

PRINCIPAL AREAS OF DISAGREEMENT - EDEN DISTRICT COUNCIL

Issue	Concern	What needs to change/be amended/included so as to overcome the disagreement	Likelihood of the concern being addressed during the Examination stage.
Non-motorised Users	East West connectivity across Junction 40 – The provision for NMU's at Junction 40 remains unchanged. The issue of east west movement for non-motorised traffic is wider than just at Jct 40. There were issues at Coupland Beck Farm which created a break to the suggested route.	Given the nature of the junction National Highways this would ideally be a grade-separated facility, removing interactions with traffic, facilitating improved traffic flow and safe passage of non-motorised users in a convenient and efficient manner.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Public Open Space	Wetheriggs Country Park - proposals include land take and significant loss of mature trees that currently provide visual screening to the park and the residential properties on The Crescent. They will result in an increase in noise, effects on biodiversity, drainage and the overall country park environment	The land take in this section of the A66 seems to be almost entirely for the cyclepath. The Council proposes that the cyclepath be redirected through the park to avoid the loss of the trees. Development of a masterplan has been requested for the country park to address this issue in a more holistic manner.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Public Open Space	Potential impact on Wetheriggs Country Park and Ullswater Playing Fields. The scheme falls foul of the requirements of para.5.166 of the NPS NN. POS and playing fields are important community assets and there is insufficient information on the impacts and how they can be mitigated.	A full study is required to be undertaken identifying the options for redesign of the Kemplay area (between the junction with the M6 and the Kemplay roundabout) in order to mitigate the proposals. This will facilitate an agreement on an acceptable way forward. This work should be funded by National Highways and would include discussions with the local FA, current users of the pitches, and other relevant bodies.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Demolition	Demolition of Lightwater Cottages is proposed in order to create a new junction to connect with the existing access road heading south from the A66. It is unclear why these need to be demolished when the junction could simply be located either side of them	NH to justify demolition of the cottages and review junction location to consider moving to one or other side of the cottages.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Freight	The scheme as submitted provides only a small number of laybys along each section. Given the route is a key east-west freight route, the number of HGVs are likely to increase significantly. Laybys provide no facilities for drivers forcing them into the towns where they add to congestion.	A detailed freight study is required to understand the likely numbers of HGVs that will use the route once completed. HGV facilities, such as an eastbound and westbound service area, should be included within the DCO.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Heritage	The proposed Long Marton Lane End junction may still encroach on the wider Roman Camp Scheduled Monument but detail from recent surveys do not appear to have been provided.	Further information to be provided showing the full extent of the Roman Camp SM as currently established and how the new road will affect this.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Heritage	Scheme encroachment on the old Roman Road (archaeological potential) north of the Roman Camp SM and impacts on its setting remain unclear.	More information needs to be provided to understand the impacts.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Biodiversity Net Gain	The Environment Act 2021 sets a requirement to deliver a minimum of 10% biodiversity net gain which will have legal force in March 2023, before the DCO is determined. There is currently insufficient information provided within the ES and DCO plans to demonstrate that this requirement will be met.	National Highways should provide further information on how enhancement measures for biodiversity will be included within the proposals for the Project consistent with Paragraph 5.25 of the National Policy Statement for National Networks (NPS NN), the NPPF and Policy ENV1 of the Eden Local Plan. A detailed calculation of the Scheme's ability to deliver at least 10% BNG should be provided and the location and land on which this will be done clearly identified.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Mature Trees	The scheme requires the felling of swathes of woodland and mature trees along the north side of the existing A66 to make way for the new road whilst land to the south is largely fields.	Further justification to be provided for the loss of mature trees and a review for the designs to look at ways to avoid or minimise this.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Lighting	Eden District Council considers that full details of the proposed lighting scheme should be provided. This is important as some species have difficulty crossing a route when there is lighting, and the Scheme may potentially have the effect of removing ecological corridors and could also hinder the movement of species. The lighting Scheme should also consider and reflect the need to protect and deliver the Cumbrian Dark Skies initiative.	National Highways to provide further details on the proposed lighting which is anticipated to be restricted to the M6 and Kemplay Bank junctions.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project

Hores Drawn Vehicles	The safety of slow moving vehicles (primarily horse drawn carriages) on the upgraded A66, particularly around Appleby and the potential for an increase in accidents.	The de-trunked sections of the A66 to be improved in terms of provision and junction access to provide a safe segregated option for these vehicles.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Noise	The Council has a particular concern about the Main Street Junction at Kirkby Thore to Fell End. This area represented the most seriously impacted area of housing in Eden in terms of noise as a result of the original proposal. However, the northern junction is now much closer to Sanderson's Croft housing estate and the properties on Fell Lane, areas which had already been identified as being significantly adversely impacted by noise in the previous iteration of the Scheme. It is unclear whether there is sufficient land to provide landscape bunds to mitigate noise impacts	Further information to be provided on the mitigation proposals for the junction in this location. Acoustic barriers are not considered appropriate for the character of the area.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Noise & Air Quality	The noise and air quality impacts of the proposals on the proposed housing on the site to the north of The Old Rectory. This site, on Newbiggin Road is very close to the current proposals. It has planning permission (19/0270) for 26 homes.	Information to be provided identifying the noise and air pollution impacts on the proposed housing and the proposed mitigation in order to determine the acceptability of the road line.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Kirkby Thore	The impact of the junction being moved closer to properties on air quality, but no updated modelling information has been provided. Whilst the consultation material mentions mitigation measures, it is difficult to see what these measures could comprise in such a tight space, and Eden District Council is concerned that these measures may not be effective in adequately protecting residents.	Updated air quality modelling results to be provided together with details of the proposed mitigation measures confirming impacts will not be significant.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Appleby to Brough	Impact on noise transmission as a result of elevating sections of the proposed new carriageway over the becks at Warcop. Sufficient information has not been provided to understand the impact that this proposal will have on noise or air quality, other than an acceptance that there could be 'slightly higher noise impacts on properties already identified as potentially being affected'.	Further information to be provided on the assessment of noise and air quality at these locations to confirm the predicted noise levels and air quality impacts together with proposals for mitigation.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Brough	The proposed Brough Hill Fair site is considerably smaller than the existing site and is further reduced as a result of a large balancing pond and service area within it, as well as combined bridleway and private means of access running across it. Concerns also about traffic management during the event.	Assurance sought that the site is actually deliverable and will not limit the size of future fairs. National Highways to confirm who will be responsible for traffic management during events. Provision of a suitable east-west route for horse drawn carriages. NH to prepare a Traffic Management Plan to mitigate its proposals.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Brough	The impact on residential amenity for the two properties immediately adjacent to the proposed Brough Hill Fair site, both of which will be more or less surrounded by fair activities for 4 full days each year.	NH to provide sufficient information and detail to enable an assessment of the impact on residential amenity at these properties, together with NH's proposals for mitigating the impacts to enable EDC to provide meaningful input to the strategy.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Brough	EDC is concerned at the very limited consultation on the proposals to relocate Brough Hill Fair site and that the decision on the final location may not reflect the current and future needs of the Fair.	A full programme of consultation should be taken with all interested and affected parties to allow comment on and input to the final location.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Brough	It is not known whether there are any covenants/agreements with local landowners relating to the existing site which will need to be addressed as a result of the proposal to move the fair to a new location, or whether there are any covenants/agreement which will need to be put in place to protect the future of the Fair.	The Council requests that National Highways provide a clarification of the position. NH to provide further detail on the effect the grant of a DCO would have on any licensing or permitting requirements for the new site, and also confirm who the intended landowner would be going forward.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Construction Compounds	Construction compounds not to include accommodation for workers other than normal welfare facilities. Worker travel time to be within 30 mins from main compound to work area.	National Highways to confirm compound locations and worker accommodation provision.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Construction Compounds	EDC notes that there are several construction compound locations across their authority. EDC would advise that a single central compound be used as the main site and the others be satellite sites just for equipment storage overnight. This would minimise the need for construction traffic to move along the route during the peak travel period.	National Highways to confirm main and satellite compound locations within each section.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Soil Storage	Soil storage compounds to not require permanent foundations or be located close to rivers and watercourses such as proposed to the east of the Cumbria Police HQ at Kemplay Bank.	National Highways to confirm arrangements for all soil storage locations and any measures required to prevent run off to rivers and watercourses.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Soil Storage	Location of proposed soil storage compound and balancing pond to the east of the Cumbria Police HQ at Kemplay Bank lies within Flood Zones 3 and 2, which is subject to regular flooding.	Further information to be provided that demonstrates no adverse impact on the flood plain and that soil will be retained within the compound during flood events.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project

