

# **A66 Northern Trans-Pennine Project**

**TR010062**

## **6.5 Applicant's Response to Relevant Representations Part 2 of 4**

**Planning Act 2008**

**Infrastructure Planning (Examination Procedure) Rules 2010**

**16 November 2022**

Infrastructure Planning

Planning Act 2008

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

A66 Northern Trans-Pennine Project  
Development Consent Order 202x

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**NH/AS/6.5 Applicant's Response to Relevant  
Representations Part 2 of 4**

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<b>Planning Inspectorate Scheme Reference</b>	TR010062
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### **3. Detailed Responses to Relevant Representations**

#### **3.1. Introduction**

- 3.1.1 This section provides the National Highways response to Relevant Representations which have raised matters which are more specific in nature and where National Highways considers that the Relevant Representation required a detailed individual response.
- 3.1.2 Responses in this section are provided by National Highways to clarify a position or update the Examination Authority (ExA) on a matter raised in a Relevant Representation.
- 3.1.3 This section has been set out to mirror the categorisations of Relevant Representations on the National Infrastructure Planning Project Webpage. This chapter is therefore structured as follows:
- Members of the Public/ Businesses
  - Non-Statutory Organisations
  - Other Statutory Consultees
  - Parish Councils
- 3.1.4 Responses to Relevant Representations submitted by Interested Parties who are either an Affected Person or who have entered into a Statement of Common Ground with National Highways can be found in the following sections of this document (Chapters 4 and 5).
- 3.1.5 The name of the Interested Party, the Relevant Representation made, and National Highways' detailed response is provided in each of the Tables 3–1 to 3-3 within each sub-section below.

### 3.2. Members of the Public/Businesses

Table 3-1 Response to Relevant Representations made by members of the public/businesses

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
Louise Taylor-Kenyon, RR-001	Design, Engineering and Construction	<p>There are differences between the final consultation documents given in March 2022 and shown on the A66 Northern Trans Pennine route website in the Map Book, and the plans sent to the Planning Inspectorate in June.</p> <p>The plans for this section are some of those that are different in the application from the consultation documents.</p>	<p>As the Project has developed a series of consultation events have been held. The Statutory Consultation was held in September/October 2021 to present the project that would be developed for DCO submission. As a result of feedback from the Statutory Consultation, several discrete changes were made that resulted in the need to undertake a series of targeted Supplementary Consultation events, primarily aimed at those stakeholder, landowners and communities where change had occurred. The Map Books summarised the project at a point in time to provide an update on the project but were not part of a Consultation process.</p> <p>The Project plans that have been submitted as part of the DCO are principally based on those that were presented at the Statutory Consultation. They incorporate changes presented at the Supplementary Consultation as well other minor changes that have come about because of engagement with affected parties.</p>
Louise Taylor-Kenyon, RR-001	Noise and vibration Alternatives	I do not currently live in the area affected but my elderly parents do; from the start of the project our family home has been shown as an isolated island almost entirely surrounded by land that will be permanently acquired for the scheme.	National Highways need to promote a route that minimises the impact of and potential damage to the North Pennines Area of Outstanding Natural Beauty (AONB), which is protected as a nationally designated site by legislation and policy. One of the

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		<p>The argument that MOD/Crown land would need to be acquired seems spurious given the amount that is already needed for the current scheme. Dualling of the A66 is necessary, and this situation has arisen partly because the 'difficult' sections have been left until last, but the number of people and homes affected, and whose lives will be disrupted does not justify the refusal to consider a Northern route, let alone the clumsy way in which local people's homes and needs appear to be ignored.</p> <p>Our home is adjacent to the A66 and will be affected by the proposed road improvement both during the carrying out of the work and also afterwards. I am worried that some of the land being used for this project will take our property nearer to the road.</p>	<p>key considerations in the design development work for Appleby to Brough has been to ensure that the design of the route alignment minimises the impact of and potential damage to the AONB. There are two key sets of policy tests to be addressed for such developments that need an incursion into the AONB; notably those applicable to developments within the boundary of such an area, and those applicable to developments outside such areas but that have an impact on them (see sections 6.5 and 6.6 of the Case for the Project (Document Reference 2.2, APP-008), and also the Legislation and Policy Compliance Statement (Document Reference 3.9, APP-242) for further information).</p> <p>As the preliminary design of the scheme developed it was found that elements of the Project could not be constructed, following the alignment of the Preferred Route, without some limited construction within the AONB. Alignments were then identified which would be in conformity with the key policy tests (as set out in the National Networks National Policy Statement (NNNPS)) for the AONB and that would be suitable with respect to minimising or satisfactorily mitigating environmental impacts and meet the project objectives. The northern route being put forward would not conform with the key policy tests so was not considered. Regarding the alternatives taken forward, National Highways carried out a sifting exercise to compare the route</p>

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			<p>options for the Appleby to Brough scheme. The details of the assessment can be found within the Project Development Overview Report (PDOR) (Document Reference 4.1, APP-244) section 5.5 'Appleby to Brough'. The comparison assessed the options on a range of criteria including environmental and landscape effects, safety, land take, demolition, geomorphology, impact on local businesses including farms and the economy, impact on communities and users, engineering, buildability and cost, carbon, and conformity with the NNNPS including key policy tests and impacts on nationally designated areas including AONBs and cultural heritage. Conformity with the policy set out in the NNNPS is necessary when considering development outside the boundary of the AONB as they highlight that there is a need to have regard to the purpose of AONBs and avoid compromising this purpose when designing schemes which are outside of the designation, but which could lead to adverse effects within them. National Highways are therefore promoting a route with a minimal incursion into the AONB and subsequently the MoD land to the north of the existing A66.</p>
Louise Taylor-Kenyon, RR-001	Development of the Project and Alternatives	I have a duty to object to this; like many others on the southern side of the A66, I do not understand why the southern route has been preferred to a northern route. We were told at consultation that this was not possible as it would	An assessment of the alternatives that have been considered throughout the Project development process is provided within Chapter 3 of the Environmental Statement (Document Reference 3.2, APP-046). The Chapter outlines how environmental

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		<p>encroach on the Northern Pennines AONB. A cursory look at the AONB website shows that the strip of land to the north of the A66 at this point is merely a buffer zone for the main part of the AONB, and has no outstanding features in it. I question whether National Highways has actually discussed this issue in any depth with the AONB partnership.</p>	<p>impacts have been considered to inform the decision-making process. Further detail about the process, the alternatives considered, and the wider factors that have informed the decision-making is set out in the Project Development Overview Report (PDOR) (Document Reference 4.1, APP-245). Section 4.3 of the PDOR sets out the policy considerations informing Preliminary Design, with Section 5.5 providing specific information relevant to the Appleby to Brough scheme.</p> <p>The North Pennine AONB designation border follows the existing A66 alignment. It is acknowledged that the DCO Application requires construction within the AONB designated area in some locations within the Appleby to Brough scheme. The National Networks National Planning Policy Statement (NNNPS) states that development consent should be refused in AONBs, except in exceptional circumstances and where it can be demonstrated that it is in the public interest (see paragraphs 5.150 – 5.153 of the NNNPS).</p> <p>As a route further to the north would involve a significant incursion into the AONB, it is highly unlikely that such a route would be granted consent at DCO. The principles supporting this are outlined in paragraphs 5.6.141 through 5.6.146 of the Route Development Report (RDR) (Appendix 3 to the Project Development Overview Report), (Document Reference 4.1, APP-247). Paragraphs 5.6.111</p>



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			<p>through 5.6.119 of the RDR summarise the exceptional circumstances case for the eastern section of the Appleby to Brough scheme, whereas paragraphs 5.6.131 through 5.6.140 summarise the exceptional circumstances case for the central section of the scheme.</p> <p>Sections 6.5 and 6.6 of the Case for the Project (Document Reference 2.2, APP-008) set out the findings of an assessment against the relevant policies in the NNNPS and demonstrate, with reference to paragraph 5.151, that exceptional circumstances do exist and are met for development of the Project partially within an AONB and that the proposed development is in the public interest. Also, these sections demonstrate that to conform with paragraph 5.153 the Project will be carried out to high environmental standards through a commitment to a set of design principles, as set out in the Project Design Principles (Document Reference 5.11, APP-302).</p> <p>National Highways continues to engage with the North Pennines AONB Partnership, and this is detailed in a Statement of Common Ground (Document Reference 4.5, APP-284).</p>
Louise Taylor-Kenyon, RR-001	Development of the Project and Alternatives	From an engineering and cost point of view a northern route would be preferable, and would not encroach on the UNESCO Geopark, but NH has decided on a route that will be more	Regarding the alignment alternatives taken forward, National Highways carried out a sifting exercise to compare the route options for the Appleby to Brough scheme. The details of the assessment can be

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		<p>expensive, that involves complex engineering to ensure that that inhabitants of the numerous settlements to the south of the A66 have local access routes and access to the new road, and which has a significant negative impact on their lives.</p>	<p>found within the Project Development Overview Report (PDOR) (Document Reference 4.1, APP-244) section 5.5 'Appleby to Brough'. The comparison assessed the options on a range of criteria including environmental and landscape effects, safety, land take, demolition, geomorphology, impact on local businesses including farms and the economy, impact on communities and users, engineering, buildability and cost, carbon, and conformity with the National Networks National Policy Statement including key policy tests and impacts on nationally designated areas including AONBs and cultural heritage.</p>
Bryan Hall, RR-024	Traffic and Transport	<p>The continued use of the old A66 through Crackenthorpe to access the new junction is detrimental to the safety of all residents in the parish.</p>	<p>The design will be carried out in accordance with the relevant design standards and a Road Safety Audit will be carried out by an independent team to ensure that any safety issues are considered, and recommendations made accordingly to mitigate.</p> <p>Paragraphs 8.1.16 to 8.1.18 of the Transport Assessment (Document Reference 3.7, APP-236) describes the impact of the project between Temple Sowerby and Appleby. Table 8-3 shows that the traffic flow on the old A66 will be reduced by up to 98% due to the Project, which reflects the use of the road being made by people wishing to access local residences and services. Accident risk on any given route rises proportionately with vehicle kilometres travelled (i.e. overall traffic levels), therefore the</p>

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			<p>accident risk on this section of road will be reduced by 98%.</p> <p>Section 9.4 of the Transport Assessment (Document Reference 3.7, APP-236) describes the impact of the Project on Road Safety. It forecasts that the Project will save 530 casualties (including 14 fatalities) over the 60-year appraisal period. This saving is derived from upgrading the single carriageway sections of route, together with at-grade junctions to a safer standard, i.e. dual carriageway, with grade separated junctions.</p>
Lesley Kelly, RR-025	Biodiversity and BNG	Disregards local wildlife and the importance of the countryside.	<p>Impacts and proposed mitigation are detailed within ES Chapter 6 Biodiversity (Document Reference 3.2, APP-049) and underpinned by detailed assessments within separate appendices to ES Chapter 6.</p> <p>The environmental mitigation design has been developed to ensure that mitigation is provided for impacts on protected species and that replacement habitats are provided for those lost, achieving a minimum of no net loss. The design has been informed by the principles of habitat replacement (i.e., replacement ratios) set out in Defra Biodiversity Metric 2.0.</p>
Lesley Kelly, RR-025	Consultation and Engagement Process Design, Engineering and Construction	The change of plan in February 2022 was inadequately consulted on or advertised locally. Is not in keeping with National Highways purpose regarding safety of local and transient road users.	Following the statutory consultation process in Autumn 2021 and ongoing engagement with stakeholders, proposed design changes were identified to the layout of several schemes as well as changes to walking, cycling and horse-riding

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			<p>provisions, the location of construction compounds and landforms. These proposed design changes, as set out in Table 7.1 of the Consultation Report (Document Reference 4.4, APP-252), were subject to a supplementary consultation. The supplementary consultation targeted those parties affected by the design changes to ensure statutory consultees and local communities had the opportunity to provide feedback on the changes and for that to be considered in the final DCO submission. The consultation documents were publicised and were made accessible to these parties, as set out in section 7.4 of the Consultation Report (Document Reference 4.4, APP-252). The supplementary consultations were conducted in line with the principles of pre-application statutory consultation as set out in the Planning Act 2008 (PA 2008) and principles and methods in the Project's Statement of Community Consultation (Document Reference 4.4, APP-259) to the extent they were relevant for these supplementary consultations.</p> <p>The Planning Inspectorate (by letter dated 19th July 2022) has accepted the DCO application and in doing so has confirmed that the consultation undertaken accords with the requirements of the PA 2008 as set out in Chapter 2, Part 5 of PA 2008.</p> <p>The design will be carried out in accordance with the relevant design standards and a Road Safety Audit will be carried out by an independent team to ensure</p>

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			that any safety issues are considered, and recommendations made accordingly to mitigate those issues.
Howard Charlesworth, RR-029	Traffic and Transport	<p>Increased traffic down the road (B6277) into Startforth</p> <p>Longer queues at the three-way traffic lights to cross the bridge which will then affect the speed of traffic going up the narrow "Bank" into town as traffic parks on both sides hence more congestion. More traffic will use this route coming from the East as it will be the shortest distance into the town centre and the Sat Nav rules. 4 HGV traffic from the East will have to travel back towards the present Rokeby junction to access the present road so they can cross the Abbey Bridge which is the only legal crossing point of the Tees for them.</p>	<p>Section 8.1.29 of the Transport Assessment (Document Reference 3.7, APP-236) discusses the impact of the Project on the B6277 'The Sills' in Startforth within Barnard Castle.</p> <p>While there is forecast to be an increase in traffic on the (B6277) Sills (into Startforth) of 520 vehicles per day, which equates to less than 1 vehicle per minute across the day, the impact on Barnard Castle is one of a general reduction in traffic flow due to the lower flows on the A67, of around 400 vehicles AADT, including on Barnard Castle Bridge, and on Galgate within the town centre. This reduction on the A67 occurs due to the improved A66 attracting more longer distance east west traffic from the A67.</p> <p>HGV traffic will continue to be signed to the Rokeby Junction, and Abbey Bridge as it will remain the route to/from Barnard Castle.</p>
Howard Charlesworth, RR-029	Walking, cycling and horse riding (WCH)	<p>This road has very narrow footpaths close to the river in Startforth, a real hazard to pedestrians.</p> <p>No bike or footpath access to cross the A66 (which exists at the moment at the junction) to link with bridleways and footpaths exist in the plan which means walking or riding further on the Black route compared with the Blue route on a</p>	<p>Footpaths in Barnard Castle town are outside of the Project scope. Any concern about the condition of existing footpaths should be passed on to Durham County Council as the responsible local authority.</p> <p>Across the project, the pedestrian, cyclist, and horse-rider facilities that would be severed by the dualling works are proposed to be reconnected via grade-separated crossings. A grade-separated</p>

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		<p>section of road which all the HGV's will travel on, giving extra safety concerns.</p>	<p>crossing is one whereby the route of the path used by those crossing the A66 dual carriageway is either above or below the A66. The crossings are proposed to be provided either at grade-separated junctions, or at stand-alone bridges and underpasses. Some accommodation underpasses may be provided as shared-use facilities for walkers, cyclists or horse-riders as required.</p> <p>Please refer to the Walking, Cycling and Horse-riding Proposals (Document Reference 2.4, APP-010) and the Rights of Way and Access Plans (Document Reference 5.19, APP-347) which sets out details of the proposed north-south and east-west connectivity for each of the respective schemes including Cross Lanes to Rokeby.</p> <p>The Project Design Report (Document Reference 2.3, APP-009) goes into further detail on the history of the design development of the Project and how the Black and Blue routes have been considered throughout the development of the Preliminary Design. Further detail on the assessment of alternatives and the rationale for progressing with the Black route is set out in the Project Development Overview Report (Document Reference 4.1, APP-244).</p>
Howard Charlesworth, RR-029	Development of the Project and Alternatives	The Blue route has so many advantages compared with the Black, in fact when I talked to Highways England representatives in the Witham	A Registered Park and Garden is a statutory heritage designation which current policy and legislation requires Nationally Significant

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		<p>Hall they preferred it. It is Historic England which is the problem. They want to preserve the "Park" which is a load of Tosh. There is a narrow strip of new planted trees next to the present road which is what they want to preserve, the rest of the Park is farm land (crops). It beats me how that strip can be called "Historic". It was all changed years ago (1978) from the plans that Historic England seem to be working from. There is no evidence of their justification on the ground. I asked them if they had actually inspected at the site but got no reply. Historic England's preferred route will put a lot more pressure on truly Historic buildings and traffic flow through Barnard Castle, increasing congestion, and consequently pollution</p>	<p>Infrastructure Projects such as the A66 to give due regard to in terms of avoidance of impacts. Each designation is designated for its own reasons, however land take and severance from a designation is considered a significant effect.</p> <p>The Project must adhere to National Policy Statement for National Networks, which addresses Registered Parks and Gardens in section 5.131 which states "When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conversation...Substantial harm to or loss of designated assets of the highest significance, including...grade I and II* Registered Parks and Gardens should be wholly exceptional." As the Blue Route would have resulted in loss of designated area of the Grade II* Registered Park and Garden area, an exceptional circumstances case would have had to have been made.</p> <p>The Black route was taken forward following Statutory Consultation for several reasons, including its avoidance of direct impacts on the Registered Parks and Garden. The Project Design Report (Document Reference 2.3, APP-009) goes into further detail on the history of the design development of the Project and how the Registered Park and Garden has been considered throughout the development of the Preliminary Design. Further</p>



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			<p>detail on the assessment of alternatives and the rationale for progressing with the Black route is set out in the Project Development Overview Report (Document Reference 4.1, APP-244).</p> <p>Each designation is designated for its own reasons, however land take from a designation and severance of it is considered a significant effect. According to current policy, direct impacts such as this must be avoided, unless there is no technically feasible alternative. In this situation, there is a technically feasible alternative (the Black Route).</p> <p>The Environmental Statement Chapter 8: Cultural Heritage (Document Reference 3.2, APP-051) sets out the legislation and policy required to be adhered to.</p> <p>Planting design in locations such as this may alter over time however a substantial change that would alter the landscape character should be avoided.</p> <p>Section 8.1.29 of the Transport Assessment (Document Reference 3.7, APP-236) discusses the impact of the Project on the B6277 'The Sills' in Startforth within Barnard Castle. While there is forecast to be an increase in traffic on the Sills (of 520 vehicles per day, which equates to less than 1 vehicle per minute across the day), the impact on Barnard Castle is one of a general reduction in traffic flow due to the lower flows on the A67, of around 400 vehicles AADT, including on Barnard Castle</p>



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			<p>Bridge, and on Galgate within the town centre. This reduction on the A67 occurs due to the improved A66 attracting more longer distance east west traffic from the A67.</p>
<p>Celia Chapple, RR-031</p>	<p>Walking, cycling and horse riding (WCH)</p>	<p>The plan to route traffic through The Sills into Barnard Castle (from A66) is not the best route of the routes on offer. It is a road used by pedestrians as part of the town landscape and has inadequate space to cope with traffic</p>	<p>While there is forecast to be an increase in traffic on the Sills (of 520 vehicles per day, which equates to less than 1 vehicle per minute across the day), the impact on Barnard Castle is one of a general reduction in traffic flow due to the lower flows on the A67, of around 400 vehicles AADT, including on Barnard Castle Bridge, and on Galgate within the town centre. This reduction on the A67 occurs due to the improved A66 attracting more longer distance east west traffic from the A67.</p> <p>Footpaths in Barnard Castle town are outside of the Project scope. Any concern about the adequacy of existing footpaths should be passed on to Durham County Council as the responsible local authority.</p> <p>When considering the need for interventions to improve road safety, STATS 19 is typically used to identify the severity of safety issues at locations where accidents frequently occur. The STATS19 dataset provides detailed road safety data about the circumstances of personal injury road collisions in Great Britain, the types of vehicles involved and the consequential casualties. The statistics relate only to personal injury collisions on public roads that are reported to the, and subsequently recorded, using</p>

