is National Highways understanding that this issue is resolved and may be treated as agreed between the parties.	Agreed

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status
3-1.13 Cross Lanes to Rokeby Road Classification	Design Drawing Review Session (06.04.2022)	DCC raised no objection with the extension of the B6277 or the extension of the C165.	Thank you for confirming this is acceptable.	Agreed
3-1.14 Cross Lanes to Rokeby De-trunking extent and principles	Design Drawing Review Session (06.04.2022)	DCC Raised no concerns with the principle and extent of de-trunking of the A66 as part of the Cross Lanes to Rokeby Section.	Thank you for confirming this is acceptable.	Agreed
3-1.15 Bowes Bypass Speed Limits	Design Drawing Review Session (06.04.2022)	DCC Raised no concerns with the proposed speed limit changes as part of the Bowes Bypass Scheme.	Thank you for confirming this is acceptable.	Agreed
3-1.16 Bowes Bypass Public Rights of Way Access Pan Regulation 5(2)(k) Drawings	Design Drawing Review Session (06.04.2022)	DCC Raised no concerns with Public Rights of Way Access Pan Regulation 5(2)(k) Drawings.	Thank you for confirming this is acceptable.	Agreed
3-1.17 Cross Lanes to Rokeby Public Rights of Way Access Pan Regulation 5(2)(k) Drawings	Design Drawing Review Session (06.04.2022)	DCC Raised no concerns with Public Rights of Way Access Pan Regulation 5(2)(k) Drawings.	Thank you for confirming this is acceptable.	Agreed
3-1.18 Nutrient Impacts on protect sites advise from Natural England	Email from C Teasdale on 21.04.22	On 16 March 2022 Natural England sent a letter to a number of local planning authorities, including Durham County Council, which provided new advice for LPA's in relation to development proposals with the potential to affect water quality resulting in adverse 'nutrient impacts' on protected habitat sites. The A66 project is not a form of development they are generally concerned with, but might be in terms of the likely extent of welfare facilities that will be required and their	Natural England have confirmed via email (28.11.2022) that: <i>Natural England's nutrient neutrality advice applies to all types of development that would result in a net increase in population served by a wastewater system, including new homes and student accommodation. The River Eden SAC catchment is currently failing it's Phosphorous targets. We would not expect a highways scheme to fall under the nutrient</i>	Agreed



Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status
		subsequent disposal when full. This is a matter that you may or may not have considered but it is appropriate that you are made aware of the issue.	<p><i>neutrality criteria as we would expect that the workforce either do not reside on site or are likely to be drawn from the local catchment, we would expect any surface water drainage to be treated through the usual EMP and CEMP criteria</i></p> <p>We can confirm there is no outstanding issues between DCC and National Highways in relation to nutrient neutrality.</p>	
3-1.19 East Bowes Accommodation Overbridge Maintenance	Design Drawing Review Session	East Bowes Accommodation overbridge will have a big maintenance requirement.	We will retain the responsibility of the maintenance of the structure of the bridge. The surfacing would be the responsibility of DCC.	Agreed
3-1.20 De-trunking and return of DCC Assets	Design Drawing Review Session	When will DCC be able to see the extent of the Detrunking.	We are committed to ensuring de-trunked sections are acceptable in terms of their standard to Local Authorities. De-trunking schedules are included within the DCO application, see document TR010062/APP/5.21, APP-562.	Agreed
3-1.21 HGV Realignment at Cross Lanes Priority Junction	Design Drawing Review Session	Are we confident that the two priority junctions at Bowes Bypass can turn out of the diverge and not obstruct the carriageway.	We have auto-tracked this layout as part of our design process. We have also undertaken a Road Safety Audit as reported in Section 9 of the Transport Assessment (Application Document Reference 3.7, APP-236) to ensure an independent audit of our design proposal and incorporated feedback from this process into our design. National Highways are therefore confident regards this	Agreed

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status
			<p>matter and consider that this point is now agreed, following the Design Drawing Review Session and the evidence provided in the DCO application as cited.</p>	
<p>3-1.22 Diversionary Impacts and Construction traffic</p>	<p>Meeting with DCC – 17.05.22 Deadline 4 Response from DCC (REP4-025)</p>	<p>Durham will not accept construction traffic or diversionary traffic via Barnard Castle. At Deadline 4, DCC also stated: DCC will need to see a detailed diversion plan to establish suitability and to determine whether this will have an impact on the surrounding networks from a traffic, noise, dust/pollution perspective. Discussions will be required with Darlington Borough Council to confirm acceptance of the routes if, as suggested, part of the diversion route passes through their borough.</p>	<p>The construction and diversionary routes will be developed as part of the Environmental Management Plan (EMP), should the DCO be made. This document will be subject to consultation with DCC and the other host authorities. We note DCC’s position on this matter and will work with DCC to ensure suitable construction routes are identified.</p> <p>We would also note that the EMP (Application Document Reference 2.7 (Rev 2), REP3-004) confirms that no part of the project can start until a Construction Traffic Management Plan (CTMP) is developed which will include (amongst other requirements) the following:</p> <p>Details of proposed traffic management measures, including phasing plans, route restrictions and speed limits.</p> <p>Details of planned carriageway and local road closures, including proposed stakeholder and community engagement protocols in advance of closures.</p>	<p>Agreed</p>

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status
			<p>Details of proposed diversion routes, durations of use and proposals for encouraging compliance with designated diversion routes (with consideration for potential noise impacts).</p> <p>The CTMP will include, amongst other commitments, the following commitment for diversion routes to be discussed with the Local Highway Authority in advanced of required closures. National Highways consider that this matter is agreed in so far is possible at this stage and with commitment to the further engagement as cited above.</p> <p>It is understood that these matters including rat running and diversions are the subject of dialogue between the authorities and National Highways Delivery Integration Partners (DIPs) and will be discussed at a meeting on 14 March 2023.</p>	
3-1.23 Responsibility for Maintenance	Design Drawing Review Session	Who will be responsible for the proposed private accesses?	This has not been determined yet. In most cases these are shared routes so an agreement will need to be determined between National Highways, DCC and the landowners.	Agreed subject to continued dialogue during detailed design

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status
3-1.24 De-trunking	Durham County Council – Relevant Representations – RR-073 – 30 August 2022 DCC Response at Deadline 4 (Rep4-025)	<p>Under which legislation does National Highways propose to carry out ancillary highway works to the Local Highway Authority’s (LHA) network? This is important for DCC as both highway and permit Authority as to how it addresses the construction of the works.</p> <p>Has a Side Road Order been produced by National Highways? This would be needed to address, stopping / diversion / change in status / de-trunking / reclassification of highways impacted by the scheme. This Order is very important as it will determine what (and what not) the council inherits for the scheme.</p> <p>At Deadline 4, DCC also stated: DCC has agreed in principle detrunking arrangements. Further discussions are required as to the asset condition, location of drainage, signing, street lighting, and other infrastructure that DCC will be managing. A commuted sum will need to be agreed for those assets part of the detrunking arrangement in particular carriageways, footways and drainage assets.</p> <p>Durham County Council (DCC) request a 12-month maintenance period for those highway assets that are proposed to be handed over as part of the project. Street sweeping, gully cleaning, winter routes will need</p>	<p>The Development Consent Order will provide the necessary approvals, under the Planning Act 2008. For further detail on the Applicant’s position please see Appendix A.</p> <p>National Highways accepts that, at handover, some assets will be at or nearing the end of their serviceable life and it may be appropriate that a commuted sum is provided to allow the Local Authority to fund renewal works at the optimal time for an intervention and not before. Assets, at handover, with more than half of their residual life remaining are expected to be inspected by the relevant Local Highway Authority and renewal works planned and funded through the uplifted central Government grant.</p> <p>The Local Highway Authority will be responsible for maintenance from the handover date.</p> <p>National Highways note the request for details of items which are within either defects liability or warranty periods to be identified on handover.</p> <p>National Highways and the Local Highway Authorities continue to work together to reach an agreed position on matters of principle and detail.</p>	Agreed in principle in relation to the de-trunking arrangements process. The detail of maintenance periods will continue to be developed as part of the de-trunking agreement.

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status
		to be confirmed if part of the maintenance agreement. For all works that DCC will be maintaining post-project completion, a copy of as-built drawings will be required. Any pumps that may be installed as part of any drainage/SUDS works will need to be detailed with any warranty, maintenance etc		
3-1.25 Safety Audit	Durham County Council – Relevant Representations – RR-073 – 30 August 2022	As part of the preliminary design process and before land take is determined a Stage 1 Road Safety Audit should have been carried out which would include works on the LHN. Has this been seen by DCC Highways.	A Stage 1 Road Safety Audit (RSA) has been carried out. Both the RSA report and Designers Response Report for the Bowes Bypass scheme and the Cross Lanes to Rokeby scheme has been shared with Durham County Council on the 8 November 2022. Any comments will be reviewed and discussed through our ongoing engagement and scheduled meetings.	Agreed subject to continued dialogue during detailed design
3-1.26 Departures	Durham County Council – Relevant Representations – RR-073 – 30 August 2022	It is understood that there would be a number of departures and relaxations from standard on some of the works proposed to become part of the LRN. DCC as Local Highway Authority would need to see these, and the rationale behind them before they could be agreed too. When would these be available for comment?	Local Authority Departures from Standard application forms for the Bowes Bypass and Cross Lanes to Rokeby Schemes have been drafted with the relevant rationale and this has been shared with Durham County Council on 27 October 2022 and discussed at meetings on 31 October 2022 and 14 November 2022. We expect the Council will provide a Determination on the Departures from Standard sought. Liaison will continue through our scheduled	Agreed subject to continued dialogue during detailed design and agreement on a formal determination document (which will be recorded in this SoCG)

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status
			meetings and the discussions and formal determination document will be recorded in this SoCG.	
3-1.27 Geology and Soils	Durham County Council – Relevant Representations – RR-073 – 30 August 2022	The findings of the initial Phase 1 ground investigations and the proposal to carry out further ground investigation (Phase 2) prior to construction to further assess risks to human health/sensitive receptors are considered to be satisfactory.	It is considered that the measures contained within the Environmental Management Plan (Document Reference 2.7, REP3-004) are consistent with the requested wording and this matter is agreed.	Agreed
3-1.28 Inclusion of relevant legislation: Defra Metrics	Legislation and Policy Compliance Statement review session	Defra Metric 2.0 is referenced, and should this be revised to Defra metric 3.0?	The design has been informed by the principles of habitat replacement (i.e. replacement rations) set out in Defra Biodiversity Metric 3.0. Impacts and proposed mitigation are detailed within Chapter 6 (Biodiversity) of the ES (Application Document Reference 3.2, APP-049) and underpinned by detailed assessments within separate appendices (Appendix 6) Located within Volume 3 of the ES (Document Reference 3.4 , APP-154 to APP-175).	Agreed in relation to the use of the metric. Further discussion is recorded in table 3-2.

Table 3-2: Record of Issues – Under Discussion Issues

Appendix B includes issues which were stated as under discussion at the time of DCO submission (related to Statutory consultation and/or pre-application discussions) but are no longer considered to be relevant as the issues are either addressed in the DCO documents or outstanding issues are now recorded under relevant representations.

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status
3-2.1 Air Quality	Durham County Council – Relevant Representations – RR-073 – 30 August 2022 Relevant Representations RR-073.28	There are nine human health sensitive receptors assessed in DCC (HSR 57 to HSR 65) for the operational phase. There are no predicted exceedances at human health receptors of any pollutant reported in the chapter, and so no new exceedances as a result of the scheme would be expected within DCC. Results are confirmed to not be presented on a scheme by scheme basis and that the discussion for region 1 in Chapter 5 Air Quality is presents the impact of the overall scheme on the A66 region including the section of the scheme within DCC. The largest human health impact as a result of the scheme is reported to be +0.9 ug/m3, within the DCC boundary at Highly Sensitive Receptor 60 within the Cross Lanes to Rokeby section adjacent to the A66, south of Barnard Castle, to the east of the B6277 junction with the A66. At this location, concentrations are predicted to increase from 9 ug/m3 in DM 2029 to 9.9 ug/m3 in the DS scenario, where an increase of 3,603 AADT is predicted for the A66. It is not clear whether this receptor is the same receptor which was reported in the PEIR to have an increase of +4.0 ug/m3 in annual mean NO2 at a residential property adjacent to the A66 at Cross Lanes, however the predicted impacts would appear to have dropped significantly in DCC compared to the PEIR stage.	National Highways Subsequent to these meetings, where required, short technical notes have been issued to DCC and their Consultants on these specific items.  The summation of the current position on Air Quality is provided within Appendix C identifying most items raised by DCC and their Consultant have now reached understanding and agreement.  There remains a small number of questions relating to the Construction Phase, specifically relating to the section of The Sills between County Bridge and Bowes Road in Barnard Castle which are subject to ongoing discussion.	Under discussion.

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status
3-2.2 Inclusion of relevant legislation	Legislation and Policy Compliance Statement review session	<p>It is noted that there was an amendment to the Environment Bill in 2021 that extended the scope of BNG to include applications in respect of nationally significant infrastructure projects (NSIPs).</p> <p>NPSNN accordence table states the following:                      3.3 “On this basis, the Project has aligned with the principles of the NPPF in seeking to avoid and mitigate environmental and social impacts.”</p> <p>There is no mention of biodiversity net gains in reference to NPPF.</p>	<p>Pending the introduction of secondary regulations (which have recently been consulted upon by Government), a Biodiversity net gain assessment is not currently a requirement for Nationally Significant Infrastructure Projects therefore is not included as part of the Application documents.</p> <p>The Applicant has also had regard to paragraph 5.33 of the National Networks National Policy Statement which advises that “Development proposals potentially provide many opportunities for building in beneficial biodiversity or geological features as part of good design. When considering proposals, the Secretary of State should consider whether the applicant has maximised such opportunities in and around developments.”. The Applicant has accordingly sought opportunities to maximise biodiversity enhancements as part of its mitigation where possible. For example, by providing habitat linkages to increase connectivity to areas of semi-natural habitats within the wider area and therefore enhancing and tying into existing green infrastructure networks. Whilst Biodiversity Net Gain (BNG) is not currently a statutory requirement that is in force for Nationally Significant</p>	Under discussion. This is to be discussed as part of the regular SoCG meetings with DCC.



Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status
			<p>Infrastructure Projects, one of the Project objectives is to seek to achieve no net loss as a minimum and looks to deliver net gains where such opportunities exist. The BNG Metric was therefore used as a tool alongside the development of the environmental mitigation design to understand the situation against the Project's objective of achieving no net loss and to seek opportunities to maximise net gains.</p>	
3-2.3	Environmental Management Plan	<p>DCC continues to have concerns regarding the EMP process. The EMP process should not disadvantage DCC or other Councils in any way and their input to and influence over the matters contained within each iteration of the EMP should be no less than would have been the case had the approvals followed the normal DCO requirements process. The amendment to Article 53 and continued engagement with the Applicant is welcomed, but concerns remain about the EMP process which are shared by the other Councils. The Applicant's proposal to include a mechanism for notification to the Secretary of State (SoS), when it proposes to determine a change to the 2nd iteration EMP, is welcomed giving the SoS the opportunity to 'call -in' the decision. To enable DCC's views to be taken into account by the SoS in deciding whether to exercise call - in powers, it is requested that the article should also include a provision requiring the Applicant to notify DCC</p>	<p>A session was held with the Local Authorities on 23 February to outline the approach to the EMP. This included outlining the consultation requirements within the EMP for National Highways to consult with the Local Authorities. Further detail was also provided in terms of the SoS call-in process.</p> <p>The issue of the Secretary of State 'referral' process under article 53 was discussed at Issue Specific Hearing 3. In light of those discussions, and the submissions made by DCC and (and other interested parties), National Highways has amended the draft DCO (a revised version of which has been submitted alongside this SoCG at Deadline 5) to provide the Secretary of State with the ability to extend the 14 day 'call in' period in article 53. This is also confirmed in</p>	<p>It is National Highways understanding that this matter can be considered to be agreed between the parties but this remains under discussion until confirmed by DCC.</p>

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status
		<p>and other interested parties be informed at the same time as the notification to the SoS.</p>	<p>National Highways' Issue Specific Hearing 3 (ISH3) Post Hearing Submissions (including written submissions of oral case) (doc. ref 7.30). It is also worth noting the oral submissions made by National Highways at Issue Specific Hearing 3, where it was confirmed that the Secretary of State (in deciding whether or not to make the DCO) can also amend the 14 day time period if they see fit.</p> <p>As also stated in the post-hearing submission made by National Highways in respect of Issue Specific Hearing 3, Paragraph 1.4.34 of the first iteration EMP requires National Highways to provide consultees with a copy of any submission made to the Secretary of State. National Highways will reflect on this wording further with a view to establishing whether any amendments are required to make it clear that this extends to submissions to the Secretary of State relating to proposed amendments to the second iteration EMP (including any 'referrals'). Any required revisions to the first iteration EMP will be reflected in the next draft submitted into the examination.</p>	

Table 3-3: Record of Issues – Not Agreed Issues

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status
There are no issues that are currently not agreed.				