Soil Storage	Lack of information regarding the construction of all soil storage compounds and how the land will be reinstated to its former use post-construction.	National Highways to provide further detail on construction and reinstatement together with details of how biodiversity net gain will be achieved (minimum 10%).	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
M6J40 - Kemplay Bank	Proposed compound adjacent to the Cumbria County Council depot at Kemplay Bank. Concerns about the viability of the site and the adequacy of access/egress using the slip road only. Concerns about the need for alteration to or effects on the operation of the depot. NH should note that the proposed compound would be located on filled ground as confirmed by EDC local records. The site was formerly a sand/gravel quarry and would require an appropriate assessment and foundation, suitable to the geomorphology present.	NH confirm the access arrangements to the A66. NH also to confirm the compound will not require alteration to or affect the current operations of the CCC depot buildings. EDC also seek confirmation this is a main compound due to its size and location, with the majority of plant for the western section of develop stationed here. Due to its strategic location EDC want clarification on the foundations of the construction compound and its ability to support future commercial development in Penrith. EDC and CCC wish to consider the possibility of using the construction compound at Kemplay Bank as a possible future site to support employment opportunities or HGV services. EDC further seek confirmation that the access arrangements provided for the compound is suitable to support permanent operation of the site as an employment area, as designated by the EDC Local Plan (2018).	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Soil Storage	The soil storage area overlaps the proposed route, junction, earthworks and attenuation pond east of Lane End School House adjacent to the new GS junction for Centre Parcs.	A phasing plan of the construction process is required to confirm the approach and evolution of the large storage area. Details of the connection between the north/south WCH routes need to be confirmed whether this is an under pass or flyover of the proposed A66. The two WCH routes on the flyover junction do not join and this need to be confirmed.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Soil Storage	There is a temporary soil storage site that overlaps the proposed WCH route west of Winderwarth Farm.	A programme of works is necessary to understand the impact on the WCH route becoming operational.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Soil Storage	There are multiple soil storage compounds located between Kirkby Thore and the proposed alignment of the A66. EDC are concerned about the location of the soil storage compound south of the proposed junction at Kirkby Thore which results in compounds being proposed in close proximity to Kirkby Thore Primary School on Priest Lane. EDC is concerned about negative noise and air quality impacts that this might have on Kirkby Thore Primary School and potential impacts on children's learning and health.	NH should locate soil storage areas and general compounds further away from the school to avoid these potential impacts.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Soil Storage	Potential closure of an existing PRoW that transects the proposed soil storage compound east of Kirkby Thore.	EDC would seek confirmation that this WCH route would remain operational during the construction period and require details of any temporary diversion to ensure this.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Environmental Management Plan	There is a relative lack of information about what is proposed and EDC expect to receive information in the draft Environmental Management Plan (dEMP) prior to the finalisation of the design. The EMP should include an assessment of the likely significant effects of noise, dust and light pollution emanating from the compound location prior. There is currently no guidance on the volume or height the soil storage may comprise, EDC would seek to minimise the height of the storage, particularly in this location to the sensitive residential properties.	NH to confirm the volumes and area of topsoil storage at each of the sites. NH to also confirm that in accordance with BS3882:2015 topsoil spoil heaps will not exceed 3 m in height, including topsoil existing on site, and will be used within 12 months (reference BS 4428:1989 Code of practice for general landscape operations).	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Soil Storage	The soil storage compound located north of Cross Street, Kirkby Thore overlaps an existing EDC planning approval for a residential development. Northern Trading Cumbria Ltd applied for planning permission to construct 26 units. The proposed development was approved by EDC planning committee on the 22nd January 2022.	NH would need to alter the DCO to avoid land interest conflicts. The PEIR Chapter 2 confirms the construction period for the A66 would be 5 years, it is therefore possible the soil storage area could be adjacent to occupied housing units. The EMP would need to consider the potential for residential properties being on this site.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Soil Storage	EDC has concerns regarding the potential for large quantities of soil to be stored in close proximity to the watercourse Trout Beck. The soil storage is located within the flood plain and directly adjacent to the water channel.	EDC would ask that this location be re-examined and a mitigation strategy produced to ensure environmental impacts on the fluvial network are not detrimental.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Appleby - Brough	The construction compound east of Moor Beck Bridge does not show an access route. It is unlikely the construction compound will be directly accessed from the A66 and instead construction traffic will enter from the south. This route is unsuitable for construction traffic due to it only being a single lane bounded by field boundaries comprises stone walls. The access route would also run past several residential properties who would be subject to increased disturbance.	Detail required on the proposed access into the compound with appropriate consideration of the route to/from and its suitability for HGVs and construction plant.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project

Non-motorised Users	It is not clear if the proposed WCH routes extend the full length of the scheme. At Coupland Beck the route appears to stop abruptly with no indication of whether this will join an existing pathway.	A full set of design proposals needs to be provided showing the proposed new WCH routes and how they will connect with existing pathways to provide a full east-west route for NMUs. This is an issue of great importance to EDC.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Non-motorised Users	The plans provide a useful tool for identifying the lineal route of the WCH provision. However, the plans lack information denoting the location and standard of WCH crossing points where the WCH route transects the local highway network.	EDC would require information on all the crossing points prior to the finalisation of design. EDC would require that all crossing points for walkers, cyclists and equestrians be in accordance with the Design Manual for Roads and Bridges (DMRB) (CD 143) and Cycle infrastructure design (LTN 1/20) and location of all highway crossing points be confirmed.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Non-motorised Users	A signage strategy is needed for the route to be confirmed prior to the finalisation of design. The signage strategy is an important aspect due to the scale of change proposed to local WCH provision in Eden and the safety implications to keep non-motorised users (NMU) off the dualled A66. Similarly, signage for WCH routes will need to be confirmed, particularly where existing PRoW are to be diverted along the new walking/cycling route.	Signage strategy to be developed and agreed with EDC. EDC also require additional design detail regarding the standard of the proposed WCH routes so that the provision does not have an over engineered appearance that would be detrimental to the existing landscape.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Non-motorised Users	Segregation of pedestrian and cyclists under LTN 1/20 guidance is required to ensure the safety of all users in urban areas. At the M6 J40 and Brougham Castle, segregation between cyclists and pedestrians is appropriate and a 2.0m minimum width footway will be required, segregated from a 3.0m minimum width cycleway. In rural areas the width of the path should be a minimum of 3.0m where cyclist flows are up to 300 per hour and a minimum 4.5m width path for greater than 300 cyclists per hour (see LTN 1/20 table 6-3). In instances where the new WCH provision meets and existing PRoW or Bridleway, NH should ensure the width is consistent to avoid sudden changes in provision causes accidents or riders to dismount. EDC are opposed to the use of physical barriers as a means of inter NMU segregation, as it would adversely affect the rural setting and contributed to an over engineered approach. The plans currently provide no information on the proposed location, length, type or height of vehicle restraint systems (VRS) on the A66 Trans-Pennine route.	designs of WCH routes to meet LTN/1/20 requirements as noted. Details to be agreed with EDC.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Non-motorised Users	EDC and CCC have previously stated that the provision for NMU access between Junction 40 of the M6 and Brougham Castle is currently poor and undermines the opportunities for those living east of Penrith and the M6 to access local facilities. It is noted that no changes have been proposed to improve the provision as part of the current or autumn 2021 consultation design reviews.	Consideration should be given to the potential of locating the WCH route alongside Wetheriggs Country Park within the country park rather than along the roadside to provide a more attractive environment for users. This would need to be considered in the context redesigning the Wetheriggs country park and sports playing field provision as requested in the Councils response to Kemplay Bank Open Space consultation. The existing alignment is adjacent to the A66. EDC believe the alignment of the route alongside the A66 is undesirable and NH should take advantage of widening works and subsequent mitigation (noise) and consider positioning the cycleway inside the park and to provide a higher quality of NMU provision. This would also reduce the necessary land take within the woodland strip adjacent the road thereby retaining much of the visual screening currently afforded park users and residential properties along Clifford Road.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Non-motorised Users	The current provision for WCH routes does not provide a connection between Castle Lodge and the Blue light facilities to the north. This also includes no provision made for WCH between Kemplay Bank roundabout and the B6262 Brougham Castle Lane leading to Moor Lane. The proposed link is via Frenchfield which provides a high-quality route in terms of views and tranquillity but does not sit within the DCO boundary.	National Highways needs to confirm how the continuity of the WCH provision will be created if outside the DCO boundary remit. The bridleway and underpass located on Frenchfield is also in a poor state and does not conform to LTN 1/120 standard for minimum width for shared NMU use.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Non-motorised Users	EDC supports the provision to improve WCH access to cultural heritage assets as a benefit to the wider development. The current design shows a new dedicated access the Countess Pillar (Temple Sowerby to Penrith Sheet 1-3) south of the proposed A66 route. There appears to be two parallel routes running east/west. One solely to the Countess Pillar and the other connecting the new WCH route east. EDC believes that this dual route is unnecessary and would appear "over engineered" in the rural landscape to the south.	The east/west route could incorporate an access point to the Countess Pillar reducing the land take. Should NH require both routes, EDC would request the inclusion of appropriate landscaping to mitigate the visual intrusion of both route on the landscape view. The extension of the WCH route to the Countess Pillar would also provide access to the Larma Karma Café, for which there is currently no dedicated NMU access proposed.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project