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			<p>the STATS19 collision reporting form. Studies generally look at data from the last 5 years, and older data is usually excluded to ensure only current issues are identified. Within the last 5 years (2017-2021) there have been no recorded accidents on either the B6277 Moorhouse Lane or B6277 'the Sills'. The last recorded accident was a slight accident which occurred in 2010, and before this a further slight accident was recorded to have occurred in 2001. Given the existing safety record of the road, the absolute increase of 520 vehicles per day (or less than 1 vehicle per minute) there is no evidence to suggest that the Project will cause a substantial increase.</p>
Celia Chapple, RR-031	Landowner	I do not support the compulsory purchase of land from the Rokeby estate and the dismissal of the Rokeby church as unimportant	Comment duly noted.
Barrie Cheetham, RR-039	Development of the Project and Alternatives	I object to increasing traffic flow south of Penrith between Kemplay Roundabout on the A6 and junction M40 on the M6. An alternative route must be found for north to south and south to north traffic flow away from the south of Penrith."	<p>Paragraph 8.2.3 of the Project Development Overview Report (Document Reference 4.1, APP-024) summarises how the Project has been identified as the best option to meet the defined need and objectives, including the delivery of a comprehensive set of benefits.</p> <p>Section 3.3 of the Project Development Overview Report (PDOR) (Document Reference 4.1, APP-244) describes the process of considering alternative options to dualling the A66. The long list of options considered included 43 strategic options</p>

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			<p>identified within the NTPRSS (North Trans Pennine Route Strategic Study) corridor, included 20 strategic options for the A66, 18 strategic options for the A69 and 5 strategic options for the A685. Four options on the A66 were discussed in detail including:</p> <ul style="list-style-type: none"> <li>• A66 dualling, to dual all remaining single carriageway sections of the A66.</li> <li>• Improvement of the existing A6/A66 at-grade junction. Could be delivered as a standalone scheme or as part of the A66 dualling option.</li> <li>• Dualling the section of the A66 between Greta Bridge and the A1 at Scotch Corner.</li> <li>• Dualling the section of the A66 between Temple Sowerby and Brough.</li> </ul> <p>In addition, at that time and stage, it was recommended that three options for the A69 and one option for the A685 were to be taken forward to be considered in detail.</p> <p>Paragraphs 3.3.24 to 3.3.26 of the PDOR (Document Reference 4.1, APP-244) describe the recommendations of the study, namely that a recommendation was made that PCF Stage 1 development of A66 dualling should be undertaken. Strategic benefits highlighted included:</p> <p>Journey time savings, particularly for strategic trips (including freight).</p>

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			<p>Safety improvements, including a reduction in accidents (due to increased capacity significantly reducing the need for vehicles to overtake others on busy sections of single carriageway).</p> <p>Improved reliability (dual carriageway sections would reduce delays, incidents, and the need for road closures).</p> <p>Chapter 5.2 of the PDOR (Document Reference 4.1, AP-244) goes on to describe how the development of the scheme between M6 Junction 40 to Kemplay Bank progressed through the design stages, and paragraphs 5.2.43 to 5.2.58 describes the scheme in more detail. Elements of the scheme that will significantly increase the highway capacity within this area to the south of Penrith are:</p> <p>At Kemplay Bank Roundabout, the scheme would pass beneath the existing roundabout via two underpass structures that would carry the circulatory carriageway. This would comprise a new dual carriageway under Kemplay Bank Roundabout allowing free-flowing east-west traffic, reducing congestion, and improving access to Penrith and the A6. This scheme would include new on-slip and off-slip roads with the A6 and A686 allowing users to safely join and leave the A66 in both directions, serving the local road network with links to Penrith, Eamont Bridge, and other local settlements.</p>

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			<p>At M6 Junction 40, the A66 eastern arm of the roundabout would be widened to three lanes in each direction between M6 Junction 40 and Kemplay Bank Roundabout (compared to the present two lanes) to increase capacity for local movements around Penrith. Widening would be required on the following five approach arms to M6 Junction 40 to provide additional lanes and a dedicated left turn facility, each controlled under its own signal phase: M6 North, M6 South, A66 East, A66 West, and A592 Ullswater Road.</p> <p>A three-lane circulatory carriageway with spiral markings, within the footprint of the current roundabout at M6 Junction 40, compared to the mix of two and three lanes at present.</p> <p>Chapter 8.2 of the Transport Assessment (Document Reference 3.7, APP-236) describes the assessment of M6 Junction 40 and Kemplay Bank Roundabout, both with and without the Project in Place.</p> <p>Without the project in place;</p> <p>At Kemplay Bank, maximum queues of over 800m daily are anticipated by 2044 (the assessment year) on the A66 West approach in the AM peak period, and on both the A66 west approach and on the A686 Carleton Avenue approach in the PM peak period. On Fridays, additional queues of over 800m would be also expected on the A66 East approach.</p>

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			<p>At M6 Junction 40 maximum queues of over 800m would be expected daily on the A592 Ullswater Road.</p> <p>With the improvements identified above, as part of the Project;</p> <p>At Kemplay Bank, the largest queue that is forecast to occur in 2044 daily is a maximum 200m on the A686 Carleton Avenue.</p> <p>At M6 Junction 40 the largest queue is on the A66 west arm and is a maximum of 347m in the evening peak hour.</p> <p>The significant improvement in the performance of the junctions with the Project in place indicates that the proposals will improve the conditions for drivers south of Penrith between Kemplay Roundabout on the A6 and Junction M40 on the M6.</p>
Antony Metcalfe, RR-040	Funding and Delivery	The scheme was priced at 88 £million when the cost would be less than half that probably around £20 to £25 £million	National Highways is not able to ascertain from the information provided in the Relevant Representation which of the schemes the Interested Party is referring to, or where the £88 million figure has been taken from. If the Interested Party can provide further context, then National Highways will be able to respond in more detail.
Antony Metcalfe, RR-040	Traffic and Transport	Mileages used in scheme assessment ignored the effect on HGV mileages of the A685 weight restriction	National Highways is not able to ascertain from the information provided in the Relevant Representation from what part of the DCO documentation that the Interested Party has inferred that the effect of HGV

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			<p>mileages on the A685 weight restriction have not been accounted for within the project assessment. If the Interested Party is able to provide further context, then National Highways will be able to respond in more detail.</p> <p>Appendix 5 (Northern Trans-Pennine Routes Strategic Study: Stage 3 Report) of the Project Development Overview Report (Document Reference 4.1, APP-244) paragraph 2.3.5 shows that at Stage 0, an option to bypass Kirkby Stephen on the A685 was considered within the shortlist. This option was included within the assessment because it was recognised within para 1.7.14 that the A685 between Brough and the M6 at Kemplay Bank via Kirkby Stephen is a single carriageway route. It notes that there are HGV restrictions at two points around Kirkby Stephen which mean that this more direct route travelling between the Northeast and Northwest cannot be used as a through route by HGVs. In addition, Table 1.4 which provides a summary of key current and future issues in the A685 corridor notes 'Restrictions on HGVs use'.</p> <p>Tables 3.1 and 3.2 show that the A685 option was judged to not meet the majority of needs of the project requirements. Considering freight, this assessment is illustrated by Figure 2 of the report which shows the origins and destinations of all HGVs within the Great Britain Freight Model to use the A66 across the Pennines. This shows that the</p>

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			demand for major freight movement that the A66 serves is on a Southeast to Northwest axis. While the A685 would reduce journey distances for some freight movements (as it would remove the current weight restriction on the A685) these movements are small when compared with those movements on the A66 that travel on the M6 north of Penrith.
Antony Metcalfe, RR-040	Development of the Project and Alternatives	<p>The A685 Kirkby Stephen bypass and a bypass of Warwick bridge should be included in the trans Pennine scheme because of their relative low cost and the effects of increased traffic on them as a result of A66 upgrade particularly during construction stages.</p> <p>The proposed route for the new A66 between Appleby and Penrith is not the best route and has many disadvantages particularly the fact that it does not alleviate Skirsgill roundabout issues, and it is longer than present route from Appleby to M6 at Penrith. The route should be a new road from Crackenthorpe (just North of Appleby) to the M6 at Hackthorpe or thereabouts.</p>	<p>As part of the early stages of design development, route corridor studies were undertaken to establish how to improve Trans-Pennine transport routes. That work is summarised in Chapter 3 - Summary of previous route options assessments of the Project Development Overview Report (Document Reference 4.1, APP-244).</p> <p>The strategic case for the A685 option was shown not to perform to the same level as the full A66 dual option. Appendix 5 (Northern Trans-Pennine Routes Strategic Study: Stage 3 Report) of the Project Development Overview Report (Document Reference 4.1, APP-244) shows within an Option Appraisal Scoring Framework at Table 3.1 the A685 scheme scored 12 points compared to the 28 points scored by the dual A66 scheme reflecting the relative performance of both schemes in terms of requirements, quality, time, and risk profile. Comparing the Critical Success Factors in Table 3.3 shows that the dual A66 would:</p>



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			<ul style="list-style-type: none"> <li>• facilitate local, regional, and north-wide economic growth through step change in east –west route provision</li> <li>• improve connectivity for strategic east–west movements, freight, tourism, and residents</li> <li>• improve journey time reliability, resilience of the route during incidents or maintenance and reduce collisions</li> </ul> <p>In contrast the A685 option would:</p> <ul style="list-style-type: none"> <li>• provide some economic benefits</li> <li>• improve connectivity along this route which provides a link to the M6 south from the A66</li> <li>• partially improve journey time reliability along this section of the A685</li> </ul> <p>The A66 dual option would meet the project objectives without the need to dual the A685 in addition.</p> <p>Whilst the suggested connection between Crackenthorpe and Hackthorpe is theoretically shorter in a direct line, there is no existing infrastructure along this corridor therefore leading to more significant impacts were a solution of this nature to be viable.</p>
Climate Emergency Planning and	Environment and EMP	Dr Andrew Boswell, Climate Emergency Planning and Policy I am an independent environmental consultant specialising in climate science, policy, and law, and I object to the A66	The A66 project is about improving safety on a road which is well below standard, transforming East-West connectivity particularly for longer distance freight to/from the English/Scottish ports, and

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Policy, RR-054		<p>Northern Trans-Pennine Project: (1) The Environmental Statement (ES) does not comply with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (“the 2017 Regulations”. One of the requirements of the 2017 Regulations is that the applicant must provide an environmental statement (“ES”) including the cumulative impacts of the project and other existing and/or approved projects on climate change. The requirement can only be discharged by providing a separate cumulative assessment in the ES. The Institute of Environmental Management &amp; Assessment (IEMA) “Assessing greenhouse gas emissions and evaluating their significance” guidance (February 2022) states that best EIA practice for GHGs uses multiple sources of evidence and contextualises GHG assessment against local and regional carbon budgets. The IEMA guidance says comparison against national budgets is only of “limited value”. The ES does not follow this guidance, and instead makes a sole assessment of significance against the entire UK economy carbon budget. The very large construction stage emissions of 518,562 tCO<sub>2</sub>e [Table 7-21] have been omitted from the cost side of the BCR calculations (3.8 Combined Modelling and Appraisal Report, page 148). These would amount to over £130,000,000 at the 2025 government carbon valuation increasing</p>	<p>supporting businesses and communities along the route particularly the tourism sector.</p> <p>HM Treasury and The Department for Transport sets out guidance for valuing the costs and benefits through a scheme business case, through the ‘Green Book’ and WebTAG. Some of the costs and benefits can have a monetary value calculated and presented into a Benefit Cost Ratio (‘BCR’), whilst other costs and benefits are valued qualitatively and described within the business case.</p> <p>The BCR is just one component of the overall scheme business case and should be read alongside all the other impacts of the scheme – This wider view of the scheme is key to decision making.</p> <p>As the A66 project develops, more information becomes available around the scheme costs, and the scheme benefits, so the Benefit Cost Ratio will be refined, as the project goes through its various development stages, which is normal and to be expected and occurs on all projects, as set out in the ‘Green Book’.</p> <p>In advance of the next DfT approval stages of the business case, National Highways are undertaking further development work to prepare the full business case. This includes for example, looking to better value components of the BCR (across costs and benefits) to reflect the latest scheme costs and applying latest data around safety, freight, the</p>

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		<p>the cost side to at least £880m. The value of cumulative carbon emissions from the scheme has not been used in the benefit side of the BCR calculations, because no cumulative assessment has been done. (6) The existing adjusted BCR of 0.92 is an investment hard to justify. It should be recalculated for the issues above, which would reduce it further. We are in a climate emergency, and recent record-breaking global heating and drought in the UK, Europe and around the world demonstrate that it is a crisis of ever-increasing dimensions. The scheme increases carbon emissions and cannot be justified even within the scope of UK climate legislation, especially when properly contextualised by EIA best practice. No scheme increasing carbon emissions on this scale, and at such a poor BCR, can be justified within the planning balance. However, as a scientist in the good company of many others including Professor Sir David King, former UK Government's Chief Scientific Advisor (see his commentary on the Intergovernmental Panel on Climate Change 6th Assessment report "The final warning bell" at <a href="http://www.ccag.earth">www.ccag.earth</a>), I go further and call out the Government targets, policies including the out-of-date NPSNN as being wholly</p>	<p>impact of the scheme on levelling-up and environmental impacts.</p> <p>The Combined Modelling and Appraisal Report (ComMA) (Document Reference 3.8, APP-237) Paragraphs 6.2.24 to 6.2.30 describe the process used for valuing the Carbon emissions. Table 6-9 shows that the valuation of all Carbon is £202.05m (£m, at 2010 Market Prices, Discounted). It should be noted that the Land Use Change Emissions (223,280 tCo<sub>2</sub>) in Table 7-21 of the ES are included in Operating Column of Table 6-9 within the ComMA, where they are partially offset against the Land Use and Forestry Sequestration tonnages (146,666 tCo<sub>2</sub>) from Table 7-23 of the ES.</p> <p>Table 6-21 of the ComMA shows that £202.047m has been included as a disbenefit to the scheme and is therefore part of the 0.92 BCR.</p> <p>The assessment of road user emissions used in the Environmental Statement Chapter 7 Climate (Document Reference 3.2, APP-050) is cumulative as it is based on the strategic traffic model, which includes for committed development and is therefore considered compliant with the EIA Regulations. This is considered the best way to account for changes in the road user emissions from a cumulative perspective.</p> <p>The IEMA Guidance noted by Dr Boswell also notes:</p>

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			<p>“All global cumulative GHG sources are relevant to the effect on climate change, and this should be considered in defining the receptor (the atmospheric concentration of GHGs) as being of ‘high’ sensitivity to further emissions.</p> <p>Effects of GHG emissions from specific cumulative projects therefore in general should not be individually assessed, as there is no basis for selecting any (or more than one) cumulative project that has GHG emissions for assessment over any other”.</p> <p>National Highways notes that a climate emergency was declared by the UK Parliament in the House of Commons on 01 May 2019. National Highways considers climate change to be a very important issue, and as such has conducted a thorough assessment of the impact of the Project on climate change. The Project will not materially impact on the ability of the Government to meet its carbon reduction plan targets and Carbon Budgets as reported in Section 7.11 of the Environmental Statement Chapter 7: Climate (Document Reference 3.2, APP-050).</p> <p>National Highways also notes paragraph 5.17 of the National Policy Statement for National Networks (NPSNN) which states that it is “very unlikely that a road project will in isolation affect the ability of Government to meet its carbon reduction plans”. In the context of the Project, the greenhouse gas</p>

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			<p>assessment has demonstrated that the Project will not materially affect the ability of Government to meet its carbon reduction targets.</p> <p>National Highways cannot comment on the adequacy of current policy and regulations.</p> <p>In respect of national policy, the existing National Policy Statements retain their status for decision making as outlined in the DLUHC guidance on the review of NPS (Planning Act 2008: Guidance on the process of carrying out a review of existing National Policy Statements).</p>
Sister Mary Taylor, RR-082	Air Quality  Climate	Above all, I am seriously concerned by the vast carbon emissions that would be caused by first building the extra road and then using it, and this in violation of our legally binding international commitment to the Paris Agreement. We, the UK, need to play our part seriously and generously in the international effort to check climate change. If we fail to check it, our planet will soon become unfit to support human life	<p>The Environmental Statement assess the likelihood of significant effects and is underpinned by detailed assessments within separate appendices for each chapter. Impacts relating to carbon emissions have been assessed within ES Chapter 7 Climate (Document Reference 3.2, APP-050).</p> <p>The assessment concludes no residual significant climate change risks for the Project during construction or operation. This is assuming the identified mitigation is incorporated into the design and operation of the Project effectively. The Project will not materially impact on the ability of the Government to meet its carbon reduction plan targets and Carbon Budgets as reported in Section 7.11 (Document Reference 3.2, APP-050).</p> <p>Overall compliance with, or attainment of, 'carbon budgets' and 'the 2050 zero target' under CCA</p>

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			<p>2008, and the 'UK's Nationally Determined Contribution' under the Paris Agreement are the responsibility of Government to manage as they are matters of national policy and not policies set at an individual scheme level.</p> <p>The National Policy Statement for National Networks (NPS NN) sets the national policy framework against which decision makers can evaluate the outcomes of proposed road infrastructure projects. The NPS NN sets policy advice across a range of topics such as air quality, noise, biodiversity, and carbon (see paragraphs 5.16 to 5.29 pages 49 and 50).</p> <p>The specific advice on the evaluation of carbon impacts from a proposed scheme and decision-making considerations is set out in paragraphs 5.17 and 5.18 respectively.</p>
Sister Mary Taylor, RR-082	Case for the Project	Secondly, the cost to the taxpayer, at this time of acute crisis in the cost of living, would seem unwarranted	<p>When considering value for money, the Project needs to be considered alongside all the benefits that it will bring. Chapter 4 the Case for the Project (Document Reference 2.2, APP-008) describes the current issues on the route:</p> <ul style="list-style-type: none"> <li>• Paragraphs 4.2.8 to 4.2.15 outline the current safety issues. In summary the A66 has a higher-than-average number of accidents across some lengths of the route, with a direct correlation between road accidents within the single carriageway lengths of the route and where</li> </ul>

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			<p>dualled lengths meet or are reduced to single carriageway lengths.</p> <ul style="list-style-type: none"> <li>• Paragraphs 4.2.16 to 4.2.21 outline the issues caused by the single carriageway sections in terms of journey times and reliability.</li> <li>• Paragraphs 4.2.22 to 4.2.23 discuss the increased likelihood of road closures on the single carriageway sections.</li> <li>• Paragraph 4.2.24 to 4.2.27 discuss the issues of severance, notably within Kirkby Thore.</li> </ul> <p>Paragraphs 4.2.28 to 4.38 discuss the importance of the route to Freight traffic, as highlighted by the fact that HGVs comprise on average 25% of total vehicles on most lengths significantly higher than on comparable roads of this nature</p> <p>In advance of the next Department for Transport (DfT) approval stages of the business case National Highways is undertaking further development work to prepare the full business case. This includes for example, looking to update our valuation of the BCR (across costs and benefits) to reflect the latest project costs and applying latest data around safety, freight, the impact of the project on levelling-up, environmental impacts etc.</p>
Sister Mary Taylor, RR-082	Biodiversity and BNG	There are also several other serious reasons, such as the negative impact on the Eden valley as a Special Area of Conservation, Site of Scientific Interest, habitat of endangered	A full assessment of the likely significant environmental effects of the Project is provided within the Environmental Statement with mitigation proposals detailed within each topic assessment.