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## Appendices

## **Appendix A: A66 Impacts on Barnard Castle (HE565627-AMY-GEN-S08-RP-TR-000001)**

## Appendix B: Matters from Rev1 SoCG superseded by DCO Submission and National Highways’ responses to Relevant Representations

Table B-1: Record of Superseded Issues

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
B-1.1 Cultural Heritage - misinterpreted policy guidance	Appendix 1 of DCC’s Statutory Consultation response dated 05.11.2021	It is the contention of the design and conservation team that National Highways has misinterpreted policy guidance on harm to designated assets and sought to remove perceived harm rather than undertaking an appropriate weighting exercise of the impact of the proposal in the round. The fact that it has now been demonstrated in a plan provided to DCC by National Highways that further heritage benefits can be drawn from an amended Blue route further strengthens the objection to the Black route in this specific location.	We have fully considered the potential impact of the Project on designated heritage assets as set out within the policy tests contained within the National Networks National Policy Statement (NNNPS). Section 8.9 of Chapter 8 (Cultural Heritage) of the ES (Application Document Reference 3.2, APP-051) presents the assessment of likely significant effects. It is during the construction phase and operational phase that some adverse effects on heritage assets are sustained (as summarised in the response to NN NPS paragraph 5.131 above). No significant impacts are expected to arise in the operational phase.	No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that: <i>In terms of cultural heritage in respect of the “Blue” route, the balance of harm derived from the “Black” (subject of the DCO application) or “Blue” route is nuanced and, as such, whilst the “Blue” route remains the preference ....</i> <i>....it is acknowledged that design refinement and the preparation of the heritage mitigation strategy in the Environmental Management Plan provides a reasoned justification for the selected route.</i>	24.01.2023

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			<p>Essential mitigation of construction impacts would include measures that reduce the likelihood of physical damage as well as changes to the setting that affect the significance of the heritage assets. An investigation of archaeological remains prior to construction and the analysis of artefacts and publication of results following the construction would minimise the direct impacts on archaeological remains. The type and location of mitigation required will be agreed with Historic England and County Durham by means of an Historic Environment Mitigation Strategy, to be submitted as part of the Environmental Management Plan (EMP) (Application Document Reference 2.7 (Rev 2), REP3-004). The operational phase of the Project could lead to beneficial and</p>		

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			<p>adverse effects on the setting of cultural heritage assets through traffic noise and the visibility of moving vehicles on the road. Adverse impacts during operation will be no different to the permanent impacts that have occurred as part of the construction phase. National Highways will continue to engage with DCC on these issues and seek agreement that its approach to applying heritage policy is robust.</p>		
<p>B-1.2 Cultural Heritage - Impact on Significance – imposing harm</p>	<p>Appendix 1 of DCC’s Statutory Consultation response dated 05.11.2021</p>	<p>The Black route imposes harm on the setting of the Church of St Mary by the construction of the western junction arrangement. This compromises the gateway effect to Rokeby Park created historically as a result of localised topography</p>	<p>We have fully considered the potential impact of the Project on designated heritage assets. This is assessed within our Chapter 8 (Cultural Heritage) within Volume 1 of the ES (Application Document Reference 3.2, APP-051). It is our view that the proposed route will not introduce a major physical change to the Register Park and</p>	<p>No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that:  <i>In terms of cultural heritage in respect of the “Blue” route, the balance of harm derived from the “Black” (subject of the DCO application) or “Blue” route is nuanced and, as such, whilst the “Blue” route remains the preference ....</i></p>	<p>24.01.2023</p>



Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			<p>Garden (RPG) and it will minimise the impacts on the settings of the associated assets (St Mary's Church, the school house and the Old Rectory) and avoids further severance of a part of the RPG.</p> <p>Furthermore, the proposed route will bring some benefits to the historic environment through reduction of severance between St Mary's Church and the Old Rectory and the likely reduction of impact risk at the Gate Piers at the southwest corner of the park.</p> <p>National Highways will continue to engage with DCC on these issues and seek agreement that its proposals represent the optimal solution.</p>	<p><i>....it is acknowledged that design refinement and the preparation of the heritage mitigation strategy in the Environmental Management Plan provides a reasoned justification for the selected route.</i></p>	
<p>B-1.3 Cultural Heritage – Impact on Significance – relentless traffic</p>	<p>Appendix 1 of DCC's Statutory Consultation response dated 05.11.2021</p>	<p>The Black Route fails to remove the harm to the setting of the Church of St Mary which results from relentless traffic movements in close proximity, a primary</p>	<p>We have fully considered the potential impact of the Project on designated heritage assets. This is assessed within our Chapter 8 (Cultural Heritage)</p>	<p>No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that: <i>In terms of cultural heritage in respect of</i></p>	<p>24.01.2023</p>

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
		<p>reason for the inclusion of the asset on the risk register, therefore this route promotes harm</p>	<p>within Volume 1 of the ES (Application Document Reference 3.2, APP-051).                      It is accepted that construction activities would occur within the setting of the church, both on existing road corridor immediately south and for the construction of the new offline section of road beyond. This would include moving plant, lighting and noise. Construction activity would be visible and audible from the church and would feature heavily in views towards it when viewed from the road. However, this impact would be temporary, resulting in a minor adverse magnitude of impact. However, during operation, traffic noise from current road corridor may be reduced, but the beneficial effects of that moderated by new</p>	<p><i>the “Blue” route, the balance of harm derived from the “Black” (subject of the DCO application) or “Blue” route is nuanced and, as such, whilst the “Blue” route remains the preference                      ....                      ....it is acknowledged that design refinement and the preparation of the heritage mitigation strategy in the Environmental Management Plan provides a reasoned justification for the selected route.</i></p>	

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			moving traffic across land to the south. National Highways will continue to engage with DCC on these issues and seek agreement that its proposals represent the optimal solution.		
B-1.4 Cultural Heritage - Impact on Significance – eastern option access to Barnard Castle	Appendix 1 of DCC’s Statutory Consultation response dated 05.11.2021	The Blue Route utilising the eastern alternative junction sites the proposed Rokeby Junction closer to the location of the existing junction, ensuring the primary flow of westbound vehicles travelling to and from Barnard Castle uses this junction and not the Cross Lanes junction. This traffic behaviour improves journey times, negates possible issues at The Sills and Barnard Castle Bridge and is considered safer for walkers, cyclists and horse riders using the B6277 Moorhouse Lane. These public benefits do not appear to have been weighed	It was agreed within our meeting on 13 December that the modelled flow on Moorhouse Lane is low within the base model validation. It was also agreed in the meeting that this will not lead to us underestimating the reassignment of trips from Barnard Castle Road to Moorhouse Lane within the Do Something Scenario. We have provided a technical note to DCC (issued on 22 April 2022) which sets out the agreed stance on Highways and Traffic Modelling. This is included within Appendix A of this SoCG.	No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that: <i>overall when considering the merits of the “Black” route vs the “Blue” route, the differences in Highways terms are shown to be small with the revised modelling scenario.</i> <i>Given that both routes produce a benefit to trip reduction through the centre of Barnard Castle of circa 384 trips per day including over the 16th century bridge, this does in turn, lead to an increase in traffic on the B6277 The Sills of up to 524 additional vehicles per day.</i>	24.01.2023

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
		<p>against the potential harm to Rokeby Park.</p>	<p>National Highways will continue to engage with DCC on these issues and seek agreement that its proposals represent the optimal solution.</p>	<p><i>When considering the “Black” vs “Blue” route, DCC had previously objected to National Highways preference of the “Black” route, mainly due to the impact of the additional traffic on the B6277 compared to the “Blue” route. However, the revised modelling has shown that the difference between the routes would be just 127 vehicles per day.</i></p> <p><i>Given the benefits of traffic reduction through Barnard Castle, it is not considered that the additional 127 vehicles per day in the “Black” route scenario vs the “Blue” route scenario, would be sufficient grounds for DCC to maintain an objection to National Highways preference of the “Black” route.</i></p> <p>DCC outstanding issues in relation to Highways are considered in table 3-2 above.</p>	

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
B-1.5 Cultural Heritage - Impact on Significance – design development	Appendix 1 of DCC's Statutory Consultation response dated 05.11.2021	The design development has not been carried far enough prior to statutory consultation to ensure that all heritage benefits can be weighed against any harm. The revised proposal HE565627 AMY HGN S08 SK CH 000020 clearly carries substantial benefits for the improvement of the setting of the listed Church of St Mary by partially stopping up the A66 and de-trunking the section adjacent to the church providing a potential stimulus for reuse.	Both of the route options were subject to a detailed review, in light of applicable legislation and guidance and these policy tests, particularly to understand the potential harm first in terms of any loss and then setting to all heritage assets.  The methodology for the Cultural Heritage assessment follows the guidance set out within Design Manual for Roads and Bridges (DMRB) LA 106 Cultural Heritage Assessment (DMRB LA 106) and the Chartered Institute of Archaeologist's Standard and guidance for historic environment desk-based assessment. The methodology is detailed within Section 8.4 of the Chapter 8 (Cultural Heritage) of Volume 1 of the ES (Application Document reference 3.2, APP-051).  It is our view that the route will not introduce a	No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that:  <i>In terms of cultural heritage in respect of the "Blue" route, the balance of harm derived from the "Black" (subject of the DCO application) or "Blue" route is nuanced and, as such, whilst the "Blue" route remains the preference ....</i>  <i>....it is acknowledged that design refinement and the preparation of the heritage mitigation strategy in the Environmental Management Plan provides a reasoned justification for the selected route.</i>	24.01.2023

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			<p>major physical change to the RPG and minimises the impacts on the settings of the associated assets (St Mary's Church, the school house and the Old Rectory) and avoids further severance of a part of the RPG.</p> <p>The route brings some benefits to the historic environment through reduction of severance between St Mary's Church and the Old Rectory and the likely reduction of impact risk at the Gate Piers at the southwest corner of the park.</p> <p>We maintain our view (as set out within the consultation brochure) that the principal consideration in our preference for the black junction (the proposed route) is the impact on the Grade II* Rokeby Park RPG, in that the Blue junction (your preference) would lead to fragmentation of the RPG site. National</p>		

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			Highways will continue to engage with DCC on these issues and seek agreement that its proposals represent the optimal solution.		
B-1.6 Cultural Heritage - Impact on Significance – impact on Barnard Castle Bridge	Appendix 1 of DCC’s Statutory Consultation response dated 05.11.2021	The potential impact on the Grade I listed and Scheduled Barnard Castle Bridge resulting from increased traffic movements from the western Rokeby junction has not been factored into the balancing exercise. Collision impact already poses an ongoing problem and any increase in movements can only exacerbate this.	<p>As reported within the Transport Assessment (Document reference 3.7, APP-236) the traffic flow in Barnard Castle is expected to reduce due to the lower flows on the A67, of around 400 vehicles AADT, including on Barnard Castle Bridge. This reduction on the A67 occurs due to the improved A66 attracting more longer distance east west traffic from the A67.</p> <p>Further details on traffic modelling are included within the Transport Assessment (Document Reference 3.7, APP-236).</p>	<p>No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that:</p> <p><i>overall when considering the merits of the “Black” route vs the “Blue” route, the differences in Highways terms are shown to be small with the revised modelling scenario.</i></p> <p><i>Given that both routes produce a benefit to trip reduction through the centre of Barnard Castle of circa 384 trips per day including over the 16th century bridge, this does in turn, lead to an increase in traffic on the B6277 The Sills of up to 524 additional vehicles per day.</i></p> <p><i>When considering the “Black” vs “Blue” route, DCC had previously objected to National</i></p>	24.01.2023

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
				<p><i>Highways preference of the “Black” route, mainly due to the impact of the additional traffic on the B6277 compared to the “Blue” route. However, the revised modelling has shown that the difference between the routes would be just 127 vehicles per day.</i></p> <p><i>Given the benefits of traffic reduction through Barnard Castle, it is not considered that the additional 127 vehicles per day in the “Black” route scenario vs the “Blue” route scenario, would be sufficient grounds for DCC to maintain an objection to National Highways preference of the “Black” route.</i></p> <p>DCC outstanding issues in relation to Highways are considered in table 3-2 above.</p>	
B-1.7 Cultural Heritage - Impact on Significance – improvements to Rokeby Park and Garden	Appendix 1 of DCC’s Statutory Consultation response dated 05.11.2021	The possible improvements to the substantially eroded Rokeby Park and Garden at the point of impact have not been	The Project Design Report (Document Reference 2.3, APP-009) sets out the proposed landscape mitigation being	No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that:	24.01.2023



Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
		<p>included in the balancing exercise, this could include improved visual and physical links to the core of the estate, reinstated designed views, interpretation and replanting in appropriate native and managed species.</p>	<p>delivered as part of the Cross Lanes to Rokeby Scheme.</p> <p>This includes localised tree planting at: <i>Church Plantation to the north east side of the de-trunked road.</i></p> <p>South of the de-trunked road opposite Church Plantation.</p> <p>North west of Barnard Castle Junction.</p>	<p><i>In terms of cultural heritage in respect of the “Blue” route, the balance of harm derived from the “Black” (subject of the DCO application) or “Blue” route is nuanced and, as such, whilst the “Blue” route remains the preference</i></p> <p>....</p> <p><i>....it is acknowledged that design refinement and the preparation of the heritage mitigation strategy in the Environmental Management Plan provides a reasoned justification for the selected route.</i></p>	
<p>B-1.8 Landscape &amp; Visual Impact – driver experience</p>	<p>Appendix 1 of DCC’s Statutory Consultation response dated 05.11.2021</p>	<p>During pre-application presentations it was indicated that driver experience of the A66 – the ‘view from the road’ - would form part of the analysis. This was also referenced in the scoping report (11.5.2022). This does not appear to have formed a significant part of the PEI Report LVIA which considers views</p>	<p>The project recognises the importance of the A66 as an historic route and for the scenic opportunities it affords for road users. The Project Design Report (Application Document Reference 2.3, APP-009) sets out the requirements and expectations for the design of the permanent features that will be</p>	<p>No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that:</p> <p><i>It is considered that the Landscape and Visual Effects section of the ES is thorough in establishing the baseline conditions of the landscape and visual receptors that would be affected by the</i></p>	<p>24.01.2023</p>

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
		<p>of the A66 from other receptors (including users of other roads) but does not in all cases explicitly consider effects on users of the A66, or the view from the road in the wider sense. While this doesn't undermine the general soundness of the LVIA its omission may limit our understanding of the existing road as part of the landscape and visual baseline, how it engages with the significance of heritage assets such as Rokeby Hall and Park, and how different route junction options in areas like Rokeby would be experienced by users.</p>	<p>located within the landscape.</p> <p>At Bowes Bypass, this landscape and design mitigation includes:</p> <ul style="list-style-type: none"> <li>• Retaining the open aspect of this landscape with minimal introduction of woodlands, instead seeking to reinforce existing tree/vegetation belts and layers.</li> <li>• Retaining and ensuring the protection for fossilised field systems to protect ridge and furrow field systems and earthwork.</li> <li>• Ensuring boundary treatments are to reflect the rural character of the Scheme with existing treatments.</li> <li>• Use native tree and scrub planting on the new bridge's embankment to screen and soften the structure and its abutments in the wider landscape.</li> </ul>	<p><i>proposals and the likely magnitude and significance of effects.</i></p> <p><i>The general principles for mitigation set out in the Project Design Principles are well considered. The effectiveness of the proposed mitigation will depend on detailed schemes yet to be submitted.</i></p>	

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			<ul style="list-style-type: none"> <li>• Retain the setting of Bowes Castle and views to it, from the A66, as this is an important landmark and orientation feature.</li> <li>• Provide appropriate visual screening from The Old Armoury Campsite and tie this in with existing field patterns.</li> </ul> <p>At Cross Lanes, this landscape and design mitigation includes:</p> <ul style="list-style-type: none"> <li>• Enhance Princess Charlotte woodland to the north of the junction extending the existing stand of woodland and connecting the green infrastructure north to south at the junction.</li> <li>• Provide new native woodland drawn from a locally appropriate species palette for the islands and slip roads.</li> </ul> <p>At Rokeby, this landscape and design mitigation includes:</p> <ul style="list-style-type: none"> <li>• Specifically at Rokeby Grange junction:</li> </ul>		

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			<p>rationalise and restore field patterns, and where the road is to be removed, restore, reinforce and replant the hedgerow (double tree line) to reflect the line of the historic (Roman) road alignment.</p> <ul style="list-style-type: none"> <li>• At Rokeby Grange drive/approach road: Ensure the detailed design does not involve the removal of the large pollard sycamores Rokeby Chapel and Rectory: Open up views of the Old Rectory by removing dense, inappropriate modern coniferous planting.</li> </ul> <p>Full details of these measures and their intended effects are included within the Project Design Report (Application Document Reference 2.3, APP-009).</p> <p>National Highways will continue to engage with DCC on these issues and seek agreement</p>		

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			that its assessment of driver experience is robust.		
B-1.9 Landscape & Visual Impact - Rokeby Junction options	Appendix 1 of DCC's Statutory Consultation response dated 05.11.2021	In the absence of a detailed consideration of the potential for mitigation I don't believe it is possible to conclude that junction options based on the Red (Rokeby) alternative, such as the DCC Suggested Blue Option slip road. priority junction, would inevitably be more harmful to the significance of the RPG than the 'do nothing' scenario (in which the A66 impacts heavily on Church Plantation and the church) or the Black eastern (Rokeby) Page 11 of 25 option which would be more harmful to the setting of the church and Church Plantation.	Both of the route options were subject to a detailed review, in light of applicable legislation and guidance and these policy tests, particularly to understand the potential harm first in terms of any loss and then setting to all heritage assets. National Policy contained within the NN NPS seeks to minimise harm to heritage assets unless there are demonstrable public benefits to outweigh the harm. We maintain our view (as set out within the consultation brochure) that the principal consideration in our preference for the black junction (the proposed route) is the impact on the Grade II* Rokeby Park RPG, in that the blue junction (your preference) would lead to fragmentation of the	No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that: <i>In terms of cultural heritage in respect of the "Blue" route, the balance of harm derived from the "Black" (subject of the DCO application) or "Blue" route is nuanced and, as such, whilst the "Blue" route remains the preference ... ...it is acknowledged that design refinement and the preparation of the heritage mitigation strategy in the Environmental Management Plan provides a reasoned justification for the selected route.</i>	24.01.2023