Non-motorised Users	Plans show WCH routes also functioning as maintenance access routes for attenuation ponds. This dual functionality occurs across the proposed scheme between M6 J40 and Brough. The maintenance of these ponds would presumably require vehicular access. To accommodate vehicle movement, the WCH would understandably be widened in these locations. Despite this widening, EDC have concerns regarding the possibility maintenance vehicles will be parked in the WCH routes during periods of inspection and block the route. This also raises concerns regarding safety should vehicle and NMU interact in the confined space. Finally, EDC would require information regarding the potential need for a retractable barrier to restrict unauthorised vehicle access to member of the public would not in use. The use of a retractable barrier should ensure WCH facilities are not impeded as a result.	Further information should be provided on the design and operation of the access roads for agreement with EDC.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Non-motorised Users	North of Crackenthorpe, there is currently a PROW footpath (east) and bridleway (west), both of which are designed to link up with the proposed new WCH route connecting to the Roman Road to the south.	EDC seeks confirmation that the new route would match the design standard of the bridleway, not the footpath, to ensure no reduction in width and continued use for equestrian users. In addition to this, EDC would request NH confirm the approach to the existing PROW and Bridleway, specifically if they are to be extinguished and the potential extent of this.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Non-motorised Users	The WCH crossing provision west of Trout Beck requires additional information. There appears to be two crossing points proposed. Point A, appears to cross the A66 but does not connect with the WCH route to the north due to the presence of a culvert. Point B is extended in length along the carriageway east before crossing and returning west. The route appears considerably longer and would be unpleasant for WCH use due to the proximity to the carriageway.	EDC would prefer a shorter more direct connection. NH to revise the alignment accordingly.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Non-motorised Users	The current route of the WCH provision between Moor Beck Bridge and Market Brough (Sheet 3 to 5) is unsatisfactory. The WCH route is located in between the new A66 dualled route and the de-trunk section of the existing A66 open to local traffic. In places the WCH route is directly adjacent to both these routes, to the north and south. The proximity of these roads and their position surrounding NMU would result in poor quality of provision. The route would not benefit from rural landscape views and intimate users, notably equestrians. It is unclear if the location of the route would be subject to noise and particle emissions without an appropriate environmental assessment being undertaken. The location of the WCH route between the two A66 routes restricts the number of opportunities for NMU to gain access or leave the route between Moor Beck Bridge and Market Brough.	NH to review route of WCH provision and move to the north of the de-trunked A66 or otherwise move away from being between the old and new roads.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Landscape	EDC note the presence of several large-scale landforms across the proposed route between J40 M6 and Brough. The Council notes that the consultation does not provide sections or elevation drawings that allow the authority to evaluate the impact of such landforms in terms of land removal or height of the landform. In the absence of this information, EDC is unable to comment upon the suitability of scale and location of these features on the visual landscape or as acoustic mitigation bunds.	EDC requests Section drawings of these landforms prior to design finalisation. EDC would like to recommend, in addition to soil storage areas, that appropriate baseline surveys are undertaken at all landform locations prior to the commencement of construction. This will help facilitate the implementation of BNG as part of their operational design.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Structures	The importance of the A66 in the landscape, visitors' perceptions of the area, and the sensitivity of the landscape that the route travels through.	EDC need to see full details of the proposed structures. These designs will require visual integration into the surrounding landscape character to reduce visual impacts.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Parking	Parking problems in Penrith are likely to intensify following the completion of the A66 upgrades as more people travel to the town.	EDC wish to see NH assist with the provision of parking spaces within the Town.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Traffic Flows/Modelling	There is a concern that the removal of the junction for westbound traffic entering the A66, will mean that significantly more traffic will utilise the old A66 west of Appleby which will make it less conducive for use by non-motorised travellers.	Junction and slip road to be provided to westbound carriageway of new section A66.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Structures/Flood Risk	At Warcop, the alteration to the viaduct across Moor Beck and Cringle Beck may provide improvements from a watercourse geomorphology perspective but they do not take account of local flood risk.	The watercourse crossing proposals need to be better linked with the CCC (EA funded) Cumbria innovative flood resilience programme, which is proposing to install a range of Natural Flood Management (NFM) interventions in the Warcop area to reduce flood risk.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Access Roads	The new plans for Warcop show the addition of an extensive length of access track along the full length of this scheme. The ownership, designation, maintenance liability and design of this new asset will need to be clarified as it serves multiple purposes.	Further information is to be provided on the WCH route along this section. EDC expects the route to contiguous with the sections either end.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project

Access Roads	The new plans for Warcop show the addition of an extensive length of access track along the full length of this scheme.	The ownership, designation, maintenance liability and design of this new asset will need to be clarified as it serves multiple purposes. As stated in previous consultation responses, it is the Councils' expectation that WCH will be accommodated along this route.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Nutrient Neutrality	The addition of new sections of carriageway and access roads etc together with the potentially significant increase in traffic using the A66 as a result of the Scheme has the potential to add to nutrient load, specifically, phosphorous (TP) and nitrogen (TN), in local rivers and watercourses within the Eden catchment. This could exacerbate the nutrient neutrality problem faced by housing development resulting in potentially significant costs and delays.	The proposed drainage and balancing ponds should be designed so that discharge to watercourses achieves nutrient neutrality. Designs and nutrient load calculations should be provided and agreed with EDC and Cumbria CC.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Warcop	Warcop West - The retention of the small copse of broadleaved woodland is welcomed. There is insufficient information included within the consultation material to comment further on the adequacy of any mitigation proposals for protected species that may be present in the coniferous woodland to the north.	The Councils therefore expect full details to be provided in the ES and further to comments raised previously, expect enhancement opportunities to be included within the proposals.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Warcop	Warcop Central - It is welcomed that earthwork embankments within the floodplain have been removed and in principle it is agreed that placing the A66 NTP on a viaduct will have a positive effect upon protected aquatic species present within Moor Beck and Cringle Beck (rather than culvert) and hence the integrity of the SAC. However, until the Councils are provided with information on what these 'protected species' are and with GA drawings that show the alignment of the carriageway relative to the watercourses, we are unable to comment on whether the proposals are adequate or indeed preferable to the previous design.	NH to provide sufficient information and detail to enable an assessment of the impact protected species.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
GHG Emissions	The potential GHG emission sources during the construction and operational phases are considered to be appropriate for the size and nature of the Project. However, the PEIR does not provide justification for scoped out emission sources, such as decommissioning.	It is recommended that the ES includes a complete list of the PAS 2080 lifecycle stages and justification for why each emission source has been scoped in or out of the assessment.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
GHG Emissions	Environmental Mitigation – Climate - Eden District Council have declared a Climate Emergency.	EDC and Cumbria County Council would expect to see reductions in the emissions associated with the construction phase of the A66.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Noise	There are likely to be significant increases in road traffic noise at a number of sensitive receptors, especially for options to the north of Kirkby Thore.	The mitigation measures proposed are not yet adequately presented and further noise attenuation measures are required. Highways England should also pay particular attention to the increase in noise at Kirkby Thore Primary School and the Councils expect greater detail on the precise increase and mitigation that is proposed. NH should consider and provide further information on how acoustic mitigation measures can be complimentary to the landscape and biodiversity enhancement measures so that environmental benefits across all three disciplines can be realised. (notably on Kirkby Thore)	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Noise	Warcop Central - The revised proposals will lead to an increase in noise that the Applicant has stated will be 'slightly higher'. We infer therefore that the change is not significant although this can only be confirmed through detailed noise modelling. Information in the PEIR showed that noise sensitive receptors in Warcop may be subject to significant effects and therefore any increase in the noise level that they experience is of concern.	NH must provide detail on the mitigation proposals for noise that will be included within the design of the A66 NTP. This will allow an evaluation of whether the mitigation is adequate or whether further measures are required.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Worker Accommodation	Insufficient information is known as to the number of construction workers that will be required throughout the construction phase and where they will be accommodated so as not to put undue pressure on local resources, potentially affecting tourism and the local rented housing market.	An Accommodation Strategy should be prepared identifying where construction workers are anticipated to live during the construction of the Scheme and any dedicated facilities proposed to be provided by NH. The location of such facilities should be included within the DCO boundary and appropriately assessed to confirm operational suitability.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Social Value	Insufficient information is known on the nature and scale of social value to be delivered by the Scheme. Given the size of the project EDC would expect a significant social value contribution to be included. This is also linked to the accommodation strategy.	NH to provide details of the social value to be delivered by the Scheme. Although it is likely the Contractor will, as part of the procurement process, it is important to understand the social benefits to the communities along the route that will be delivered.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Diversions and construction impacts	Insufficient information is available on the proposed diversion routes and other temporary traffic management measures that will be put in place for the works, particularly in key locations such as the new junctions where existing junctions will be closed while the works take place. EDC is concerned that in some locations, such as Ullswater Road and Clifford Road in Penrith, the impact of diversions could significant on local residents in terms of congestion, noise and air quality.	A detailed traffic management and route diversion strategy is required to enable EDC and CCC to be confident the disruption to users of the A66 and the adjacent local road networks is minimised as far as practicable. The strategy should include an assessment of the condition and capacity of the proposed roads to accommodate increased traffic flows.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project