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		species, etc, and the North Pennine Area of Outstanding Natural Beauty.	<p>The assessments and mitigation requirements have been used to develop the principles set out in the Environmental Management Plan (Document Reference 2.7, APP-019) and Project Design Principles (Document Reference 5.11, APP-302) to manage construction and operation related impacts, which will be included in Examination as part of the DCO submission and will become a certified document.</p> <p>Impacts upon the River Eden SAC, SSSI and the qualifying protected species is covered within Section 6.10 of Chapter 6 Biodiversity (Document Reference 3.2, APP-049). No likely significant effects upon the designated site are anticipated during construction or operation.</p> <p>Section 10.10 of Chapter 10 Landscape and Visual (Document Reference 3.2, APP-053) states that the effects upon the North Pennines AONB for both construction and operation has been assessed slight adverse (not significant).</p>
Sister Mary Taylor, RR-082	Development of the Project and Alternatives	I would strongly recommend seriously considering possible solutions to the present problems that do NOT require roadbuilding, such as sending goods by rail rather than road, reducing the speed limit, and possible engineering projects, I would also support the points raised by Dr Mary Clare Martin, as well as by Mrs Joy Thompson.	The Case for the Project (Document Reference 2.2, APP-008) reports the approach taken to considering alternatives. It notes that there are no direct rail alternatives for passenger or freight movements along the corridor. This is demonstrated by the feasibility work carried out between 2014-2016 as part of the Northern Trans-Pennine Routes Strategic



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			<p>Study Stage 3 Report (Document Reference 4.1, APP-249).</p> <p>Further information on this and other early-stage assessments can be found in Chapter 3 of the Project Development Overview Report (Document Reference 4.1, APP-244) and the various early-stage reports appended (APP-247, APP-248 and APP-249).</p>
David Sparrow, RR-176	Cultural Heritage	<p>An organisation has objected to allowing a full junction at Greta Bridge on the basis that some parkland will be affected. The fact that it is parkland and not a natural environment means that it is an artificial man-made environment. In other words, a brownfield site and not a greenfield site. Apart from that many of the trees in the area have already been removed. History (at least in part) is the study of how and why things change. Conservation is about preventing change. The two things are diametrically opposed to each other. Part of the interest in looking at mediaeval churches and monasteries is to see the different styles over the centuries in different parts. Eggleston Abbey is not far away. One of the most interesting things there is that the church part was repeatedly altered and there are about 5 different styles of window. That adds to the interest. The proposed route through Startforth includes taking a lot of extra traffic along The Sills with its narrow footpath where if</p>	<p>Rokeby Park Registered Park and Garden is a statutory heritage designation which current policy and legislation requires Nationally Significant Infrastructure Projects such as the A66 NTP to give due regard to in terms of avoidance of impacts. Each designation is designated for its own reasons, however land take and severance from a designation is considered a significant effect.</p> <p>The Project must adhere to National Policy Statement for National Networks, which in section 5.131 states “When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset’s conversation...Substantial harm to or loss of designated assets of the highest significance, including...grade I and II* Registered Parks and Gardens should be wholly exceptional.” As such, for these sorts of impacts on a Registered Park to be acceptable, an exceptional circumstances case</p>

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		<p>two pedestrians approach each other than one must step into the road. It will also add a lot of extra traffic to the bottleneck which is The Bank in Barnard Castle. To increase dangers and increase problems at a bottleneck based on a fundamental misunderstanding of what history is makes no sense</p>	<p>would need to be demonstrated. Having had regard to this requirement, it was considered that a route having these sorts of impacts would likely be regarded as not according with national policy, having regard to various factors, including the fact that technically feasible alternative exists.</p> <p>The Environmental Statement Chapter 8: Cultural Heritage (Document Reference 3.2, APP-051) sets out the legislation and policy required to be adhered to. The Project Development Overview Report (Document Reference 4.1, APP-244) goes into further detail on the history of the design development of the Project and how the Registered Park and Garden has been considered throughout the development of the Preliminary Design. Planting design in locations such as this may alter over time however a substantial change that would alter the landscape character should be avoided.</p> <p>As stated in Section 8.1.29 of the Transport Assessment (Document Reference 3.7, APP-236), while there is forecast to be an increase in traffic on the Sills (of 520 vehicles per day, which equates to less than 1 vehicle per minute across the day), the impact on Barnard Castle is one of a general reduction in traffic flow due to the lower flows on the A67, of around 400 vehicles AADT, including on Barnard Castle Bridge, and on Galgate within the town centre. This reduction on the A67 occurs due</p>

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			to the improved A66 attracting more longer distance east west traffic from the A67.
County Cllr Richard Bell, RR-203	Development of the Project and Alternatives  Cultural Heritage  Landscape and Visual	He contends that the decision by Highways England to prefer the Black route is flawed because it is based on a flawed analysis by Historic England of the landscape and conservation issues (see "Other" section). He further contends that any damage to the Church Plantation at Rokeby, designated protected, is more than outweighed by the public benefits resulting from selection of the Blue route. Rokeby Junction As detailed in the 'Other' section, the Rokeby junction on the Black route although avoiding the listed Rokeby Park places the underpass and associated junction at 190m above sea level and requires at least 400m of break in the current road 'tunnel' that has developed over time with the hedging and treelines along the line of the A66. It also exposes St Mary's Church to the West and South. This damage has not been adequately recognised. The Blue route junction although only 500m to the East is situated at 160m above sea level and its junction appears to only require 200m lead into the South and 50m* to the North of the A66 (in the listed Church Plantation). *This could be mitigated further by reducing the width of cutting by building vertical sides with gabions. In fact, various improvements have been	National Highways duly notes the comments from Historic England's analysis of the landscape and conservation issues. It is acknowledged that there is no alternative in this location that completely avoids harm to the heritage designations in the area. The Black route was taken forward following Statutory Consultation for several reasons, including its avoidance of direct impacts on the Registered Parks and Garden, having regard to current national planning policy tests. Policy required to be followed is set out in the Environmental Statement Chapter 8: Cultural Heritage (Document Reference 3.2, APP-051). Further detail on the reasoning for progressing with the Black route is set out from paragraph 5.7.33 of the Project Development Overview Report (Document Reference 4.1, APP- 244).  The Project Development Overview Report (Document Reference 4.1, APP-244) provides further information on the decision-making process and design development. How the environment was considered in this process is summarised in Environmental Statement Chapter 3 Assessment of Alternatives (Document Reference 3.2, APP-046).  The potential effects of the Project on St Mary's Church and its setting is set out in the Environmental Statement Appendix 8.10 Impact Assessment Table

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		<p>suggested to the Blue route to mitigate any small effects on this worthless piece of scrubland, and it is disappointing that Highways England have chosen to go to Stat Con before these have been able to be fully worked up and assessed. Costs and funding The Black route junction at Rokeby requires the loss of more productive farmland and a more complex junction than the Blue alternate. The Blue route would also allow the line of the new dualling to return to the current line further to the East. Overall, the landscape effect of the Black route is more damaging than the Blue.</p>	<p>(Document Reference 3.4, APP-187) and notes that while the views to the south will be altered, views towards the Rokeby Park will remain unchanged and traffic levels passing in front of the Church will be reduced. Environmental Statement Appendix 10.6 Schedule of Visual Effects (Document Reference 3.3, APP-202) Table 84 notes that there will be a large adverse effect on the view looking south from the Church of St Mary, however once the landscape planting is established by year 15, it is considered to not be a significant effect.</p>
<p>County Cllr Richard Bell, RR-203</p>	<p>Traffic and Transport</p>	<p>Engineering design Environment (including comments on the PEIR) Highways England's own modelling shows a change in traffic flow into Barnard Castle in particular a marked increase (*3) in traffic from the A66 into Barnard Castle by the B6277 into Startforth, along the Sills, over the County Bridge, Bridgegate and The Bank to the Butter Market. An increase in traffic congestion in lower areas of Barnard Castle particularly The Bank and County Bridge will have economic and environmental impact. The environmental impact of increased traffic on the B6277 and the lower part of Barnard Castle have not been considered in the PEIR. In the week of COP21</p>	<p>Chapter 8.1.29 of the Transport Assessment (Document Reference 3.7, APP-236) discusses the impact of the Project on 'The Sills' within Barnard Castle.</p> <p>While there is forecast to be an increase in traffic on the Sills (of 520 vehicles per day, which equates to less than 1 vehicle per minute across the day), the impact on Barnard Castle is one of a general reduction in traffic flow due to the lower flows on the A67, of around 400 vehicles AADT, including on Barnard Castle Bridge (County Bridge), and on Galgate within the town centre (i.e. Bridgegate, the Bank up to the Butter Market/Market Cross). This reduction on the A67 occurs due to the improved</p>

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			<p>A66 attracting more longer distance east west traffic from the A67.</p> <p>As a result, total traffic at Barnard Castle's Traffic Light controlled County Bridge is reduced by 150 vehicles per day therefore the project will relieve this the pressure on this junction.</p>
<p>County Cllr                      Richard Bell,                      RR-203</p>	<p>Traffic and Transport</p> <p>Air Quality</p> <p>Noise and Vibration</p> <p>Development of the Project and Alternatives</p>	<p>it is astonishing that the 2 extra miles that the Black Rokeby Junction adds cf. the Blue, with the attendant pollution and emissions is not considered. The additional distance to residents of Barningham and Greta Bridge coming to Barnard Castle, their local market town, should not be discounted. The Black route would create more noise pollution, adversely affecting 195 homes and 8 non-residential buildings compared with only 16 homes and one non-residential building for the Blue route (p.84 HE's Statutory Consultation booklet). Traffic, transport, and junctions Highways England's own modelling shows a change in traffic flow into Barnard Castle in particular a marked increase (*3) in traffic from the A66 into Barnard Castle by the B6277 into Startforth, along the Sills, over the County Bridge, Bridgegate and The Bank to the Butter Market/Market Cross. This will have negative economic and environmental air quality harms on Startforth and lower Barnard Castle: "public health issues</p>	<p>An assessment of the alternatives that have been considered throughout the Project development process is provided within Chapter 3 of the Environmental Statement (Document Reference 3.2, APP-046). The Chapter outlines how environmental impacts have been considered to inform the decision-making process. Further detail about the process, the alternatives considered, and the wider factors that have informed the decision-making is set out in the Project Development Overview Report (PDOR) (Document Reference 4.1, APP-244). The decision regarding the preference for the black route is discussed in more detail from paragraph 5.7.33 of the PDOR.</p> <p>The potential effects of the Project on Noise and Vibration are set out in the Environmental Statement Chapter 12 Noise and Vibration (Document Reference 3.2, APP-055). Figure 12.4 Opening Year Alignment Noise Difference (Document Reference 3.3, APP-115) shows the predicted change in noise level because of the Project.</p>

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			<p>National Highways accepts that the distance for a 11.4-mile round trip to Barnard Castle will be increased for residents of Barningham will be increased by 1.4 miles or 12%, and that the distance for a round trip to Barnard Castle from Greta Bridge will be increased by 18%.</p> <p>However, this increase in journey lengths for some specific journeys should be considered against the overall Benefits of the Scheme, as discussed in Chapter 3.5 of the Case for the Project (Document Reference 2.2, APP-008). Paragraphs 3.5.8 to 3.5.13 discuss the benefits of the Project on the local and national economy, namely that the Project improvements represent a significant opportunity to boost east-west connectivity (based on reduced overall journey times) and drive economic growth. Likewise, businesses that are dependent on the A66 for east-west connectivity will benefit from direct cost reductions, an improved environment for maintaining contact with their customers and suppliers, and the ability to access larger markets and different geographical areas. In addition, paragraph 3.5.2 states the safety benefits of the scheme, arising from the consistent standard of dual carriageway, will lead to less accidents.</p> <p>The potential effects of the Project on Air Quality are set out in the Environmental Statement Chapter 5: Air Quality (Document Reference 3.2, APP-048). This assessment is based on a model that predicts</p>



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			likely emissions based on the traffic model used for the Project, creating a study area that follows the Affected Road Network as per Section 5.6.12. Environmental Statement Chapter 13: Population and Human Health (Document Reference 3.2, APP-056) reports on potential effects of noise and Air Quality changes and their effects on people and communities, including those in Barnard Castle, reported in multiple sections.
County Cllr Richard Bell, RR-203	Traffic and Transport	As well as Public Health, Public safety is a real issue along the Sills where the road is narrow, with narrow footpaths making it hazardous and unpleasant already when traffic is heavy. You cannot push a pushchair or a wheelchair along there without going into the road at some point. There is nothing that can be done to improve this road, as it is bounded by housing and the River Tees. Schoolchildren walking into town from Startforth (which has no school) must cross the road and the County Bridge. Extra traffic will make this situation worse. The area is already congested at peak times and significant traffic jams are likely if the Black route goes ahead. Similarly, The Bank in Barnard Castle is steep and narrow and incapable of safely absorbing extra traffic. The Black route is longer than the current route into Barnard Castle via the C165 from Rokeby, and the Blue route. Emissions!	Improvements to the existing footpath provision is beyond the scope of the Scheme. Chapter 8.1.29 of the Transport Assessment (Document Reference 3.7, APP-236) discusses the impact of the Project on 'The Sills' within Barnard Castle. While there is forecast to be an increase in traffic on the Sills (of 520 vehicles per day, which equates to less than 1 vehicle per minute across the day), the impact on Barnard Castle is one of a general reduction in traffic flow due to the lower flows on the A67, of around 400 vehicles AADT, including on Barnard Castle Bridge (County Bridge), and on Galgate within the town centre (i.e. Bridgegate, the Bank up to the Butter Market/Market Cross). This reduction on the A67 occurs due to the improved A66 attracting more longer distance east west traffic from the A67.

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		Other (such as any additional important local knowledge relevant to the scheme)	<p>When considering the need for interventions to improve road safety, STATS 19 is typically used to identify the severity of safety issues at locations where accidents frequently occur. The STATS19 dataset provides detailed road safety data about the circumstances of personal injury road collisions in Great Britain, the types of vehicles involved and the consequential casualties. The statistics relate only to personal injury collisions on public roads that are reported to the, and subsequently recorded, using the STATS19 collision reporting form. Studies generally look at data from the last 5 years, and older data is usually excluded to ensure only current issues are identified. Within the last 5 years (2017-2021) there have been no recorded accidents on either the B6277 Moorhouse Lane or B6277 'the Sills'. The last recorded accident was a slight accident which occurred in 2010, and before this a further slight accident was recorded to have occurred in 2001. Given the existing safety record of the road, the absolute increase of 520 vehicles per day (or less than 1 vehicle per minute) there is no evidence to suggest that the Project will cause a substantial increase in Pedestrian safety issues at this location.</p> <p>Revised traffic modelling has demonstrated the difference across the day in traffic increase on the B6277 'the Sills' of "Black" vs "Blue" is very small, i.e. 127 vehicles (19%) per day i.e. around than 12</p>



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			<p>vehicles an hour, or 1 vehicle per 5 minutes, particularly with reference to the historic accident record considered above. Both routes produce a benefit to trip reduction through the centre of Barnard Castle of circa 384 trips per day including over the 16th century bridge.</p>
<p>County Cllr Richard Bell, RR-203</p>	<p>Development of the Project and Alternatives  Cultural Heritage</p>	<p>It is considered that the preference shown by Highways England for the Black route is based on a flawed Historic England assessment for the reasons detailed below: 1. Historic England has failed to consider the damage resulting from the increased traffic flows over the Grade 1 listed County Bridge, the Bank with its listed buildings like Blagraves and the Market Cross. 2. Historic England has not fully assessed the alternative (blue) route. 3. In their assessment Historic England have focussed on the (redundant) St Mary's Church, but their opinion that the black route is preferable is flawed in that: - The Black Route interchange and underpass will dominate the western approaches to the Grade II* Registered Park- because this will be built at the highest point of the –route and hence very visible and noisy. - The Church's location mimics the positioning of Mausoleums along the Appian Way and has acted as a focal point and Gateway on the westernmost part of Rokeby Park – an arcadian spectacle glimpsed through the decorative railings between the Pillars at the</p>	<p>National Highways acknowledges the Interested Party's concerns.</p> <p>National Highways have developed the proposed Black Route for the Cross Lanes to Rokeby scheme, having regard to current national planning policy as set out in paragraphs 5.8.92 to 5.8.98 of the Route Development Report, Appendix 3 to the Project Development Overview Report (Document Reference 4.1, APP-247).</p> <p>As is set out in section 5.7 of the Project Development Overview Report (Document Reference 4.1, APP-244), the principal consideration in the preference for the black route (with a western junction at Rokeby) is the impact on the Grade II* Registered Park and Garden at Rokeby Park. The eastern junction would create harm to the Grade II* Registered Park and Garden at Rokeby Park. Whilst impacts on some key views of the eastern junction could be mitigated through careful landform design and reinstatement, the impacts cannot be completely avoided as the eastern junction would still lead to additional fragmentation of the site.</p>

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		<p>Abbey Bridge road junction. Thorpe Farm – also designed by Thomas Robinson (who self-designed and built Rokeby Hall) acts in the same way as the easternmost Gateway. The Roman Road at both these points rises up and when approaching Rokeby, the eye is drawn along the tightly defined carriageway to the focal point of the Hall and its surrounding parkland - This concept was compromised by the construction of the Greta Bridge Bypass which reverted back to the route of the Roman Road and thus destroyed the views into the Park from the Carr of York bridge over the Greta – but the views approaching from the west remain (albeit the screen and pillars were moved back during the 1970's works) -The complexity of the landscape design builds as you approach Rokeby culminating in the sight of the Palladian splendour of the Hall showing off the owners wealth &amp; status but also their knowledge and appreciation of the classical world – not something encountered in the North of England at that time -It is considered that the Black Route will cause substantial harm as the interchange will spill over and away from the roman road's ridge alignment – the A66 Corridor is framed by woodland belts running parallel to the road funnelling the views towards Galley bank and the wilderness of the upland grassland and moors beyond This is all supported by the 1770 survey</p>	<p>The Black Route avoids direct impacts on the Registered Parks and Garden, having regard to the requirements set out in the National Policy Statement for National Networks. Table 1-17 of Environmental Statement Chapter 3 Assessment of Alternatives (Document Reference 3.2, APP-046) provides further information in this regard.</p> <p>Further information on design development for the Cross Lanes to Rokeby scheme, including consideration of wider impacts is set out from paragraph 5.7.14 to 5.7.80 of the Project Development Overview Report (Document Reference 4.1, APP-244), and within paragraphs 1.5.77 to 1.5.88 of Environmental Statement Chapter 3 Assessment of Alternatives (Document Reference 3.2, APP-046).</p>

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		<p>completed just after the Morritts acquired the Estate from the Robinsons in 1769 and has been strengthened and preserved by subsequent generations. 4. In their assessment Historic England have focussed on the strip of trees comprising the protected woodland (Church Plantation). It is notable that this is not actual original forestry, having been felled recently (3 years ago?), nor is there any physical connectivity by way of path or road between Hall and Church, nor is there a view between Hall and Church that would be 'spoiled' by the Blue route. It is contended that the Historic England assessment is based on a less than full understanding of the original design and layout. 5. While the Black route avoids incursion into the Church Plantation, siting the junction in this west location would have no ameliorating effect on Rokeby Park itself, as the C165 road would still follow its present route, channelling traffic alongside the boundary wall and separating the Plantation from the Park. 6. The Blue route that was previously promoted moved the Rokeby junction a little to the west of its current location with an underpass that pierced the Plantation at its narrowest point and then connected with the C165 several hundred meters to the north of the current junction. This would site the junction close to its lowest point, with all but the main carriageway below the current ground level and</p>	

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		<p>therefore not nearly as obvious as the main carriageway, thus reducing visibility and noise levels to a minimum. 7. Various improvements have been suggested to the Blue route to mitigate any small effects on this worthless piece of scrubland, and it is disappointing that Highways England have chosen to go to StatCon before these have been able to be fully worked up and assessed.</p>	
<p>County Cllr Richard Bell, RR-203</p>	<p>Development of the Project and Alternatives  Population and Public Health</p>	<p>The main harms from the proposed Black Route will be negative health effects in particular acute ones from the increased risk of accidents between vehicles and pedestrians in Startforth and lower Barnard Castle and more chronic health effects from reductions in air quality, noise, and disturbance.</p>	<p>An assessment of the alternatives that have been considered throughout the Project development process is provided within Chapter 3 of the Environmental Statement (Document Reference 3.2, APP-046). The Chapter outlines how environmental impacts have been considered to inform the decision-making process. Further detail about the process, the alternatives considered, and the wider factors that have informed the decision-making is set out in the Project Development Overview Report (PDOR) (Document Reference 4.1, APP-244). The decision regarding the preference for the black route is discussed in more detail from paragraph 5.7.33 of the PDOR.</p> <p>The potential effects of the Project on Air Quality are set out in the Environmental Statement Chapter 5: Air Quality (Document Reference 3.2, APP-048). This assessment is based on a model that predicts likely emissions based on the traffic model used for the Project, creating a study area that follows the</p>

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			<p>Affected Road Network as per Section 5.6.12. Environmental Statement Chapter 13: Population and Human Health (Document Reference 3.2, APP-056) reports on potential effects of noise and Air Quality changes and their effects on people and communities, including those in Barnard Castle, reported in multiple sections.</p> <p>Chapter 8.1.29 of the Transport Assessment (Document Reference 3.7, APP-236) discusses the impact of the Project on 'The Sills' within Barnard Castle. It states that while there is forecast to be an increase in traffic on the Sills (of 520 vehicles per day, which equates to less than 1 vehicle per minute across the day), the impact on Barnard Castle (and Startforth) is one of a general reduction in traffic flow due to the lower flows on the A67, of around 400 vehicles Average Annual Daily Traffic (AADT), including on Barnard Castle Bridge, and on Galgate within the town centre. This reduction on the A67 occurs due to the improved A66 attracting more longer distance east west traffic from the A67.</p> <p>Section 9.4 of the Transport Assessment (Document Reference 3.7, APP-236) describes the impact of the Project on Road Safety. It forecasts that the Project will save 530 casualties (including 14 fatalities) over the 60-year appraisal period.</p>