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			<p>RPG site. There are no additional public benefits arising from the blue junction which would outweigh the harm to the RPG.</p> <p>National Highways will continue to engage with DCC on these issues and seek agreement that its proposals represent the optimal solution.</p>		
B-1.10 Landscape & Visual Impact – Mitigation	Appendix 1 of DCC’s Statutory Consultation response dated 05.11.2021	Mitigation measures will need to be carefully designed to reduce the effects of the proposals whilst not in themselves introducing additional adverse effects. Particular attention will need to be given to effects on those residential properties where otherwise substantial effects are predicted. Officers anticipate being further involved in the design process and welcome that opportunity.	Further landscape mitigation measures which will be enacted during construction within Section 3.3 of the Environmental Management Plan (EMP) (Application Document Reference 2.7 (Rev 2), REP3-004). The EMP confirms that no part of the project can start until a Landscape and Ecological Mitigation Plan (LEMP) has been prepared and approved (in consultation with Local Authorities). We will continue to engage with DCC in relation to this plan.	No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that: <i>It is considered that the Landscape and Visual Effects section of the ES is thorough in establishing the baseline conditions of the landscape and visual receptors that would be affected by the proposals and the likely magnitude and significance of effects. The general principles for mitigation set out in the Project Design Principles are well</i>	24.01.2023

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
				<i>considered. The effectiveness of the proposed mitigation will depend on detailed schemes yet to be submitted.</i>	
B-1.11 Traffic Flow and Routing Impacts – Moorhouse Lane	Jacobs Impact Report – Appendix 2 of DCC’s Statutory Consultation response dated 05.11.2021	<p>Car flow on B6277 Moorhouse Lane is less than the observed in the base model which is potentially underestimating the level of flow using this route in the Do Minimum scenario.</p> <p>Could the promoter comment if additional traffic flows on the B6277 in the Do Minimum would impact on the switch in routing from Barnard Castle Road to B6277 with the Black and Blue options in place?</p>	<p>It was agreed within our meeting on 13 December that the modelled flow on Moorhouse Lane is low within the base model validation. It was also agreed in the meeting that we have not underestimated the reassignment of trips from Barnard Castle Road to Moorhouse Lane within the Do Something Scenario. We have provided a technical note to DCC (issued on 22 April 22) which sets out the agreed stance on Highways and Traffic Modelling.</p> <p>Further information is included within the Transport Assessment (Document Reference 3.7, APP-236).</p> <p>We will continue to engage with DCC with a</p>	<p>No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that:</p> <p><i>overall when considering the merits of the “Black” route vs the “Blue” route, the differences in Highways terms are shown to be small with the revised modelling scenario.</i></p> <p><i>Given that both routes produce a benefit to trip reduction through the centre of Barnard Castle of circa 384 trips per day including over the 16th century bridge, this does in turn, lead to an increase in traffic on the B6277 The Sills of up to 524 additional vehicles per day.</i></p> <p><i>When considering the “Black” vs “Blue” route, DCC had previously</i></p>	24.01.2023

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			<p>view to reaching agreement that the traffic flow and routing impacts have been the subject of robust assessment.</p>	<p><i>objected to National Highways preference of the “Black” route, mainly due to the impact of the additional traffic on the B6277 compared to the “Blue” route. However, the revised modelling has shown that the difference between the routes would be just 127 vehicles per day.</i></p> <p><i>Given the benefits of traffic reduction through Barnard Castle, it is not considered that the additional 127 vehicles per day in the “Black” route scenario vs the “Blue” route scenario, would be sufficient grounds for DCC to maintain an objection to National Highways preference of the “Black” route.</i></p> <p>DCC outstanding issues in relation to Highways are considered in table 3-2 above.</p>	
<p>B-1.12 Traffic Flow and Routing Impacts – Differences in data</p>	<p>Jacobs Impact Report – Appendix 2 of DCC’s Statutory Consultation response dated 05.11.2021</p>	<p>There are differences in the Do Something traffic flows between the shapefile data provided for this summary and</p>	<p>We are aware that a number of comments in the response relate to the traffic flow modelling numbers which have</p>	<p>No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that:</p>	<p>24.01.2023</p>



Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
		<p>the consultation materials.</p> <p>Could the promoter clarify why there are differences between the sets of flows provided?</p>	<p>previously been provided. We met with your Head of Transport on 13 December 2021 to clarify the modelling information.</p> <p>Whilst the data in the LTR was from a later version of the junction design this had omitted the Rokeby eastbound merge, we provided the corrected data to your team for analysis.</p> <p>We have provided a technical note to DCC (issued on 22 April 2022) which sets out the agreed stance on Highways and Traffic Modelling.</p> <p>The full result of the transport modelling is included within the Transport Assessment (Document Reference 3.7, APP-236).</p> <p>We will continue to engage with DCC but believe that the reasoning for the difference in traffic flows is capable of being agreed.</p>	<p><i>overall when considering the merits of the “Black” route vs the “Blue” route, the differences in Highways terms are shown to be small with the revised modelling scenario.</i></p> <p><i>Given that both routes produce a benefit to trip reduction through the centre of Barnard Castle of circa 384 trips per day including over the 16th century bridge, this does in turn, lead to an increase in traffic on the B6277 The Sills of up to 524 additional vehicles per day.</i></p> <p><i>When considering the “Black” vs “Blue” route, DCC had previously objected to National Highways preference of the “Black” route, mainly due to the impact of the additional traffic on the B6277 compared to the “Blue” route. However, the revised modelling has shown that the difference between the routes would be just 127 vehicles per day.</i></p>	

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
				<p><i>Given the benefits of traffic reduction through Barnard Castle, it is not considered that the additional 127 vehicles per day in the “Black” route scenario vs the “Blue” route scenario, would be sufficient grounds for DCC to maintain an objection to National Highways preference of the “Black” route.</i></p> <p>DCC outstanding issues in relation to Highways are considered in table 3-2 above.</p>	
<p>B-1.13 Traffic Flow and Routing Impacts – traffic in Barnard Castle</p>	<p>Jacobs Impact Report – Appendix 2 of DCC’s Statutory Consultation response dated 05.11.2021</p>	<p>Whilst both the Black and Blue options show some level of increase on B6277, there is a much larger decrease in traffic through Barnard Castle and on Bridgegate; 15% with the Black option and 18% with the Blue option.</p> <p>Could the promoter clarify why there is a decrease in traffic through Barnard Castle and if this is specifically a result of either of the</p>	<p>Traffic flows on the A67 through Barnard Castle will drop as a result of the Scheme. The improved (faster) A66 attracts more longer distance east-west traffic from the A67 between Cumbria and the rural areas to the south and west of Darlington. This reduction in flow on the A67 would be expected to be a beneficial aspect of the scheme to Barnard Castle.</p>	<p>No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that:</p> <p><i>overall when considering the merits of the “Black” route vs the “Blue” route, the differences in Highways terms are shown to be small with the revised modelling scenario.</i></p> <p><i>Given that both routes produce a benefit to trip reduction through the centre of Barnard Castle</i></p>	<p>24.01.2023</p>

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
		<p>proposed options for the Rokeby junction?</p>	<p>Further detail is provided within the Transport Assessment (Document Reference 3.7, APP-236).                      We will continue to engage with DCC with a view to reaching agreement that the traffic flow and routing impacts have been the subject of robust assessment.</p>	<p><i>of circa 384 trips per day including over the 16th century bridge, this does in turn, lead to an increase in traffic on the B6277 The Silks of up to 524 additional vehicles per day.</i></p> <p><i>When considering the “Black” vs “Blue” route, DCC had previously objected to National Highways preference of the “Black” route, mainly due to the impact of the additional traffic on the B6277 compared to the “Blue” route. However, the revised modelling has shown that the difference between the routes would be just 127 vehicles per day.</i></p> <p><i>Given the benefits of traffic reduction through Barnard Castle, it is not considered that the additional 127 vehicles per day in the “Black” route scenario vs the “Blue” route scenario, would be sufficient grounds for DCC to maintain an objection to National Highways</i></p>	

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
				<p><i>preference of the “Black” route.</i></p> <p>DCC outstanding issues in relation to Highways are considered in table 3-2 above.</p>	
<p>B-1.14 Traffic Flow and Routing Impacts – Select Link Analysis</p>	<p>Jacobs Impact Report – Appendix 2 of DCC’s Statutory Consultation response dated 05.11.2021</p>	<p>The Black option results in a change to the HGV routing, with 188 additional vehicles using B6277 Moorhouse Lane. It is expected that HGV routing would remain as per the Do Minimum due to the weight restrictions on Bridgegate limiting the available route choice. Could the promoter provide Select Link Analysis plots to show why there is a change to the HGV routing with the Black option compared to the Do Minimum and the Blue option?</p>	<p>We can confirm that the traffic model does include the HGV ban to represent the weight restriction on Barnard Castle Bridge. Further detail is provided within the Transport Assessment (Document Reference 3.7, APP-236).                      Select Link Analysis plots to show the why there is a change in HGV Routing was provided within Document HE565627-AMY-GEN-S08-RP-TR-000001 (HGV Impacts on Barnard Castle).</p>	<p>No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that:</p> <p><i>overall when considering the merits of the “Black” route vs the “Blue” route, the differences in Highways terms are shown to be small with the revised modelling scenario.</i></p> <p><i>Given that both routes produce a benefit to trip reduction through the centre of Barnard Castle of circa 384 trips per day including over the 16th century bridge, this does in turn, lead to an increase in traffic on the B6277 The Sills of up to 524 additional vehicles per day.</i></p> <p><i>When considering the “Black” vs “Blue” route, DCC had previously</i></p>	<p>24.01.2023</p>

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
				<p><i>objected to National Highways preference of the “Black” route, mainly due to the impact of the additional traffic on the B6277 compared to the “Blue” route. However, the revised modelling has shown that the difference between the routes would be just 127 vehicles per day.</i></p> <p><i>Given the benefits of traffic reduction through Barnard Castle, it is not considered that the additional 127 vehicles per day in the “Black” route scenario vs the “Blue” route scenario, would be sufficient grounds for DCC to maintain an objection to National Highways preference of the “Black” route.</i></p> <p>DCC outstanding issues in relation to Highways are considered in table 3-2 above.</p>	
B-1.15 Social and Distributional Impacts – Negative distributional impacts	Jacobs Impact Report – Appendix 2 of DCC’s Statutory Consultation response dated 05.11.2021	The 2011 Census shows that 23.6% of the population of Barnard Castle are over 65, which indicates there	The Distributional Impact Report is summarised within section 6.3 of the Combined Modelling	This issue is now considered under DCCs Relevant Representations (Document Reference	24.01.2023

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
		<p>could be potential negative impacts on vulnerable groups of the traffic flow increases on B6277.</p> <p>Could the promoter confirm if there are any negative distributional impacts resulting from the increase in traffic flows on B6277?</p>	<p>and Appraisal Report (Document reference 3.8, APP-237), which is being submitted with our DCO Application. The Distributional Indicators and the 7-point Scale Assessment are briefly summarised below:</p> <ul style="list-style-type: none"> <li>• User Benefits - Slight Beneficial</li> <li>• Noise - Moderate Adverse</li> <li>• Air Quality - Moderate Adverse</li> <li>• Accidents - Neutral</li> <li>• Personal Security - Not Applicable</li> <li>• Severance - Neutral</li> <li>• Accessibility - Not Applicable</li> <li>• Affordability - Slight Adverse</li> </ul> <p>We will continue to engage with DCC with a view to reaching agreement that the distributional impacts have been the subject of robust assessment.</p>	<p>RR-073) and National Highways Issue Specific Hearing 1 (ISH1) Post Hearing Submissions (including written submissions of oral case) - Appendix 2 – The Sills – Scope for complementary environmental consideration.</p>	

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
<p>B-1.16 Social and Distributional Impacts – Black options impact on walkers and cyclists</p>	<p>Jacobs Impact Report – Appendix 2 of DCC’s Statutory Consultation response dated 05.11.2021</p>	<p>The Black option has a larger impact on walkers and cyclists using B6277 Moorhouse Lane.</p> <p>Could the promoter clarify if an assessment of the impacts to walkers and cyclists from each option has been undertaken?</p> <p>A grade-separated crossing of the new dualled section, on or in the near vicinity of the current footpath alignment, is recommended. Has this been considered?</p>	<p>A Walking Cycling Horse-riding Assessment Report was undertaken in January 2020 to review the existing WCH provision within a 5km of the scheme, to outline potential opportunities for improvements to the existing WCH Provision.</p> <p>A Walking Cycling Horse-riding Assessment Report Review was undertaken to identify any new opportunities, or changes to opportunities, as a result of redesign or design progression.</p> <p>The proposed scheme has not included a grade-separated crossing at alignment of Moorhouse lane and instead diverts users to the new proposed Rokeby Junction, adding a distance of approximately 700m to their journey. The proposals are designed to provide a safe crossing point for</p>	<p>No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that:</p> <p><i>In general attempts to accommodate and improve the public rights of way network, by providing opportunities to safely cross the A66 and by providing link routes alongside the carriageway are welcomed.</i></p> <p>The relevant representation makes no further comment or objection relating to impact on walkers and cyclists.</p> <p>The associated Appendix to DCC relevant Representation, REP1-022 states on Page 2 that:</p> <p><i>It is not considered that NH has clarified satisfactorily that the east-west links will be designed and clearly identified as being for the users of walkers, cyclists and horseriders.</i></p>	<p>24.01.2023</p>

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			<p>walkers, with the intension of connecting Public Rights of Ways (PRoWs) together, which are currently severed. The proposed Rokeby junction also brings together several PRoWs in the area for onward journeys, and further, provides a safe crossing point, which does not currently exist. Full details of the assessments undertaken to support the changes and additions to local Public Right of Way provision is detailed within the Walking Cycling and Horse-riding Proposals Report (Application Document Reference 2.4, APP-010).</p> <p>We will continue to discuss these matters with DCC with a view to reaching agreement that the impacts on walkers and cyclists along the Black option has been the subject of robust assessment and that reasonable alternatives</p>	<p><i>By doing so they would address any potential future bridleways which might be applied for and that would join or intersect with the A66.</i></p> <p>It is understood that this relates primarily to the labelling of the proposals included with the Walking Cycling and Horse-riding Proposals (Document Reference 2.4 , APP-010). No further comments are made related to PROW at Moorehouse lane in association with this issue and is therefore considered to no longer be relevant.</p>	



Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			have been considered and appropriately discounted.		
B-1.17 Environmental Impacts – Air Quality	Jacobs Impact Report – Appendix 2 of DCC’s Statutory Consultation response dated 05.11.2021	<p>The consultation document stated a worse outcome for the Blue option, but the air quality impact described in the PEI Report as minor and not impacting human or ecological receptors.</p> <p>Could the promoter clarify why the Blue option is presented as having worse air quality impacts in the consultation document?</p>	<p>The PEI Report identified that it is likely that a number of sensitive receptors in close proximity to all junction options, will experience minor changes in air quality (both positive and negative due to the shifting alignment) and no human or ecological receptors are predicted to experience any significant adverse effects or pollutant concentrations above the Air Quality Objectives. The consultation booklet incorrectly identifies a worse outcome in regards air quality impacts for the blue route as a consequence of the modelling reporting error we report above under the heading Traffic Modelling Assumptions.</p> <p>We will continue to engage with DCC with a</p>	Issues in relation to air quality are now addressed under 3-2.9 in Table 3-2 above.	24.01.2023

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			view to reaching agreement that the air quality impacts have been the subject of robust assessment.		
B-1.18 Environmental Impacts – Biodiversity	Jacobs Impact Report – Appendix 2 of DCC’s Statutory Consultation response dated 05.11.2021	<p>The greater impact of the Blue option on bats, otters and Tutta Beck is mentioned in the consultation document, but not clarified in the PEI Report.</p> <p>Could the promoter clarify the specific impacts of the Black and Blue options on bats, otters and Tutta Beck and highlight why the Blue option has a greater impact?</p>	<p>It is our view that the Blue option alignment (your preference) results in additional potential impacts associated with severance to potential bat crossings, loss of potential habitat for otters and additional discharges to Tutta Beck in comparison to the black option alignment (the proposed alignment).</p> <p>Impacts associated with Biodiversity are detailed within Chapter 6 (Biodiversity) of Volume 1 of the ES (Application Document Reference 3.2, APP-049). We will continue to engage with DCC on biodiversity issues should they have any residual concerns.</p> <p>Impacts relating Bats is further detailed within Appendix 6.11 of Volume 3 of the ES (Application Document</p>	<p>No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that:</p> <p><i>In terms of cultural heritage in respect of the “Blue” route, the balance of harm derived from the “Black” (subject of the DCO application) or “Blue” route is nuanced and, as such, whilst the “Blue” route remains the preference ....</i></p> <p><i>...it is acknowledged that design refinement and the preparation of the heritage mitigation strategy in the Environmental Management Plan provides a reasoned justification for the selected route.</i></p> <p>The associated Appendix to DCC relevant Representation,</p>	24.01.2023

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			<p>Reference 3.4, APP-079)).</p> <p>Impacts related to Otters is further detailed within Appendix 6.16 of Volume 3 of the ES (Application Document Reference 3.4, APP-084).</p> <p>Impacts related to Tutta Beck is detailed within Chapter 14 (Road Drainage and the Water Environment) of Volume 1 of the ES (Application Document Reference 3.2, APP-057).</p>	<p>REP1-022 states on Page 2 that:</p> <p><i>DCC has no additional comments to make in relation to ecology</i></p> <p>It is therefore considered that this issue is no longer be relevant.</p>	
B-1.19 Environmental Impacts – Cultural Heritage	Jacobs Impact Report – Appendix 2 of DCC’s Statutory Consultation response dated 05.11.2021	<p>Cultural heritage –The degree of harm for the Blue option has not been established and would offer public benefits above those offered by the Black option.</p> <p>Could the promoter clarify if he considers the Blue option has been assessed in accordance with the test set out in the NNNPS as it is considered that it has not been?</p>	<p>We have fully considered the potential impact of the Project on designated heritage assets as set out within the policy tests contained within the National Networks National Policy Statement (NNNPS).</p> <p>The policy tests are well understood by National Highways. We have sought to minimise or avoid harm to heritage assets, where possible and having regard to other factors. Having</p>	<p>No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that:</p> <p><i>In terms of cultural heritage in respect of the “Blue” route, the balance of harm derived from the “Black” (subject of the DCO application) or “Blue” route is nuanced and, as such, whilst the “Blue” route remains the preference</i></p> <p>....</p>	24.01.2023