Contaminated Land	Contaminated Land and known burial/burn sites for Foot and Mouth: the potential for parts of the project to encroach in these areas could have implications for contamination. EDC has provided National Highways with numbers of possible sites, but have not seen any assessment of the sites in relation to this development.	National Highways to undertake an assessment of the potential impact on contaminated land sites and provide to the Council to agree.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Air Quality	Air Quality - previously have alerted applicant to steps Council has taken to declare AQMA on Castlegate, and raised queries with the modelling and conclusions drawn. Also recommended that monitoring be undertaken, in conjunction with EDC for a period of at least twelve months and to start as soon as possible (Dec 2021)	National Highways to provide details of the assessment to confirm it has included the increased traffic flows.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Air Quality/Noise	Air Quality and Noise - significant changes have been made to road layouts and junctions since the PEIR, but the applicant has not carried out any assessments for the revised changes	A detailed assessment of Air Quality and Noise impacts upon receptors needs to be undertaken and mitigation identified where levels exceed or are likely to exceed Objective levels (Air Quality, NO2, PM2.5, PM10) and the LOAEL and SOAEL (Noise). This has already been drawn to the applicant's attention (see WP 14 Acoustic enhancements)	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Lighting	Lighting impact upon residential receptors; EDC would have expected an assessment to be provided.	Further information on the assessment and mitigation, if required, to be provided.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Landscape	There is concern about the impacts of the scheme on the AONB particularly in locations close to the boundary. It is unclear whether adequate landscape mitigation is being proposed to reduce the impacts on the AONB.	NH to provide more detail on the AONB impacts and the proposed mitigation. This may require consultation with the AONB as well as EDC.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Biodiversity	Lack of information about monitoring wildlife and natural habitats lost or degraded during the construction work. This will be necessary in order to confirm accurate records of the areas of habitats lost and hence how much biodiversity gain is achieved.	NH needs to provide further information about the monitoring process and how this will be reported to the councils.	
Biodiversity	Concern over water pollution, run-off and the function of the attenuation basins/balancing ponds. It is not clear what the risk will be in terms of direct and indirect impacts on biodiversity, fresh water ecosystem and Nutrient Neutrality. The scheme must not increase the risk increasing eutrophication in watercourses in the Eden District.	Further details of the form and function of the ponds to be provided, particularly how they will minimise risks to biodiversity and nutrient load in receiving watercourses. EDC will need to be satisfied that the ponds and surface run-off will not exacerbate existing problems.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Biodiversity	There is a lack of information about the replacement of lost habitats during construction (where are they going to be). It is unclear whether NH is going to replace some existing habitat with new ones (e.g. lost grassland replaced with planted woodland).	NH needs to provide more information about their habitat replacement strategy.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Climate	Lack of details on mitigation actions overall, including land use change.	NH needs to provide more information about their Carbon Management Strategy for the Project	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Climate	There does not appear to be a carbon offsetting solution proposed. EDC has decalred a climate emergency and this scheme could impede the council's ability to achieve net zero.	NH needs to provide more information about their Carbon Management Strategy for the Project	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Climate	Lack of information about carbon emissions monitoring for the Project. The nature of the work and construction materials might change due to unforeseen issues which in turn might increase the total of CO2e emitted.	The Council would like to see ongoing monitoring and recording of construction related carbon emissions and a commitment to produce a carbon emissions statement reporting the actual CO2e emissions from the construction phase.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Climate	There is a lack of information on adaptation measures for extreme climatic events.	NH needs to provide more information about their long term climate change adaptation and resilience plan	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Structures	Structure designs will require visual integration into the surrounding local landscape character to reduce visual impacts.	Consideration will need to be given to materials for construction, finishes, in combination with materials for construction – e.g. stone clad in local stone, paint colours for painted metallic elements, etc, large expanses of concrete to be avoided, particularly wingwalls, abutments, piers, retaining walls for such structures that can be viewed from a position other than the A66 main line. More detail around proposals should be discussed and agreed with the Councils.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project

De-trunking A66	Legacy assets to be passed to the Councils for de-trunking shall be of a standard agreed with the local highway authority, and the extent of works required to achieve this shall be agreed between National Highways and the Councils.	This will entail clear identification of all such assets for which future inspection, maintenance and demolition responsibility to reside with the Councils. Clear understanding of currently assessed capacities and condition and clear identification of work bank for such structures, and associated costs, etc would be required. Asset management work is required to understand whole life cost of asset, including consultancy fees, council management regime (new assets usually carry a 120 year life). National Highways and the Councils need to carry out analysis of structures to understand the most likely routing / impacts etc. Further work is required to explore options as to how the road will be used in the future; its look, feel and classification etc. The Council recommends an options appraisal is undertaken as part of the process.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Drainage	It appears that long access tracks are proposed to serve drainage ponds. However at some locations access to these ponds is gained from lay-bys on the A66 mainline.	National Highways should provide the risk assessment hierarchy for determining each access. If access tracks are being provided for the sole purpose of maintenance of drainage ponds, then a consistent approach, should be applied where feasible to minimise impact on the local roads and land take.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Drainage	Impact of drainage basins and/or access tracks on planned and potential development/ regeneration sites along the A66 corridor e.g. land to east of Skirsgill Depot (M6, J40) should be considered in more detail to mitigate any potential impact.	National Highways need to provide further information and clarity on how the basins and access tracks will be integrated with existing and future land uses on and adjacent to the sites. These will need to be agreed with the Councils. Further detail should also be provided to the Councils to confirm how the design of these assets has been optimised to reduce land take, landowner and environmental impacts; improve the sustainability of the drainage proposals; and reduce overall scheme costs.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
M6 Junction 40 to Kemplay Bank	For cyclists and pedestrians passing through J40 there is no betterment to provision and the need to pass through several signalised crossings (six for the movement from A66 west to Skirsgill Depot) to navigate the junction is a barrier to the necessary growth in active travel set out in local and national policy. The approaches to the junction will be widened and additional traffic attracted as a result of the scheme, both of which make the junction more hostile and less attractive for pedestrians and cyclists. The quality of the design is not of the expected standard and falls short of meeting the core design principles of LTN 1/20 and CD195 under Coherence, Directness, Comfort and Attractiveness.	The use of the central island of the roundabout could be acceptable if a separate on-demand stage can be introduced where both the entry and exit are held on red, while cyclists can cross to and from the central island in one diagonal movement (See para. 10.7.27 in LTN 1/20).	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
M6 Junction 40 to Kemplay Bank	The vehicular access from Skirsgill Depot north onto A6 has been replaced by an access approximately 100m to the east. This is helpful for vehicles exiting Skirsgill Depot and enables them to manoeuvre into the correct lane on the approach to M6 J40 roundabout. However there doesn't appear to be a dedicated pedestrian access onto A66. A pedestrian access could be provided on approximately the same alignment as the existing vehicular access and this would save a 200m detour. It would appear that grass verges are being provided alongside the new access into Skirsgill Depot. Footways would be preferable. Internally, the vertical alignment of the depot access / egress will be altered by the proposal, making it difficult for drivers, particularly lorry/ wagon drivers to negotiate the proposed gradients. It is recommended that further analysis of levels is explored to mitigate this.	A dedicated pedestrian access to be provided onto the A66. Further investigation of the levels and gradient for the new vehicular access to be undertaken and the plans modified to enable better access/egress.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
M6 Junction 40 to Kemplay Bank	The retention of only 3 lanes on the M6 J40 overbridges and the retention of traffic signals on the slip roads onto M6 north and A66 west, may limit capacity of this junction despite the proposed scheme providing additional lanes on the approaches. By moving the pedestrian and cycle movements onto the central island, it may be possible to move the 3 lanes on the overbridges further to the nearside, thus eliminating the requirement for traffic signals on the slip roads leading off the roundabout, thereby improving capacity and lessening the likelihood of traffic backing up from these signals and blocking the roundabout.	Consider moving the pedestrian and cycle movements onto the central island, opening up the possibility to move the 3 lanes on the overbridges further to the nearside, thus eliminating the requirement for traffic signals on the slip roads leading off the roundabout, thereby improving capacity and lessening the likelihood of traffic backing up from these signals and blocking the roundabout. Additionally, a new pedestrian/cycle overbridge across the M6 would provide an alternative to pedestrians/cyclists having to negotiate round the periphery of this large roundabout. This would allow an additional traffic lane to be incorporated on the M6 overbridges, improving capacity of this junction (subject to bridge assessments).	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
M6 Junction 40 to Kemplay Bank	It would appear that, with limited detail on the consultation GAs, there is only a single lane exit from A66 eastbound onto the A6 Kemplay roundabout. This is on the diversion route for traffic from the M6 when the M6 is closed either north or south of J40.	Consideration should be given to providing 2 lanes rather than a single lane on the approach to this signal controlled roundabout over a distance of say 200m to help satisfy the need to maximise capacity at this junction. The additional construction required (two 3.65m lanes plus 1m hard strip versus one 3.7m lane plus 3.3m hard shoulder) would be minimal and appears to present better value. Provision of a two lane approach to the traffic signal controlled roundabout, should also be considered for westbound A66 off slip on the opposite side of the roundabout.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project

