

**A66 Northern Trans-Pennine Project
TR010062**

**7.18 Environmental Management Plan
(1st Iteration) Change Log (Rev 3)**

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The Infrastructure Planning (Examination Procedure) Rules 2010

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(Examination Procedure)
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A66 Northern Trans-Pennine Project
Development Consent Order 202x

**7.18 ENVIRONMENTAL MANAGEMENT PLAN
(1ST ITERATION) CHANGE LOG**

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Rev 1	24 January 2023	Deadline 3
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Contents

1. Introduction.....	2
Purpose of this document.....	2
2. Development Consent Order Environmental Management Plan Change Log.....	3

1. Introduction

Purpose of this document

- 1.1.1 This document, the Environmental Management Plan (EMP) Change Log – Deadline 8, sets out and explains the changes to the Environmental Management Plan that have been made in the third revision of the EMP submitted at this Deadline 8 when compared to the version of the EMP that was submitted at Deadline 7 (REP7-007). It should be noted that the version of the EMP that was submitted at Deadline 7 (incorporated amendments arising specifically from the 22 changes accepted into the Examination by the Examining Authority. This updated version addresses all comments raised since Deadline 6, but the changes listed are as compared to the version submitted at Deadline 7.
- 1.1.2 This document also sets out and explains changes made to a number of the EMP annexes, when compared to the previous version of those annexes submitted to the examination as listed below:
- Annex B1 Outline Landscape and Ecological Management Plan, as compared to the version submitted at Deadline 6 (REP6-005)
 - Annex B3 Outline Heritage Mitigation Strategy, as compared to the version submitted at Deadline 6 (REP7-009-)
 - Annex B4 Air Quality and Dust Management Plan, as compared to the version submitted at Deadline 6 (REP6-009)
 - Annex B5 Noise and Vibration Management Plan, as compared to the version submitted at Deadline 6 (REP6-011)
 - Annex B13 Construction Traffic Management Plan, as compared to the version submitted with the application (APP-033)
 - Annex C3 Scheduled Monuments Method Statement, as compared to the version submitted at Deadline 6 (REP6-013)
- 1.1.3 A number of stakeholders and interested parties have made further comments about the content of the EMP since Deadline 6, through the Statements of Common Ground and Principal Areas of Disagreement Statements, as well as direct to National Highways through on-going engagement. A number of amendments have been proposed to the EMP (and its annexes) to address some of these comments and these are reflected in revision 4 of the EMP, revision 3 of Annexes B1, B3 and C3, revision 2 of Annexes B4 and B5 and revision 1 of Annex B13 submitted at Deadline 8.
- 1.1.4 This Change Log sets out each substantive change made to the EMP (including its supporting Annexes), the source of that change, and an explanation of why the change has been made. Where minor changes have been made to deal with clarity or correcting typographical errors, these are not noted in the Change Log.
- 1.1.5 This Change Log does not make reference to comments that have been raised by a third party where a change has not been made to the EMP in response to it. This has either been explained in our direct responses to examination submissions, or engagement is ongoing.
- 1.1.6 This Change Log should be read alongside the updated version of the Environmental Management Plan (Rev 4) (Document Reference 2.7/REP7-007) and any updated annexes submitted alongside it and is correct as of Deadline 8 of the Examination.

2. Development Consent Order Environmental Management Plan Change Log

Table 2.1: Environmental Management Plan Change Log

Section Amended in Revised Document	Source of Comment or Reason for Amendment (Examination Library Reference)	Brief Description and Explanation of Change
EMP		
Throughout	Ongoing engagement with Historic England	Where the word 'commence' or 'commencement' have been used in the context of indicating the beginning of construction works it has been amended to 'start' where appropriate to reflect the definition in Chapter 1 of the EMP. Amendment made in response to a comment from Historic England.
Paragraph 1.4.10	Ongoing engagement with Historic England	Paragraph tweaked to clarify the reference to Table 1-2 in response to a suggestion made by Historic England.
Table 1-2	Ongoing engagement with Historic England	Column title amended
Paragraph 1.4.15	Ongoing engagement with Historic England	Paragraph amended to make it clear that the consultation set out in this section must also be carried out on amendments to the approved second iteration EMP including prior to referral to the Secretary of State in accordance with article 53 of the DCO, and on a third iteration EMP, in response to comment received from Historic England.
Paragraphs 1.4.37 and 1.4.40	Ongoing engagement with Historic England	Paragraph references amended for consistency in response to a comment made by Historic England.
Table 3-2 REAC commitment ref D-AQ-01	Ongoing engagement with Durham County Council (DCC)	Bullet points amended in respect of the required content of the AQDMP to expand on the potential techniques for monitoring and ensure the document includes criteria for determining when monitoring and management measures are no longer required at a particular location, in response to comments made by DCC.
Table 3-2 REAC commitment ref MW-AQ-05	Ongoing engagement with Durham County Council (DCC)	Action expanded to specify that the monitoring required by this commitment, including the locations and techniques, will be included in the AQDMP and subject to measures set out in the AQDMP. Amendment made in response to comments made by DCC.