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			<p>done that, the policy requires that if there is harm remaining, then a weighing exercise against the public benefit of development is required under the applicable paragraph of the NNNPS.</p> <p>Both routes have been subject to detailed review in light of applicable legislation and guidance and these policy tests, particularly to understand the potential harm first in terms of any loss and then setting to all heritage assets and particularly those with the highest significance.</p> <p>Our assessment of the Project's accordance with the NNNPS is included within the Legislation and Policy Compliance Statement (Document Reference 3.9, APP-242).</p> <p>We will continue to engage with DCC on these issues and seek agreement that its</p>	<p><i>....it is acknowledged that design refinement and the preparation of the heritage mitigation strategy in the Environmental Management Plan provides a reasoned justification for the selected route.</i></p>	

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			approach to applying heritage policy is robust.		
B-1.20 Environmental Impacts – Geology and Soils	Jacobs Impact Report – Appendix 2 of DCC’s Statutory Consultation response dated 05.11.2021	DCC want to highlight that, during construction, we believe that there is likely to be significant effects due to the potential permanent land take and loss of high value agricultural soil resource (Grade 3a agricultural land). DCC believe that no likely significant effects will be anticipated during operation.	<p>Where possible, we have sought to reduce required land take and use areas of poorer quality land in preference to that of a higher quality. Further information of the impact to agricultural land is detailed within Chapter 9 (Geology and Soils) within Volume 1 of the ES (Application Document Reference 3.2, APP-052).</p> <p>For both schemes in Durham, no grade 1, 2 or 3a agricultural land is lost due to the scheme construction.</p> <p>The EMP sets out the geology and soils-related construction phase monitoring requirements. These shall include any land to be restored as a result of construction works (as agreed with the landowner and National Highways).</p> <p>The primary measures to mitigate the impacts</p>	<p>No further comment on this issue is provided in DCC’s Relevant Representations (Document Reference RR-073).</p> <p>The associated Appendix to DCC relevant Representation, REP1-022 also makes no reference to this issue and is therefore considered no longer relevant.</p>	24.01.2023

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			<p>on soil resources would be set out in a Soil Resource Plan (SRP), as set out in the Soils Management Plan, Annex B9 of the EMP (Application Document 2.7, APP-029) and secured by the DCO.</p> <p>The plan would confirm the different soil types (based on the soil surveys already undertaken); the most appropriate re-use for the different types of soils; and the proposed methods for handling, storing and replacing soils on-site.</p> <p>Compounds and storage areas should be sited to avoid the best and most versatile soils where possible.</p> <p>The aim of the SRP will be to re-use displaced soil resources on-site in the detailed design of open spaces and green infrastructure. The quality of soils retained on-site would be maintained by following good practice guidance</p>		

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			on soils handling and storage, particularly to avoid compaction and degradation of soils.		
B-1.22 Inclusion of relevant legislation	Legislation and Policy Compliance Statement review session	What measures are the IPT undertaking to ensure all relevant policy document is included? Policy could potential move forward between submission and examination.	<p>The ES has been undertaken in accordance with the extant NPSNN. There is no draft revised NPSNN published at present and it is the current NPSNN that remains the applicable policy for assessment.</p> <p>It is National Highways understanding that this issue is resolved and may be treated as agreed between the parties.</p>	No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that a reasonable high level overview of the statutory development plan in County Durham, with suitable references to emerging policies including the Minerals and Waste Policies and Allocations document has been provided.	24.01.2023
B-1.23 Inclusion of relevant legislation: Reason for the Exclusion of certain policies	Legislation and Policy Compliance Statement review session	Needs to provide a reason why other policies (such as Policy 31 for Noise) as well as others that are listed within the Local Plan but are not assessed against these. Suggest that we are clear as to why these are not included or not assessed. Other policies to consider are 10, 14, 25, 31, 32, 35, 43.	<p>We can confirm that a full policy assessment is included as part of the Legislation and Policy Compliance Statement (Application Document Reference 3.9, APP-242)</p> <p>In accordance with Policy 31 of the County Durham Plan, an assessment has been carried out to predict the construction and</p>	No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that a reasonable high level overview of the statutory development plan in County Durham, with suitable references to emerging policies including the Minerals and Waste Policies and	24.01.2023

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
		<p>To check relevant policies of the Whorlton Village Neighbourhood Plan are included. Given the scope of other policies in the Plan, WP5 appears to be the appropriate policy to consider.</p>	<p>operational noise levels (after embedded mitigation) to determine any potential impact and assess likely significant effects to nearby receptors. This is presented in Section 2.10: Assessment of likely significant effects, of the ES Chapter 12 (Noise and Vibration) within Volume 1 of the ES (Application Document Reference 3.2, APP-055).</p> <p>Residual significant adverse effects have been reported for construction noise and vibration. Where it is practicable and sustainable, further mitigation will be considered to avoid significant effects as part of the Noise and Vibration Management Plan and Section 61 applications that will be prepared as required by the Environmental Management Plan (EMP) (Application Document 2.7, APP-019) following</p>	<p>Allocations document has been provided.</p> <p>The associated Appendix to DCC relevant Representation, REP1-022 also states on page 29 that in regard to the Development Plan Policy for County Durham that:</p> <p><i>DCC has no additional comments to make. Policy compliance is considered in DCC's Local Impact Report.</i></p>	



Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			<p>engagement with local authorities and stakeholders.</p> <p>Residual significant adverse effects are also predicted for operational noise. A total of 17 residential receptors and 5 non-residential receptors will experience significant adverse effects above the Significant Observed Adverse Effect Level. Four residential receptors are identified as potential qualifiers for noise insulation.</p> <p>Operational significant adverse effects will be minimised as far as practicable and sustainable through scheme design and embedded mitigation, including scheme alignment and the use of lower noise road surface and noise screening where it is sustainable to do so.</p> <p>For receptors with a predicted operational significant adverse effect, the viability has</p>		

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			<p>been assessed of providing a noise barrier in the form of a fence to avoid these significant effects.</p> <p>We will continue to discuss these matters with DCC with a view to reaching agreement. These significant effects are the total number of receptors after both embedded and essential mitigation measures have been investigated and implemented. For receptors with a predicted operational significant adverse effect, an assessment of the viability has been assessed of providing a noise barrier in the form of a fence to avoid these significant effects assessed. Details of the process are presented in Chapter 12 of the ES and relevant Appendices (Application Document 3.4, APP-211 to APP-216)</p>		

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
B-1.24 Inclusion of relevant legislation: Minerals and Waste	Legislation and Policy Compliance Statement review session	<p>County Durham's Local Plan consists of the County Durham Plan (2020) together with the remaining saved policies of the County Durham Minerals Local Plan (December 2000) and County Durham Waste Local Plan (April 2005). The County Durham Plan provides the policy framework for the county up to 2035 to support the development of a thriving economy, so that residents can experience the benefits that ensue as a result. The plan sets out how many new homes and jobs are needed and where they will go, what infrastructure we need and how important landscapes and habitats can be protected.</p> <p>The Council is also preparing a Minerals and Waste Policies and Allocations document to complement the policies of the County Durham Plan.</p>	<p>The policies of the County Durham Plan Local Plan have been considered as part of the Material Assets and Waste assessment.</p> <p>It is National Highways understanding that this issue is resolved and may be treated as agreed between the parties.</p>	No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that a reasonable high level overview of the statutory development plan in County Durham, with suitable references to emerging policies including the Minerals and Waste Policies and Allocations document has been provided.	24.01.2023

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
		<p>In reference to Minerals Safeguarding, Policy 56 (Safeguarding Mineral Resources) of the adopted County Durham Local Plan specifically safeguards areas of Mineral Resources within the County. A number of these areas have been identified either within or in proximity to the DCO limits (in particular, Bowes Bypass and Cross Lanes to Rokeby). Within the eastern edge Bowes Bypass scheme, this includes Carboniferous Limestone. To the east of this sits two existing quarries: Hulands Quarry operated by Aggregate Industries and Kilmond Wood Quarry operated by Kearton Farms Ltd. There is also an allocation, Policy 58 (Preferred Areas for Future Carboniferous Limestone Extraction) for further working of carboniferous limestone</p>			

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
B-1.25 Inclusion of relevant legislation: Wider Infrastructure Policies	Legislation and Policy Compliance Statement review session	County Durham Infrastructure Plan and National Strategy (NRM Industrial Strategy), Levelling Up Policies, and any active modes strategies (such as Sustrans) need to be included.	The infrastructure plan has been reviewed however as there is no reference to the Strategic Road Network or the A66, they have been discounted. Levelling up has been considered generally regarding the scheme. It is National Highways understanding that this issue is resolved and may be treated as agreed between the parties	No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that a reasonable high level overview of the statutory development plan in County Durham, with suitable references to emerging policies including the Minerals and Waste Policies and Allocations document has been provided.	24.01.2023
B-1.26 Clint Lane Bridge	Walking, Cycling and Horse-Riding Proposals review session	Clint Lane Bridge is not just NCN17 and Pennine Way and Trans-Pennine Way which should be included. Does pose issues as to how we manage pedestrians during the bridge rebuild.	We have included reference to this at 4.6.3 of the Walking, Cycling and Horse Riding Proposals (Application Document Reference 2.4, APP-010). The Environmental Management Plan (Application Document Reference 2.7 (Rev 2), REP3-004) requires the approval of a Public Rights of Way management plan before the start of	No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that: <i>In general attempts to accommodate and improve the public rights of way network, by providing opportunities to safely cross the A66 and by providing link routes alongside the carriageway are welcomed.</i>	24.01.2023

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			development, to be agreed in consultation with the local authorities.	No objection is raised to the WCH proposals within the relevant representation.	
B-1.27 Construction Impacts	Walking, Cycling and Horse-Riding Proposals review session	<p>Construction. Will the inspector want to consider the impact and methodology of construction and how will this be approved?</p> <p>These don't seem to be diversion and would more likely be closures. DCC would not be keen on lengthy closures so the impact of this will need be carefully considered.</p>	<p>We note the concerns regarding construction and the particular concern regarding a lengthy closure of the PRow.</p> <p>Safeguards for construction will be included within the EMP to ensure DCC know and agree in advance what they are going to be consulted on as part of the next stage.</p>	<p>No longer relevant – DCC does not make reference to WCH Proposals within their relevant representations (Document Reference RR-073). The associated Appendix to DCC relevant Representation, REP1-022 states on Page 2 that:</p> <p><i>It is not considered that NH has clarified satisfactorily that the east-west links will be designed and clearly identified as being for the users of walkers, cyclists and horseriders. By doing so they would address any potential future bridleways which might be applied for and that would join or intersect with the A66.</i></p> <p>It is understood that this relates primarily to the labelling of the proposes included with the Walking Cycling and</p>	24.01.2023

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
				Horse-riding Proposals (Document Reference 2.4 , APP-010). No further comments and is therefore considered to no longer be relevant.	
B-1.28 BHS Comments around Bridleways	Walking, Cycling and Horse-Riding Proposals review session	<p>As raised by the BHS at a previous meeting, will these paths be suitable for horse riders. Some 260 future route application (to turn existing footpaths into bridleways) are being looked at by BHS, but these may not all result in a formal application. If a route was suitable for horses, then perhaps these could be labelled as such on the plans.</p>	<p>The works being undertaken are seeking to reconnect and re-provide like for like. The proposed footpaths are going to be 3m wide and suitable for walkers and off-road bikes and will likely consist of a compact stone or be gravel dust topped.</p> <p>The space used would not prejudice these being turned from footpath to bridleway for all users.</p> <p>Continued engagement on these and others will continue during detailed design and any notice of these historic bridleway applications by BHS would be appreciated.</p>	<p>No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that:</p> <p><i>In general attempts to accommodate and improve the public rights of way network, by providing opportunities to safely cross the A66 and by providing link routes alongside the carriageway are welcomed. However, many of the linking routes provided alongside the carriageway, which all appear, at least within County Durham, to be marked as “shared pedestrian/cycle path”. The legend for the maps mention “shared pedestrian/bridleway” but none were immediately apparent on the maps. It would</i></p>	24.01.2023

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
				<p><i>seem to make sense to identify all these links as being multi-user shared paths, i.e. for pedestrians, equestrians and cyclists. If the physical space is available then a path suitable for all should be provided.</i></p> <p>The associated Appendix to DCC relevant Representation, REP1-022 states on Page 2 that:</p> <p><i>It is not considered that NH has clarified satisfactorily that the east-west links will be designed and clearly identified as being for the users of walkers, cyclists and horseriders. By doing so they would address any potential future bridleways which might be applied for and that would join or intersect with the A66.</i></p> <p>It is understood that this relates primarily to the labelling of the proposes included with the Walking Cycling and Horse-riding Proposals</p>	



Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
				(Document Reference 2.4, APP-010). No further comments and is therefore considered to no longer be relevant	
B-1.29 A66 Crossing of Footpath 5 and6	Walking, Cycling and Horse-Riding Proposals review session	Would a crossing close to the original line would be more useful, especially given its popularity? Ideal preference would be to have a separate crossing at this location.	We note the concern, and this is understood, however currently there are no other crossing points in the vicinity. Further details are included within the Walking Cycling and Horse-riding Proposals (Application Document Reference 2.4, APP-010). Re-connection of existing Footpath No.5 through Rokeby Chapel to Footpath No.6 is proposed via the new grade-separated junction. The length of the new route is approximately 750m which is not considered a significant increase given that the proposals remove safety issues associated with the current at-grade crossing.	No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that: <i>In general attempts to accommodate and improve the public rights of way network, by providing opportunities to safely cross the A66 and by providing link routes alongside the carriageway are welcomed.</i> No objection is raised to the WCH proposals within the relevant representation. The associated Appendix to DCC relevant Representation, REP1-022 states on Page 2 that: <i>It is not considered that NH has clarified satisfactorily that the east-west links will be designed and clearly</i>	24.01.2023

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
				<p><i>identified as being for the users of walkers, cyclists and horseriders. By doing so they would address any potential future bridleways which might be applied for and that would join or intersect with the A66.</i></p> <p>It is understood that this relates primarily to the labelling of the proposes included with the Walking Cycling and Horse-riding Proposals (Document Reference 2.4, APP-010). No further comments and is therefore considered to no longer be relevant</p>	
B-1.30 Screening at Rokeby Park	Project Design Principles & Tree Preservation Order Document review session	What's happening in terms of grassland screening Rokeby Park	Table 5-12 of the Project Design Principles (Application Document Reference 5.11, APP-302) references specific design principles for the Cross Lanes to Rokeby scheme to address this, in particular principle 8.9 which states: <i>Plant native woodland along the northern verge east of the Old Rectory between the existing</i>	No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that: <i>It is considered that the Landscape and Visual Effects section of the ES is thorough in establishing the baseline conditions of the landscape and visual receptors that would be affected by the proposals and the likely</i>	24.01.2023

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			<p><i>and proposed alignment to enhance the existing character of Rokeby Park, and to provide visual screening in relation to the new A66 alignment.</i></p>	<p><i>magnitude and significance of effects. The general principles for mitigation set out in the Project Design Principles are well considered. The effectiveness of the proposed mitigation will depend on detailed schemes yet to be submitted.</i></p>	
<p>B-1.31 Reinstated woodland south of Rokeby Park</p>	<p>Project Design Principles &amp; Tree Preservation Order Document review session</p>	<p>South of Rokeby Junction there was talk about reinstating the woodland belt and how that character, may be not as clear in the Project Design Principles report.</p>	<p>Table 5-12 of the Project Design Principles (Application Document Reference 5.11, APP-302) references specific design principles for the Cross Lanes to Rokeby scheme to address this, in particular principle 8.14 which states: Reinforce existing tree belts to the south of the A66 east of the Barnard Castle junction with appropriate native parkland tree species. This will help maintain the historic integrity of the small section of the RPG south of the 1960s bypass and contain</p>	<p>No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that: <i>It is considered that the Landscape and Visual Effects section of the ES is thorough in establishing the baseline conditions of the landscape and visual receptors that would be affected by the proposals and the likely magnitude and significance of effects. The general principles for mitigation set out in the Project Design Principles are well</i></p>	<p>24.01.2023</p>

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			<p>visual impacts of the road upon it.</p> <p>We will continue to engage with DCC on these matters.</p>	<p><i>considered. The effectiveness of the proposed mitigation will depend on detailed schemes yet to be submitted.</i></p>	
<p>B-1.32 Rokeby Park Red Squirrel Mitigation and associated landscape impacts</p>	<p>Project Design Principles &amp; Tree Preservation Order Document review session</p>	<p>Red Squirrel Mitigation, is this still included and how are we going to manage the visual impact of the structures.</p>	<p>The Environmental Management Plan (EMP)(Application Document Reference 2.7 (Rev 2), REP3-004) confirms that no part of the project can start until a Landscape and Ecological Mitigation Plan (LEMP) has been prepared and approved (in consultation with Local Authorities). The LEMP shall be in accordance with the Outline LEMP essay plan set out in the Appendix B to the EMP which confirms the following mitigation for red squirrel.</p> <p>Animex Wildlife bridges (or equivalent) are to be installed to connect red squirrel habitat severed by the Project. Two types of red squirrel crossings will be installed throughout the</p>	<p>No longer relevant – DCC confirmed in their relevant representations (Document Reference RR-073) that:</p> <p><i>It is considered that an appropriate level of ecological survey work has been undertaken and the ecological receptors have been identified alongside an assessment of impacts. A mitigation approach is provided that will minimise impacts and provide compensation where required.</i></p>	<p>24.01.2023</p>