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			This saving is derived from upgrading the single carriageway sections of route, together with at-grade junctions to a safer standard, i.e., dual carriageway, with grade separated junctions.
County Cllr Richard Bell, RR-203	Development of the Project and Alternatives  Cultural Heritage	The main harms from the proposed Black Route will be negative health effects in particular acute ones from the increased risk of accidents between vehicles and pedestrians in Startforth and lower Barnard Castle and more chronic health effects from reductions in air quality, noise, and disturbance. These risks are not addressed in the PEIR. Above are the harms of the Black Route. I would however also like to challenge the alleged harm that the Blue route would pose to Rokeby Park. The proposed loss from the Blue Route junction would be a block 30-50m (East/West) by 15m (North/South) of the Church Plantation 150m West of the current C165 junction. None of the 35 listed structures within the listed extent of Rokeby Park or its environs would be directly affected by the Blue route proposal The C165 and its historic predecessors have always broken the visual connection between the walled Park and Church plantation. There is no public path between Rokeby Park and the Church Plantation, access to Rokeby Church and its environs is only from the current A66. I would contend that any harms to the broad character area and visual character	It is acknowledged that both Blue and Black alternatives at Cross Lanes to Rokeby have potential adverse effects on cultural heritage assets in the area, however, the Black route avoids direct impact on the Registered Parks and Garden having regard to current national planning policy.  The options consultation in 2019 sought feedback on the proposed options to dual the remaining single carriageway sections of the A66 to help inform the selection of a preferred option. Feedback received was carefully considered and further scheme development was undertaken. At statutory consultation the public and other stakeholders were informed that their comments on the project and the alternative routes presented would be reviewed, and regard given to them in the final preparation of the application for development consent. The feedback from statutory consultation on the preferred route and alternatives presented is set out along with National Highway's response for each issue raised in Annex N of the Consultation Report (Document Reference 4.4, APP-271). Table 6.2 of the Consultation Report (Document Reference 4.4, APP-252) provides a summary of some of the project design changes made following statutory

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		<p>around and of St Mary's Church would be more significantly impacted by the Black Route junction. For these reasons and noting the County Council's, Rokeby Estates, Local A66 Liaison Group's opinions, and the opinions of the great majority of constituents who have contacted the local councillors about the junction, I would urge the Planning Inspectorate to mandate the Blue Route junction at Rokeby.'</p>	<p>consultation. Design development continued following statutory consultation having regard to feedback received throughout the consultation and ongoing engagement, to address environmental and traffic issues that arose following completion of surveys and to incorporate mitigation for impacts that had been identified through the Environmental Impact Assessment (EIA). The decision regarding the preference for the black route is discussed in more detail from paragraph 5.7.33 of the Project Development Overview Report (PDOR) (Document Reference 4.1, APP-244).</p> <p>In addition to consultation on alternative routes there was engagement with local communities on those sections of the route where alternatives were being considered. The engagement was undertaken to provide additional information for stakeholders and local communities to help them understand the alignment alternatives before undertaking the statutory consultation. Attendees at the local events arranged as part of this engagement were encouraged to participate in the statutory consultation that followed. Attendees were also advised at these engagement events that a route preference would be stated at statutory consultation. The approach to the engagement on the alternative alignments is set out at sections 3.12 – 3.17 of the Consultation Report (Document Reference 4.4, APP-252).</p>



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			<p>The Planning Inspectorate (by letter dated 19th July 2022) has accepted the DCO application and in doing so has confirmed that the consultation undertaken accords with the requirements of the Planning Act (PA 2008) as set out in Chapter 2, Part 5 of PA 2008.</p>
Nicola Renison, RR-207	Climate	<p>I particularly object to the agricultural land take this road will result in at a time when maintaining the country's ability to produce its own food is crucial. As a Farmer currently adopting regenerative principals, the role of land in carbon capture is only just becoming fully understood. Does the carbon analysis complete by NH fully account for the loss of soil in future carbon analysis. Regenerative farming and carbon neutral food is increasingly popular. I am a Partner in a farming enterprise called Carbon Calling. We focus on how soil can be used to reduce carbon in agriculture.</p>	<p>In addition to the development of the highway and associated infrastructure the project requires land to effectively mitigate for the loss of habitat and other environmental impacts. In response to NNNPS policies National Highways LD117 Landscape Design provides a list of eight environmental masterplan codes to summarise and illustrate the environmental mitigation. Four of these are utilised to show the types of land required for environmental mitigation, as shown on the Environmental Mitigation Maps (Document Reference 2.8, APP-041) and are listed below in no particular order:</p> <ol style="list-style-type: none"> <li>1. Landscape integration</li> <li>2. Nature conservation and biodiversity</li> <li>3. Visual amenity</li> <li>4. Visual screening</li> </ol> <p>Areas of habitat creation and replacement are principally within the third category (nature conservation and biodiversity) shown on the Environmental Mitigation Maps, although some of the landscape and visual mitigation also shown on the maps can also function as habitat (hence has a</p>



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			<p>dual function). The total area required for each type of habitat creation or replacement is outlined within Table 6-20 of the Chapter 6 Biodiversity within the Environmental Statement (Document Reference 3.2, APP-049). The size of the areas proposed for environmental mitigation is based upon the land required to effectively mitigate the species impacts, landscape and visual effects and habitat impacts and loss of the Project based on the assessment of the preliminary engineering design (which forms part of the DCO application).</p> <p>The Application including the Environmental Statement (Document Reference 3.2, APP-044 to APP-059), DCO and related Project Design Principles (Document Reference 5.11, APP-302) and Environmental Management Plan (Document Reference 2.7, APP-019) are prepared on the basis that detailed design will be progressed and refined and this will result in greater certainty at the final design stage and implementation (should consent be granted). Any design details brought forward will be within the terms of any consent granted, order limits and within the extent of assessment. It will also be in conformity with the EMP (Document Reference 2.7, APP-019) and the PDP (Document Reference 5.11, APP-302) but may not be in the same form as shown on the Environmental Mitigation Maps (Document Reference 2.8, APP-041).</p>

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			<p>The Legislation and Policy Compliance Statement (Document Reference 3.9, APP-242) describes how the Project complies with paragraph 5.168 of the NNNPS by taking consider the economic and other benefits of the best and most versatile agricultural land. It states:</p> <p>“The Applicant has identified where it encroaches into areas to be classed as best and most versatile (‘BMV’) agricultural land. The Applicant has considered the requirements of paragraph 5.168 as set out in Table 9.2 of Chapter 9 (Geology and Soils) of the ES (Document Reference 3.2, APP-052).</p> <p>Natural England Strategic Agricultural Land Classification (‘ALC’) Maps and Ministry of Agriculture, Fisheries and Food (‘MAFF’) Provisional ALC Maps have been consulted for the study areas, giving an indication of the likelihood of BMV agricultural land, that is, better quality land (Grade 1 to Grade 3a) and lower quality land (Grade 3b to Grade 5).</p> <p>For areas of temporary development, ALC grade as determined from the soil survey will be used to inform the restoration criteria; BMV is to be returned to the same quality as far as reasonably practicable to minimise BMV losses and limit permanent impacts. Further details are set out at section 9.9 (Essential Mitigation and Enhancement Measures) in Chapter 9 of the ES.</p>

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			<p>An assessment of likely significant effects that could arise because of the Project has been undertaken and is set out at section 9.10 (Assessment of likely significant effects) of Chapter 9 of the ES. This confirms that a greater amount of poorer quality land will be lost (Grade 3b, 4 and 5) at 163.5ha compared to Grade 1-3a which results in 144ha lost. The Applicant has therefore sought to use areas of poorer quality land where this has been possible in lieu of higher quality land.”</p> <p>A full assessment of the likely significant environmental effects of the Project is provided within the Environmental Statement (Document Reference 3.2, APP-043 to APP-059) with mitigation proposals detailed within each topic assessment.</p> <p>Assessment of the potential effects of the Project on the Climate and any required mitigation is set out in Environmental Statement Chapter 7 (Document Reference 3.2, APP-050). The assessment includes a land use component which looks at areas and types of land that are impacted/removed by the scheme – and what the loss of stored carbon and future carbon sequestration potential is of that land. This includes agricultural land as one of the land types within the assessment.</p>

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			In accordance with the assessment methodology detailed within DMRB LA114 there is no requirement to include soils within the carbon calculation
Nicola Renison, RR-207	Impacts to Land	Development in the area is paused which is having a major impact of householders who are trying to achieve planning permission on even small project such as an extension.	Chapter 13 Population and Human Health within the Environmental Statement (Document Reference 3.2, APP-056) includes an assessment of the Project on development land; paragraphs 13.10.13 to 13.10.20 set out its findings in relation to the construction and operation of the Project on a route wide basis and later parts of the document consider the likely significant effects at the Scheme level.
Nicola Renison, RR-207	Biodiversity and BNG	As Sleastonhow farm is within a European SAC that is a major benefit and it has been consistently working with other environmental agencies such as the Eden River Trust and Countryside Stewardship projects for several years. This is exactly the sort of land management we should be protecting. Allowing the road to run parcelled to the Trout beck SAC is a concern for the Eden Rivers Trust who strongly opposed the selection of the Northern Route. N02 emissions from HGVs is an increasing concern for air pollution and within the Troutbeck SAC there is the additional concern that when combined with rain it will create nitric acid which will run off into the Troutbeck. What assessment of the impact of Nitric acid on the Troutbeck has been completed? In March 2022 Natural England issued a Nutrient Neutrality	The Project is aware of the River Eden Special Area of Conversation (SAC) and Site of Special Scientific Importance (SSSI) and has worked with Natural England and the Environment Agency on ensuring that the potential effects of the Project are minimised. National Highways are also working closely with the Eden Rivers Trust to facilitate the proposed river restoration scheme at Sleastonhow; the project will not prevent the Eden River Trust's scheme to restore Trout Beck in this location from going ahead.  The potential construction and operation impact of nitrogen deposition at all affected designated sites has been assessed in Document Reference 3.6, Habitat Regulations Assessment (HRA) Stage 2 Statement to Information Appropriate Assessment and (Document Reference 3.6, APP-235) and

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		<p>Notification to Eden District Council, as many parts of the Eden Area fall within European protection. This includes the Eden River which is severely polluted due to agricultural runoff.</p> <p>Why is the same consideration of nutrient irritation of the Eden River not being given to the additional impact of additional vehicle use, siting compounds and the impact of runoff in the Troutbeck SAC from the proposed A66. The Planning Inspectorate must have more information on nutrification of the SAC. Electric vehicles are not going to be a solution as most emissions come from HGV. Currently traffic passes through the Kirkby Thore section of the A66 at 40 MPH.</p>	<p>Environmental Statement Chapter 6 Biodiversity (Document Reference 3.2, APP-049). This impact was not considered to be significant or result in an adverse effect on the integrity of the River Eden SAC.</p> <p>The Natural England <i>Advice for development proposals with the potential to affect water quality resulting in adverse nutrient impacts on habitats sites</i>, (Natural England 2022) sets out a Nutrient Neutrality Methodology that enables a nutrient budget to be calculated. This only applies to those types of development that would result in a net increase in a population served by a wastewater system. The Project does not include the provision of accommodation and does not require connection to the wastewater network. It is therefore considered that a nutrient neutrality assessment, which involves the calculation of population increase and the associated increase in wastewater production, is not applicable to the A66 Project.</p>
<p>Louis Martin, RR-222</p>	<p>Environment and EMP</p> <p>Population and Human Health</p> <p>Design, Engineering and Construction</p>	<p>As a campaigner for divestment from fossil fuels, I am horrified by the number of extra roads, junctions and other blots on the landscape involved in this scheme. My grandparents who are in their nineties live very near the proposed Langrigg Junction and I am very concerned about their health and wellbeing, both during and after the road works. The Junction is a total change from the preferred route of spring 2020,</p>	<p>The Langrigg Junction has evolved in response to feedback in advance of and from the Autumn 2021 Statutory Consultation. Access to the local road (former A66) is provided via an underpass local to Flitholme. A connection to the east, links this access to the Langrigg Lane. The provision of a westbound junction local to Langrigg Lane has been included in order provide direct connectivity with the new A66.</p>

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		<p>and residents in the Langrigg area have never been given the choice of the northern route recommended by local parish councils and the MP, nor of upgrading the single carriageway.</p>	<p>An assessment of the alternatives that have been considered throughout the Project development process is provided within Chapter 3 of the Environmental Statement (Document Reference 3.2, APP-046). The Chapter outlines how environmental impacts have been considered to inform the decision-making process. Further detail about the process, the alternatives considered, and the wider factors that have informed the decision-making is set out in the Project Development Overview Report (PDOR) (Document Reference 4.1, APP-245). Section 4.3 of the PDOR sets out the policy considerations informing Preliminary Design, with Section 5.5 providing specific information relevant to the Appleby to Brough scheme.</p> <p>The North Pennine Area of Outstanding Natural Beauty (AONB) designation border follows the existing A66 alignment. It is acknowledged that the DCO Application requires construction within the AONB designated area in some locations within the Appleby to Brough scheme. The National Networks National Planning Policy Statement (NNNPS) states that development consent should be refused in AONBs, except in exceptional circumstances and where it can be demonstrated that it is in the public interest (see paragraphs 5.150 – 5.153 of the NNNPS).</p>

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			<p>As a route further to the north would involve a significant incursion into the AONB, it is highly unlikely that such a route would be granted consent at DCO. The principles supporting this are outlined in paragraphs 5.6.141 through 5.6.146 of the Route Development Report (RDR) (Appendix 3 to the Project Development Overview Report), (Document Reference 4.1, APP-247). Paragraphs 5.6.111 through 5.6.119 of the RDR summarise the exceptional circumstances case for the eastern section of the Appleby to Brough scheme, whereas paragraphs 5.6.131 through 5.6.140 summarise the exceptional circumstances case for the central section of the scheme.</p> <p>Sections 6.5 and 6.6 of the Case for the Project (Document Reference 2.2, APP-008) set out the findings of an assessment against the relevant policies in the NNNPS and demonstrate, with reference to paragraph 5.151, that exceptional circumstances do exist and are met for development of the Project partially within an AONB and that the proposed development is in the public interest. Also, these sections demonstrate that to conform with paragraph 5.153 the Project will be carried out to high environmental standards through a commitment to a set of design principles, as set out in the Project Design Principles (Document Reference 5.11, APP-302).</p>



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			<p>National Highways continue to engage with the North Pennines AONB Partnership, and this is detailed in a Statement of Common Ground (Document Reference 4.5, APP-284).</p> <p>A full assessment of the likely significant environmental effects of the Project is provided within the Environmental Statement (Document Reference 3.2, APP-043 to APP-059) with mitigation proposals detailed within each topic assessment. The ES includes an assessment of the likely effects upon landscape, carbon, air quality and noise. Where significant effects have been identified mitigation measures have been proposed where practicable to reduce residual effects.</p> <p>The assessments and mitigation requirements have been used to develop the principles set out in the Environmental Management Plan (EMP) (Document Reference 2.7, APP-019) and Project Design Principles (Document Reference 5.11, APP-302) to manage construction and operation related impacts.</p>
Louis Martin, RR-222	Consultation and Engagement Process	<p>Consultation with my grandparents who are not computer literate has been very poor. Indeed, an extra bit of road was added after consultation rather than improvements which had been asked for by the parish council chairs.</p>	<p>Members of the project team have met with Mr and Mrs Martin on several occasions including a meeting on 7<sup>th</sup> September 2022 where the referenced matters were discussed.</p> <p>Public consultation and engagement has been a critical part of the preparation of the DCO application and has been underpinned by the Government's Consultation Principles. Many consultation events</p>

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			<p>and engagement activities over several years have been undertaken to fully understand the concerns of the local communities and the wider public and where possible resolve their issues. The approach taken and how it accords with the legal requirements and government guidance is set out in the Consultation Report (Document Reference 4.4, APP-252). The SoCC compliance provided in Table 4.3 of the Consultation Report details how the statutory consultation was undertaken in compliance with the published SoCC, as per the requirements of section 47(7) of the PA 2008. This table provides details on how we ensured that the consultation material and events were accessible and well publicised in accordance with the SoCC. Some of the methods implemented to ensure that the consultation was accessible and publicised, as set out in Table 4.3 are:</p> <ul style="list-style-type: none"> <li>• Holding 24 consultation events, along the route in locations accessible to local communities, such as Dalton &amp; Gayles Village Hall, Bowes Village Hall, and the Witham, Barnard Castle</li> <li>• Utilising a range of awareness-raising methods such as newspapers, social media, posters, and leaflets. This included flyer notification to those living within 5km of the Project centreline, this equated to over 47,000 addresses, posters shared in local community facilities, including Bowes Post Office, several locations in Barnard Castle,</li> </ul>

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			<p>Mainsgill Farm, Richmond Theatre Royal, Richmond Library, Richmond Post Office</p> <ul style="list-style-type: none"> <li>• Use of organic and paid for adverts (including social media and at service stations covered by the DST distribution, such as Leeming Bar and Scotch Corner services</li> <li>• Using posters and leaflets publicity at community facilities and hubs that seldom heard groups may frequent. For example, we shared posters and leaflets with several tourist centres such as Appleby Tourist Information Centre, Penrith Tourist Information Centre, and Center Parcs.</li> <li>• Contacting key community group representatives for them to share information about the consultation with their wider network.</li> <li>• Ensuring our phone number and email address are available on materials for those who may find have questions or find it difficult to submit comments.</li> </ul> <p>Further to carrying out statutory consultation for the project, supplementary consultation was also undertaken with respect of proposed design changes in specific parts of the route as set out in Table 7.1 of the Consultation Report (Document Reference 4.4, APP-252). The supplementary consultation targeted those parties affected by the design changes to ensure statutory consultees and local communities had the opportunity to provide feedback on the changes. The consultation documents were publicised and were made</p>

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			<p>accessible to these parties, as set out in Section 7.4 of the Consultation Report (Document Reference 4.4, APP-252). The supplementary consultations were conducted in line with the principles of pre-application statutory consultation as set out in sections 41-50 of the Planning Act 2008 and principles and methods in the Project's Statement of Community Consultation to the extent they were relevant for these supplementary consultations. Section 7.4 of the Consultation Report describes our approach to the supplementary consultation and Sections 7.5-7.10 describes in detail the approach and methods used for the supplementary consultation for each design change. Paragraph 7.4.3 confirms that "The consultation periods were considered proportionate to the scale of the proposed changes, the likely impact of the changes and the level of public interest. Phase 1 included multiple issues and statutory consultation with PILs under s42(1)(d) of the PA 2008, therefore requiring a minimum 28-day consultation period under s45 of the PA 2008. Phase 2 included consultation on multiple issues (including walking, cycling and horse riding, landforms, and construction compounds) and Phase 3 was a single-issue consultation on the Brough Hill Fair site."</p>

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
			<p>The Planning Inspectorate (by letter dated 19th July 2022) accepted the DCO application and in doing so has confirmed that the consultation undertaken accords with the requirements of the Planning Act (PA 2008) as set out in Chapter 2, Part 5 of PA 2008.</p>
<p>Louis Martin, RR-222</p>	<p>Environment and EMP  Climate</p>	<p>On environmental grounds, the scheme will destroy beautiful landscape, increase carbon emissions, and greatly increase air and noise pollution. There is no guarantee that safety will be improved and value for money is poor. There is little enough unspoiled landscape in the UK without ruining what is left. This cottage was being left to future generations of our family, yet the environment which makes it so special may be destroyed for no good reason. We are living in a climate emergency and this scheme is completely inappropriate."</p>	<p>A full assessment of the likely significant environmental effects of the Project is provided within the Environmental Statement (Document Reference 3.2, APP-043 to APP-059) with mitigation proposals detailed within each topic assessment. The ES includes an assessment of the likely effects upon landscape, carbon, air quality and noise. Where significant effects have been identified mitigation measures have been proposed where practicable to reduce residual effects.</p> <p>The assessments and mitigation requirements have been used to develop the principles set out in the Environmental Management Plan (Document Reference 2.7, APP-019) and Project Design Principles (Document Reference 5.11, APP-302) to manage construction and operation related impacts, which will be included in Examination as part of the DCO submission and will become a certified document.</p> <p>National Highways notes that a climate emergency was declared by the UK Parliament in the House of Commons on 01 May 2019. National Highways</p>