M6 Junction 40 to Kemplay Bank	The existing Public Rights of Way and the intentions for their stopping up or diversion are unclear e.g. to the west of Kemplay roundabout existing PROWs are severed but there don't appear to be proposals for stopping up or diversions.	Further information and plans to be provided indicating where existing PROWs will be either stopped up or diverted. Diversion routes to be clearly identified on plans.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
WCHR Safety	There is no apparent physical separation between the shared use path and the dual carriageway. Given the 70mph speed limited it is considered unsafe for users to be in such close proximity.	National Highways to share details of the safety audit/risk assessment undertaken for the design. Consideration to be given to the inclusion of some form of safety barrier between the road and shared use path.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Penrith to Temple Sowerby	The Project provides a cycle track/private means of access that runs parallel to the A66 from the B6262 to the new Center Parcs junction. There is insufficient detail shown in the General Arrangement plan (TR010062/APP/2.5) to show whether this will be a public right of way for pedestrians, cyclists and horse riders. The Project should provide this link for all non-motorised users if it can be demonstrated that it can be safely shared with farm vehicles and those used for maintaining drainage ponds, assumed to be at a minimal level of traffic. However, the proposed width of the access tracks is not deemed sufficient for overtaking cyclists and should be a minimum of 4.5m, following guidance within LTN 1/20 for bus lane widths. If the tracks cannot be opened up for non-motorised users, then the Project should create a parallel route for non-motorised users to provide an alternative to using the A66, which is unsuitable for these users. This parallel route should provide appropriate protection and priority for users when crossing side roads. The provision of an off highway route for Walking, Cycling and Horse-riding for this section aligns with the preferred route for a cycle route as set out by the Councils which connects key communities along the route.	National Highways to confirm the intended final use of the track and widen as needed to allow for safe use by NMUs, failing which, an alternative route should be provided.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Penrith to Temple Sowerby	Opposite Whinfell Park Cottages there is an existing Byway Open to All Traffic (BOAT) running north from the A66. The Project restricts access to this Public Right of Way as the junction with the A66 will become left in/left out.	The current level of accessibility, for all traffic, should be retained and it appears that the access track that crosses the A66 at this location could perform this function if designated as a BOAT, therefore allowing right turn movements in and out to be replicated.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Penrith to Temple Sowerby	At Whinfell Park Cottages, an underbridge (underpass) is proposed taking an access track beneath the proposed A66 mainline. Underpasses usually need to be illuminated which presents an ongoing maintenance liability. TProvision of energy, replacement electrical components, vandalism. There are also issues with cleaning/litter picking / removal of graffiti. If used as a bridleway, there can be issues relating to keeping the underpass clean and fit for purpose as an underpass will not self-cleanse.	Responsibility for maintenance of underpasses must be agreed. There are a considerable number of underpasses proposed on the Project and these same issues will manifest at other locations.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Penrith to Temple Sowerby	The access track overbridge (circa 200m west of Barn Owl Cottage) is shown perpendicular to A66 mainline.	By introducing a slight skew (say 20 degrees) the horizontal alignment of the access track would be improved and it would avoid the sharp 90 degree bends as depicted. This would add 1.2m to the span of the overbridge. This situation occurs at several other locations on the scheme.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Temple Sowerby to Appleby	The scheme at Temple Sowerby creates local access routes via the existing A66 and Priest Lane. There is insufficient detail shown in the General Arrangement drawings to show what provision will be made on either of these routes for pedestrians and cyclists or the level of traffic that will remain on these roads once the scheme is in place.	The appropriate provision on these local routes should be guided by LTN 1/20 in respect to vehicle flows and speeds. The Councils preferred route for a walking and cycle route follows the de-trunked A66 at this location.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Temple Sowerby to Appleby	The diverted bridleway running under the new A66 alignment at Priest Lane presents an opportunity to create a traffic free route into Kirkby Thore and should be surfaced for use by road cyclists so that the link between the two sections of Priest Lane can be made, forming a low traffic/traffic free route into the settlement.	National Highways to confirm the surface treatment for the bridleway.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Temple Sowerby to Appleby	New bridleways crossing the A66 should be designed to enable different user types to pass as per the typical cross sections shown in the plans and profiles document, with 5m width shown. There does not appear to be sufficient width allowed in the GA drawing (sheet 4 of 11) to allow for the diverted bridleway running along the road between Halefield Farm and Kirkby Thore Primary School to be of the standard as shown in the typical cross sections.	National Highways to confirm sufficient width has been provided and if not, to widen as needed.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Temple Sowerby to Appleby	Currently there are two public rights of way (one footpath and one bridleway) that run from the Roman Road southwards to the north of Crackenthorpe. The Project shows the bridleway being diverted via an underpass, however the public footpath is cut off by the new alignment of the A66.	The PROW here should be maintained as close to the current alignment via a footbridge or divert the footpath along the farm track and create a shared footpath/bridleway that uses the underpass.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project

Temple Sowerby to Appleby	The existing compact grade separated junction at the very start of this scheme appears to be constructed to old design standards which are not consistent with the design of other junctions on the proposed scheme (auxiliary lane, tapers, radii).	National Highways to demonstrate that an operational safety assessment has confirmed this is appropriate.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Temple Sowerby to Appleby	There are many instances where new link/connector roads are proposed to replace sections of the existing A66. Often these link roads replace sections of the A66, picking up local traffic and connecting to the proposed A66 mainline at new junctions. A good example is shown on this consultation GA sheet.	If the intention is that these link roads are to be offered to the Councils for adoption and future maintenance, this should be subject to a formal adoption procedure and agreement and the links should be designed to the Councils' standards and specification. Drainage, street lighting, traffic signs and signals, structures, maintenance including routine, structural, winter, soft landscaping, fences and hedges etc would all be considered in this agreement. Note that these agreements would be separate to de-trunking agreements relating to the adoption of sections of existing A66 which will no longer be required as part of the A66 trunk Road.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Temple Sowerby to Appleby	Priest Lane is shown as being severed by the proposed A66 mainline. An access track/PRoW is shown being diverted to the west of where Priest Lane is severed by the A66 mainline.	National Highways should consider an alternative to diverting Priest Lane, with an underbridge constructed on the alignment of Priest Lane (with an approximate skew of 45 degrees) which would also serve as the diversion route of the access track/PRoW. A slight realignment of Priest Lane would be required. The additional cost of constructing an 8m wide skewed underpass versus a 3m wide underpass to the west would be offset against the cost of constructing the Priest Lane diversion to the north, which would have extensive earthworks and environmental impact. The retention of Priest Lane on its approximate existing alignment would obviate the need for the maintenance liability for the diversion route being transferred to the Councils.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Temple Sowerby to Appleby	The Kirkby owl junction does not appear to allow for "Right In" or "Right Out" traffic movements at the connection of the Link Roads with Main Street.	National Highways should consider if all traffic movements were permitted at the connection of these Link Roads with Main Street.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Temple Sowerby to Appleby	On the north side of the Kirkby Thore junction there is a proposed new road running west and then north leading off Main Street. Running parallel to this road there is also an access track/road approximately 400m long which runs at the top of the embankment. The typical distance between the road and the track is 15m wide, which leaves a very narrow grass/landscape area 400m long, which the Councils would not wish to take on ownership and would be difficult to maintain.	National Highways to consider if the access can be provided from the new road instead.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Temple Sowerby to Appleby	The central reserve of the A66 mainline through this section appears to be very wide, even allowing for sight lines.	National Highways to justify the carriageway alignment and additional land take.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Temple Sowerby to Appleby	The proposed local diversion of Sleastonhow Lane crosses the A66 Mainline on an approximate 20 degree skew. To comply with sight lines and minimum radii on the approaches, this produces a horizontal alignment which is convoluted, takes up large amounts of land and requires wide highway verges.	Consideration should be given to increasing the skew on the bridge. This would increase the span but would bring about a significant improvement in alignment, reduce highway construction and reduce land take. This proposal would also minimise "sterile" land between the existing and proposed alignments which the Councils would not look to adopt.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
Appleby to Brough	There is a need to provide an off-carriageway link between Appleby and the old A66 at Kemplay. This section of the A66 is well used, as evidenced by Strava data, as it provides the most direct route to link local roads and settlements. The scheme will add additional traffic to the route making it much less suitable for cycling.	Without a link at this location, the opportunity of creating a walking and cycling route utilising the de-trunked A66 sections at Kirkby Thore, Crackenthorpe and Warcop will be lost. The Councils' preferred route is for a parallel link to the A66 at this location.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project
The issues below have been raised by Cumbria Country Council in various consultation responses. They are concerns shared by Eden District Council and reproduced here accordingly.			
Penrith Area	General There are a number of issues associated with the proposals for M6 Junction 40, Kemplay Bank and the adjacent Skirsgill Depot. These have been grouped together geographically under the Penrith Area heading. Specific concerns are set out below.	See comments in relation to specific issues below	There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals and contribute positively to the development of the project