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			<p>Project, standalone bridges which are independently supported by steel columns for installation in locations where there is no existing structure, and retrofit bridges fixed to existing structures such as a culvert, underpass tunnel, or bridge overpass. In some cases, vegetation may need to be planted at the ends of the bridge for full connectivity.</p> <p>The landscape planting detail around each crossing point will need to be defined during detailed design in consultation with the Project Ecologist.</p> <p>We will continue to engage with DCC on these matters.</p>		
B-1.33 Important Hedgerows Methodology	Project Design Principles & Tree Preservation Order Document review session	What's the methodology for defining important hedgerows? I would expect most to be defined as important hedgerows in planning terms. Generally speaking, the scheme has had good regard to	Our Hedgerow methodology is included within Appendix 6.4 of Volume 3 of the Environmental Statement (Application Document Reference 3.4, APP-072) and has	No longer considered relevant as refers to documents provided in the DCO and no comment is provided in DCC Relevant Representations (Document Reference RR-073).	24.01.2023

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
		<p>hedgerows, but it is difficult to map on mass so understanding this criterion will be important.</p>	<p>used the following criteria.</p> <p>To be classified as 'important' under the wildlife and landscape criteria, a hedgerow must fulfil one of the criteria in Schedule 1 of the Hedgerow Regulations. The hedge must be over 30 years old and satisfy one of the following:</p> <p>Contains certain categories of species of birds, animals or plants listed in the Wildlife and Countryside Act 1981 or classified as "endangered", "extinct", "rare" or "vulnerable" in Britain within a Red Data Book Joint Nature Conservation Committee (JNCC) publications.</p> <p>Include six or more woody species listed in Schedule 3 of the Hedgerow Regulations in the surveyed section.</p> <p>Include five woody species in the surveyed section and at least three features listed in</p>	<p>Additionally the associated Appendix to DCC relevant Representation, REP1-022 states on Page 2 that:</p> <p><i>DCC has no additional comments to make in relation to ecology</i></p> <p>No further comments are raised within the relevant representation and it is therefore considered to no longer be relevant</p>	

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
			<p>of the Hedgerows Regulations.</p> <p>Include five woody species including one of the following rare native trees – native black poplar, large leaved lime, small leaved lime and wild service tree.</p> <p>Include at least four woody species in the surveyed section and have four or more of the features listed in paragraph 4 of the Hedgerow Regulations.</p> <p>Have four woody species in the surveyed section, is adjacent to a footpath, bridleway or byway open to all traffic and have two or more features listed in paragraph 4 of the Hedgerow Regulations.</p>		
B-1.34 Air Quality Construction Phase Assessment	Durham County Council's Response to Examination Document PDL-013	With reference to Figure 5.3 Air Quality Construction Phase Assessment, the construction phase ARN only falls within DCCs boundary on the A66 to the east of Barnard Castle leading to Scotch Corner. There appears	Data provided for the Project and the construction traffic movements were screened in-line with the criteria in LA105 (where available). The worst-case scenario of the peak-averaged daily construction traffic were	<i>DCC require confirmation on why roads adjacent to Bowes construction compound does not cause an increase of more than 1000 AADT, when roads further east of the compound do.</i>	24.01.2023

Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
		<p>to be no ARN east of Bowes at Scheme 7 Bowes Bypass and also no ARN to the west of Scheme 8 Cross Lanes to Rokeby. One of two construction compounds is noted by the Air Quality Chapter to be in Bowes, amongst other locations. It is understood that the construction traffic impact assessment in this area does not fall into the ARN and has been scoped out of requiring assessment on local air quality, possibly due to the criteria for AADT and HDV flow changes provided in Paragraph 5.6.4 of the Chapter not being exceeded. Explanation as to why these sections would not be materially affected by the scheme should be provided to suitably scope out these sections of construction within DCC, particularly in light of Bowes construction compound being in this location. A table similar to that</p>	<p>used and the ARN identified based on the changes in vehicle flows, as set out in the assessment as set out in the Environmental Statement Chapter 5: Air Quality (Document Reference 3.2, APP-048). The location of construction compounds will be reviewed through the continued development of the design.</p>	<p>NH Stated that Construction traffic data was screened against the thresholds for HDV movements outlined in DMRB LA 105 and not total AADT movements (200 HDV AADT movements). The data highlighted in the Transport Assessment (Document Reference 3.7, APP-236) is based on a worst-case unlikely scenario for potential local short-term diversions, with no assumed mitigation in-place. As such, given the uncertainty around likelihood and duration, following discussion at a Project level, they were not considered appropriate to be included within the Air Quality Assessment and are based on a worst-case unlikely scenario for potential local short-term diversions, with no assumed mitigation in-place. As such, given the uncertain likelihood and duration, following discussion at a Project</p>	



Issue	Document References (if relevant)	Durham County Council Position	National Highways Position	Status	Date
		<p>provided for the operational phase traffic Table 5-10 would be useful. The other construction compound locations should be confirmed and agreed with DCC prior to construction commencing.</p>		<p>level, they were not considered appropriate to be included within the Air Quality Assessment. Bowes construction compound will be rechecked in terms of its HDV movements in readiness for Deadline 3.</p> <p>Further checking at Deadline 3 has confirmed that the short-term peaks were considered to have a negligible impact on the Annual Average Daily Traffic (AADT) for the area and therefore wouldn't affect the conclusions of the assessment.</p>	

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## Appendix C Air Quality Detailed Issues Under Discussion

This appendix provides the detailed air quality comments raised by DCC (and their sub consultants AECOM) which all fall under issue 3-2.1 (Air Quality) in the Under Discussion table in Section 3 above. Matters within this table may be resolved or remain open to be addressed and is included within this SOCG to demonstrate that both parties are actively seeking to resolve the Air Quality issues raised.

	DCC response 31.08.2022	Applicant response 16.11.2022	DCC response 24.11.2022	Applicant response 15.01.2023	DCC response 20.01.2023	Resolved at Update Session 10.02.23 / Comments	Resolved at Update Session 28.02.23 / Comments
<b>Baseline</b>							
3	Four months of NO2 monitoring was undertaken for the Scheme between November 2021 to February 2022 at 16 NO2 locations in triplicate; four of these locations were in DCC (AQM 5, 6, 7 and 8). DCC were not consulted on the locations or given the opportunity to provide insightful, local feedback on the locations where monitoring would be useful. Based on the level of impact indicated by document 3.7 Transport Assessment in both construction and operational phases, it would have been useful to monitor at a sensitive receptor location along the A67 in Barnard Castle, near the river bridge,	The NO2 monitoring locations were informed by the findings of the Preliminary Environmental Information Report (PEIR) and were undertaken at locations where the preliminary assessment identified the likelihood of significant effects. The comments provided, relating to monitoring locations in Barnard Castle, are noted.	We have outstanding concern of potential air quality impact at sensitive receptors in Barnard Castle due to lack of project monitoring data. Monitoring data in Barnard Castle would be helpful to understand the air quality impact risk and assist inform key method points the assessment has taken.	Traffic data for the construction and operational assessment were screened against the thresholds outlined in DMRB LA 105. Changes in construction traffic were not exceeding these thresholds in the Barnard Castle area and therefore a detailed assessment of construction traffic was screened out of the assessment.  As set out within the Issue Specific Hearing 1 (ISH1) Post Hearing Submissions (Document Reference 7.2, REP1-006) National Highways has committed to providing complementary environmental considerations to further ratify the findings of the Environmental Statement in specific regards to the Sills (Barnard Castle). The outline scope of this local level consideration is as follows:	The current scope of further air quality assessment at The Sills in Barnard Castle within Issue Specific Hearing 1 (ISH1) Post Hearing Submissions (Document Reference 7.2, REP1-006) is considered unclear. Further discussion is requested between DCC and the Applicant to simplify communications at this point. This further work is considered to be intrinsically linked to method choices and assumptions made in the air quality assessment.	<b>AECOM noted issue is more from a construction phase point rather than operation / north of County Bridge on A67 – see points below in terms of construction</b>	<b>File Note will be prepared by AmeyArup to set out the approach taken to assessing the air quality impact from the traffic data provided as well as a breakdown on how the EMP and CTMP will be undertaken post DCO approval. AECOM and DCC will undertake a parallel review of the EMP and CTMP</b>

	DCC response 31.08.2022	Applicant response 16.11.2022	DCC response 24.11.2022	Applicant response 15.01.2023	DCC response 20.01.2023	Resolved at Update Session 10.02.23 / Comments	Resolved at Update Session 28.02.23 / Comments
	where a number of dwellings are located at locations nearby the road edge.			<ul style="list-style-type: none"> <li>• More granular / environment assessment of the impact of increased traffic on the Sills (including the consideration of Air Quality).</li> <li>• Institute of Environmental Assessment and Management (“IEMA”) subjective assessment of being a pedestrian/pedestrian experience and consideration of noise in the same context National Highways will submit the local level consideration and report to the examination for Deadline 3.</li> </ul>			
5	Data from the NO2 monitoring survey was noted to be annualised to 2019, the model base year, for AQM1 to AQM14, however not for AQM15 and 16; neither of these	Reviewer statement, no response required	Applicant is requested to please respond to this point. The initial comment was intended to highlight that the adjustments had	The modelled concentrations are well below the air quality objectives at human receptor locations across the ARN. The modelling carried out is robust and has demonstrated that there is no potential for	There are a number of points within the SOCG regarding the robustness of the air quality assessment undertaken, to include baseline characterisation,	Validation exercise has been completed – demonstrates no likely significant effects. AECOM requested a copy of the	A technical note has been issued to DCC and their Consultants on 24 February 2023 which

DCC response 31.08.2022	Applicant response 16.11.2022	DCC response 24.11.2022	Applicant response 15.01.2023	DCC response 20.01.2023	Resolved at Update Session 10.02.23 / Comments	Resolved at Update Session 28.02.23 / Comments
<p>locations are in DCC. AQM 5 is adjacent to the existing A66, AQM 6 is more than 250m from the A66 at Rokeby, AQM 7 is adjacent to the B6277, and AQM 8 is to the south of the B6277 Lartington Lane. The backcasted adjusted annual mean NO2 monitoring results for monitors in DCC ranges from 2.6 µg/m3 to 10.2 µg/m3 and therefore below the annual mean objective of 40 µg/m3. The highest concentrations were recorded at AQM 5, adjacent to the existing A66; the unadjusted concentration is noted to be 16.3 µg/m3, showing that the adjustment has reduced the concentrations at this location by almost 40%.</p>		<p>decreased concentrations. These monitors have been relied on for verification, and so robustness of these adjustments is important to impact significance.</p>	<p>adverse likely significant effects, following the DMRB LA105 standards – as set out in Chapter 5 of the Environment Statement (ES) Having considered the comment, the points made regarding the model set up or adjustment of results would not alter the assessment of no likely significant effects on air quality as there would be negligible risk of exceeding the air quality objectives.</p>	<p>model assumptions and limitations for both construction and operational phases, the RMSE and predicted pollutant concentrations and impacts at receptors in DCC. The assessment undertaken is not considered robust or to have taken a reasonable worst case approach, however it is acknowledged that existing baseline air quality may be good within the study area. This is subject to further air quality work undertaking the additional assessment within Barnard Castle, and further discussion between DCC and the Applicant is requested to simplify communications.</p>	<p>verification exercise – TH confirmed we would provide. AA confirmed that small number of locations due to availability of sites – hence data was supplemented at late stage. AECOM expressed concern on Human Health north of County Bridge – needs to be considered in reviewing verification.</p>	<p>was discussed at the meeting of 28 February 2023. Further meeting will take place in March to discuss the contents of the technical note.</p>

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6	There is no discussion of appropriateness of the method to adjust monitoring results in light of the Covid-19 pandemic and the changing traffic patterns associated with government lockdowns and post-lockdown trends. This should be provided.	The baseline monitoring survey and data annualisation were carried out in line with the guidance in LAQM TG16. Supplementary guidance published by Defra in April 2021 for use in reporting 2020 data, which were affected by the activity restrictions associated with Covid-19 lockdown measures, indicates that the diffusion tube sampling and data annualisation methodology in LAQM TG16 remain valid. No further guidance has been issued for 2021/22 data; consequently, the approach is considered appropriate.	A recognition of the current uncertainties following the Covid-19 pandemic would be considered best practice in this situation and a cautious approach to any future prediction would be sensible.	The impact of covid on traffic data collection and on traffic modelling was noted in the Combined Modelling and Appraisal Report (Document Reference 3.8, APP-237) in sections 3.1, 3.2 and 3.3. Chapter 5 of the document describes how the traffic forecasting has been undertaken in line with TAG Unit M4 Forecasting and Uncertainty. Covid 19 is not mentioned specifically in TAG Unit M4 as such the reporting around the transport forecasts is considered appropriate.	The points within the Combined Modelling and Appraisal Report on the impact of Covid on traffic data are noted. However the lack of discussion in the Air Quality Chapter on how this relates to air quality, and the method choices behind air quality monitoring periods may have been informed by Covid, is highlighted. This is however considered a lesser concern than the other points raised in the review process.	AECOM consider that this issue is now addressed and can be considered closed	NA
8	NH3 Scheme specific monitoring was additionally undertaken during the	Roadside NH3 measurements in the UK are limited although national	The risk remains that ammonia concentrations	A call was held between National Highways and Natural England on Thursday 8th December.	The document does not yet appear to be available. It is understood that this	Technical Note will be issued to DCC/AECOM	A technical note has been issued to DCC and

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	same period at 13 of the 16 locations of NO2 monitoring. The same four locations are within DCC (AQM 5 to 8). The NH3 monitoring results for the monitors in DCC ranges from 1.6 µg/m3 to 3.3 µg/m3; again the concentration at AQM 5 was the highest. There is no provided discussion around representativeness of this data to the assessed base year of 2019.	predictions of mid-year (3-year average) averaged background NH3 concentrations, taken from the Concentration Based Estimates of Deposition (CBED) model, are available on a 1km x 1km basis. To address this uncertainty, project specific monitoring was undertaken. Whilst no adjustment was made for concentrations to NH3 (or indeed recognized guidance to do this, particularly around the effects of Covid-19 pandemic), the data collected are considered to be representative to provide an insight to NH3 levels across the study area, which otherwise would have been absent from the assessment.	relied on may be lower than actual.	A summary of the ammonia assessment will be set out in the Natural England Statement of Common Ground (SoCG).	will be considered further.		their Consultants on 24 February 2023 which was discussed at the meeting of 28 February 2023. Further meeting will take place in March to discuss the contents of the technical note. -
10	Defra annual mean background pollutants	Reviewer statement, no response required.	There are a number of	The modelled concentrations are well	There are a number of points within the	Validation exercise has	A technical note has

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<p>concentrations have been used in the assessment for 2019 and future year 2029; in grid square contribution from major road sector emissions have been removed from the background NOx estimates. This is reasonable. A comparison between Defra modelled and local authority background NO2 monitoring data has been made; this showed that Defra backgrounds were slightly lower than local authority monitored data however there is no discussion on this other than the difference is small (1 µg/m3) and concentrations are below the objective, nor any consideration discussed of factoring the Defra predictions</p>		<p>methodological assumptions in the assessment that we consider not to represent a reasonable worst case. Therefore, it is not clear whether reasonable worst-case assumptions would materially affect the conclusions of the assessment. An assessment taking into account a reasonable worst case here would have used the monitoring data to inform the background pollutant concentrations.</p>	<p>below the air quality objectives at human receptor locations across the ARN. The modelling carried out is robust and has demonstrated that there is no potential for adverse likely significant effects, following the DMRB LA105 standards— as set out in Chapter 5 of the Environment Statement (ES) Monitoring data for the Project is limited. Outside of the Eden DC area, the data are even more limited. Only one monitoring site in the Richmond DC area was considered appropriate for verification purposes, which is a roadside site and therefore not representative of 'background' conditions. Having considered the comment, the points made regarding the model set up or adjustment of results, we feel we have made reasonable worst-case</p>	<p>SOCG regarding the robustness of the air quality assessment undertaken, to include baseline characterisation, model assumptions and limitations for both construction and operational phases, the RMSE and predicted pollutant concentrations and impacts at receptors in DCC. The assessment undertaken is not considered robust or to have taken a reasonable worst case approach, however it is acknowledged that existing baseline air quality may be good within the study area. This is subject to further air quality work undertaking the additional assessment within</p>	<p>been completed – demonstrates no likely significant effects. AECOM requested a copy of the verification exercise – TH confirmed we would provide. AmeyArup confirmed that small number of locations due to availability of sites – hence data was supplemented at late stage.</p>	<p>been issued to DCC and their Consultants on 24 February 2023 which was discussed at the meeting of 28 February 2023. Further meeting will take place in March to discuss the contents of the technical note.</p>



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	using the monitoring. Given the low levels of predicted model result concentrations, this will not likely materially affect the conclusions.			assumptions that would not alter the assessment of no likely significant effects on air quality, as there would be negligible risk of exceeding the air quality objectives	Barnard Castle, and further discussion between DCC and the Applicant is requested to simplify communications.		
11	There was very little on verification provided in the PEIR. Baseline data from ten sites from local authorities and one National Highways monitor (total 11 sites) are presented in Table 1 of Appendix 5.3 Air Quality Baseline Monitoring; it is understood that seven of these 11 sites have been used to verify the roads model. It would be useful to provide discussion of whether the seven monitors have been used to verify both the construction and operational phase assessments, and the appropriateness of	Model verification factors used in the assessment are reported in Table 4 of Appendix 5.4 Air Quality Assessment Results (Document Reference 3.4, APP-153) and have been applied to the predicted road NOX concentrations, used in both the construction and operational phase assessments, as stated in section 5.4.1.8. Tables 2 and 3, also in Appendix 5.4 (Document Reference 3.4, APP-153), provide details of which sites were used to derive the verification factors for the urban (Table 2)	It is understood that the same adjustment factors have been used to adjust the construction phase and operational phase dispersion modelling results despite the model domains for each assessment differing. A discussion on the limitations of relying on the same method for both assessments should be provided given the stated different traffic data sets, and model domain extents.	The modelled concentrations are well below the air quality objectives at human receptor locations across the ARN. The modelling carried out is robust and has demonstrated that there is no potential for adverse likely significant effects, following the DMRB LA105 standards— as set out in Chapter 5 of the Environment Statement (ES).  Whilst the RMSE value is noted as being above the desired values in Defra TG(16 and 22), monitoring data for the Project is limited. Outside of the Eden DC area, the data are even more limited. Only one monitoring site in the Richmond DC area was	There are a number of points within the SOCG regarding the robustness of the air quality assessment undertaken, to include baseline characterisation, model assumptions and limitations for both construction and operational phases, the RMSE and predicted pollutant concentrations and impacts at receptors in DCC. The assessment undertaken is not considered robust or to have taken a reasonable worst case approach, however it is	Validation exercise has been completed – demonstrates no likely significant effects. AECOM requested a copy of the verification exercise – TH confirmed we would provide. AmeyArup confirmed that small number of locations due to availability of sites – hence data was supplemented at late stage.	A technical note has been issued to DCC and their Consultants on 24 February 2023 which was discussed at the meeting of 28 February 2023. Further meeting will take place in March to discuss the contents of the technical note.