Section Amended in Revised Document	Source of Comment or Reason for Amendment (Examination Library Reference)	Brief Description and Explanation of Change
Table 3-2 REAC commitment ref MW-BD-21	Errata Report submitted at Deadline 8 (Document Reference 6.1)	Amendment made to commitment to clarify that rodenticides shall not be used at construction compounds, in order to prevent deaths of barn owls.
Table 3-2 REAC commitment ref D-CH-01 to D-CH-03, and MW-CH-01 to MW-CH-05	Ongoing engagement with Historic England	A number of clarification amendments have been made to the action and achievement criteria of these commitments, in line with suggested wording provided by Historic England. The intent of the updates is to better reflect the links between the various management plans and method statements and ensure consultation requirements and achievement criteria are clear and enforceable.
Table 3-2 REAC commitment ref D-RDWE-02	Ongoing engagement with the Environment Agency	Bullet point amended to clarify that detailed design must incorporate findings of both the updated baseline and proposed detailed design modelling at detailed design stage.
Table 3-2 REAC commitment ref D-RDWE-16	Ongoing engagement with the Environment Agency	New REAC commitment added to specify that the detailed design of flood compensation measures shall be consulted on with the Environment Agency and form part of the second iteration EMP for the Appleby to Brough Scheme , for approval by Secretary of State. This commitment is to ensure the DCO includes suitable controls to ensure flooding is not worsened by the scheme in line with policy requirements in relation to the Appleby to Brough Scheme and has been agreed with the Environment Agency albeit the Environment Agency consider the controls better sit on the face of the DCO. The parties accept this will need to be a decision for the Secretary of State but should the Secretary of State agree with National Highways' position that the wording should be included in the EMP, the Environment Agency is content with the wording now included.
Annex B1 Outline Landscape and Ecological Management Plan		
Paragraph B1.2.5	Revised draft NNNPS and ongoing engagement with Westmoreland and Furness Council	Paragraph expanded to specifically reference the pilot Cumbria Local Nature Recovery Strategy following feedback from WFC and to ensure it is clear this is included as part of the proposed engagement.

Section Amended in Revised Document	Source of Comment or Reason for Amendment (Examination Library Reference)	Brief Description and Explanation of Change
Paragraph B1.5.23	Ongoing engagement with Westmoreland and Furness Council	Wording of paragraph amended to make it clear that part of the purpose of the proposed AIA is to ensure protection of trees that are located immediately outside of the Order Limits, from works that could potentially damage routes within the Order Limits.
Paragraph B1.7.6	Westmoreland and Furness Council Deadline 7 submission	Wording of paragraph amended in line with request from WFC in their Deadline 7 submission
Paragraph B1.10.5 and Paragraph B1.15.2	Comments made by an Interested Party	Footnote added to clarify that species that could be poisonous to horses must not be included in planting of plots adjacent to known horse stud farms, in order to prevent harm to the animals.
Annex B3 Outline Heritage Mitigation Strategy		
Paragraph B3.1.2	Ongoing engagement with Historic England	Paragraph amended to clarify the strategy is to be updated as part of the Second Iteration EMP, in response to a suggestion from Historic England
Paragraphs B3.1.3 and B3.1.4, B3.2.10, B3.2.16, B3.2.17, B3.2.18	Ongoing engagement with Historic England	Paragraphs added (B3.1.3 and B3.1.4) and amendments made throughout the document to clarify the intent of how the document progresses from the Outline Heritage Mitigation Strategy (which provides a suite of mitigation measures and an indication of what will be needed where based on the reasonable worst case assessment set out in the ES and preliminary design) through to the Detailed Heritage Mitigation Strategy, where the specific mitigation to be implemented at each location is refined based on the detailed design, updated survey work and specific construction methodologies. Amendments made as a response to ongoing discussion with Historic England which highlighted a lack of clarity in how the DHMS will be an update/refinement of the OHMS.
Paragraph B3.1.5	Ongoing engagement with Historic England	Paragraph added to clarify how the Heritage Mitigation Strategy and the Scheduled Monuments Method Statement work alongside each other and must be read in parallel. Amendment made in response to comments received from Historic England.