Penrith Area	Junction Capacity at M6 J40 There is a key concern that the Project will worsen current congestion issues in Penrith, especially because M6 junction 40 does not see any significant capacity improvements, but will need to handle significantly more traffic. The Council therefore expects NH to undertake further reviews of the designs of this scheme and look to increase the capacity of this junction. The Council is not satisfied that J40 of the M6 has adequate capacity to manage traffic flows at peak times and on Fridays resulting in congestion and delays to local journeys. We consider that, following scheme opening, demand on this junction will grow with the potential for adverse impacts upon local residents, visitors, businesses alongside long distance travellers.	The Council needs to be provided with the opportunity to review the traffic modelling and traffic forecasts. Discussions are needed with NH to discuss the modelling and reach agreement on the approach, which informs the suitability of the junction design and road capacity (see also Traffic Flows and Modelling below)	There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals at Junction 40 and review the modelling approach and traffic forecasts.
Penrith Area	M6 J40 Cycling and Walking crossing provision do not appear appropriate or in accordance with LTN 1/20. The proposals result in a slow and lengthy journey across the junction and are likely discourage sustainable modes. <u>The proposals for the cycle route linking J40 and Kemplay Bank are unclear</u>	The proposals need to be amended to comply with LTN 1/20, then reviewed by the Council to confirm agreement	There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the proposals for cycling and walking crossing provision and confirm their acceptability
Penrith Area	Skirsgill Depot Proposed new access road to Skirsgill Depot is not agreed due to potential adverse impact of proposals on the delivery of CCC operational services (CTOT (customer transport), highway depot operations, county stores, buses, winter maintenance - during construction works and in operation	Discussion needed to ensure suitability of proposals and design integration with the operational usage of the depot. Incorporation of agreed solution in scheme design Need to review how the construction impacts will be managed in order to minimise impacts and ensure continued viable operation of the site. Confirm suitability of junction design for depot usage, including CTOT (Community Transport) buses	There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the proposals for Skirsgill access and the impacts upon the functioning of the depot
Penrith Area	The routes to access Skirsgill depot from the west by motorised vehicles can be increased by 2km if the secondary access if the M6 slip road is removed. Journey times can be lengthened significantly at peak periods. The Council oppose removal of this access, <u>Karl M to confirm position</u>	The vehicular access to the depot from the M6 slip road needs to be retained to enable potential access from the west. Further consideration of movements in and out of the depot is required. Final design needs to be agreed to the satisfaction of the Council	There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the proposals for and impacts upon Skirsgill Depot
Penrith Area	Congestion at Skirsgill Depot entrance as a consequence of capacity issues at M6 J40	The vehicular access to the depot from the M6 slip road needs to be retained to enable access from the west. Further consideration of movements in and out of the depot is required. Final design solution needs to be agreed to the satisfaction of the Council	There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the proposals for and impacts upon Skirsgill Depot
Penrith Area	Cycling & Walking crossing provision at Skirsgill Depot is not appropriate or in accordance with LTN 1/20. Opportunities to cross the A66 between the depot and Penrith are inadequate and the proposed design will discourage sustainable travel.	he removal of the uncontrolled crossing point across the A66, moving the access to Skirsgill Depot eastwards and the requirement to negotiate 4 sets of signals will make access to Skirsgill Depot less direct. There is a need to review the proposals and consider whether an amended design can address this concern.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the proposals for and impacts upon Skirsgill Depot
Penrith Area	Drainage at Skirsgill Depot Lack of clarity on how additional run-off from new access road will be managed. Council is concerned that drainage basins and associated access tracks will adversely impact development site.	The Council requires details of how existing depot drainage will cope with the increased runoff from the new access road, which will need to include treatment of surface run-off.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the proposals for and impacts upon drainage at Skirsgill Depot
Penrith Area	Kemplay Bank Concern that access to Blue Light Hub at Kemplay Bank may be adversely affected by the proposals. There is potential for the construction activity to have a detrimental impact on the traffic flow and accessibility of the hub from the Kemplay Bank Roundabout. Response time is of critical importance for emergency services.	During construction of the A66 NTP, the Councils require assurance that the operational performance of the blue light hub facility will not be negatively impacted. It is expected that NH approach to this matter will be addressed in the EMP and detailed design process. The emergency services directly access the A66 from this facility as means of providing the fastest response and this needs to be retained throughout construction.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for the Kemplay Bank area and potential impacts upon the Blue Light Hub
Penrith Area	Kemplay Bank Concern that the Project will worsen current congestion issues in the vicinity of Kemplay Bank Roundabout, due to lack of capacity	The Council needs to be provided with the opportunity to review the traffic modelling and traffic forecasts. Discussions are needed with NH to discuss the modelling and reach agreement on the approach, which informs the suitability of the junction design and road capacity (see also Traffic Flows and Modelling below)	There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the proposals for and impacts upon Kemplay Bank roundabout
Penrith Area	Cycling and Walking access routes are proposed via the centre of the Kemplay Bank roundabout, which will lead to an increase in severance due to an increase in the number of crossing points and increased conflicts with vehicles. The PROW across KB needs to be extinguished and improvements made to other PROW.	The proposals for cycling and walking at Kemplay Bank need to be reviewed to ensure compliance with LTN1/20 and consideration given by NH to improving PROW.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand and shape the proposals for cycling and walking at Kemplay Bank roundabout
Penrith Area	Detrunking of roundabout into local network and liability for bridge structures. Unclear what the detrunking proposals for the KB roundabout will mean for the Council. The Council is not willing to accept maintenance liability for the roundabout, which includes new overbridges, lighting, traffic signals, etc	NH need to explain their proposals for detrunking of the roundabout and what arrangements will be put in place for future operation and maintenance. See also comments on 'Detrunking' below	There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the proposals for detrunking at Kemplay Bank
Penrith Area	The Council is not satisfied that impacts on the local road network, on Ullswater Road, Clifford Road and Eamont Bridge have been adequately assessed.	See Traffic Flows and Modelling below See also comments regarding M6 diversions under Diversions below	There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the impacts of the proposals at Ullswater Road, Clifford Road and Eamont Bridge and review the modelling approach and traffic forecasts.
North - South Connectivity	In areas as above and at the following locations there are concerns about the maintaining of North-South connectivity. There should be no loss of north south connectivity - which are particularly an issue at the locations below	Where connectivity is adversely impacted, the Council expects to have dialogue with NH to overcome the concerns. Mitigation, including design amendments where necessary will need to be agreed with NH and approved through the DCO process	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for and impacts upon north-south connectivity
North - South Connectivity	Larma Karma Kafe site - removal of right turn limits the future use of this building	Where connectivity is adversely impacted, the Council expects to have dialogue with NH to overcome the concerns. Mitigation, including design amendments where necessary will need to be agreed with NH and approved through the DCO process	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for and impacts upon north-south connectivity