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	the chosen method to verify each model domain.	and rural (Table 3) road links based on site typology in the construction and operational phase assessments, as stated in section 5.4.1.8. Tables 2 and 3, also in Appendix 5.4, provide details of which sites were used to derive the verification factors for the urban (Table 2) and rural (Table 3) road links based on site typology.	It is understood that the rural zone adjustment factor has been applied to the assessed receptors within DCC's jurisdiction. It is not considered a reasonable worst case to use an adjustment factor lower than 1 to adjust any dispersion model outputs and also rely on an RMSE of 12.6ug/m <sup>3</sup> . This is not considered a robust assessment and is recommended to be re-assessed.	considered appropriate for verification purposes. In-line with TG(16 and 22) the model parameters were reviewed multiple times as part of the model verification, to no avail. So as to include at least one site on the A66 in Richmond DC, the adjustments were made accordingly, Having considered the comment, the points made regarding the model set up or alternative adjustment of results would not alter the assessment of no likely significant effects on air quality as there would still be negligible risk of exceeding the air quality objectives in DCC.	acknowledged that existing baseline air quality may be good within the study area. This is subject to further air quality work undertaking the additional assessment within Barnard Castle, and further discussion between DCC and the Applicant is requested to simplify communications. Suggestion that this point is revisited after this discussion and the further assessment at Barnard Castle.		
12	<b>No DCC monitoring or National Highways monitoring within DCC boundaries has been used to verify the model outputs against measured data. It is further</b>	12 and 13. There are no DCC monitoring locations adjacent to the ARN (as noted by the Interested Party in comment (2) above which they acknowledge is not a material issue).	A reasonable worst-case and robust assessment should be undertaken. It is not considered a	The modelled concentrations are well below the air quality objectives at human receptor locations across the ARN. The modelling carried out is robust and has demonstrated that there is no potential for	There are a number of points within the SOCG regarding the robustness of the air quality assessment undertaken, to include baseline characterisation,	<b>Validation exercise has been completed – demonstrates no likely significant effects. AECOM requested a copy of the</b>	<b>A technical note has been issued to DCC and their Consultants on 24 February 2023 which</b>

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<p><b>understood that none of the Scheme-specific monitoring has been used for verification. Discussion would be useful in this instance to present how representative the verification is of receptors within DCC.</b></p>	<p>Available data from a National Highways air quality monitoring station have been used for model verification. Several administrative areas are covered by the assessment study area which is predominantly rural in nature with pockets of urban settlements; overall, air quality is good. In addition to National Highways air quality monitoring data, the model was verified using local authority monitoring data from representative roadside locations adjacent to the ARN. As noted above in response to item (13), site typology was considered and two separate verification factors, one for urban and another for rural road links (and receptors), were</p>	<p>reasonable worst case to use an adjustment factor lower than 1 to adjust any dispersion model outputs, given the ADMS software's tendency to underpredict. Relying on an RMSE of 12.6ug/m<sup>3</sup> is not considered robust, based on the guidance referenced in the ES chapter, and it is recommended that the modelling and verification that informed the assessment of construction and operational phase impacts is revisited. It is also not considered a limitation of the assessment to not use more monitoring data locations. Should</p>	<p>adverse likely significant effects, following the DMRB LA105 standards as set out in Chapter 5 of the Environment Statement (ES). Whilst the RMSE value is noted as being above the desired values in Defra TG(16 and 22), monitoring data for the Project is limited. Outside of the Eden DC area, the data are even more limited. Only one monitoring site in the Richmond DC area was considered appropriate for verification purposes. In-line with TG(16 and 22) the model parameters were reviewed multiple times as part of the model verification, to no avail. So as to include at least one site on the A66 in Richmond DC, the adjustments were made accordingly. Additional site-specific monitoring was undertaken for a period of four months to gain</p>	<p>model assumptions and limitations for both construction and operational phases, the RMSE and predicted pollutant concentrations and impacts at receptors in DCC. The assessment undertaken is not considered robust or to have taken a reasonable worst case approach, however it is acknowledged that existing baseline air quality may be good within the study area. This is subject to further air quality work undertaking the additional assessment within Barnard Castle, and further discussion between DCC and the Applicant is requested to simplify communications.</p>	<p>verification exercise – TH confirmed we would provide. AmeyArup confirmed that small number of locations due to availability of sites – hence data was supplemented at late stage.</p>	<p>was discussed at the meeting of 28 February 2023. Further meeting will take place in March to discuss the contents of the technical note.</p>

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		<p>derived and applied. Where possible, sites with ≥75% data capture were used; where this condition could not be met, in one instance, this has been noted. The verification using the rural zone for use with DCC receptors is considered to be representative as the site typology, setting and traffic were not considered to be materially different and therefore did not warrant an alternative approach or verification factor. The best monitoring data available in the study were also used. Due to the generally low background concentrations in the study area rural locations, an alternative rural factor would however unlikely change the</p>	<p>DCC not monitor in this area, project specific monitoring should have been undertaken to sufficiently obtain a reliable baseline of air quality. This is not considered to have been presented.</p>	<p>additional understanding of the baseline conditions in the study. These data presented in Appendix 5.3 Air Quality Baseline Monitoring (bias adjusted and annualised in-line with guidance) were not used for verification purposes given the short time scales of deployment, however they confirm the position that ambient NO2 conditions are well below relevant objective across the study areas.</p> <p>Having considered the comment, the points made regarding the model set up or alternative adjustment of results would not alter the assessment of no likely significant effects on air quality as there would still be negligible risk of exceeding the air quality objectives in DCC</p>	<p>Suggestion that this point is revisited after this discussion and the further assessment at Barnard Castle.</p>		

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		conclusions of the assessment.					
14	<p>The rural verification zone of two monitors has a bias adjustment factor of 0.632 and an RMSE of 12.6 µg/m<sup>3</sup>; this is well outside the RMSE of 10% of the objective (4 µg/m<sup>3</sup> for annual mean NO<sub>2</sub>) recommended by LAQM TG16.</p> <p><b>Discussion is required to explain how the results at sensitive receptors presented in DCC and the rural zone as a whole are reliable in this instance. This is considered a potentially material consideration, particularly in light of the presented slight adverse (albeit concluded not significant) effects at receptors in DCC boundary.</b></p>	<p>The suitability and representativeness of the verification for use with DCC receptors is set out in the response for item 12 above. The verification factor was derived using available monitoring data collected at representative rural roadside locations with 200m of the ARN. While the RMSE derived does not meet the criteria given in LAQM TG16, the use of two verification points, as opposed to one, reduces uncertainty in the assessment and improves the representativeness of the model verification (as noted above in response to item 13), it is therefore not perceived to be a risk to the assessment</p>	<p>It is not considered reliable to only use two monitoring locations for verification in an assessment, especially when applied to such a large area and when the agreement with monitoring data post-adjustment is very poor. An RMSE of 12.6ug/m<sup>3</sup> is considered very poor and could be representative of several things, including the poor data capture at the automatic monitor used for verification, if no annualisation was undertaken. It is additionally not considered</p>	<p>The modelled concentrations are well below the air quality objectives at human receptor locations across the ARN. The modelling carried out is robust and has demonstrated that there is no potential for adverse likely significant effects, following the DMRB LA105 standards– as set out in Chapter 5 of the Environment Statement (ES).</p> <p>Whilst the RMSE value is noted as being above the desired values in Defra TG(16 and 22), monitoring data for the Project is limited. Outside of the Eden DC area, the data are even more limited. Only one monitoring site in the Richmond DC area was considered appropriate for verification purposes. In-line with TG(16 and 22) the model parameters were reviewed multiple</p>	<p>There are a number of points within the SOCG regarding the robustness of the air quality assessment undertaken, to include baseline characterisation, model assumptions and limitations for both construction and operational phases, the RMSE and predicted pollutant concentrations and impacts at receptors in DCC. The assessment undertaken is not considered robust or to have taken a reasonable worst case approach, however it is acknowledged that existing baseline air quality may be good within the study area. This is subject</p>	<p><b>Validation exercise has been completed – demonstrates no likely significant effects. AECOM requested a copy of the verification exercise – TH confirmed we would provide. AmeyArup confirmed that small number of locations due to availability of sites – hence data was supplemented at late stage.</b></p>	<p><b>A technical note has been issued to DCC and their Consultants on 24 February 2023 which was discussed at the meeting of 28 February 2023. Further meeting will take place in March to discuss the contents of the technical note.</b></p>

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		<p>findings. No likely significant effects were identified within DCC and any change in verification method is unlikely to material change this conclusion. This is particularly relevant when considering the approach followed in-line with DMRB LA105 (rather than EIA specific significance criteria), which determines significance only at locations with predicted concentrations above the relevant air quality standard, in this case 40µg/m<sup>3</sup> for nitrogen dioxide, which is unlikely to occur for DCC receptors.</p>	<p>appropriate to use an adjustment factor of less than 1; a reasonable worst-case adjustment factor should be used, despite the likelihood of the assessed receptors to exceed the air quality objective, or not.</p>	<p>times as part of the model verification, to no avail. So as to include at least one site on the A66 in Richmond DC, the adjustments were made accordingly.                      Data capture for the continuous monitoring site at Leeming was poor and therefore the data were annualized for use.                      Additional site-specific monitoring was undertaken for a period of four months to gain additional understanding of the baseline conditions in the study. These data presented in Appendix 5.3 Air Quality Baseline Monitoring (bias adjusted and annualized in-line with guidance) were not used for verification purposes given the short time scales of deployment, however they confirm the position that ambient NO<sub>2</sub> conditions are well below relevant objective across the study areas.</p>	<p>to further air quality work undertaking the additional assessment within Barnard Castle, and further discussion between DCC and the Applicant is requested to simplify communications. Suggestion that this point is revisited after this discussion and the further assessment at Barnard Castle.</p>		

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				Having considered the comment, the points made regarding the model set up or adjustment of results would not alter the assessment of no likely significant effects on air quality as there would still be negligible risk of exceeding the air quality objectives in DCC			
15	27 monitoring locations are noted to have been excluded from verification, and the reader of Appendix 5.4 Air Quality Assessment Results is directed to Table 1 for the reasons for exclusion. Table 1 only includes reasons for 19 monitors; none of the 19 sites are within DCC. The eight remaining monitors excluded from verification should be presented alongside the 19 in Table 1. It would be useful to	The comment on the exclusion of monitoring locations is noted. Scheme specific monitoring data are set out in Environmental Statement Appendix 5.3 Baseline Air Quality Baseline Monitoring (Document Reference 3.4, APP-152). A detailed review was undertaken on a project level alongside National Highways, in relation to the gathered data and its use for comparison against the formal	We disagree that the two verification factors perform well, in light of the RMSE of 12.6 µg/m <sup>3</sup> and how that contradicts the Defra guidance referred to in the ES chapter. This point is not considered to have been addressed on reliability of the results. A reasonable worst case assessment of impacts at sensitive	The modelled concentrations are well below the air quality objectives at human receptor locations across the ARN. The modelling carried out is robust and has demonstrated that there is no potential for adverse likely significant effects, following the DMRB LA105 standards as set out in Chapter 5 of the Environment Statement (ES). Whilst the RMSE value is noted as being above the desired values in Defra TG(16 and 22), monitoring data for the Project is limited. Outside	Reasons for the eight remaining monitors removed from verification should be presented as requested on 31.08.2022. It remains to be understood why more project specific monitoring with suitable monitoring periods was not undertaken to fill in this area with limited monitoring data. This is not considered a valid reason for such a	Validation exercise has been completed – demonstrates no likely significant effects. AECOM requested a copy of the verification exercise – TH confirmed we would provide. AmeyArup confirmed that small number of locations due to availability of sites – hence data was	A technical note has been issued to DCC and their Consultants on 24 February 2023 which was discussed at the meeting of 28 February 2023. Further meeting will take place in March to discuss the contents of

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<p>discuss the use of the scheme specific monitoring for verification in light of the poor RMSE, where these are located at site types acceptable for verification as per LAQM TG16.</p>	<p>verification. The data was not used formally in the assessment verification due to the short-time period, however the two verification factors were considered to perform reasonably well and had a high level of agreement to one another. Overall, National Highways concluded that it was unlikely for there to be any material changes to the conclusions of the assessment.</p>	<p>receptors should be presented.</p>	<p>of the Eden DC area, the data are even more limited. Only one monitoring site in the Richmond DC area was considered appropriate for verification purposes. In-line with TG(16 and 22) the model parameters were reviewed multiple times as part of the model verification, to no avail. So as to include at least one site on the A66 in Richmond DC, the adjustments were made accordingly.</p> <p>Data capture for the continuous monitoring site at Leeming was poor and therefore the data were annualized for use.</p> <p>Additional site-specific monitoring was undertaken for a period of four months to gain additional understanding of the baseline conditions in the study. These data presented in Appendix 5.3 Air Quality Baseline Monitoring (bias adjusted and annualized in-line</p>	<p>project to only have two monitors used to verify the model output, and to use an adjustment factor that lowers it is not considered a reasonable worst case assessment.</p> <p>There are a number of points within the SOCG regarding the robustness of the air quality assessment undertaken, to include baseline characterisation, model assumptions and limitations for both construction and operational phases, the RMSE and predicted pollutant concentrations and impacts at receptors in DCC. The assessment undertaken is not considered robust or to have taken a reasonable worst</p>	<p>supplemented at late stage.</p>	<p>the technical note.</p>



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				with guidance) were not used formally for verification purposes given the short time scales of deployment, however the overall findings were the same. Having considered the comment, the points made regarding the model set up or adjustment of results would not alter the assessment of no likely significant effects on air quality as there would still be negligible risk of exceeding the air quality objectives in DCC	case approach, however it is acknowledged that existing baseline air quality may be good within the study area. This is subject to further air quality work undertaking the additional assessment within Barnard Castle, and further discussion between DCC and the Applicant is requested to simplify communications. Suggestion that this point is revisited after this discussion and the further assessment at Barnard Castle.		
<b>Construction phase dust</b>							
<b>Construction phase traffic assessment</b>							
24	It was noted at the PEIR stage that no construction phase road traffic was available for assessment. The	Construction traffic data provided for the Project were limited to vehicle movements only based on the anticipated	Applicant has confirmed that limited construction traffic data limited the scope of the	Construction traffic speeds were not provided and therefore the data was not screened on this basis. The assessment is robust without screening	It is requested that the Applicant confirms that the numbers of vehicles are low enough that the speeds wont	Maximum offsite HGV flow at 361 AADT – discussions confirmed speed band changes	Confirmed on the 10 February 2023 that this issue is

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<p>PEIR stated that an assessment of such emissions will be undertaken as part of the EIA and reported in the Environmental Statement (ES). ADMS Roads modelling is understood to have been undertaken for limited sections of the scheme – between M60 Junction 40 to Brough and between east of Bowes, to Scotch Corner. This Affected Road Network is understood to be determined based on changes of 1000 AADT or more and/or changes of 200 AADT or more as a result of the construction phase; the chapter does not make reference to speed bands factoring into the determination of the construction phase traffic ARN</p>	<p>construction programme and phasing. No speed banding data was available to consider and assess as part of the Air Quality study</p>	<p>assessment. The construction phase traffic assessment is therefore understood to be not meeting all of LA 105 guidance. The applicant should confirm whether speed bands are predicted to change with the scheme's construction phase.</p>	<p>for changes in construction traffic speed.</p>	<p>vary considerably, and no greater than the relevant LA105 screening criteria.</p>	<p>are unlikely to be changed.</p>	<p>considered closed</p>