Section Amended in Revised Document	Source of Comment or Reason for Amendment (Examination Library Reference)	Brief Description and Explanation of Change
Paragraph B3.1.14	Ongoing engagement with Historic England	Paragraph amended to remove reference to updates through the DCO process (as the process for updating is set out earlier in the document) and to remove reference to Historic England confirming any finds as being nationally significant, to avoid any conflict with their role in recommending assets for scheduling. Wording amended to clarify the roles the Local Authorities and Historic England have in the process. Updates made in response to comments received from Historic England.
Paragraphs B3.1.15 to B 3.1.21 and paragraph B3.3.5. Paragraphs B3.3.9 and B3.3.92 deleted	Ongoing engagement with Historic England	Section amended to clarify the approvals process for documents required under the OHMS (including but not limited to the SSWSI), and for any subsequent updates (para B3.3.9 moved to B3.1.20 and paragraph B3.3.92 deleted to avoid repetition). Later paragraphs (B3.3.5) amended to refer back to this process for clarity. Amendments made in response to queries raised by Historic England.
Paragraph B3.1.18	Ongoing engagement with Historic England	Wording amended to make it clear the 10 day period following receipt of further information for approvals would follow after the initial 20 day period. Amendment in response to comment raised by Historic England.
Paragraph B3.1.22	National Highways review of document	Scheme numbers added for clarity
Paragraph B3.1.23	Ongoing engagement with Historic England	Paragraph amended to provide further information on principles of dispute resolution mechanism. Amendment in response to comment raised by Historic England.
Figure 1	National Highways review of document	Figure amended to refer to National Highways, rather than Highways England, and to update the name of the Local Authorities.
Figure 2	Ongoing engagement with Historic England	Figure updated to correct the references to OHMS and DHMS, update the names of the Local Authorities and to ensure it better reflects the stages now agreed as part of the OHMS following completion of DCO examination. Amendments made following comments received from Historic England and on further review of the document at the current stage of examination.
Paragraph B3.2.5, B3.2.7 and B3.3.79	Ongoing engagement with Historic England	Reference corrected from DHMS to OHMS.

Section Amended in Revised Document	Source of Comment or Reason for Amendment (Examination Library Reference)	Brief Description and Explanation of Change
Paragraph B3.2.14	National Highways review of document	Section references corrected
Paragraph B3.2.15	Ongoing engagement with Historic England	Reference to DCO requirements amended to correctly refer to commitments in the EMP REAC table in response to query raised by Historic England.
Paragraph B3.3.9	Ongoing engagement with WFC	A list of contents for a typical SSWSI has been inserted into the document at the request of WFC.
Paragraphs B3.3.19 and B3.3.20	Ongoing engagement with Historic England	Paragraph amended to clarify it relates to intrusive works. Typographic error corrected. Amendments made in response to query raised by Historic England.
Paragraph B3.3.21	Ongoing engagement with Historic England	Paragraph amended to make it clear that the method statement referred to is the Scheduled Monuments Method Statement, and to ensure there is a link to the SSWSI. Amendments made in response to comments received from Historic England.
Paragraph B3.3.23	Ongoing engagement with Historic England	Paragraph amended to refer to the DHMS and SSWSI for clarity. Amendments made in response to comments received from Historic England.
Paragraph B3.3.27	Ongoing engagement with Historic England	Paragraph amended to refer specifically to consultation with the Local Authority and Historic England regarding the methodology for relocation of milestones. Amendments made in response to comments received from Historic England.
Paragraph B3.3.39	National Highways further review of document	Paragraph amended to allow flexibility in the methodology to allow emerging digital approaches to be adopted in order to improve accuracy and deliverability of the proposed methodology. The detailed scope and method for fieldwalking will be subject to consultation and approvals through the SSWSI.
Paragraph B3.3.63	National Highways further review of document	Paragraph amended, to allow flexibility in the methodology regarding use of digital or monochrome photography methods to be used depending on the policy of the individual archives to be used.
Paragraph B3.3.82	Ongoing engagement with Historic England	Consultation with relevant local planning authorities added in relation to the programme of public engagement
Annex B4 Air Quality and Dust Management Plan		
Paragraph B4.5.2	Ongoing engagement with DCC	Speed limit corrected to 10mph