North - South Connectivity	Brougham Castle - Temple Sowerby (Eamont Bridge Llama Karma Café & Sewage work) Removal of the all-movement junction of the A66 and B6262 is opposed as this is used as a diversion route during flood events at Eamont Bridge to enable the A6(S) to remain connected to the A66.	Where connectivity is adversely impacted, the Council expects to have dialogue with NH to overcome the concerns. Mitigation, including design amendments where necessary will need to be agreed with NH and approved through the DCO process	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for and impacts upon north-south connectivity
North - South Connectivity	Crackenthorpe At the western end of the Appleby bypass where the proposed realignment of the A66 will tie-in to the existing bypass, a footway/cycleway connection exists between the westbound merge slip road and the old alignment of the A66 towards Crackenthorpe Hall. This needs to be maintained and improved to LTN 1/20 standards as a segregated facility to maintain active travel linkages between Crackenthorpe and Appleby.	Where connectivity is adversely impacted, the Council expects to have dialogue with NH to overcome the concerns. Mitigation, including design amendments where necessary will need to be agreed with NH and approved through the DCO process	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for and impacts upon north-south connectivity
North - South Connectivity	Appleby Bypass - Brough (Warcop & Langrigg) Connectivity from Warcop towards the east will be reduced as the current right turn provision will be removed resulting in a detour. Accessing Langrigg from the A66 west will result in a detour.	Where connectivity is adversely impacted, the Council expects to have dialogue with NH to overcome the concerns. Mitigation, including design amendments where necessary will need to be agreed with NH and approved through the DCO process	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for and impacts upon north-south connectivity
Traffic Flows/Modelling	There is concern that the assessment of scheme impacts underestimates impacts at M6 J40, Kemplay Bank, Eamont Bridge, Ullswater Road, and Clifford Road. As proposed the project may result in unacceptable congestion impacts.	The Council requires further details to be provided on the methodology and results of the assessment of impacts at M6 J40 and Kemplay Bank. The Council believes there is a need for review of more detailed outputs for local modelling undertaken, particularly on Ullswater Road and Eamont Bridge. There is also a need for further sensitivity testing to evidence that the proposals will not have unacceptable impacts on the local road network.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the modelling in sufficient detail and provide informed comments
Departures	Over 100 Departures from design standards have been assessed that carry potential safety risks; 8 of which are high risk /critical safety risk. Departure principles have not been agreed. The interface between DMRB standards and local network requires further work.	Risk assessments to address safety at interfaces between the networks need to be provided and agreed. The critical/high risk departures require extensive mitigation works that could affect the red line boundary and/or require extensive safety and operational justification. Departures where a solution appears achievable require detailed design development within the RLB. Medium risk departures either require more information eg a departure location plan to assess the safety risk, or (based on the detail provided) would require robust substantiation through the departures process. It should be noted that all identified departures should ideally be designed out by the project contractor in conjunction with the Council during detailed design or robust departures from standard developed to ensure safety risks are mitigated as far as reasonably practicable.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the approach to departures and process for resolving safety concerns
Detrunking (road and structures)	Lack of clarity as to what assets will transfer to the Council as a result of detrunking. The Council needs to be assured that the detrunking proposals are acceptable in respect of: 1. Maintenance liabilities 2. The condition of the detrunked assets 3. The design suitability of the asset (appropriate to the proposed use) 4.. The provision of funds to maintain the asset.	There is a need for continued discussion and negotiation with NH to agree the over-riding principles for detrunking. A detrunking principles document and implementation of the process for agreeing detrunking needs to be secured through the DCO process provide the Councils with a commitment or funding to bring the de-trunked sections up to an acceptable standard before handover and adoption. The condition of the proposed de-trunked sections (including carriageway surface, lighting and associated infrastructure) needs to be independently assessed. Before accepting the asset, there will need to be a full condition survey and joint agreement on how any required repairs or improvements will be implemented and funded. Need to understand deterioration of the asset once construction work commences until the handover date. Furthermore, the extent of de-trunking needs to be discussed and agreed with the Councils prior to establishing de-trunking agreements. It is understood that NH will prepare a 'Detrunking and Asset Handover Approach' and 'Asset Adoption Plan'. The Council needs an opportunity to review these documents and agree the approach for subsequent approval. Need to confirm that the application red line boundary includes all the detrunked assets.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the proposals for detrunking and the acceptability of assets to be transferred. Detrunking documents will need to be available for agreement during the Examination or the approval process clarified to the Council's satisfaction.
Detrunking (road and structures)	Future Maintenance - the Council must not inherit a maintenance liability and must be funded appropriately to maintain the de-trunked assets.	Review the detrunking strategy or other relevant documents produced by NH to confirm the acceptability of maintenance provision and agree the mechanism for payment of commuted sums for maintenance	There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the proposed mechanisms for funding of detrunked assets.
Public Rights of Way (PROW)	Lack of clarity on the acceptability of PROW proposals, including severance issues, route diversions, and the condition and maintenance of diverted PROWs	The Council needs to understand the impacts on PROW and confirm the acceptability of NH's proposals. Discussion will be needed to resolve any outstanding concerns	There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the proposals for and impacts upon Public Rights of Way.
Structures	Council will not accept liability for structures on the A66 or crossing the A66	The Council requires an assurance from NH that it will retain responsibility for structures on the A66, including overbridges, underbridges, culverts, etc.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for maintaining structures along the A66.
Structures	There is no clarity about responsibility for maintenance of road surfaces, lighting, barriers, retaining walls, etc. on structures that carry the local road network across the A66	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for maintenance of local road infrastructure that is linked to structures over and under the A66. The responsibility for road surface, lighting, barrier fencing, retaining walls, etc. needs to be clearly documented and agreed through the DCO process.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for maintaining infrastructure associated with structures along the A66.

Structures	Documents and records need to be provided in respect of any structures that are to be transferred to the Council	The Council will require full records to be provided in respect of any asset that is to be transferred to the highway authority. The process for supplying such detail needs to be agreed and secured through the DCO process. Records will need to include: information on the structural form, including any modifications, history of any issues arising (eg. scour or latent defects), condition surveys, waterproofing detail, tests and inspection results, degradation details, etc.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the documentary record for structures that are to be transferred to the Council.
Structures	Crackenthorpe Retaining Wall is a potential major maintenance liability that will not be accepted by the Council without a full understanding of the structure and assessment of risks and liabilities. Walk Mill High bridge - liability due to high alumina cement used in construction.	There is a need for the Council to be adequately resourced to consider the technical and financial liabilities associated with these structures. The structures present a major risk to the Council and it will require specialist technical advice and potentially investigation to quantify the risks and liabilities. The process for addressing the concerns and (if agreed) providing a commuted sum to offset the risks through the DCO process needs to be clarified.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand and agree the proposals for transfer of structures
New Structures	There is no design information relating to new structures, including bridges, culverts and retaining walls. In the absence of such details the Council is not satisfied that designs will be acceptable or achieve satisfactory integration with the local road network. The Council has not had the opportunity to comment on or agree the design of new structures that will carry the local road network, WCH routes or PROW and which it may be asked to maintain. There is a need to ensure visual integration of structures to minimise impact.	The Council needs an opportunity to review the structures designs and reach agreement with NH. Design detail needs to be provided by NH to confirm acceptability in terms of accommodating the proposed usage, tie-in with existing structures, meeting non-trunk road functions, integrating with PROW, meeting the needs of users and ensuring safety. The impact upon remote structures needs to be assessed and any mitigation delivered through the DCO. The mechanism for jointly agreeing the design detail needs to be clarified and set out and the agreed proposals secured through the DCO. New A66 structures designed in accordance with DMRB and the associated design, checking and approval processes will be acceptable to the Council if built and maintained by NH. Council needs to be consulted upon and agree the design of all structures that will carry its network in order to ensure that they are fit for purpose and acceptable. The designs must be suitable to accommodate the proposed usage and should seek to address existing problems and constraints. The process for designing, checking and approving structures should be shared with the Council and should include the opportunity for Council input (in terms of agreeing the process and being able to influence the design)	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for and impacts upon structures. This includes review of the Project Design Report.
New Structures	Lack of clarity on liability & maintenance responsibilities relating to structures assets transferred to local highway authority	The Council needs to examine the DCO submission to understand the proposals for transferring structures assets. This needs to include consideration of all aspects of repairs and maintenance associated with the structures, including road surface, pavements, drainage, lighting, barriers, winter maintenance, etc. Such matters need to be clarified and agreed through the DCO process.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the proposals for transferring structures assets to the Council.
New Structures	There may be an adverse impact on 'remote' structures (outside the red line boundary) during construction or operation. This concern is linked to potential diversions that will have impacts on structures caused by additional traffic on local roads, particularly HGVs	The impact of diversion traffic upon 'remote' structures needs to be included in the consideration of diversions - see also concern relating to Diversions and Construction Impacts.	There is a need for the Council to be adequately resourced to examine the DCO submission to understand the proposals for diversion routes during construction and in operation.
Diversions and construction impacts	Diversion routes are not suitable without mitigation and fall outside the DCO boundary. The Council's assessment of diversion routes indicates that all will require mitigation and six are unsuitable without significant mitigation. Particular concerns remain in respect of the A685 at Kirkby Stephen, as well as other local roads, where various physical constraints will give rise to congestion and delay during construction. There is also concern about the impact of traffic management measures and increased traffic through Kirkby Stephen Conservation Area. HGV - lack of clarity on diversions and impacts during construction. M6 diversion routes do not appear to have been considered (The A6 at Kemplay Bank is a diversion route when the M6 is closed). There are also concerns about the diversion routes around and through Penrith where there is already a significant traffic issue. Serious congestion occurs at Kemplay Bank during M6 closures	Council needs to understand what future diversion use NH may have for the detrunked routes, eg. Tactical diversions and future use of network. NH must develop a clear strategy for traffic management and the establishment of viable alternative/diversion routes to support the construction of the upgraded A66, taking into account the condition and suitability of local roads, susceptibility to rat-running the the particular constraints that may apply to HGV use. There are clear challenges with the suitability of the rural road network to accommodate the types and volumes of vehicles to be diverted. NH should improve the existing strategic diversion routes, specifically the A6 and the A685 and undertake further feasibility work to determine how these routes can be enhanced to cope with the increased volume of traffic. This issue requires consideration by NH in discussion with the Council and mitigation measures need to be agreed through the DCO process. The Council believes there is a need for further sensitivity testing to provide comfort that the proposals will not have unacceptable impacts on the local road network.	There is a need for the Council to be adequately resourced to examine the DCO submission to understand the proposals for diversion routes during construction and in operation.
HGVs	HGV (Parking and Services) - lack of provision and an absence of analysis of the impacts and requirements arising from a forecast increase in HGV traffic. Potential nuisance and safety risks arising from HGV parking.	Consideration of the adverse impacts arising from substantial increase in HGV traffic is required. NH need to provide clarity on provision of parking and services to accommodate increased usage by HGVs and parking and services demands. Freight Study needs to be developed in conjunction with Council and stakeholders to establish the need for parking and services provision and the recommendations considered for delivery through the DCO.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the proposals for and impacts upon HGV parking and services provision