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	therefore it is assumed that this is not a part of the criteria used; this is not following LA 105 guidance.						
25	It is not clear whether AADT has been used for the construction phase assessment, or whether traffic data provided was split by the four periods required by LA 105 at detailed air quality assessment stage of morning (AM), inter peak, evening peak (PM) and overnight period (OP). This should be clarified and if AADT has been used, reasons provided as to why this is considered acceptable and any limitations associated with this method choice.	Average Annual Daily Traffic (AADT) was used in the construction phase traffic assessment to maintain consistency with the operational phase assessment. Consistent with the guidance in DMRB LA105, a proportionate approach was taken to the speed pivoting process. AADT was used because, as noted in the guidance, the possibility of exceedances of air quality thresholds was considered to be low. This is reflected in the assessment's findings as set out in the Environmental Statement Chapter 5: Air Quality	The possibility of exceedances is understood to be low, however a representative baseline through the use of air quality monitoring is not considered to have been undertaken, as noted in comments above. The monitoring data availability in the DCC area and the absence of monitoring in Barnard Castle should have informed the locations of the scheme-specific survey. The screening of the Barnard Castle	Traffic data for the construction and operational assessment were screened against the thresholds outlined in DMRB LA 105. Changes in construction traffic were not exceeding these thresholds in the Barnard Castle area and therefore a detailed assessment of construction traffic was screened out of the assessment	There are a number of points within the SOCG regarding the robustness of the air quality assessment undertaken, to include baseline characterisation, model assumptions and limitations for both construction and operational phases, the RMSE and predicted pollutant concentrations and impacts at receptors in DCC. The assessment undertaken is not considered robust or to have taken a reasonable worst case approach, however it is acknowledged that	MS explained that modelling was on worst case without mitigation and does not include for diversions – will be addressed through CTMP to mitigate impacts – AECOM would like further session to understand how mitigation/ scenarios are linked in terms of the EMP and contractor commitments re CTMP	File Note will be prepared by AmeyArup to set out the approach taken to assessing the air quality impact from the traffic data provided as well as a breakdown on how the EMP and CTMP will be undertaken post DCO approval. AECOM and DCC will undertake a parallel review of the EMP and CTMP

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		(Document Reference 3.2, APP-048).	area out of the assessment is considered a limitation.		existing baseline air quality may be good within the study area. This is subject to further air quality work undertaking the additional assessment within Barnard Castle, and further discussion between DCC and the Applicant is requested to simplify communications. Suggestion that this point is revisited after this discussion and the further assessment at Barnard Castle.		
26	Construction years are between 2024 and 2029. With reference to Figures 11-2 and 11-3 in Chapter 3.7 Transport Assessment of the ES, the peak construction traffic from workers and wagons per month is understood to be in	The overall busiest construction year was forecast to be 2025; however, to be consistent with the noise assessment, the air quality assessment is based on 2024.	The maximum year of construction is understood to be 2025 and this is understood to not have been assessed. It should be confirmed whether the traffic data of the peak	Peak construction vehicle movements occur in 2025 and have been used as a basis for the assessment. Construction traffic flows have been modelled using 2024 emissions data. Therefore we have used the largest forecast traffic flows (2025) during the	The response that the air quality assessment has used 2025 traffic data, the largest year of construction, is welcomed. It is however not agreed that traffic data presenting a reasonable worst	MS explained that modelling was on worst case without mitigation and does not include for diversions – will be addressed through CTMP to mitigate impacts –	File Note will be prepared by AmeyArup to set out the approach taken to assessing the air quality impact from the traffic data provided as well as a

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	April/May 2025 and the overall busiest year for construction will be 2025. 2024 is understood to have been assessed. The year of traffic modelled, or a method to explain how the consultant has assessed the worst-case impacts of the scheme, and the chosen year of emissions factors should be explained.		construction period has been used to represent 2024 in the air quality assessment. If so, this is considered appropriate as future emission predictions will be more cautious. If not, this is a limitation of the assessment and recommended to be re-assessed to ensure the maximum impacts of the construction phase have been assessed.	construction period together with the worst-case vehicle emission factors (2024) to represent a conservative assessment.	case has been utilised given the Transport Chapter present data different (higher) impacts. No further comment on this as this is considered to be covered in other responses.	AECOM would like further session to understand how mitigation/ scenarios are linked in terms of the EMP and contractor commitments re CTMP	breakdown on how the EMP and CTMP will be undertaken post DCO approval. AECOM and DCC will undertake a parallel review of the EMP and CTMP
27	There is no detail on the methodology provided in the Environmental Statement Appendix 5.2 Air Quality Assessment Methodology for the dispersion modelling assessment of construction traffic, in the same level of	The construction traffic assessment methodology followed the same approach used for the operational modelling, except for the level of detail in the traffic data, i.e., no speed band information (as acknowledged above	Justification of the method provided in relation to the construction phase affected road network remains outstanding.	Response as 16.11.22 The construction traffic assessment methodology follows the same approach used for the operational modelling, except for the level of detail in relation to available traffic data.	The construction and operational phase ARNs cover different study areas. The same methods for both construction and operational phases therefore would not be considered appropriate. The Applicant has not	MS explained that modelling was on worst case without mitigation and does not include for diversions – will be addressed through CTMP to mitigate impacts –	File Note to be prepared to address issue whilst AECOM and DCC undertake a parallel review of the EMP and CTMP

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<p>detail as for the operational phase assessment. This should be provided to understand the construction phase traffic data and TRA, model input parameters, verification process and choice of met station data. If these parameters are the same as for the operation phase traffic emissions assessment of effects, then this should be stated, and justification of the method provided in relation to the construction phase affected road network.</p>	<p>in response to item 24).</p>			<p>provided the justification for this method choice, specifically for the construction phase, as requested.</p> <p>There are a number of points within the SOCG regarding the robustness of the air quality assessment undertaken, to include baseline characterisation, model assumptions and limitations for both construction and operational phases, the RMSE and predicted pollutant concentrations and impacts at receptors in DCC. The assessment undertaken is not considered robust or to have taken a reasonable worst case approach, however it is acknowledged that</p>	<p>AECOM would like further session to understand how mitigation/ scenarios are linked in terms of the EMP and contractor commitments re CTMP</p>	

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					existing baseline air quality may be good within the study area. This is subject to further air quality work undertaking the additional assessment within Barnard Castle, and further discussion between DCC and the Applicant is requested to simplify communications. Suggestion that this point is revisited after this discussion and the further assessment at Barnard Castle.		
28	<b>With reference to Figure 5.3 Air Quality Construction Phase Assessment, the construction phase ARN only falls within DCCs boundary on the A66 to the east of Barnard Castle leading to Scotch Corner. There</b>	Data provided for the Project and the construction traffic movements were screened in-line with the criteria in LA105 (where available). The worst-case scenario of the peak-averaged daily construction traffic were used and the ARN identified	Confirmation required on whether the peak averaged daily construction traffic stated to be used was for 2025 or 2024. Question not considered to have been suitably answered on why roads	Peak construction vehicle movements occur in 2025 and have been used as a basis for the assessment. Construction traffic flows have been modelled using 2024 emissions data. Therefore we have used the largest forecast traffic flows (2025) during the	Why roads adjacent to Bowes construction compound do not cause an increase of more than 1000 AADT, when roads further east of the compound do, is understood to be being looked into further by the	MS explained that for Bowes all lorries exporting material are assumed to be going towards Scotch Corner and A1 – access would not be via compound but from roads to	A table of data is to be issued by AmeyArup to DCC and AECOM

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<p><b>appears to be no ARN east of Bowes at Scheme 7 Bowes Bypass and also no ARN to the west of Scheme 8 Cross Lanes to Rokeby. One of two construction compounds is noted by the Air Quality Chapter to be in Bowes, amongst other locations. It is understood that the construction traffic impact assessment in this area does not fall into the ARN and has been scoped out of requiring assessment on local air quality, possibly due to the criteria for AADT and HDV flow changes provided in Paragraph 5.6.4 of the Chapter not being exceeded. Explanation as to why these sections would not be</b></p>	<p>based on the changes in vehicle flows, as set out in the assessment as set out in the Environmental Statement Chapter 5: Air Quality (Document Reference 3.2, APP-048). The location of construction compounds will be reviewed through the continued development of the design.</p>	<p>adjacent to Bowes construction compound does not cause an increase of more than 1000 AADT, when roads further east of the compound do. Table of data requested is outstanding.</p>	<p>construction period together with the worst-case vehicle emission factors (2024) to represent a conservative assessment. Construction traffic data was screened against the thresholds for HDV movements outlined in DMRB LA 105 and not total AADT movements (200 HDV AADT movements). The data highlighted in the Transport Assessment (Document Reference 3.7, APP-236) is based on a worst-case unlikely scenario for potential local short- term diversions, with no assumed mitigation in-place. As such, given the uncertainty around likelihood and duration, following discussion at a Project level, they were not considered appropriate to be included within the Air Quality Assessment and are based on a worst-case</p>	<p>Applicant. We reiterate that we would welcome a table of traffic data similar to that provided for the operational phase traffic Table 5-10 following this further consideration.</p>	<p>the east – therefore lorries would be progressively lighter as moving through Bowes construction area. AECOM query is in relation to flows outside of red line boundary eg between schemes 7 and 8 MS confirmed that between the two schemes vehicle movements would be less than 200 – AECOM requested can MS provide a table with the numbers between the two schemes?</p>	



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	<b>materially affected by the scheme should be provided to suitably scope out these sections of construction within DCC, particularly in light of Bowes construction compound being in this location. A table similar to that provided for the operational phase traffic Table 5-10 would be useful. The other construction compound locations should be confirmed and agreed with DCC prior to construction commencing.</b>			unlikely scenario for potential local short-term diversions, with no assumed mitigation in-place. As such, given the uncertain likelihood and duration, following discussion at a Project level, they were not considered appropriate to be included within the Air Quality Assessment. Bowes construction compound will be rechecked in terms of its HDV movements in readiness for Deadline 3.			
29	<b>Explanation should also be provided as to how Barnard Castle does not fall within the ARN for the construction phase. Following a review of Chapter 3.7 Transport</b>	The data highlighted in the Transport Assessment (Document Reference 3.7, APP-236) is based on a worst-case unlikely scenario for potential local short- term diversions,	It should be made clear whether the mitigation is built in. It is standard practice for a reasonable worst case to be first considered, and then assessment	Paragraph 11.1.3 of the Transport Assessment (APP-236) states: “construction advice has been provided by specialist construction advisor Sir Robert McAlpine (SRM). SRM have provided preliminary	We would like to discuss this further to understand what the potential changes are in Barnard Castle and up to what level of traffic change.	<b>MS explained that modelling was on worst case without mitigation and does not include for diversions – will be addressed</b>	<b>File Note will be prepared by AmeyArup to set out the approach taken to assessing the air quality impact from</b>

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<p><b>Assessment it is apparent there is at least a 2,000 two-way AADT increase at A67 Barnard Castle Bridge in both Scenario C and D. It is additionally noted that Scenarios C and D combined are for a length of more than two years.</b></p>	<p>with no assumed mitigation in-place. As such, given the uncertainty around likelihood and duration, following discussion at a Project level, they were not considered appropriate to be included within the Air Quality Assessment. are based on a worst-case unlikely scenario for potential local short-term diversions, with no assumed mitigation in-place. As such, given the uncertain around likelihood and duration, following discussion at a Project level, they were not considered appropriate to be included within the Air Quality Assessment. Paragraph 11.7.4 of the Transport Assessment</p>	<p>of residual effects following mitigation. Worst case traffic data and impact appears to have been presented in the Transport Chapter but not in the Air Quality Chapter's air quality assessment. Consistency between transport and air quality chapters should be made and where this is not possible, reasons provided for inconsistency. It does not appear that a reasonable worst case assessment been undertaken. <b>It is considered that the assessment is missing a significant risk that needs to be assessed unless</b></p>	<p>indicative information relating to Temporary Traffic Management (TTM) proposals, and potential compound locations such that the impact of; traffic management measures, and construction worker travel, on road capacity can be appraised during project construction". This is the best information currently available. It also clarifies in paragraph 11.1.4 " The Construction Traffic Management Plan forms Annex B13 of Environmental Management Plan (EMP) (Document Reference 2.7). Annex B13 is an extended essay plan for the Construction Traffic Management Plan (CTMP) for the Project. It will be completed on an iterative basis by the Principal Contractor (PC) as the Project progresses through detailed design and will be used to</p>	<p>There are a number of points within the SOCG regarding the robustness of the air quality assessment undertaken, to include baseline characterisation, model assumptions and limitations for both construction and operational phases, the RMSE and predicted pollutant concentrations and impacts at receptors in DCC. The assessment undertaken is not considered robust or to have taken a reasonable worst case approach, however it is acknowledged that existing baseline air quality may be good within the study area. This is subject to further air quality work undertaking</p>	<p>through CTMP to mitigate impacts – AECOM would like further session to understand how mitigation/ scenarios are linked in terms of the EMP and contractor commitments re CTMP</p>	<p>the traffic data provided as well as a breakdown on how the EMP and CTMP will be undertaken post DCO approval. AECOM and DCC will undertake a parallel review of the EMP and CTMP</p>

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		<p>(Document Reference 3.7, APP-236) states:                      “The impacts identified within this will help inform the potential issues that may arise during construction such that mitigation can be considered and implemented where possible. The project team will monitor the journey times on the A66 to ensure excessive delays are not occurring due to the works. If delays on the A66 are causing inappropriate local routes to be used then the project team will consider if any adjustments can be made to the TTM (Temporary Traffic Management) with the aim of reducing the delays.”                      Annex B13 of the Environmental Management Plan</p>	<p><b>a concrete mitigation can be determined. Clarification is requested on what short term is, in the context of the diversions.</b></p>	<p>agree the final TTM measures for implementation during the construction of the Project.”                      The TTM proposals are therefore indicative, and therefore the CTMP will be updated once final TTM measures have been agreed. Figure 11-1 of the Transport Assessment (APP-236) shows that Scenario C will be in place for 365 days, and scenario D will also be in place of 365 days.</p>	<p>the additional assessment within Barnard Castle, and further discussion between DCC and the Applicant is requested to simplify communications. Suggestion that this point is revisited after this discussion and the further assessment at Barnard Castle.</p>		

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		<p>(EMP) (Document Reference 2.7, APP-033) provides an extended essay plan for the Construction Traffic Management Plan (CTMP) for the Project. It will be completed on an iterative basis by the Principal Contractor (PC) as the Project progresses through detailed design and will set out the proposed Temporary Traffic Management (TTM) measures for implementation during the construction of the Project. Major local businesses and other stakeholders that are likely to be impacted by the proposed traffic management will also be consulted regarding this CTMP. This will ensure that a comprehensive, detailed Traffic Management Plan is available and</p>					

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		<p>understood by all parties prior to commencing the works on site.</p> <p>The CTMP will be developed to ensure that the following key objectives are considered and addressed:</p> <ul style="list-style-type: none"> <li>• Safety of the travelling public, non-motorised users and roadworkers to ensure that no person is injured either working within or travelling through the site on the strategic road network</li> <li>• Clarity of temporary traffic management schemes to ensure that the CTMP is built around the customers and stakeholders</li> <li>• Minimising delays to travellers on both trunk and local roads</li> </ul>					

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		<ul style="list-style-type: none"> <li>•Meeting the needs of the relevant Local Highway</li> <li>•Authorities</li> <li>•Addressing the needs of key local stakeholders</li> <li>•Maintaining adequate access for the emergency services and all affected properties during the construction works</li> </ul>					
30	<p><b>Following a review of Figure 11-1 in Chapter 3.7 Transport Assessment, it would appear that some of the construction phase scenarios will have similarities. It should be confirmed in the Air Quality Chapter how long the construction phase as a whole will be in areas of DCC and evidence provided as to how</b></p>	<p>Transport Assessment (Document Reference 3.7, APP-236) Figure 11-1 sets out the indicative construction programme per scheme, with works around Bowes and then Rokeby and Cross Lanes Junction being Scheme 7 and 8 respectively, showing two-year construction programmes. All worst-case</p>	<p>Statement against item 29 above does not correlate to the statement that all worst case construction traffic movement were reviewed. Worst-case construction traffic movements have not been assessed according to Point 29. Clarification is required.</p>	<p>Peak construction vehicle movements occur in 2025 and have been used as a basis for the assessment. Construction traffic flows have been modelled using 2024 emissions data.</p> <p>Therefore we have used the largest forecast traffic flows (2025) during the construction period together with the worst-case vehicle emission factors (2024) to represent a conservative assessment.</p>	<p>There are a number of points within the SOCG regarding the robustness of the air quality assessment undertaken, to include baseline characterisation, model assumptions and limitations for both construction and operational phases, the RMSE and predicted pollutant concentrations and impacts at</p>	<p>MS explained that modelling was on worst case without mitigation and does not include for diversions – will be addressed through CTMP to mitigate impacts – AECOM would like further session to understand how mitigation/ scenarios are</p>	<p>File Note will be prepared by AmeyArup to set out the approach taken to assessing the air quality impact from the traffic data provided as well as a breakdown on how the EMP and CTMP will be undertaken</p>

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	<b>this has informed the screening and ARN determination.</b>	construction traffic movements were reviewed against DMRB LA105 criteria and included in the ARN where the criteria were triggered.			receptors in DCC. The assessment undertaken is not considered robust or to have taken a reasonable worst case approach, however it is acknowledged that existing baseline air quality may be good within the study area. This is subject to further air quality work undertaking the additional assessment within Barnard Castle, and further discussion between DCC and the Applicant is requested to simplify communications. Suggestion that this point is revisited after this discussion and the further assessment at Barnard Castle.	linked in terms of the EMP and contractor commitments re CTMP	post DCO approval. AECOM and DCC will undertake a parallel review of the EMP and CTMP
31	A particular concern is noted to be if construction-related	Duly noted, the CTMP will be developed by the appointed	Considering the points made in relation to a	The Environmental Management Plan (Document reference 2.7,	The Applicant does not appear to have answered the query	MS explained that modelling was on worst	File Note will be prepared by AmeyArup