Section Amended in Revised Document	Source of Comment or Reason for Amendment (Examination Library Reference)	Brief Description and Explanation of Change
Paragraph B4.9.2	Ongoing engagement with DCC	Paragraph expanded to specify that one of the monitoring sites will be located at The Sills to ensure concerns regarding potential air quality changes during construction can be monitored and addressed.
Paragraph B4.9.3 and B4.9.4	Ongoing engagement with DCC	Paragraphs updated following discussions with DCC to clarify that the instructions include NO2 monitoring, and to clarify the expected duration and timing of monitoring.
Paragraph B4.9.5	Ongoing engagement with DCC	Sentence added to paragraph to specify that NO2 monitoring results must be provided on a monthly basis if required by the Local Authority
Paragraph B4.9.7	Ongoing engagement with DCC	Paragraph amended to clarify the latest guidance regarding site action levels for dust
Annex B5 Noise and Vibration Management Plan		
Paragraph B5.1.4	Ongoing engagement with WFC	Paragraph amended to make it clear that works in close proximity to Kirkby Thore Primary School will need to be subject to a Section 61 consent.
Paragraph B5.8.2	Ongoing engagement with WFC	Paragraph amended in response to comments raised by WFC, to make it clear that appropriate mitigation will be implemented where required to prevent a re-occurrence of an issue raised by a member of the public.
Annex B13 Construction Traffic Management Plan		
Paragraphs B13.5.2 and B13.5.3	Comments made by Durham County Council in their Deadline 6 submission	Two new paragraphs have been added to specify that the plan must contain measures to monitor changes in traffic flows on key routes adjacent to the scheme during construction (including A67) and that air quality monitoring information will be used to inform traffic management should air quality issues arising from traffic diversions be recorded.
Annex C3 Scheduled Monuments Method Statement		
Paragraph C3.1.1	Ongoing engagement with Historic England	Opening paragraph amended to clarify the relationship between the Scheduled Monuments Method Statement and the Detailed Heritage Mitigation Strategy, and the timing of the development of both.
Paragraph C3.1.3	Ongoing engagement with Historic England	Sentence added to make it clear that the Method Statement also sits alongside the Site-Specific Written Scheme of Investigation(s)

Section Amended in Revised Document	Source of Comment or Reason for Amendment (Examination Library Reference)	Brief Description and Explanation of Change
Paragraph C3.1.4	Ongoing engagement with Historic England	Additional bullet point added to clarify that the method statement will include details of protective measures, including drawings showing the extent and location of fencing. Amendment made in response to comment raised by Historic England.
Paragraph C3.1.6	Update	Names of Local Authorities amended to reflect the new unitary authorities formed in April 2023
Paragraph C3.1.7	National Highways review of document	Scheme numbers added for clarity
Paragraph C3.2.2 and C3.2.3	Correction and ongoing engagement with Historic England	Sections amended to ensure the listed monuments are under the correct schemes and to include another monument identified by Historic England immediately outside the Order Limits.
Section C3.4	Ongoing engagement with Historic England	Section updated to clarify the relationship between the method statement and other documents, to make it clear that this section will include the required fencing and protection measures and to clarify how the section is to evolve to specify how the key controls are to be implemented at each location.
Paragraphs C3.4.7, C3.4.12, C3.4.17, C3.4.23, C3.4.26	Ongoing engagement with Historic England	Paragraph updated to provide greater clarity on the controls around footpath works within Scheduled Monuments, in response to a concern raised by Historic England.
Paragraph C3.4.16	Ongoing engagement with Historic England	Paragraph updated to make it clearer what controls apply to the existing physically fenced part of the site and what controls apply to the mapped site boundary (which is larger) in response to a comment made by Historic England.
Paragraphs C3.4.27 and C3.4.28	Ongoing engagement with Historic England	Paragraphs added to specify controls relating to working areas and protection of archaeology in situ, in response to a concern raised by Historic England.
Paragraph C3.4.31	Ongoing engagement with Historic England	Reference added to the UK Forestry Standard distance of protection, in response to a suggestion made by Historic England.

Section Amended in Revised Document	Source of Comment or Reason for Amendment (Examination Library Reference)	Brief Description and Explanation of Change
Paragraphs C3.4.35, C3.4.36 and C3.4.42	Ongoing engagement with Historic England	Paragraphs amended to make it clear that the detailed method statement (as part of the second iteration EMP) will need to specify exactly what works will be needed within the scheduled monument(s) associated with both road construction and drainage, and the appropriate controls to be implemented to maximise protection of archaeology. Added in response to comments made by Historic England.
Paragraph C3.4.39	Ongoing engagement with Historic England	Paragraph amended to clarify the area of land referred to and to specify ancillary works that are included in the statement, in response to comments made by Historic England.
Paragraphs C3.5.3 to C3.5.5	Ongoing engagement with Historic England	Further information added to section “Fencing” and title amended to “Fencing and Exclusion Zone” to make it clear what the purpose of protective fencing and exclusion zones are, what measures need to be implemented and the further detail required as part of the detailed method statement, in response to concerns raised by Historic England.
Paragraph C3.5.7	Ongoing engagement with Historic England	Paragraph updated to define intrusive works and distance it applies to, and refer to the specific section of Annex B3 referenced. Amendment made in response to comment received from Historic England