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
			<p>considers climate change to be a very important issue, and as such has conducted a thorough assessment of the impact of the Project on climate change. The Project will not materially impact on the ability of the Government to meet its carbon reduction plan targets and Carbon Budgets as reported in Section 7.11 of the Environmental Statement Chapter 7: Climate (Document Reference 3.2, APP-050).</p> <p>National Highways also notes paragraph 5.17 of the National Policy Statement for National Networks (NPSNN) which states that it is “very unlikely that a road project will in isolation affect the ability of Government to meet its carbon reduction plans”. In the context of the Project, we agree with that statement and that this Project is assessed and demonstrated to be compliant with policy</p>
<p>Stephen Hammersley, RR-006</p> <p>Susan Hammersley, RR-224</p>	<p>Population and Human Health</p>	<p>“I am involved as a volunteer and funder of the community farm being established at Dyke Nook near Sandford. The plans as I understand them have not taken into account the views of local people that are also objectively true that the route with the least environmental impact lies further to the North, this route would also have the least negative impact on community life including on the community farm</p> <p>I am a stakeholder in the Dyke Nook Community Farm. The planned route will take sufficient of</p>	<p>National Highways need to promote a route that minimises the impact of and potential damage to the North Pennines Area of Outstanding Natural Beauty (AONB), which is protected as a nationally designated site by legislation and policy. One of the key considerations in the design development work for Appleby to Brough has been to ensure that the design of the route alignment minimises the impact of and potential damage to the AONB. There are two key sets of policy tests to be addressed for such developments that need an incursion into the AONB; notably those applicable to developments within the</p>

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
		<p>the community farm's land to seriously compromise its viability. The is a route further North that would be significantly less intrusive to local people including the farm. I do not think that local people's representations have been appropriately considered. Specifically, the land to the north may be designated ANOB, but it is only the path of the road that created that boundary where it is.”</p>	<p>boundary of such an area, and those applicable to developments outside such areas but that have an impact on them. As the preliminary design of the scheme developed it was found that elements of the Project could not be constructed, following the alignment of the Preferred Route, without some limited construction within the AONB. Alignments were then identified which would be in conformity with the key policy tests for the AONB and that would be suitable with respect to minimising or satisfactorily mitigating environmental impacts and meet the project objectives. The northern route being put forward would not conform with the key policy tests so was not considered.</p> <p>Regarding the alternatives taken forward, National Highways carried out a sifting exercise to compare the route options for the Appleby to Brough scheme. The details of the assessment can be found within the Project Development Overview Report (PDOR) (Document Reference 4.1, APP-244) section 5.5 'Appleby to Brough'. The comparison assessed the options on a range of criteria including environmental and landscape effects, safety, land take, demolition, geomorphology, impact on local businesses including farms and the economy, impact on communities and users, engineering, buildability and cost, carbon and conformity with the National Networks National Policy Statement including key policy tests and impacts on nationally</p>



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			<p>designated areas including Areas of Outstanding Natural Beauty (AONB) and cultural heritage. Conformity with the policy set out the National Networks National Policy Statement (NNNPS) is necessary when considering development outside the boundary of the AONB as they highlight that there is a need to have regard to the purpose of AONBs and avoid compromising this purpose when designing schemes which are outside of the designation, but which could lead to adverse effects within them. National Highways are therefore promoting a route with a minimal incursion into the AONB and MoD land to the north of the existing A66.</p>

### 3.3. Non-Statutory Organisations

Table 3-2 Response to Relevant Representations made by non-statutory organisations

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
Transport Action Network, RR-035	Case for the Project	The huge environmental harm and economic cost of the scheme cannot be justified as the Combined Modelling and Appraisal Report shows that the scheme has a Benefit	When considering value for money, the Project needs to be considered alongside all the benefits that it will bring. Chapter 4 the Case for the Project (Document Reference 2.2, APP-008) describes the current issues on the route:

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		<p>Cost Ratio of under one, which is classed as “poor” value for money by the DfT’s Value for Money Framework. This shows the scheme would cost more than it would ever deliver in benefits. The calculated emissions from constructing the scheme have been significantly reduced since the statutory consultation (down from 1.4 million tonnes to 518,562 tonnes). The methodology that the Applicant has adopted to minimise the carbon footprint from the construction of this scheme needs to be thoroughly scrutinised.</p>	<ul style="list-style-type: none"> <li>• Paragraphs 4.2.8 to 4.2.15 outline the current safety issues. In summary the A66 has a higher-than-average number of accidents across some lengths of the route, with a direct correlation between road accidents within the single carriageway lengths of the route and where dualled lengths meet or are reduced to single carriageway lengths.</li> <li>• Paragraphs 4.2.16 to 4.2.21 outline the issues caused by the single carriageway sections in terms of journey times and reliability.</li> <li>• Paragraphs 4.2.22 to 4.2.23 discuss the increased likelihood of road closures on the single carriageway sections.</li> <li>• Paragraph 4.2.24 to 4.2.27 discuss the issues of severance, notably within Kirkby Thore.</li> <li>• Paragraphs 4.2.28 to 4.38 discuss the importance of the route to Freight traffic, as highlighted by the fact that HGVs comprise on average 25% of total vehicles on most lengths significantly higher than on comparable roads of this nature.</li> </ul> <p>In summary, The A66 Project is about several factors including improving safety on a road which is well below standard, transforming East-West connectivity particularly for longer distance freight to/from the English/Scottish ports, and also supporting businesses and communities along the route particularly the tourism sector through providing a faster, safer and more reliable route.</p> <p>In response to these issues the Project Objectives have been developed, which are outlined in paragraph 1.7.10</p>

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
			<p>and Table 1-2 of the Case for the Project (Document Reference 2.2, APP-008).</p> <p>HM Treasury and The Department for Transport sets out guidance for valuing the costs and benefits through a project business case, through the 'Green Book' and TAG (Transport Analysis Guidance). The 'Green Book' is guidance issued by HM Treasury on how to appraise policies, programmes, and projects, while TAG is issued by the Department for Transport and provides information on the role of transport modelling and appraisal.</p> <p>Some of the costs and benefits can have a monetary value calculated and presented into a Benefit Cost Ratio ('BCR'), whilst other costs and benefits are valued qualitatively and described within the business case set out within the Case for the Project (Document Reference 2.2, APP-008). Table 5.4 of the document presents the monetised economic benefits the Project will bring. The principle monetisable benefits are Transport economic efficiency benefits of £521.1m; safety and accident benefits of £29.6m; and journey time reliability benefits £272.204m. The analysis that underpins this is contained within the Combined Modelling and Appraisal Report (Document Reference 3.8, APP-237).</p> <p>The BCR is just one component of the overall project business case and should be read alongside all the other impacts of the Project – this wider view of the Project is key to decision making, considering the various benefits which the Project presents. To this end, the way in which the proposals meet the project objectives is detailed within</p>

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			<p>Table 7-1 of the Case for the Project (Document Reference 2.2, APP-008).</p> <p>As the A66 Project develops, more information becomes available around the project costs, and the project benefits, so the Benefit Cost Ratio will be refined, as the project goes through its various development stages, which is normal and to be expected and occurs on all projects, as set out in the 'Green Book'.</p> <p>In advance of the next Department for Transport (DfT) approval stages of the business case National Highways is undertaking further development work to prepare the full business case. This includes for example, looking to update our valuation of the BCR (across costs and benefits) to reflect the latest project costs and applying latest data around safety, freight, the impact of the project on levelling-up, environmental impacts etc.</p> <p>Assessment of the potential effects of the Project on the Climate and any required mitigation is set out in Environmental Statement Chapter 7 (Document Reference 3.2, APP-050).</p> <p>Whilst the GHG assessment (Document Reference 3.4, APP-176) has identified an increase in GHG emissions, in the context of the overall UK GHG emissions the magnitude of the increase will not have a material impact on the Government meeting its carbon reduction targets.</p> <p>National Highways notes that a climate emergency was declared by the UK Parliament in the House of Commons on 01 May 2019. National Highways considers climate</p>

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			<p>change to be a very important issue, and as such has conducted a thorough assessment of the impact of the Scheme on climate change. The declarations made by the UK Parliament and EDCI do not give cause to alter the conclusions of the ES assessment and the Scheme will make an extremely limited contribution to the UK's carbon targets</p> <p>National Highways also notes paragraph 5.17 of the National Policy Statement for National Networks (NPSNN) which states that it is “very unlikely that a road project will in isolation affect the ability of Government to meet its carbon reduction plans”. In the context of the Project, we agree with that statement and that this Scheme is assessed and demonstrated to be such a policy compliant case</p> <p>As detailed design progresses opportunities will be sought through construction and design development to reduce the carbon requirement of the Project. Measures to reduce carbon are included within the Environmental Management Plan (Document Reference 2.7, APP-019), see D-CL-01 and MW-CL-01).</p>
Transport Action Network, RR-035	Climate	The proposed scheme would 1) increase traffic growth and carbon emissions by 2,190,452 tonnes over its lifetime; 2) increase emissions from its construction by at least an additional 518,562 tonnes, all within the critical fourth carbon budget	The Environmental Statement (ES) reports the assessment of the likelihood of significant effects on the environment (Document Reference 3.2, APP-043 to APP-059) and is underpinned by detailed assessments within separate appendices for each chapter. Impacts relating to carbon emissions have been reported within ES Chapter 7 Climate (Document Reference 3.2, APP-050).

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
		<p>when we need to achieve 68% reductions in UK carbon emissions by 2030 under our legally binding commitments under the Paris Agreement; 3) in total, increase emissions by 2,709,014 tonnes, taking us backwards on achieving net zero;</p>	<p>The assessment concludes no residual significant climate change risks for the Project, assuming the identified mitigation is incorporated into the design and operation of the Project effectively, nor will it materially impact on the ability of the Government to meet its carbon reduction plan targets and Carbon Budgets.</p> <p>National Highways also notes paragraph 5.17 of the National Policy Statement for National Networks (NPSNN) which states that it is “very unlikely that a road project will in isolation affect the ability of Government to meet its carbon reduction plans”. In the context of the Scheme, we agree with that statement and that this Scheme is assessed and demonstrated to be such a policy compliant case</p> <p>As detailed design progresses opportunities will be sought though construction and design development to reduce the carbon requirement of the Project. Measures to reduce carbon are included within the Environmental Management Plan (Document Reference 2.7, APP-019), see D-CL-01 and MW-CL-01).</p>
<p>Transport Action Network, RR-035</p>	<p>Biodiversity and BNG</p>	<p>The proposed scheme would 4) directly impact on the River Eden Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI), and the habitats of many endangered species;</p>	<p>Impacts upon the River Eden SAC are covered within Section 6.10 of Chapter 6 Biodiversity (Document Reference 3.2, APP-049). No significant effects upon the designated site are anticipated.</p> <p>The assessments and mitigation requirements have been used to develop the principles set out in the Environmental Management Plan (Document Reference 2.7, APP-019) to manage construction related impacts, which was submitted</p>

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			as part of the DCO application and would become a certified document, should the DCO be made.
Transport Action Network, RR-035	Landscape and Visual	The proposed scheme would 5) directly impact on the North Pennines Area of Outstanding Natural Beauty (AONB) and its setting.	<p>A full assessment of the environmental effects is provided within the Environmental Statement (Document Reference 3.2, APP-043 to APP-059) with mitigation proposals detailed within each topic assessment. I</p> <p>Impacts upon the North Pennines AONB and its setting are covered within Chapter 10 Landscape and Visual (Document Reference 3.2, APP-053).</p> <p>Section 10.10 of Chapter 10 Landscape and Visual states that the effects upon the North Pennines AONB for both construction and operation have been assessed as slight adverse (not significant). The Scheme sits on the southern boundary of the North Pennines AONB and is partially within the AONB and partially located outside but with potential to affect the setting of the AONB. As set out within the National Networks National Policy Statement (para. 5.151) "the SoS should refuse development consent in these areas except in exceptional circumstances and where it can be demonstrated that it is in the public interest..." There is an exceptional circumstance for construction within the AONB set out in the Case for the Project (Document Reference 2.2, APP-008).</p>
Transport Action Network, RR-035	Air Quality	6) air pollution and noise pollution which will have direct and indirect impacts on humans, the AONB, SAC, SSSI and species, and the Yorkshire Dales National Park;	A full assessment of the environmental effects is provided within the Environmental Statement (Document Reference 3.2, APP-043 to APP-059) with mitigation proposals detailed within each topic assessment. Impacts upon Air



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			<p>Quality are discussed within Chapter 5 (Document Reference 3.2, APP-048).</p> <p>Section 5.10 of the Environmental Statement (Document Reference 3.2, APP-048) states that there are no likely significant adverse effects during the construction or operation of the Project in relation to human receptors. Paragraphs 5.10.71 to 5.10.76 conclude that with best practice construction mitigation measures being implemented, the impact of construction dust on human health and designated habitats would be reduced to a negligible level.</p> <p>Chapter 13 Population and Human Health (Document 3.2, APP-056) provides an assessment of the potential impacts upon human health. During operation, the Project will affect local air quality due to changes in traffic flow, speed, and fleet composition. However, no health effects during construction or operation have been identified. Likely significant effects are reported in more detail in Section 13.10 and essential mitigation and enhancement measures are set out in Section 13.9.</p> <p>An assessment to determine the effect upon ecological habitats and ecological designated sites including SAC and SSSI is reported in Section 6.10 of Chapter 6 Biodiversity (Document Reference 3.2, APP-049). This concludes that there will be no likely significant effects at designated habitat sites. Paragraphs 6.10.5 – 6.10.81 report an assessment of construction impacts on designated sites. Further details can also be found in the</p>

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			<p>Habitats Regulation Assessment (Document Reference 3.5, APP-234).</p> <p>The assessment of effects from the operational phase are identified as being not significant. Paragraphs 6.10.315 to 6.10.466 report an assessment of operational effects on designated sites. Section 6.9 sets out the essential mitigation and enhancement measures proposed, with further details provided in the Environmental Mitigation Maps (Document Reference 2.8, APP-041) and the Environmental Management Plan (EMP) (Document Reference 2.7, APP-019).</p> <p>Potential indirect amenity effects relating to air quality (dust) associated with the movement of construction vehicles and construction works will be mitigated through considerate construction management, including the use of screening which is outlined in further detail within the EMP (Document Reference 2.7, APP-019) and Annex B13 of the EMP which provides an outline Construction Traffic Management Plan (CTMP) (Document Reference 2.7, APP-033).</p>
Transport Action Network, RR-035	Noise and Vibration	6) air pollution and noise pollution which will have direct and indirect impacts on humans, the AONB, SAC, SSSI and species, and the Yorkshire Dales National Park;	A full assessment of the environmental effects is provided within the Environmental Statement (Document 3.2, APP-043 to APP-059) with mitigation proposals detailed within each topic assessment. Impacts from Noise and Vibration are covered within Chapter 12 (Document Reference 3.2, APP-055) with likely significant effects reported within Section 12.10.

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			<p>Section 12.10 of Chapter 12 (Document Reference 3.2, APP-055) discusses the North Pennines AONB and notes that a proportion of the AONB is located within 600m of the Project. Paragraphs 12.10.108 and 12.10.125 state that no significant effects are reported during construction or operation. Likewise the Yorkshire Dales National Park will not be subject to any likely significant effects as reported in Section 10.10.113.</p> <p>Section 12.10 of the noise and vibration assessment identifies significant adverse effects on residential and non-residential receptors during construction. Significant adverse and beneficial effects are identified during operation. Section 12.9 sets out the essential mitigation and enhancement measures proposed.</p> <p>Chapter 13 Population and Human Health (Document 3.2, APP-056) provides an assessment of the potential impacts upon human health. During operation, the Project will affect levels of traffic noise from changes in traffic flow, speed and fleet composition. Some negative construction health effects have been identified. Likely significant effects are reported in more detail in Section 13.10 and essential mitigation and enhancement measures are set out in Section 13.9.</p> <p>An assessment to determine the effect upon ecological habitats is reported in Section 6.10. of Chapter 6 Biodiversity (Document Reference 3.2, APP-049). This concludes that there will be no likely significant effects at designated habitat sites. Paragraphs 6.10.5 – 6.10.81 report an assessment of construction impacts on</p>

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			<p>designated sites. The assessment of effects from the operational phase are identified as being not significant. Paragraphs 6.10.315 to 6.10.466 report an assessment of operational effects on designated sites</p> <p>Section 6.9 sets out the essential mitigation and enhancement measures proposed, with further details provided in the Environmental Mitigation Maps (Document Reference 2.8, APP-041) and the Environmental Management Plan (EMP) (Document Reference 2.7, APP-019).</p> <p>Potential indirect amenity effects relating to noise associated with the movement of construction vehicles and construction works will be mitigated through considerate construction management, including the use of screening which is outlined in further detail within the EMP (Document Reference 2.7, APP-019) and Annex B13 of the EMP which provides an outline Construction Traffic Management Plan (CTMP) (Document Reference 2.7, APP-033). The EMP contains a Noise and Vibration Management Plan (Annex B5) (Document Reference 2.7, APP-025), which includes relevant noise criteria, proposed surveys and a range of best practice measures associated with mitigation potential noise and vibration impacts.</p>
Transport Action Network, RR-035	Cultural Heritage	The proposed scheme would impact on heritage assets.	A full assessment of the likely significant effects from the Project on heritage assets is provided within Chapter 8 of the Environmental Statement (Document Reference 3.2, APP-051). The relevant mitigation measures are contained in Section 8.8, compliance with which would be secured by

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			<p>the DCO, should it be made, through the cultural heritage mitigation measures included within the Environmental Management Plan [REF] (EMP). With these mitigation measures in place, the Environmental Statement reports temporary and permanent moderate adverse residual effects within Section 8.9. A Detailed Heritage Mitigation Strategy is contained within the Environmental Management Plan (Document Reference 2.7, APP-023), which must be developed in further detail and approved by the Secretary of State as part of a second iteration EMP. Key project-wide and scheme-specific design principles relating to heritage assets are also set out within the Project Design Principles (Document Reference 5.11, APP-302).</p>
<p>Transport Action Network, RR-035</p>	<p>Population and Human Health</p>	<p>The proposed scheme would 7) increase severance of local communities and the rights of way network;</p>	<p>A full assessment of the environmental effects is provided within the Environmental Statement (Document Reference 3.2, APP-043 to APP-059) with mitigation proposals detailed within each topic assessment.</p> <p>Chapter 13 Population and Human Health (Document Reference 3.2, APP-056) assesses the direct impacts and effects of the Project in relation to severance and accessibility for local communities. The identification of severance and accessibility issues for community facilities and assets located within the study area are set out in Section 13.7. Section 13.9 explains the mitigation and enhancement measures that would be put in place to respond to severance and accessibility impacts. Severance during construction would be reduced through careful siting of construction compounds and lay down</p>

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			<p>areas and careful planning of construction activities through consultation with landowners and new temporary and permanent accesses where needed.</p> <p>Chapter 13 (Document Reference 3.2, APP-056) includes an assessment of Walking, Cyclist and Horse-rider provisions, with the likely significant effects reported within Section 13.10. Further details are provided in the Walking, Cycling and Horse-Riding Proposals (Document Reference 2.4, APP-010).</p> <p>Annex B6 (Document Reference 2.7, APP-026) of the EMP provides an extended essay plan of the Public Rights of Way (PRoW) Management Plan that will be further developed and implemented at construction stage. The plan will detail the proposed diversions and new routes before and during construction, which seek to mitigate impacts on the PRoW network. It will also set out a hierarchy of mitigation to help maintain access across the PRoW network during construction, for example through the use of appropriate signage, diversions and/or public liaison where necessary. The preparation and delivery of the detailed Public Rights of Way Management Plan will incorporate inputs from the local community through the appointed Public Liaison Officer.</p>
Transport Action Network, RR-035	Consultation and Engagement Process	We are also concerned about the secretive consultations, with the consultation documents not publicised and inaccessible unless you had been given the web link.	Public consultation and engagement has been a critical part of the preparation of the DCO application and has been underpinned by the Government's Consultation Principles. A large number of consultation events and engagement activities over a number of years have been