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<p>vehicles affected or diverted local traffic within locations with sensitive receptors close to the routes for the compounds approaching the AQO. As noted in EMP Annex B13 Construction Traffic Management Plan (Application Document 2.7), the Construction Traffic Management Plan to be developed by the appointed contractor will ensure construction vehicles avoid these areas.</p>	<p>contractor to ensure construction vehicles avoid areas where there are sensitive receptors close to routes used by construction traffic and air pollutant levels are approaching their respective AQOs</p>	<p>suitable air quality baseline having not been achieved, it is not likely that the appointed contractor will be able to develop the CTMP. Will the A67 route through Barnard Castle be avoided as a construction traffic route?</p>	<p>APP-019) (EMP) has been developed with the intent to control construction impacts and sets out controls required to be implemented in the construction phase. Annex B13 Construction Traffic Management Plan (Document 2.7, APP-033) sets out the essay plan for a Construction Traffic Management Plan (CTMP) that must be developed]. This essay plan includes the key stakeholders to be engaged within the development of the final Construction Traffic Management Plan (section B13.2.1) and includes Durham County Council. The EMP, confirms that a detailed CTMP is subject to consultation with the local planning and highway authorities (in accordance with the consultation provisions also provided within the EMP). The CTMP must then be</p>	<p>made on 24.11.2022. Considering the points made in relation to a suitable air quality baseline having not been achieved, it is not likely that the appointed contractor will be able to develop the CTMP.  There are a number of points within the SOCG regarding the robustness of the air quality assessment undertaken, to include baseline characterisation, model assumptions and limitations for both construction and operational phases, the RMSE and predicted pollutant concentrations and impacts at receptors in DCC. The assessment</p>	<p>case without mitigation and does not include for diversions – will be addressed through CTMP to mitigate impacts – AECOM would like further session to understand how mitigation/ scenarios are linked in terms of the EMP and contractor commitments re CTMP</p>	<p>to set out the approach taken to assessing the air quality impact from the traffic data provided as well as a breakdown on how the EMP and CTMP will be undertaken post DCO approval. AECOM and DCC will undertake a parallel review of the EMP and CTMP</p>



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				approved by the Secretary of State as part of a 2nd iteration EMP prior to the start of works (see article 53 of the draft DCO (Document Reference 5.1, APP-285) and paragraph 1.4.11 of the EMP). These are legally enforceable requirements.	undertaken is not considered robust or to have taken a reasonable worst case approach, however it is acknowledged that existing baseline air quality may be good within the study area. This is subject to further air quality work undertaking the additional assessment within Barnard Castle, and further discussion between DCC and the Applicant is requested to simplify communications. Suggestion that this point is revisited after this discussion and the further assessment at Barnard Castle.		
33	Of the three designated habitats presented within Figure 5.3 in DCC, only one (Rokeby	There does appear to be a drafting error in the Environmental Statement Chapter 5: Air Quality	Error noted by applicant. The current version of DMRB LA 105 guidance does not	The drafting error in Chapter 5 of the Environmental Statement has been accepted and a report revision is being	It is suggested here that other clarification points we have requested input to within this	AA to write to DCC to confirm that guidance being updated to reflect the	Information has been shared and AECOM have confirmed this

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<p>Park and Mortham Wood (ERIC LWS)) is reported on, however it would appear that transect receptor points have not been modelled. This does not align with the requirements of LA 105 guidance. At the distance of 7.5m from the road edge, there is a 24% increase in nitrogen deposition compared to the critical load for this site. Chapter 5 Air Quality does not reference this site in the discussion, although there may be an error in Paragraph 5.10.17 which refers to Lightwater Alluvial Forest part of the River Eden and Tributaries SSSI, located outside of DCC. This should be checked and confirmed. Chapter 6 of the ES Biodiversity</p>	<p>(Document Reference 3.2, APP-048) Paragraph 5.10.17, where Rokeby Park LWS should have been referenced with a change of 24% against the critical load of 10, with a change in 2.4 kg N/ha/yr.</p> <p>No further transect receptor locations have been included as the predicted change in annual mean NOx at these locations is considered to be imperceptible (&lt;0.3µg/m3), in-line with DMRB LA105.), in-line with DMRB LA105.</p>	<p>require the consideration of annual mean NOx and annual mean NOx concentrations should not be used to screen whether or not impacts on designated ecological site are included in any air quality assessment, or not.</p>	<p>prepared which does not alter the overall conclusions presented in Chapter 5 of the Environmental Statement.</p> <p>It is important to recognise the limitations of models and to use the outputs appropriately. For example, DMRB LA 105 section 2.90 sets out that no likely significant air quality effects shall occur where the “difference in concentrations is imperceptible i.e., less than 1% of the air quality threshold (e.g., 0.4µg/m3 or less for annual mean NO2)” based on uncertainties in modelling. This approach is used by the Environment Agency and also the Institute of Air Quality Management in their respective air quality guidance</p> <p>In the same way, changes of less than 1% of the NOx critical level (30µg/m³ - therefore the criterion is 0.3µg/m³) were considered to be</p>	<p>table, also be taken into account in the report revision.</p> <p>It is agreed that for the public exposure / human health element, that percentage change in ambient concentrations are appropriate to be used to determine significance. However for ecosystems, this process should be based on changes in nitrogen deposition rather than NOx. If this has been misunderstood by the Applicant’s consultant, it is suggested that the air quality impact assessment on ecosystems be revisited.</p>	<p>approach being taken – explanation in PPT of issue.</p>	<p>issue is now considered closed.</p>

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	is however noted by Chapter 5 Air Quality to conclude that there will be no likely significant effects at designated habitat sites.			imperceptible and not considered further in the assessment. This approach is consistent with all NH projects.			
34	Graham's Gill Jack-Wood Ancient Woodland and Steven Band Road Verge (NEYEDC LWS) do not have receptor points or transects marked on Figure 5.3, nor results reported in Table-8. Reasons for not reporting impacts on these two designated habitats should be provided.	The impacts at these receptors have not been reported or illustrated as the predicted change in annual mean NOX at these locations is considered to be imperceptible (<0.3µg/m3), in-line with DMRB LA105. This approach is set out in sections 5.5.7 to 5.5.9 of Environmental Statement Chapter 5: Air Quality (Document Reference 3.2, APP-048).	The current version of DMRB LA 105 guidance does not require the consideration of annual mean NOx and annual mean NOx concentrations should not be used to screen whether or not impacts on designated ecological site are included in any air quality assessment, or not.		No response provided by the Applicant for this point. This is requested.	AA to write to DCC to confirm that guidance being updated to reflect the approach being taken – explanation in PPT of issue.	Information has been shared and AECOM have confirmed this issue is now considered closed.
<b>Operational phase assessment</b>							
40	It is not clear whether AADT has been used for the operational phase assessment, or whether traffic data	Consistent with the guidance in DMRB LA105, a proportionate approach was taken	Methodological point that period flows have not been used based on unlikely	The modelled concentrations are below the air quality objectives at human receptor locations across the ARN.	This point is understood to rely on the outcome of	AA view that due to existing baseline, lack of sensitive receptors didn't	File Note will be prepared by AmeyArup to set out the approach

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<p>provided was split by the four periods required by LA 105 at detailing air quality assessment stage of morning (AM), inter peak, evening peak (PM) and overnight period (OP). This should be clarified and if AADT has been used, reasons provided as to why this is considered acceptable and any limitations associated with this method choice.</p>	<p>to the speed pivoting process. AADT was used in the operational phase assessment because, as noted in the guidance, the possibility of exceedances of air quality thresholds was considered to be low. This is reflected in the assessment's findings.</p>	<p>exceedances of AQOs. Considering the above points made in relation to the absence of a reliable air quality baseline, this may require revisiting.</p>	<p>Modelling undertaken is considered robust and demonstrates no significant effects, when judged against DMRB LA105 standards. Model set up or adjustment of results would not alter conclusions for air quality as the risk of exceeding air quality objectives is negligible.</p>	<p>the assessment at Barnard Castle. There are a number of points within the SOCG regarding the robustness of the air quality assessment undertaken, to include baseline characterisation, model assumptions and limitations for both construction and operational phases, the RMSE and predicted pollutant concentrations and impacts at receptors in DCC. The assessment undertaken is not considered robust or to have taken a reasonable worst case approach, however it is acknowledged that existing baseline air quality may be good within the study area. This is subject</p>	<p>warrant reviewing Inter-peak data.</p>	<p>taken to assessing the air quality impact from the traffic data provided as well as a breakdown on how the EMP and CTMP will be undertaken post DCO approval. AECOM and DCC will undertake a parallel review of the EMP and CTMP</p>

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					to further air quality work undertaking the additional assessment within Barnard Castle, and further discussion between DCC and the Applicant is requested to simplify communications. Suggestion that this point is revisited after this discussion and the further assessment at Barnard Castle.		
45	Paragraph 5.5.7 of the Air Quality Chapter states: "It is important to recognise the limitations of models and to use the outputs appropriately. For instance traffic flows of less than a 1,000 AADT are not used in assessment as they are below the confidence that can be attributed to a traffic model. In the same way that	The AADT change criterion is taken from Note 2, section 2.1 in DMRB LA105. The NO2 change criterion is also quoted from section 2.90, item 2 in DMRB LA105. For NOX, the Environment Agency <sup>2</sup> and the Institute of Air Quality Management <sup>3</sup> use an identical air pollutant change criterion approach in their respective	The current version of DMRB LA 105 guidance does not require the consideration of annual mean NOx and annual mean NOx concentrations should not be used to screen whether or not impacts on designated ecological site are included in any air	It is important to recognise the limitations of models and to use the outputs appropriately. For example, DMRB LA 105 section 2.90 sets out that no likely significant air quality effects shall occur where the "difference in concentrations is imperceptible i.e., less than 1% of the air quality threshold (e.g., 0.4µg/m <sup>3</sup> or less for annual mean NO2)" based on uncertainties in modelling.	It is agreed that for the public exposure / human health element, that percentage change in ambient concentrations are appropriate to be used to determine significance. However for ecosystems, this process should be based on changes in nitrogen deposition rather	As above points on NOx	Information has been shared and AECOM have confirmed this issue is now considered closed.

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	changes of less than 1% of the AQO for NO <sub>2</sub> (40 µg/m <sup>3</sup> - therefore the criterion is 0.4µg/m <sup>3</sup> ) and NO <sub>x</sub> (30 µg/m <sup>3</sup> - therefore the criterion is 0.3µg/m <sup>3</sup> ) are considered to imperceptible and not considered further in assessment." This should be expanded on with further explanation.	guidance to determine perceptibility and the need for further assessment.	quality assessment, or not.	This approach is used by the Environment Agency and also the Institute of Air Quality Management in their respective air quality guidance. In the same way, changes of less than 1% of the NO <sub>x</sub> critical level (30µg/m <sup>3</sup> - therefore the criterion is 0.3µg/m <sup>3</sup> ) were considered to be imperceptible and not considered further in the assessment. This approach is consistent with all NH projects.	than NO <sub>x</sub> . If this has been misunderstood by the Applicant's consultant, it is suggested that the air quality impact assessment on ecosystems be revisited.		
49	There are no human health sensitive receptors selected and modelled for each ARN link within DCC; this would have provided an understanding of impact of each ARN link. For example, the B6277 is a section of ARN within DCC and a residential property north of Thorsgill Beck has not been included in the	Reviewer statement, no response required.	We would have expected to see more receptors than included in the assessment as per LA 105. For example, the B6277 is a section of ARN within DCC and a residential property north of Thorsgill Beck has not been included in the dispersion modelling. At least	The receptors selected in the air quality assessment were identified based on the ARN and provide representative exposure of potential worst-case impacts. For a project of this scale, it was simply not possible (nor indeed necessary given the existing baseline conditions) to provide a receptor assessment on every individual link in the ARN. The modelled concentrations across the	This point relies on the assumption that baseline air quality is well below air quality objections and is therefore understood to rely on the outcome of the assessment at Barnard Castle.	North of the County Bridge at Barnard Castle point raised by AECOM	File Note will be prepared by AmeyArup to set out the approach taken to assessing the air quality impact from the traffic data provided as well as a breakdown on how the EMP and CTMP will be

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	dispersion modelling. Receptors are noted by the chapter to have been selected to represent the scale of impacts associated with the project.		one receptor per ARN link is requested to be included to ensure the air quality impact is robustly assessed.	network are well below the air quality objectives at human receptor locations across the ARN and the modelling undertaken is considered robust and demonstrates no significant effects, when judged against DMRB LA105 standards. The addition of new receptors would not alter conclusions for air quality as the risk of exceeding air quality objectives is negligible.			undertaken post DCO approval. AECOM and DCC will undertake a parallel review of the EMP and CTMP
50	The greatest air quality constraint from the scheme at the PEIR stage related to impacts on nature conservation sites, where there were potential concerns and risk of significant effects with nitrogen deposition and ammonia concentrations. This was noted to be considered in greater detail within the ES. Ammonia was	Reviewer statement, no response required.	Ammonia results at each receptor not presented and are requested to be.	A call was held between National Highways and Natural England on Thursday 8th December. A summary of the ammonia assessment will be set out in the Natural England Statement of Common Ground (SoCG).	The document does not yet appear to be available. It is understood that this will be considered further.	Ammonia technical note	A technical note has been issued to DCC and their Consultants on 24 February 2023 which was discussed at the meeting of 28 February 2023. Further meeting will take place in

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	requested to be included at scoping stage however ammonia results at each receptor are not presented. It is noted in Paragraph 5.2.3.20 of Appendix 5.2 Air Quality Assessment Methodology that the National Highways tool has been used to account for ammonia emissions impact on deposited nitrogen.						March to discuss the contents of the technical note.
51	There are nine designated ecological sites (Rokeby Park and Mortham Wood (ERIC LWS), Graham's Gill Jack-Wood Ancient Woodland, Steven Band Road Verge (NEYEDC LWS), Bowes Moor SSSI, North Pennine Moors SPA and SAC, Mill Wood Ancient Woodland, Thorsgill Wood Ancient Woodland) plus a number of Ancient	Transect locations are shown in Environmental Statement Figure 5.1: Cumulative Zones of Influence (Document Reference 3.3, APP-144). Results are only presented where the predicted change in NO <sub>x</sub> exceeds 0.3µg/m <sup>3</sup> (1% of the critical load). This is noted on all the sheets within Environmental Statement Figure 5.4: Air Quality	The current version of DMRB LA 105 guidance does not require the consideration of NO <sub>x</sub> and annual mean NO <sub>x</sub> concentrations should not be used to screen whether or not impacts on designated ecological site are included in any air quality assessment, or not.	It is important to recognise the limitations of models and to use the outputs appropriately. For example, DMRB LA 105 section 2.90 sets out that no likely significant air quality effects shall occur where the "difference in concentrations is imperceptible i.e., less than 1% of the air quality threshold (e.g., 0.4µg/m <sup>3</sup> or less for annual mean NO <sub>2</sub> )" based on uncertainties in modelling. This approach is used by the Environment Agency	It is agreed that for the public exposure / human health element, that percentage change in ambient concentrations are appropriate to be used to determine significance. However for ecosystems, this process should be based on changes in nitrogen deposition rather than NO <sub>x</sub> . If this has been	Ammonia technical note	A technical note has been issued to DCC and their Consultants on 24 February 2023 which was discussed at the meeting of 28 February 2023. Further meeting will take place in March to



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	Trees within 200m of the ARN within DCC, with reference to Figure 5.4. Results are not presented for all of these sites in Appendix 5.4, or transect locations shown in Figure 5.4.	Operational Phase Assessment (Document 3.3, APP-068). The reasoning is given in sections 5.5.7 to 5.5.9 of Environmental Statement Chapter 5: Air Quality (Document Reference 3.2, APP-048).		and also the Institute of Air Quality Management in their respective air quality guidance. In the same way, changes of less than 1% of the NOx critical level (30µg/m³ - therefore the criterion is 0.3µg/m³) were considered to be imperceptible and not considered further in the assessment. This approach is consistent with all NH projects.	misunderstood by the Applicant's consultant, it is suggested that the air quality impact assessment on ecosystems be revisited.		discuss the contents of the technical note.
53	<b>Given the poor RMSE derived from the verification exercise, discussion should be provided on how robust and reliable the results presented are, particularly in light of the impacts to designated ecological sites.</b>	Please refer to the response to item 14 (above).	See response in above points.	The modelled concentrations are well below the air quality objectives at human receptor locations across the ARN. The modelling carried out is robust and has demonstrated that there is no potential for adverse likely significant effects, following the DMRB LA105 standards—as set out in Chapter 5 of the Environment Statement (ES). Whilst the RMSE value is noted as being above the	It is noted that many of the methodological decisions made appear to have been scoped as such based upon reliance on the existing air quality baseline and comparison to the air quality objectives set for human health. This is not considered an appropriate	As above covered by validation exercise.	A technical note has been issued to DCC and their Consultants on 24 February 2023 which was discussed at the meeting of 28 Feb 2023. Further meeting will take place in March to discuss the

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				<p>desired values in Defra TG(16 and 22), monitoring data for the Project is limited. Outside of the Eden DC area, the data are even more limited. Only one monitoring site in the Richmond DC area was considered appropriate for verification purposes. In-line with TG(16 and 22) the model parameters were reviewed multiple times as part of the model verification, to no avail. So</p> <p>as to include at least one site on the A66 in Richmond DC, the adjustments were made accordingly,</p> <p>Having considered the comment, the points made regarding the model set up or alternative adjustment of results would not alter the assessment of potential air quality impacts on r sites as described in the in the Environmental Statement (ES) Chapter 6</p>	<p>methodology for ecological sites.</p> <p>In addition to this, there are a number of points within the SOCG regarding the robustness of the air quality assessment undertaken, to include baseline characterisation, model assumptions and limitations for both construction and operational phases, the RMSE and predicted pollutant concentrations and impacts at receptors in DCC. The assessment undertaken is not considered robust or to have taken a reasonable worst case approach, however it is acknowledged that existing baseline air quality may be good within the study</p>		<p>contents of the technical note.</p>

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				Biodiversity (Document Reference 3.2, APP-049) and the Habitats Regulations Assessment (HRA) Stage 2 Statement to Inform Appropriate Assessment (Application Document 3.6 APP-235).	area. This is subject to further air quality work undertaking the additional assessment within Barnard Castle, and further discussion between DCC and the Applicant is requested to simplify communications. Suggestion that this point is revisited after this discussion and the further assessment at Barnard Castle.		