Drainage and the Water Environment	<p>The proposals contain a large number of drainage assets (basins, pipes, access tracks, etc) which have an adverse impact on the environment, land take, sustainability, maintenance and cost.</p> <p>There a lack of drainage detail in some locations leading to concern about how drainage will be satisfactorily achieved.</p>	<p>Discussion is required with NH to clarify the drainage strategy, including clarification of how the designs have optimised and the operation and maintenance of drainage assets to be transferred to the Council.</p> <p>The process for agreeing the transfer of drainage assets needs to be clarified and formalised within the DCO process.</p> <p>Clarity required on the how the potentially harmful effects of highway run-off (from the A66 and detrunked sections) have been addressed.</p>	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for drainage.
Drainage and the Water Environment	Lack of clarity on drainage strategy and design detail for assets that will become the Council's responsibility.	NH needs to provide sufficient drainage design detail to enable the Council to confirm its understanding and agreement on assets to be taken over by the Council, and whether it includes any management of A66 surface water drainage?	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for drainage.
Drainage and the Water Environment	Concern about proposed storage ponds, including location, outfalls, functionality, clarity on the future maintenance responsibilities, dual 'his and hers' systems,	Discussion needed with NH to address concerns around storage ponds in order to reach agreement on design principles and future maintenance.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for drainage.
Drainage and the Water Environment	Concern about flood risk, such as the location of treatment ponds within Flood Zones 2 & 3 (eg. Carleton Hall), flood compensation being proposed in existing flood zones, lack of detail for flood compensation, proposed discharges in flooding locations. Opportunities should be taken to provide benefits in terms of flood risk reduction and natural flood management.	The Council requires details of all proposals which impact upon flood risk and need discussion with NH to resolve any concerns. NH need to ensure the inclusion of Natural Flood Management and other mitigation measures to align with EA/LLFA works. It is essential that natural flood management is considered and engagement with the Cumbria Innovation and Flood Resilience Project team takes place, particularly in relation to the Warcop area, Lowgill Beck and Broom Rigg. Discussion is required on the flood modelling to ensure that NH and the Council can reach agreement on the approach, which should then inform the drainage designs.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for drainage.
Drainage and the Water Environment	Concern over how existing drainage systems will cope with increased run-off caused by the project	Council requires details of drainage proposals for its review and comment. There is a need for the Council to understand the impacts of run-off on existing drainage systems and to confirm whether there is sufficient capacity. Discussion needed with NH to reach agreement on the proposed discharge to existing drainage infrastructure.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for drainage.
Drainage and the Water Environment	Lack of clarity on how drainage will be provided for overbridges and underpasses, particularly in areas of known surface water concern (eg. Priest Lane underpass)	Council requires details of drainage proposals for its review and comment. There is a need for discussion with NH to reach agreement on the drainage infrastructure associated with bridges and underpasses that will be the responsibility of the Council.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for drainage.
Drainage and the Water Environment	Lack of clarity on how run-off will be treated (eg. Whinfell Park Cottages underpass)	Clarity required on the how the potentially harmful effects of highway run-off (from the A66 and detrunked sections) have been addressed. The Council requires the opportunity to review and comment on the proposals and agree the acceptability of the design where it will have future responsibility.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for drainage.
Drainage and the Water Environment	Concern about new infrastructure being provided in locations where swales or existing drainage ponds can provide the necessary treatment	Council requires details of drainage proposals for its review and comment. There is a need for discussion with NH to ensure that the use of swales and drainage ponds is explored in preference to the creation of new drainage infrastructure	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for drainage.
Drainage and the Water Environment	Opportunities to enhance drainage designs to provide better treatment and improved biodiversity. Concern about water quality impacts and the need to protect aquatic ecology.	Council requires details of drainage proposals for its review and comment. There is a need for discussion with NH to ensure that designs achieve optimal treatment benefits and protect and improve biodiversity.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for drainage.
Walking, Cycling and Horse-riding (WCH)	The Standards and Suitability of designs for walking, cycling and horse-riding are unclear.	The design specification for the provision of WCH needs to be agreed with NH and approved through the DCO process. The designs should comply with DfT/Active Travel England standards.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for WCH in sufficient detail to comment and engage on the issue.
Walking, Cycling and Horse-riding (WCH)	Maintenance - future responsibilities for WCH routes is unclear and could jeopardise longevity of the provision.	the Council seeks reassurance that the WCH provision will have continuity, permanence and ongoing maintenance and will expect this to be secured through the DCO approval process.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for WCH in sufficient detail to comment and engage on the issue.
Walking, Cycling and Horse-riding (WCH)	It is not clear whether the design of the E-W cycle route includes provision for horse-riding	The design specification for the provision of WCH needs to be agreed with NH and approved through the DCO process.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for WCH in sufficient detail to comment and engage on the issue.
Walking, Cycling and Horse-riding (WCH)	Grade separation of all A66 crossing points is required to ensure the safety of WCH users.	The design specification for the provision of WCH needs to be agreed with NH and approved through the DCO process. The approved detailed design should ensure that all WCH routes which cross the A66 are grade separated to ensure the safety of users	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for WCH in sufficient detail to comment and engage on the issue.
PROW	The provision for diversions and replacements for severed PROW is unclear in a number of locations. Clarity is needed on the specification for PROW provision.	A review of the detailed proposals for PROW is required to ensure that diversions and replacement routes are appropriate and acceptable to the Council. There needs to be discussion with NH to agree any design changes and the specification for PROW provision. and these will need approval through the DCP process.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the proposals for and impacts upon PROW
Appleby Horse Fair	It is unclear how access and Traffic Management for Fair traffic will be facilitated. The scheme should not negatively impact on Appleby Fair and should encourage further improvements on the local network to discourage the use of the A66 by the travelling community.	The Appleby Fair Traffic Management Plan will require updating in consultation with NH as a consequence of scheme changes. The CTMP will need to develop proposals to address provision for Horse Fair traffic. Connections to existing routes used by travellers and designated stopping places will need to be maintained across the proposed dual carriageway to enable their continued use.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage fully in the DCO application process to understand the proposals for and impacts upon Appleby Horse Fair.

Appleby Horse Fair	Safety concerns relating to non-motorised vehicles using the A66 dual carriageway. The difference in travelling speed between motorised traffic and horse-drawn vehicles will cause an increased hazard to all road users.	The Council expect NH to confirm how non-motorised traffic will be discouraged from using the A66, in particular how horse drawn traffic can effectively access Appleby Horse Fair via alternative routes. Route risk assessment to ensure the local network can accommodate safe passage of horse drawn vehicles <u>there is continuity of alternative provision on the local network</u>	There is a need for the Council to be adequately resourced to examine the DCO submission to understand the proposals for discouraging non motorised traffic on the A66.
Appleby Horse Fair	Absence of suitable stopping places for non motorised vehicles for travellers to the Fair	There is a need to discuss the provision of stopping places for Horse Fair traffic on local and detrunked roads that will be used in preference to the A66 The Councils expect NH to provide either direct funding to provide stopping places on the detrunked sections or ensure the work is undertaken by its contractors prior to being detrunked.	There is a need for the Council to be adequately resourced to examine the DCO submission to understand the proposals for stopping places relating to horse drawn traffic.
Socio - economic	Skills & Supply Chain - absence of assessment of impacts and need for a strategy to ensure that the project delivers benefits to the local area	Skills and Employment Strategy to facilitate and contribute to support training and upskilling to ensure that the Project contractors can make the best use of the local workforce and provide suitable support and training for those will need to re-skill. Support for local schools and colleges to increase and extend the range of courses available to ensure young people have the right skills and qualifications to secure apprenticeships and employment opportunities generated directly and indirectly by the project needs to be provided. The Council has requested a Business Support Strategy and discussion is required with NH and its contractors to ensure that local businesses are supported and encouraged to engage in training and <u>tendering opportunities</u>	There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the potential socio economic impacts and the opportunities to secure local economic benefit from the project.
Socio - economic	Worker Accommodation Strategy. The impacts of accommodating the construction workforce are unclear and may have an adverse impact on the visitor economy, local housing and communities through use of existing accommodation or poor siting of the accommodation.	The Council has submitted an accommodation strategy principles document to NH to ensure that the workforce accommodation is suitable and can result in legacy benefits, but have yet to receive a response. The matter will need to be addressed through the Construction Management Statements as <u>part of the DCO process</u>	There is a need for the Council to be adequately resourced to examine the DCO submission to understand the proposals for worker accommodation and the potential impacts upon the local area.
EIA topics/mitigation relevant to local highway network	Materials and Waste. It is unclear how waste is being minimised and if the waste hierarchy is being followed. Also unclear if borrow pits will be needed.	The Council needs to understand the proposals in relation to waste and materials.	There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the proposals for materials and waste and mitigation of impacts
Communication and Collaboration	Lack of information and understanding of the proposals to inform elected members	The Council is not properly informed due to a lack of resources to review the proposals	There is a need for the Council to be adequately resourced to examine the DCO submission and engage in the DCO application process to understand the proposals and impacts so that it can properly brief and inform members