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		<p>This made it very difficult to fully assess the impacts of the scheme, and to comment.</p>	<p>undertaken to fully understand the concerns of the local communities and the wider public and where possible resolve their issues. The approach taken and how it accords with the legal requirements and government guidance is set out in the Consultation Report (Document Reference 4.4, APP-252). The SoCC compliance provided in Table 4.3 of the Consultation Report details how the statutory consultation was undertaken in compliance with the published SoCC, as per the requirements of section 47(7) of the PA 2008. This table provides details on how we ensured that the consultation material and events were accessible and well publicised in accordance with the SoCC. Some of the methods we implemented to ensure that the consultation was accessible and publicised, as set out in Table 4.3 are:</p> <ul style="list-style-type: none"> <li>• Holding 24 consultation events, along the route in locations accessible to local communities, such as Dalton &amp; Gayles Village Hall, Bowes Village Hall, and the Witham, Barnard Castle</li> <li>• Utilising a range of awareness-raising methods such as newspapers, social media, posters and leaflets. This included flyer notification to those living within 5km of the Project centreline, this equated to over 47,000 addresses, posters shared in local community facilities, such as Bowes Post Office, several locations in Barnard Castle, Mainsgill Farm, Richmond Theatre Royal, Richmond Library, Richmond Post Office, to name a few;</li> <li>• Use of organic and paid for adverts (including social media and at service stations covered by the DST</li> </ul>



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			<p>distribution, such as Leeming Bar and Scotch Corner services</p> <ul style="list-style-type: none"> <li>• Using posters and leaflets publicity at community facilities and hubs that seldom heard groups may frequent. For example, we shared posters and leaflets with several tourist centres such as Appleby Tourist Information Centre, Penrith Tourist Information Centre and Center Parcs.</li> <li>• Contacting key community group representatives for them to share information about the consultation with their wider network.</li> </ul> <p>Ensuring our phone number and email address are available on materials for those who may find have questions or find it difficult to submit comments. Further to statutory consultation for the project supplementary consultation was also undertaken with respect of proposed design changes in specific parts of the route as set out in Table 7.1 of the Consultation Report (Document Reference 4.4, APP-252). The supplementary consultation targeted those parties affected by the design changes to ensure statutory consultees and local communities had the opportunity to provide feedback on the changes. The consultation documents were publicised and were made accessible to these parties, as set out in Section 7.4 of the Consultation Report (Document Reference 4.4, APP-252). The supplementary consultations were conducted in line with the principles of pre-application statutory consultation as set out in sections 41-50 of the Planning Act 2008 and principles and methods in the Project's Statement of</p>

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			<p>Community Consultation to the extent they were relevant for these supplementary consultations. Section 7.4 of the Consultation Report describes our approach to the supplementary consultation and Sections 7.5-7.10 describes in detail the approach and methods used for the supplementary consultation for each design change. Paragraph 7.4.3 confirms that “The consultation periods were considered proportionate to the scale of the proposed changes, the likely impact of the changes and the level of public interest. Phase 1 included multiple issues and statutory consultation with PILs under s42(1)(d) of the PA 2008, therefore requiring a minimum 28-day consultation period under s45 of the PA 2008. Phase 2 included consultation on multiple issues (including walking, cycling and horse riding, landforms and construction compounds) and Phase 3 was a single-issue consultation on the Brough Hill Fair site.”</p> <p>The Planning Inspectorate (by letter dated 19<sup>th</sup> July 2022) accepted the DCO application and in doing so has confirmed that the consultation undertaken accords with the requirements of the Planning Act (PA 2008) as set out in Chapter 2, Part 5 of PA 2008.</p>
Transport Action Network, RR-035	Development of the Project and Alternatives	Non-roadbuilding alternative options have not been properly assessed such as reducing speed limits and moving freight onto rail, or small-scale engineering solutions that increase safety.”	The Northern Trans-Pennine Routes Strategic Study (NTPRSS, Highways England, 2016) examined the case for improving connectivity across the Pennines in the north of England. This study considered potential improvements to transport options along both the A69 and A66/A685 corridors.

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			<p>However, as there is no direct rail alternative for passenger or freight movements along the A66 corridor, it was recognised that greater strategic benefits could be realised through full dualling of the A66 between M6 Junction 40 and A1(M) Junction 53 Scotch Corner, than a series of discrete, smaller-scale engineering interventions like what was taken forward for the A69 corridor (in addition to upgrades to the Hexham-Carlisle railway).</p> <p>The Project Development Overview Report (PDOR) (Document Reference 4.1, APP-244) provides further information on alternatives considered, to include non-roadbuilding options considered throughout the development of the Project (see Section 3.3), and the NTPRSS referenced above is included in the Appendices to this document (both the Stage 1 Report (Appendix 4 to the PDOR, APP-248) and the Stage 3 Summary Report, Appendix 5 to the PDOR (Document Reference 4.1, APP-249).</p> <p>In addition, the Case for the Project (Document Reference 2.2, APP-008) outlines the strategic need for the project at Section 1.7, noting that the existing A66 is a key national and regional strategic transport corridor carrying high levels of freight traffic as well as being an important route for tourism and connecting nearby communities. This document also considers the traffic case for the Project (Section 4), the economic case (Section 5) and the case for each scheme (Section 6).</p>

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			<p>To consider interventions such as Speed limits along the whole route, the issues that the Project is trying to resolve should be considered.</p> <p>Chapter 4 of Case for the Project (Document Reference 2.2, APP-008) describes the current issues on the route. In response to these issues the Project Objectives have been developed, which are outlined in paragraph 1.7.10 and Table 1-2.</p> <p>As discussed in Chapter 3.5, paragraphs 3.5.8 to 3.5.13 discuss the benefits of the Project on the local and national economy, namely that the Project improvements represent a significant opportunity to boost east-west connectivity (based on reduced overall journey times) and drive economic growth. Likewise, businesses that are dependent on the A66 for east-west connectivity will benefit from direct cost reductions, an improved environment for maintaining contact with their customers and suppliers, and the ability to access larger markets and different geographical areas. Application of route long speed limits would not meet this key objective as;</p> <ul style="list-style-type: none"> <li>• Journey times would not be improved as the speed limit on the 60mph sections would remain in force or be reduced.</li> <li>• As the single carriageway sections would remain, then there would be no beneficial impact arising from the reduced closure rate of dual carriageways compared to single carriageway sections.</li> </ul>

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			<p>On the single carriageway sections, traffic would not be segregated from oncoming traffic, therefore it is doubtful that the rate severity of the accidents that currently occur on the single carriageway sections would be reduced.</p>
<p>Transport for the North, RR-048</p>	<p>Design, Engineering and Construction</p>	<p>Urges that the design of the improvement maximises provision for Active Travel modes throughout the project and that provision is made for the inclusion of the infrastructure supporting use of zero emission electric and hydrogen vehicles.</p>	<p>National Highways have published a 'Net Zero Highways: our 2030 / 2040 / 2050 plan' which sets out how we will support making every journey on our network emission free. Road travel provides a convenient, low cost and practical way to deliver goods around the UK. With 79% of freight goods moved by road, Britain's roads are an integral part of our economy and wider transport system. It states that we have set an ambition for all of our customers to be travelling using net zero transport by 2050 in line with the UK Climate Change Act 2008. Our priorities are to help roll out solutions to decarbonise HGVs and support the uptake of pollution free vehicles. We will also continue our work integrating the Strategic Road Network with other transport modes, whilst working to improve the efficiency of the network. Significant Walking, Cycling and Horse-Riding (WCH) provision is included in the proposed A66 upgrade work, to facilitate and encourage sustainable transport and active travel. For further information please see the Walking, Cycling and Horse-riding Proposals (Document Reference 2.4, APP-010). and the Rights of Way and Access Plans (Document Reference 5.19, APP-342 to APP-349).</p>

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Transport for the North, RR-048	Design, Engineering and Construction  Environment and EMP	<p>It is critical that in taking forward the scheme into delivery the Department for Transport and National Highways continue to work with TfN and Local Transport Authorities so as to ensure a holistic view of the role of the Strategic Road Network in supporting an effective and integrated transport system, one that encompasses all travel modes using strategic and local networks. Such an approach is essential in order to ensure that the scheme makes a positive contribution towards providing better outcomes for transport users, the economy and the environment. TfN supports National Highways in its approach to engaging with stakeholders on the design of the A66 dualling and will leave detailed feedback on the local impact of the scheme proposals to local stakeholders, including the local authorities representing communities along the route.</p>	<p>Comments duly noted. National Highways will continue to engage with TfN and Local Transport Authorities on the design of the Project.</p> <p>Significant Walking, Cycling and Horse-Riding (WCH) provision is included in the proposed A66 upgrade work, to facilitate and encourage sustainable transport and active travel. For further information please see the Walking, Cycling and Horse-riding Proposals (Document Reference 2.4, APP-010).</p> <p>The Trans-Pennine Strategic Route Study carried out at PCF Stage 0 considered a number of different interventions for transport solutions across the Pennines, including non-highway modes, as set out in the Project Development Overview Report (Document Reference 4.1, APP-244). In respect of public transport, there is no existing rail line alternative to the A66 between Darlington and Penrith. The east and west coast lines provide strategic north-south rail links however the only east-west rail link in the north of England (north of the Leeds to Carlisle rail line) is the one between Newcastle and Carlisle.</p> <p>Paragraph 8.2.3 of the Case for the Scheme (Application Document 2.2, APP008) states that</p> <p>'The Project has been identified as the best option to meet the defined need and objectives, including the delivery of a comprehensive set of benefits. It offers an effective and deliverable solution to the key challenges of the A66 and delivers real benefits'.</p>

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			<p>The benefits identified include those around; safety, connectivity, the environment, the economy, tourism, community, capacity and increasing reliability.</p>
<p>Campaign for National Parks, RR-050</p>	<p>DCO - Policy Legislation and Guidance</p>	<p>The proposal fails to take account of the additional protections that apply in National Parks and Areas of Outstanding Natural Beauty (AONBs) and the duty that all public bodies have to take account of the potential effect of their decisions and activities on the statutory purposes for these areas, including activities undertaken outside their boundaries which may affect land within them.</p> <p>Creating extra capacity on the A66 to the east of the M6 would also lead to increased pressure to dual or widen non-dualled sections of the route to the west of the M6, within the Lake District National Park. The proposal is, therefore, incompatible with the long-established presumption against significant road widening or the building of new roads in National Parks and AONBs “unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs very significantly. Planning</p>	<p>The North Pennines Area of Outstanding Natural Beauty (AONB) designation border follows the existing A66 alignment. The National Planning Policy Statement states that construction within an AONB can only be undertaken where there are exceptional circumstance and where there is no viable alternative. It is acknowledged in the Preliminary Design in the DCO Application that construction within the AONB designated area is required in some locations within the Appleby to Brough scheme, and the case for Exceptional Circumstances is set out in the Case for the Project (Document Reference 2.2, APP-008).</p> <p>Impacts and proposed mitigation are detailed within ES Chapter 10 Landscape and Visual (Document Reference 3.2, APP-053) and underpinned by detailed assessments within separate appendices to ES Chapter 10.</p> <p>The consideration of effects upon the North Pennines AONB is specifically covered within Section 10.10 whereby the effect for both construction and operation has been assessed slight (not significant).</p>



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		<p>of the Strategic Road Network should encourage routes that avoid National Parks, the Broads and Areas of Outstanding Natural Beauty.” (paragraph 5.152, the National Policy Statement for National Networks). It is also incompatible with the general presumption against major development in National Parks and AONBs and the additional protection for the settings of these areas set out in the National Planning Policy Framework.</p>	
<p>Campaign for National Parks, RR-050</p>	<p>Case for the Project</p>	<p>National Highways own assessment makes it clear that the proposal represents extremely poor value for money with a benefit-cost ratio of less than 1 even before the current increased level of inflation is taken into account. This makes the scheme completely inappropriate during a time of constrained public resources and a cost-of-living crisis. The benefits clearly do not outweigh the costs very significantly as national policy requires for roadbuilding to even be considered in such a sensitive location</p>	<p>When considering value for money, the Project needs to be considered alongside all the benefits that it will bring. Chapter 4 the Case for the Project (Document Reference 2.2, APP-008) describes the current issues on the route:</p> <ul style="list-style-type: none"> <li>• Paragraphs 4.2.8 to 4.2.15 outline the current safety issues. In summary the A66 has a higher-than-average number of accidents across some lengths of the route, with a direct correlation between road accidents within the single carriageway lengths of the route and where dualled lengths meet or are reduced to single carriageway lengths.</li> <li>• Paragraphs 4.2.16 to 4.2.21 outline the issues caused by the single carriageway sections in terms of journey times and reliability.</li> </ul>

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			<ul style="list-style-type: none"> <li>• Paragraphs 4.2.22 to 4.2.23 discuss the increased likelihood of road closures on the single carriageway sections.</li> <li>• Paragraph 4.2.24 to 4.2.27 discuss the issues of severance, notably within Kirkby Thore.</li> <li>• Paragraphs 4.2.28 to 4.38 discuss the importance of the route to Freight traffic, as highlighted by the fact that HGVs comprise on average 25% of total vehicles on most lengths significantly higher than on comparable roads of this nature.</li> </ul> <p>In summary, The A66 Project is about a number of factors including improving safety on a road which is well below standard, transforming East-West connectivity particularly for longer distance freight to/from the English/Scottish ports, and also supporting businesses and communities along the route particularly the tourism sector through providing a faster, safer and more reliable route.</p> <p>In response to these issues the Project Objectives have been developed, which are outlined in paragraph 1.7.10 and Table 1-2 of the Case for the Project (Document Reference 2.2, APP-008).</p> <p>HM Treasury and The Department for Transport sets out guidance for valuing the costs and benefits through a project business case, through the 'Green Book' and TAG (Transport Analysis Guidance). The 'Green Book' is guidance issued by HM Treasury on how to appraise policies, programmes and projects, while TAG is issued by</p>

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			<p>the Department for Transport and provides information on the role of transport modelling and appraisal.</p> <p>Some of the costs and benefits can have a monetary value calculated and presented into a Benefit Cost Ratio ('BCR'), whilst other costs and benefits are valued qualitatively and described within the business case set out within the Case for the Project (Document Reference 2.2, APP-008). Table 5.4 of the document presents the monetised economic benefits the Project will bring. The principle monetisable benefits are Transport economic efficiency benefits of £521.1m; safety and accident benefits of £29.6m; and journey time reliability benefits £272.204m. The analysis that underpins this is contained within the Combined Modelling and Appraisal Report (Document Reference 3.8, APP-237).</p> <p>The BCR is just one component of the overall project business case and should be read alongside all the other impacts of the Project – this wider view of the Project is key to decision making, taking into account the various benefits which the Project presents. To this end, the way in which the proposals meet the project objectives is detailed within Table 7-1 of the Case for the Project (Document Reference 2.2, APP-008).</p> <p>As the A66 Project develops, more information becomes available around the project costs, and the project benefits, so the Benefit Cost Ratio will be refined, as the project goes through its various development stages, which is</p>

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			<p>normal and to be expected and occurs on all projects, as set out in the 'Green Book'.</p> <p>In advance of the next Department for Transport (DfT) approval stages of the business case National Highways is undertaking further development work to prepare the full business case. This includes for example, looking to update our valuation of the BCR (across costs and benefits) to reflect the latest project costs and applying latest data around safety, freight, the impact of the project on levelling-up, environmental impacts etc.</p>
<p>Cross Lanes to Rokeby Community Liaison Group, RR-051</p>	<p>Population and Human Health</p>	<p>The proposed junction and route at the East end of the Cross Lanes to Rokeby section of the upgrade, the 'Black Route' does not recognise the harms it will impose on Startforth and the lower parts of Barnard Castle by increased traffic flow.</p>	<p>Chapter 13 Population and Human Health (Document Reference 3.2, APP-056) considers the potential impacts upon said receptors as a result of the Project. Section 13.8 and 13.10 outline the potential impacts and likely significant effects respectively. Where effects are likely to occur they have been reported within the Chapter. Specifically Human Health takes account of the in-combination effects upon human receptors from the air quality, noise and vibration and landscape and visual assessments. The Human Health assessment considers all of the aforementioned factors when considering the impact on local receptors.</p> <p>Potential effects in the area surrounding Barnard Castle have been reported within Section 13.10 and include detail on the increased traffic flows around Barnard Castle during construction which may lead to increased traffic flows through Barnard Castle. This will be monitored and action such as traffic calming measures will be taken as</p>

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			<p>necessary to discourage traffic. Any measures will be detailed in Environmental Management Plan Annex B13 Construction Traffic Management Plan (CTMP) (Document Reference 2.7, APP-033). In operation, it is expected that there will be reduced congestion along the A66 and A67 which is expected to improve connectivity between Barnard Castle and Bowes. It is also expected to encourage traffic to use the A66 instead of travelling through Barnard Castle which is expected to lead to a decrease in traffic and noise along Newgate Road and the A67 within Barnard Castle.</p>
<p>Cross Lanes to Rokeby Community Liaison Group, RR-051</p>	<p>Cultural Heritage Alternatives</p>	<p>The 'harms' to the historic assets of St Mary's Church, Rokeby Park and Garden by adopting the Blue Route' have been accepted without apparent question by National Highways.</p>	<p>Potential effects to St Mary's Church and Rokeby Park and Garden of the 'Blue Route' were assessed alongside the 'Black Route' and the results presented in the Preliminary Environmental Information Report at Statutory Consultation in Autumn 2021. Section 1.5.77 to 1.5.88 of Environmental Statement Chapter 3 Assessment of Alternatives (Document Reference 3.2, APP-046) summarises the outcomes of this assessment. Table 1-17 which compares the Rokeby junction arrangements with the Black alternative considered more preferable for multiple reasons including the fact that the Red alternative junction (which was the name for the alternative junction in this location at the time of the Preliminary Environmental Information Report assessment) would lead to non-compliance with NPSNN due to fragmentation of the Rokeby Park Registered Park and Garden (5.130, 5.131, 5.132) which could not be mitigated.</p>

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			<p>It was determined on balance by the Applicant that the 'black route' would be taken forward for further development and as such, no further work was undertaken on the 'blue route' following this decision. Further detail on the reasoning behind the selection of the route through the Cross Lanes to Rokeby scheme can be found in the Project Development Overview Report (Document Reference 4.1, APP-244).</p>
<p>Friends of the Lake District, RR-060</p>	<p>Case for the Project</p>	<p>The Benefit Cost Ratio (BCR) for the whole road is 0.92. This puts the A66 upgrade in the bottom 1% of value for money of all transport infrastructure projects assessed by the DfT 2015-2019.</p>	<p>When considering value for money, the Project needs to be considered alongside all the benefits that it will bring. Chapter 4 the Case for the Project (Document Reference 2.2, APP-008) describes the current issues on the route:</p> <ul style="list-style-type: none"> <li>• Paragraphs 4.2.8 to 4.2.15 outline the current safety issues. In summary the A66 has a higher-than-average number of accidents across some lengths of the route, with a direct correlation between road accidents within the single carriageway lengths of the route and where dualled lengths meet or are reduced to single carriageway lengths.</li> <li>• Paragraphs 4.2.16 to 4.2.21 outline the issues caused by the single carriageway sections in terms of journey times and reliability.</li> <li>• Paragraphs 4.2.22 to 4.2.23 discuss the increased likelihood of road closures on the single carriageway sections.</li> <li>• Paragraph 4.2.24 to 4.2.27 discuss the issues of severance, notably within Kirkby Thore.</li> </ul>

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			<ul style="list-style-type: none"> <li>Paragraphs 4.2.28 to 4.38 discuss the importance of the route to Freight traffic, as highlighted by the fact that HGVs comprise on average 25% of total vehicles on most lengths significantly higher than on comparable roads of this nature.</li> </ul> <p>In summary, The A66 Project is about a number of factors including improving safety on a road which is well below standard, transforming East-West connectivity particularly for longer distance freight to/from the English/Scottish ports, and also supporting businesses and communities along the route particularly the tourism sector through providing a faster, safer and more reliable route.</p> <p>In response to these issues the Project Objectives have been developed, which are outlined in paragraph 1.7.10 and Table 1-2 of the Case for the Project (Document Reference 2.2, APP-008).</p> <p>HM Treasury and The Department for Transport sets out guidance for valuing the costs and benefits through a project business case, through the 'Green Book' and TAG (Transport Analysis Guidance). The 'Green Book' is guidance issued by HM Treasury on how to appraise policies, programmes and projects, while TAG is issued by the Department for Transport and provides information on the role of transport modelling and appraisal.</p> <p>Some of the costs and benefits can have a monetary value calculated and presented into a Benefit Cost Ratio ('BCR'), whilst other costs and benefits are valued qualitatively and described within the business case set out within the Case</p>



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			<p>for the Project (Document Reference 2.2, APP-008). Table 5.4 of the document presents the monetised economic benefits the Project will bring. The principle monetisable benefits are Transport economic efficiency benefits of £521.1m; safety and accident benefits of £29.6m; and journey time reliability benefits £272.204m. The analysis that underpins this is contained within the Combined Modelling and Appraisal Report (Document Reference 3.8, APP-237).</p> <p>The BCR is just one component of the overall project business case and should be read alongside all the other impacts of the Project – this wider view of the Project is key to decision making, taking into account the various benefits which the Project presents. To this end, the way in which the proposals meet the project objectives is detailed within Table 7-1 of the Case for the Project (Document Reference 2.2, APP-008).</p> <p>As the A66 Project develops, more information becomes available around the project costs, and the project benefits, so the Benefit Cost Ratio will be refined, as the project goes through its various development stages, which is normal and to be expected and occurs on all projects, as set out in the 'Green Book'.</p> <p>In advance of the next Department for Transport (DfT) approval stages of the business case National Highways is undertaking further development work to prepare the full business case. This includes for example, looking to update our valuation of the BCR (across costs and benefits) to reflect the latest project costs and applying</p>

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			latest data around safety, freight, the impact of the project on levelling-up, environmental impacts etc.
Friends of the Lake District, RR-060	Consultation and Engagement Process	FLD had no contact from National Highways/Highways England between 2018 and 2021 despite having previously been part of the stakeholder group. Minutes in Environmental Statement 3.4 Appendix 1.1 show that there were no non-statutory organisations involved in pre DCO consultation. It is concerning that the consultation process appears to have broken down.	<p>The Consultation Report (Document Reference 4.4, APP-252) describes the approach to and the outcomes from engagement and consultation on the Project. It describes the large number of consultation events and engagement activities over a number of years that have been undertaken to fully understand the concerns of the local communities and the wider public and where possible resolve their issues.</p> <p>This included a series of focus groups, which were established, and meetings were held at the Holiday Inn Scotch Corner in March 2019. The focus groups included the business and freight group, local authority group, emergency services group, environmental interest groups, Statutory Environmental Bodies (SEBs) and walkers, cyclists, and horse riders group. These focus groups gave the project team the opportunity to outline the proposed options and explore any local constraints and issues raised by members. The focus groups also had an opportunity to discuss the options consultation and stress test the proposed consultation materials prior to non-statutory options consultation.</p> <p>Friends of the Lake District were invited to be part of these Focus Groups (as confirmed in Table 2.1 of the Consultation Report) (Document Reference 4.4, APP-252).</p>

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			<p>We have also communicated directly with FLD, through correspondence (e.g. a letter sent in February 2022) to address their specific issues and concerns.</p> <p>The feedback from all parties, including FLD, we have consulted and engaged with on the proposed design of the project, its assessment and the proposed mitigation measures (as presented at statutory consultation and as part of the supplementary consultation) has informed the design for the DCO application. The process of how the consultation feedback has informed the design is set out in the Consultation Report (Document Reference 4.4, APP-252) with details on our response to each consultation issue set out in Annex N and P of the Consultation Report.</p> <p>The Planning Inspectorate (by letter dated 19th July 2022) has accepted the DCO application and in doing so has confirmed that the consultation undertaken accords with the requirements of the Planning Act (PA 2008) as set out in Chapter 2, Part 5 of PA 2008.</p>
Pennine National Trails Partnership, RR-084	Walking, cycling and horse riding (WCH)	There is no mention of the Pennine Bridleway Northern Extension in the aforementioned document, nor it's need to cross the A66. The Northern Extension was approved by the Secretary of State for the Environment, Transport and the Regions, but has not yet been implemented. As the route will carry pedestrians, cyclists and horse	<p>National Highways acknowledge that the Pennine Bridleway Northern Extension has been approved by the Secretary of State but is yet to be implemented. National Highways will seek to engage directly with Pennine National Trails Partnership in relation to details of this extension including the proposed timescales for its implementation with regard to the construction and operation of the Project.</p> <p>Annex B6 (Document Reference 2.7, APP-026) of the Environmental Management Plan provides an expanded</p>

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		<p>riders, a suitable grade-separated crossing is required, along with potential to link to existing or newly created bridleways/byways or minor roads to the north and south. The approved route of the Northern Extension did not consider the dualling of the A66, and utilised the only grade-separated crossing which was available at the time (at Coupland). This route is not ideal for a number of reasons, including the need for a substantial new bridge over the river Eden at Great Ormside. The dualling of the A66 provides an opportunity for the Northern Extension to utilise the existing river bridge at Sandford, and the proposed accommodation underpass near to Café 66 or the grade separated junction west of Warcop. Both of these grade separated crossings link to the east-west shared cycleway/footway on the north side of the carriageway. However:</p> <ul style="list-style-type: none"> <li>• The east-west shared cycleway/footway does not extend all the way to the Coupland Beck</li> </ul>	<p>essay plan of the Public Rights of Way Management Plan that will be further developed and implemented at construction stage. The plan will detail the proposed diversions and new routes before and during construction, which seek to mitigate impacts on the Public Rights of Way (PRoW) network. It will also set out a hierarchy of mitigation to help maintain access across the PRoW network during construction, for example through the use of appropriate signage, diversions and/or public liaison where necessary. The preparation and delivery of the detailed Public Rights of Way Management Plan will incorporate inputs from the local community through the appointed Public Liaison Officer.</p> <p>In addition to this the EMP provides an expanded essay plan for the Public Rights of Way Management Plan which sets out the operation mitigation for WCH and other users of rights of way/highway with public access.</p> <p>A parallel east west shared pedestrian and cycle route has been provided along all the route of the existing A66 which will provide a safer alternative than using the proposed A66 carriageway and associated junctions. In addition, following submission of our DCO application, we have had requests from the British Horse Society (BHS) to consider additional equestrian provision. These facilities are being considered across the whole project and will be developed and incorporated where possible.</p>

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		<p>underpass. Extending this to connect with the underpass would provide greater opportunity for connectivity of walking, cycling and horse riding routes. Especially, the opportunity for the Pennine Bridleway Northern Extension to use the Sandford bridge over the River Eden, and a new grade-separated crossing of the A66, and then connect up with the approved route northwards at Coupland.</p> <ul style="list-style-type: none"> <li>• The east-west shared cycleway/footway makes no mention of horse riders or mobility devices such as trampers. These user groups are just as valid, especially with the potential of a National Trail using the route in future. The east-west route should be designed as a truly multi-user corridor.</li> <li>• The design of the grade-separated crossing at Warcop only refers to pedestrians. With the future potential of carrying the Pennine Bridleway National Trail, this junction should be designed with horse riders and cyclists in mind.</li> </ul>	

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		<p>The junction will provide connectivity for these users from a minor road to the east-west shared cycleway/footway regardless of the future presence of the Pennine Bridleway.</p>	
<p>NFU North West, RR-126</p>	<p>DCO - Policy Legislation and Guidance</p>	<p>Loss of productive land when food security is climbing up the political agenda – concern has been expressed that the development could see a substantial loss of productive agricultural land at a time when food security is becoming increasingly important. The UK is currently around 60% self-sufficient in food and the importance of reducing our reliance on imported food has been demonstrated by the recent events in the Ukraine. Action needs to be taken to keep loss of good quality agricultural land to a minimum. A balance also needs to be struck between the loss of good agricultural land particularly when looking at environmental offset.</p>	<p>Chapter 13 Population and Human Health within the Environmental Statement (Document Reference 3.2, APP-056) includes an assessment of impacts upon agricultural land holdings. As part of the assessment process agricultural landowners were consulted in order to understand how their businesses operated and what the effect upon them would likely be. This has been factored into the assessment of likely significant effects.</p> <p>The dialogue will continue with land interests throughout the Examination and detailed design stages of the Project in order to minimise and mitigate impacts including those impacting the loss of good quality agricultural land as far as practicable.</p> <p>National Highways recognises that the Project may impact on businesses. Where this is the case, it will work with the relevant owners of the land affected to minimise disruption.</p>
<p>The Ramblers,</p>	<p>Walking, cycling and horse riding (WCH)</p>	<p>Scheme 03 rights of way and access plans sheet 1 &amp; draft DCO page 85. We want access to the Countess Pillar for walkers from the B6262</p>	<p>National Highways acknowledge the concern regarding access provision to the Countess Pillar. This change, if appropriate and feasible, can most likely be undertaken within the boundaries of the DCO application as there is</p>

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Penrith Group, RR-021		road. The existing access to Countess Pillar is from the B6262 near its junction with the A66, a point easily reached from Penrith on foot or cycling. The proposed access can only be used by motorists who have driven to the site of the former Llama Kharma café. A length of new footpath from the south side of the Brougham Accommodation Bridge, east to the Countess Pillar is needed. Otherwise walkers will only be able to reach the Pillar by walking on the verge of the A66 from the B6262 junction.	sufficient flexibility in most cases built into the DCO application to allow for this type of change. If feasible and appropriate the change would be secured through commitments in an appropriate written form, or through a legal agreement between National Highways and the relevant Interested Parties or Affected Persons. National Highways is continuing the engagement with stakeholder to resolve matters such as those relating to access to Countess Pillar through the examination of the DCO application.
The Ramblers, Penrith Group, RR-021	Legal	<p>Errors in some of the descriptions. Draft DCO page 96. A*, new cycleway, should read “in a generally south-easterly direction”, and cycleway is not shown with new right of way symbol (as it is for scheme 03).</p> <p>Draft DCO page 97. Bridleway 372024 has new route with letter B*, but this is not shown with the right of way symbol on plan sheet 1 and inset 3.</p>	<p>Thank you for your comments on the Rights of Way and Access Plans [Document Reference 5.9, APP-342 to APP-349 inclusive] and their corresponding provisions in Schedule 2 of the draft DCO [Document Reference 5.1, APP-285].</p> <p>It should be noted that many of the new walking, cycling and horse-riding routes that would be provided by the project are to be located within the bounds of another highway to be constructed or improved under the terms of the draft DCO. These are the routes that are identified on the Rights of Way and Access Plans with capital letter and an asterisk (e.g. Reference A*). As these routes would form part of another highway, and would not be highways in their own right, it is not appropriate for them to be</p>



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		<p>Draft DCO page 97. Footpath 372022. The descriptions of new paths D* &amp; F do not seem to make sense, though they are clearly shown on the plans.</p> <p>Draft DCO page 98. Footpaths 372013 &amp; 372014. The sections of new path (G* &amp; H*) under the Cringle Beck viaduct are not shown with the symbol for a new right of way on the plans.</p> <p>Draft DCO pages 98-9. Footpath 372021. The description for the new path (J* &amp; K*) does not fit what is shown on the plan, and again the symbol for the new route is not clear.</p> <p>Draft DCO pages 99-100. Footpath 372020. Should the symbol on the plan show right of way?</p> <p>Draft DCO page 102. Footpath 329001. The length to be closed should be reduced, as we need to retain the connection between the path and the new B1066 (existing A66). We assume this was intended, but is not mentioned in the draft DCO schedule or marked on the plan.</p>	<p>represented on the Rights of Way and Access Plans as a new public right of way. National Highways acknowledges the important role that these routes play in the overall provision within the Project for walking, cycling and horse-riding and has nonetheless chosen to indicate the extents of these routes on the Rights of Way and Access Plans and to describe them in Schedule 2 to the draft DCO. The general arrangement of the walking, cycling and horse riding routes, including those that are to be provided within the bounds of another highway, are indicated on the General Arrangement Drawings [Document Reference 2.5, APP-011 to APP-018] inclusive.</p> <p>In relation to each of the specific queries:</p> <ul style="list-style-type: none"> <li>• Reference A* page 96 of the draft DCO – Yes, thank you this description should read “in a generally south-easterly direction” and will be corrected in a future update of the draft DCO, which will be submitted to the ExA. For the reasons outlined above, it would not be appropriate to represent this route as a new public right of way on sheets 1 and 2 of the Rights of Way and Access Plans for Scheme 06 [APP-345] because it will be provided within the bounds of a highway to be constructed or improved (the A66).</li> <li>• Reference B* page 97 of the draft DCO - For the reasons outlined above, it would not be appropriate to represent this route as a new public right of way on sheet 1 of the Rights of Way and Access Plans for Scheme 06 [Document Reference 5.19, APP-345] because it will be</li> </ul>

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			<p>provided within the bounds of a highway to be constructed or improved (the A66).</p> <ul style="list-style-type: none"> <li>• References D* and F as mentioned on page 97 of the draft DCO – National Highways has reviewed the descriptions queried and is content that the descriptions of References D* and F (shown on sheet 2 of the Rights of Way and Access Plans for Scheme 06 [Document Reference 5.19, APP-345]) are adequate.</li> <li>• References G* and H* page 98 of the draft DCO - For the reasons outlined above, it would not be appropriate to represent this route as a new public right of way on sheet 3 of the Rights of Way and Access Plans for Scheme 06 [Document Reference 5.19, APP-345] because they will be provided within the bounds of a highway to be constructed or improved (the A66).</li> <li>• References J* and K* pages 98 and 99 of the draft DCO – For the reasons outlined above, it would not be appropriate to represent this route as a new public right of way on the Rights of Way and Access Plans because it will be provided within the bounds of a highway to be constructed or improved. National Highways has reviewed the descriptions queried and is content that the descriptions of References J* and K* (shown on sheet 3 of the Rights of Way and Access Plans for Scheme 06 [Document Reference 5.19, APP-345]) are adequate.</li> <li>• Reference O* as mentioned on page 99 and 100 of the draft DCO pages - For the reasons outlined above, it would not be appropriate to represent this route as a new public right of way on the Rights of Way and Access</li> </ul>

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			<p>Plans because it will be provided within the bounds of a highway to be constructed or improved (the A66).</p> <ul style="list-style-type: none"> <li>• Draft DCO page 102 in relation to the extent of stopping up of Footpath 329/001 – National Highways is satisfied that the extent of the proposed stopping up of Footpath 329/001 is appropriate. It should be noted that the provision of the new footway reference W* would preserve pedestrian connectivity with the A66 (to be de-trunked). For the reasons outlined above, it would not be appropriate to represent this route as a new public right of way on the Rights of Way and Access Plans because it will be provided within the bounds of a highway to be constructed or improved (the A66).</li> </ul>
The Ramblers, Penrith Group, RR-021	Walking, cycling and horse riding (WCH)	For all the other rights of way in Cumbria affected by the scheme, we have no objections to the proposed changes, subject to the comments below. For scheme 06 Appleby to Brough the routes of the new paths on the rights of way and access plans are hard to read, as the symbol for a new right of way seems to be missing in many cases, and there seem to errors in some of the descriptions.	Please see the response above for an explanation as to how new routes within the bounds of another highway to be constructed or improved under the draft DCO, if granted, are shown on the Rights of Way and Access Plans [Document Reference 5.19, APP-342 to APP-349 inclusive].
British Horse Society, RR-005	Equality Impact Assessment	The BHS would currently object to the DCO application submitted by National Highways on the grounds that equestrians are being	The provision for equestrians has been considered in the proposals and new sections of bridleways have been included where there are existing bridleway facilities to connect into, or where existing bridleways are required to

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		<p>marginalised in the scheme with walkers and cyclists being favoured. Throughout this scheme equestrians are excluded, the arguments for inclusivity of walkers and cyclists can be extended to equestrians using the mechanism of the Equality Duty. This is a form of discrimination, and the Equality Act 2010 created a Public Sector Equality Duty for organisations such as National Highways to provide equal opportunities for all, which means that an organisation needs a cogent reason for excluding equestrians.</p>	<p>be diverted. Please refer to the Walking, Cycling and Horse-riding Proposals (Document Reference 2.4, APP-010) which was submitted as part of the DCO application, for details of new WCH provision on the project. The full detail of impacts on routes for WCH's is provided in Environmental Statement Chapter 13 Population and Human Health (Document Reference 3.2, APP-056). These documents also outline on-going engagement with groups including the British Horse Society. Refer also to the Rights of Way and Access Plans (Document Reference 5.19, APP-343 to APP-349).</p> <p>Regarding the point made about exclusion of equestrians and Equality Duty, The Equality Act 2010 ('the Act') identifies nine protected characteristics. These are: age; disability, gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion; sex; and sexual orientation.</p> <p>Under Section 149 of the Equalities Act 2010, all public bodies are required to have due regard to the need to:</p> <ul style="list-style-type: none"> <li>• eliminate discrimination, harassment, victimisation and other conduct prohibited by the Act;</li> <li>• advance equality of opportunity between people who share a protected characteristics and people who do not; and</li> <li>• foster good relations between people who share a protected characteristic and people who do not.</li> </ul> <p>Walkers, cyclists and equestrians are not protected characteristic groups under the Equalities Act 2010.</p>

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			<p>National Highways has also produced an Equalities Impact Assessment (Document Reference 3.10, APP-243) to support National Highways in meeting its statutory requirements under the Public Sector Equality Duty (PSED), as set out in the Equality Act 2010</p>
<p>British Horse Society            North Yorkshire,            RR-012</p>	<p>Walking, cycling and horse riding (WCH)</p>	<p>Comments Relate to Scheme 09 Stephen Bank to Carkin Moor TR010062 Rights of Way and Access Plans - the comments are on behalf of the British Horse Society. The provision at Carkin Moor Farm as shown on Plan sheet 4 inset 2 is a difficult to interpret as it shows the bridleway north of the A66 stopped up but then with a flag to state new bridleway provision "N" , assuming all is correct with this depiction and a new bridleway is to be provided along the PMA to link to Warrener Lane then we accept the plans. The BHS supports the plans for the bridleway provisions as shown on this section (Stephen Bank to Carkin Moor) of the A66 upgrade project with the proviso stated above at Carkin Moor Farm. With regard to the Other sections of the proposed upgrade West of Stephen Bank to Carkin Moor representation will be</p>	<p>The Interested Party;s interpretation is correct in that the existing Bridleway 20.30/8/1 north of the A66 will be connected to Warrener Lane on the south of the A66 via a new Bridleway Underpass. National Highways acknowledges that the Interested Party is supportive of the proposals in this location. In relation to schemes to the west of Stephen Bank to Carkin Moor, we have received a Relative Representation from the British Horse Society which we have responded to in RR-005. It should be noted that new sections of bridleways have been considered where there are existing bridleway facilities to connect into. or where existing bridleways are required to be diverted.</p> <p>Please refer to 2.4 Walking, Cycling and Horse-riding (Document Reference 2.4, APP-010) proposals as part of the DCO application for details of new WCH provision on the project. The full detail of impacts on routes for WCH's is provided in 3.23 Environmental Statement Chapter 13 Population and Human Health (Document Reference 3.2, APP-056).</p> <p>National Highways has also produced and Equalities Impact Assessment (Document Reference 3.10, APP-243) to support National Highways in meeting its statutory requirements under the Public Sector Equality Duty</p>

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		<p>made by other persons on behalf of the British Horse Society, but I support their objection on the basis that cycleway/pedestrian provision only is being provided. Such exclusive provision this is discriminatory and against the Equalities Act, any new provision should be public bridleway status because this is an all purpose provision which includes walkers and cyclists and horse riders. The guidance from DEFRA is that all new provision should include all vulnerable road users (i.e. those not in a motor vehicle) as this gives full inclusion and is best value for money for the public purse.”</p>	<p>(PSED), as set out in the Equality Act 2010. The assessment is designed to ensure that projects do not discriminate against or disadvantage people, and also considers how equality can be advanced. It is not, however, clear at this stage from the representation made on what basis the Interested Party considers that the project is discriminatory.</p>
<p>Lake District National Park Authority, RR-055</p>	<p>Traffic and Transport</p>	<p>Lake District National Park Authority would like to register as an interested party in the A66 Northern Trans-Pennine Project Examination for the following reasons: a) The need for improved sustainable transport, particularly active travel connections along the route into the Lake District, and possible severance of routes from Penrith into the Lake District. b) Generation of increased traffic as a</p>	<p>a) Section 4.1 of Walking, Cycling and Horse-Riding Proposals (Document Reference 2.4, APP-010) provides details of the active travel routes proposed as part of the Project in the vicinity of Penrith. It should be noted that the existing Toucan crossings are to be retained on the M6 Junction 40 Roundabout, along with the existing shared cycle/footways running parallel to the local roads, as such no route between Penrith and the Lake District has been severed by the Project.                      b) Improving access to key tourist destinations, such as the Lake District National Park is identified as one of the</p>



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		<p>result of the scheme impacting on the Lake District, where there are already visitor traffic and parking issues, and leading to further development pressure within the National Park and World Heritage Site. In view of the development being within the setting of the Lake District World Heritage Site consideration could be made of whether a Heritage Impact Assessment for the infrastructure at the Western end of the route should be produced.</p>	<p>key benefits of the Project see Chapter 3.5, (Document Reference 2.2, APP-008 Case for the Project). Outputs from the Strategic Transport Model, as described in Chapter 4 of Combined Modelling and Appraisal Report, Document Reference 3.8 APP-237) has been interrogated to quantify the additional daily traffic that is anticipated as a result of the project. The model is considered the most appropriate tool to accurately undertake this task, as paragraph 4.3.1 of the report states 'The model has a focus on the area immediately affected by the Project, but it also covers the whole of Great Britain. It includes a representation of the road network and looks at where the demand for trips start and end.</p> <p>All traffic entering the park has been identified by summing the traffic on all roads crossing into the national park boundary between the A595 at Dalston in the north, and the A6 at Milnthorpe in the south.</p> <p>In 2019 in that area there were 49,700 modelled vehicle trips per direction per day. By 2044,</p> <ul style="list-style-type: none"> <li>• Without the Project in place this has increased by 33% to 66,100 modelled vehicle trips per direction per day due to background traffic growth.</li> <li>• With the Project in place there are an additional 350 trips compared to the without Project scenario forecast, which represents an increase of 0.5% in total trip making into the park. as a result of the Project.</li> </ul>



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			<p>The model does not provide any additional information about whether these additional trips are made by residents, or visitors.</p> <p>Compared to the 33% increase that is forecast to happen between 2019 and 2044 without the project, the additional 0.5% of traffic (or 350 trips) that will be added by the project and any resultant effect upon car parking is considered to be negligible.</p> <p>National Highways considers that the Cultural Heritage assessment reported in chapter (Document Reference 3.2, APP-051) provides an adequate assessment of impacts on heritage assets as a result of the Project.</p>
Lake District National Park Authority, RR-055	Environment and EMP	In view of the development being within the setting of the Lake District World Heritage Site consideration could be made of whether a Heritage Impact Assessment for the infrastructure at the Western end of the route should be produced.	The Lake District World Heritage Site is situated more than 2km at its closest point to the Project. Chapter 8 Cultural Heritage (Document Reference 3.2, APP-051) utilises a 1km study area and therefore the designation lies outside of the scope of study, and it is considered that there would not be any significant effects upon the site from a Heritage perspective. The study area was agreed upon with Historic England as part of the statutory consultation process and is detailed within the EIA Scoping Opinion (Document Reference 3.4, APP-149).
Sport England, RR-116	Population and Human Health Design, engineering and construction	Sport England OBJECTS to the land take, temporary and permanent from playing field sites including: Ullswater Community College, Penrith. Loss of part of playing field to facilitate a slip road to the new Kemplay Bank	The permanent land required to construct and operate the scheme is considered to be reasonable and has been determined through multidisciplinary design and assessment, including engineering and environmental considerations, as described in the Project Development Overview Report (Document Reference 4.1, APP-244) and

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		<p>Roundabout. It's not certain if the red edged site includes permanent or temporary loss of playing field land. This site affects a rugby pitch and it's not clear if ball stop fencing is proposed to prevent balls landing on the A66</p> <p>From the scale of the project it is not clear precisely what the impacts will be permanent or temporary. Its not clear if the land within the Order limits will be planted with trees or if access is needed for access during construction. If trees are planted on the playing field, playing field land will be lost without mitigation for loss"</p> <p>"Wetheriggs Country Park, Penrith. Paragraph 13.7.12 advises that "approximately 0.74 ha of this greenspace is located within the Order Limits, which is approximately 14.7% of the Park".</p> <p>Kirkby Thore Primary School. The documents refer to "Temporary land take of approximately 0.15ha, or 35%, of the schools outdoor playing field to facilitate a utility diversion. No alternative provisions will be provided during construction. The</p>	<p>Environmental Statement (Document Reference 3.2, APP 044-059). Chapter 13 (Population and Human Health) of the ES (Document Reference 3.2, APP-056) has assessed the impact of the Project on Ullswater Community College Rugby Field. The ES (Chapter 13 – paragraph 13.9.20) identifies that 0.9 hectares of replacement land is required to comply with section 131 of the Planning Act for the loss of land at Wetheriggs Country Park and at Ullswater Community College Rugby Field. Chapter 13 goes on to describe that "the Rugby field itself is not affected and suitable spectator areas are maintained." The ES (paragraph 13.10.59) identifies only one construction related temporary indirect minor adverse impact on the Rugby Field due to construction phase works including dust, noise and vibration and landscape impacts. The ES concludes that the effect will be of moderate significance and states that good design will ensure ongoing access to facilities and mitigation measures identified within the EMP (Document Reference 2.7, APP-019 to APP-040) will ensure that construction would not lead to any significant effects on the identified community assets over and above the moderate effect reported.</p> <p>In conclusion there is no loss of land from the Rugby Pitch and the functioning and use of the Rugby Pitch will not be affected by temporary possession or acquisition of land. Open space that the Rugby Pitch is located within (but is not part of the playable area of the Pitch) is required both permanently and temporarily, as shown on the Special Category Crown Land Plans Scheme 01/02 M6 Junction</p>

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		<p>playing field will be reinstated to existing condition upon completion of the works.” Sport England is concerned about the scale of works, uncertain time period over which the playing field would be out of use with no mitigation for loss and is also concerned about the quality of reinstatement of the playing field.</p> <p>MOD Playing Field at Warcop. Paragraph 13.9.18 advises of “loss of the Ministry of Defence playing field and helipad. Relocation of them will be provided to the south of the scheme, located off Castlehill Road. This site is likely to include a parking area, pavilion and storage shed; however, the details are still to be confirmed with the Ministry of Defence. The replacement facilities will be fully operational before the closure of the existing provisions due to the potential use as an emergency services helipad.” Sport England made detailed comments and explained a likely objection about the replacement playing field and ancillary facilities and welcomes further consultation when the details</p>	<p>40 to Kemplay Bank (Document Reference 5.15, APP-314). Page 4 of the Plans reference the land nearest to the Rugby Pitch running parallel to the Highway as 0102-02-21, where temporary possession is required and land further away from the Rugby Pitch which is a landscaped strip of land adjoining the Highway is referenced as 0102-02-22 where permanent acquisition is necessary. The Statement of Reason (Document Reference 5.8, APP 299) confirms that for the land nearest to the pitch where temporary possession is required during construction there is no requirement to provide replacement open space (paragraph 7.2.10). For the landscaped area that adjoins the highway the Statement of Reason (paragraph 7.2.10) confirms that replacement land will be provided – shown as plot 0102-02- 20 on page 4 of the Special Category Crown Land Plans Scheme 01/02 M6 Junction 40 to Kemplay Bank (APP-314).</p> <p>With regards to the provision of ball stop fencing, boundary treatments will be determined at the detailed design stage to ensure they are fit for purpose, taking into account the uses of land inside and outside of the highway. The Project is marginally closer to the playing fields than the existing route and will therefore not directly impact the land or surroundings of the playing fields as indicated on the DCO General Arrangement drawings (Document Reference 2.5, APP-011) and associated Land Plans (Document Reference 5.13, APP-304).</p>

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		<p>are available. Any replacement would need to comply with the NPPF paragraph 99</p>	<p>In relation to the land comprised in the Kirkby Thore Primary School playing field that is required for the Project; this is for overhead power cable diversion works over the adjacent road - Cross Street. It is anticipated that the impact and duration of works within the school grounds will be minimal, as confirmed in the Statement of Reasons (APP-299) that states at paragraph 7.2.17:</p> <p><i>“The land comprising part of the playing field is shown on the Land Plans and Special Category Land Plans as being subject to powers of compulsory acquisition. However, the purpose of this is to enable the Applicant to grant rights over the land for the benefit of the utility undertaker which owns and operates the existing overhead power lines which currently pass above the playing field, and which will continue to do so once the scheme is in place. As the use of the playing field itself will be unaffected, the Applicant does not propose to provide replacement land.”</i></p> <p>Mitigation planting is drafted in an illustrative manner on the Environmental Mitigation Maps (Document Reference 2.8, APP-041) including mitigation around Wetheriggs Park. This mitigation is based on a number of principles set out in the Environmental Statement Chapter 6: Biodiversity (Document Reference 3.2, APP-049) and Environmental Statement Chapter 10 Landscape and Visual (Document Reference 3.2, APP-053) and will develop as the design develops, taking into account the needs of the Project as well as intended land use following the Project.</p>

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			<p>Mitigation related to Wetheriggs Country Park is secured in the Project Design Principles (Document Reference 5.11, APP-302), specifically reference 0102.01 which requires specific planting arrangements to retain the existing setting and landscape</p> <p>National Highways will comply with the National Networks NPS (NNNPS), which is the primary policy for the determination of Highway NSIP Projects. The equivalent policy to paragraph 99 of the NPPF regarding the loss of playing fields is contained at paragraph 5.174 of the NNNPS. The legislation and policy compliance document (Document Reference 3.9, APP-242) describes how the Project complies with this policy as follows:</p> <p>“The loss of the playing pitch, taken together with the loss of a helipad on the same land, represents a major adverse impact, which would be significant. However, the embedded mitigation within the scheme design means that both the playing field and helipad will be relocated to the south of the scheme, off Castlehill Road. The replacement facilities will be fully operational before the closure of the existing provisions due to the potential use as an emergency services helipad. As such the residual impact will be no change which will be a neutral effect.”</p> <p>We are continuing to engage with Sport England on this issue.</p>
Sport England, RR-116	Drainage	This part of the proposal involves loss of part of the playing field, where it is not clear what impact this would	The playing area for the pitch is unaffected by the M6 Junction 40 to Kemplay Bank Scheme. Outfalls and connections from the pitch drainage may be impacted by

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		<p>have on pitch drainage, pitch markings or pitch safety margins; nor is it clear what scale of tree planting is proposed along the A<sup>^</sup> boundary.</p>	<p>the scheme and will be developed further at the detailed design stage with suitable mitigation measures implemented to ensure pitch drainage is maintained. The Environmental Management Plan [at Table 1-2 lists the commitments for consultation and provides assurance that detailed design for surface water drainage will be consulted on with the Environment Agency and the relevant local authorities. Reference D-RDWE-10 within the EMP states that any works that disturb drainage features, including land drainage, shall include necessary mitigation or reinstatement to ensure the features fulfil their original function and the baseline drainage conditions are maintained.</p> <p>Ecological mitigation is drafted in an illustrative manner on the Environmental Mitigation Maps (Document Reference 2.8, APP-041). This mitigation is based on a number of principles set out in the Environmental Statement Chapter 6: Biodiversity and will develop as the design develops, taking into account the needs of the Project as well as intended land use following the Project. (Document Reference 3.2, APP-049).</p> <p>For the location in question the planting will provide landscape integration as there are currently several mature trees along this boundary and it is more appropriate to enhance what is there. The existing trees should be retained with woodland / woodland edge mixes to enhance, adhering to LD117 planting design offsets, set out in the DCO application.</p>



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			The size and exact composition mix would be determined during detailed design.
Penrith and Eden Green Party, RR-227	Biodiversity and BNG  Climate	A66 Northern Trans-Pennine Project – concerns registered by Penrith and Eden Green Party The proposed dualling of the A66 between Penrith and Scotch Corner is a major road building operation that will result in massive increases in carbon emissions and loss of biodiversity at a time when we are facing catastrophic climate and ecological breakdown. This project is entirely inconsistent with the well-recognised need to dramatically reduce carbon emissions, to safeguard existing biodiversity, and to reinstate lost and damaged natural habitats both for carbon sequestration and to restore ecological integrity. We consider this to be a retrograde proposal that runs entirely counter to the need to create the infrastructure necessary a) to reduce the UK public's reliance on private motor vehicles and b) to transfer freight off roads and on to low carbon means of transport. Both these objectives are clearly necessary to achieve sustainable	<p>Paragraph 3.3 of the National Networks National Policy Statement (NNNPS) states that “in delivering new schemes, the Government expects applicants to avoid and mitigate environmental and social impacts in line with the principles set out in the NPPF and the Government’s planning guidance.”</p> <p>The Government’s detailed policy on environmental mitigations for developments is set out in Chapter 5 of the NNNPS.</p> <p>In response to NNNPS policies National Highways LD117 Landscape Design provides a list of eight environmental masterplan codes to summarise and illustrate the environmental mitigation. Four of these are utilised to show the types of land required for environmental mitigation, as shown on the Environmental Mitigation Maps (Document Reference 2.8, APP-041) and are listed below in no particular order:</p> <ol style="list-style-type: none"> <li>1. Landscape integration</li> <li>2. Nature conservation and biodiversity</li> <li>3. Visual amenity</li> <li>4. Visual screening</li> </ol> <p>Areas of habitat creation and replacement are principally within the third category (nature conservation and biodiversity) shown on the Environmental Mitigation Maps, although some of the landscape and visual mitigation also</p>



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		<p>transport policy; to meet the UK's legally mandated carbon budgets, reduce road congestion, improve air quality, increase public health and wellbeing, and to safeguard and restore biodiversity</p>	<p>shown on the maps can also function as habitat (hence has a dual function). The total area required for each type of habitat creation or replacement is outlined within Table 6-20 of the Chapter 6 Biodiversity within the Environmental Statement (Document Reference 3.2, APP-049). The size of the areas proposed for environmental mitigation is based upon the land required to effectively mitigate the species impacts, landscape and visual effects and habitat impacts and loss of the Project based on the assessment of the preliminary engineering design (which forms part of the DCO application).</p> <p>Impacts relating to carbon emissions have been assessed within ES Chapter 7 Climate (Document Reference 3.2, APP-050) and is underpinned by detailed assessments within separate appendices to ES Chapter 7. Table 7-24 of this Chapter compares estimated emissions to UK Carbon Budgets, section 7.11.24 noting that there is no significant effect as a result.</p> <p>The assessment concludes no residual significant climate change risks for the Project, assuming the identified mitigation is incorporated into the design and operation of the Project effectively nor will it materially impact on the ability of the Government to meet its carbon reduction plan targets and Carbon Budgets.</p> <p>Please refer to the Walking, Cycling and Horse-riding Proposals (Document Reference 2.4, APP-010) and the Rights of Way and Access Plans (Document Reference 5.19, APP-347) which sets out details of the proposed north-south and east-west connectivity for each of the</p>

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			<p>respective Schemes. These improvements proposed as part of the Project demonstrate our commitment to the principles described in <a href="#">National Highway's Customer Service Strategy</a> which sets out our ambition to support better end-to-end journeys by a variety of modes especially through improved links to local networks, including local and national active travel networks. Our Strategy sets out how we will facilitate better travel choice and improved safety through improvements to walking, cycling and horse-riding networks which cross or run adjacent to our Strategic Road Network, delivered in collaboration with a range of stakeholders and partners. Our Designated Funds Plan sets out how during the current RIS period we are investing £936 million to improve our road network and surroundings including walking, cycling and horse-rider routes via the Users and Communities theme. In RIS1 we invested in over 160 cycle routes and completed 62 schemes which improve integration with other transport infrastructure. In the longer term, through delivering out net-zero highways plan target for carbon neutral customer journeys by 2050, we will further improve opportunity for re-modelling journeys to alternative lower-carbon travel options, including investing in walking and cycling networks to support customers in having travel choice options, especially for shorter journeys.</p> <p>Regarding the transfer of longer distance journeys and freight to alternative modes, the Trans-Pennine Strategic Route Study carried out at PCF Stage 0 considered a</p>

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
			<p>number of different interventions for transport solutions across the Pennines, including non-highway modes, as set out in the Project Development Overview Report (Document Reference 4.1, APP-244). In respect of public transport, there is no existing rail line alternative to the A66 between Darlington and Penrith. The east and west coast lines provide strategic north-south rail links however the only east-west rail link in the north of England (north of the Leeds to Carlisle rail line) is the one between Newcastle and Carlisle.</p>
<p>Penrith and Eden Green Party, RR-227</p>	<p>Climate</p>	<p>increased traffic, especially of HGVs, and faster driving speeds that will cause significantly greater transport related emissions of carbon,</p> <ul style="list-style-type: none"> <li>considerable carbon emissions resulting from the construction process</li> </ul>	<p>Impacts relating to carbon emissions have been assessed within ES Chapter 7 Climate (Document Reference 3.2, APP-050) and is underpinned by detailed assessments within separate appendices to ES Chapter 7. Explanation of how traffic has been assessed for Carbon is set out in section 7.5.15 of this chapter.</p> <p>As detailed design progresses opportunities will be sought though construction and design development to reduce the carbon requirement of the Project. Measures to reduce carbon are included within the Environmental Management Plan (Document Reference 2.7, APP-019), see D-CL-01 and MW-CL-01).</p> <p>The assessment concludes that there are no residual significant climate change risks for the Project.</p> <p>This is assuming the identified mitigation is incorporated into the design and operation of the Project effectively nor will it materially impact on the ability of the Government to</p>

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
			meet its carbon reduction plan targets and Carbon Budgets.
Penrith and Eden Green Party, RR-227	Biodiversity and BNG	loss of important wildlife habitats such as mature hedgerows and trees that support a wide range of wildlife species including bats, badgers and rare and threatened bird species	<p>Impacts and proposed mitigation are detailed within ES Chapter 6 Biodiversity (Document Reference 3.2, APP-049) and underpinned by detailed assessments within separate appendices to ES Chapter 6.</p> <p>The environmental mitigation design has been developed to ensure mitigation is provided for impacts on protected species and replacement habitats are provided for those lost, achieving a minimum of no net loss. The design has been informed by the principles of habitat replacement (i.e. replacement ratios) set out in Defra Biodiversity Metric 2.0. Once the mitigation, arising from the Environmental Statement and Habitat Regulations Assessment, for protected species, landscape and visual effects and habitat impact and loss was developed and incorporated into the Project, the biodiversity metric 2.0 Metric was applied to the overall ecological and landscape mitigation requirements.</p> <p>Following the publication of BNG 3.1 the team are in the process of recalculating the BNG Metric output.</p>
Penrith and Eden Green Party, RR-227	Landscape and Visual	damage to the landscape and tranquillity of the North Pennines AONB.	Impacts on landscape and visual receptors and proposed mitigation measures are detailed within ES Chapter 10 Landscape and Visual (Document Reference 3.2, APP-053) and underpinned by detailed assessments within separate appendices to ES Chapter 10.

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
			<p>The consideration of effects upon the North Pennines AONB is specifically covered within Section 10.10 of Chapter 10, whereby the effect for both construction and operation has been assessed slight (not significant).</p>
<p>Penrith and Eden Green Party, RR-227</p>	<p>Case for the Project</p>	<p>National Highways' own evaluation of the project shows it is very poor value for money, costing more than the projected benefit – at a time of financial crisis ,</p>	<p>When considering value for money, the Project needs to be considered alongside all the benefits that it will bring. Chapter 4 the Case for the Project (Document Reference 2.2, APP-008) describes the current issues on the route:</p> <ul style="list-style-type: none"> <li>• Paragraphs 4.2.8 to 4.2.15 outline the current safety issues. In summary the A66 has a higher-than-average number of accidents across some lengths of the route, with a direct correlation between road accidents within the single carriageway lengths of the route and where dualled lengths meet or are reduced to single carriageway lengths.</li> <li>• Paragraphs 4.2.16 to 4.2.21 outline the issues caused by the single carriageway sections in terms of journey times and reliability.</li> <li>• Paragraphs 4.2.22 to 4.2.23 discuss the increased likelihood of road closures on the single carriageway sections.</li> <li>• Paragraph 4.2.24 to 4.2.27 discuss the issues of severance, notably within Kirkby Thore.</li> </ul> <p>Paragraphs 4.2.28 to 4.38 discuss the importance of the route to Freight traffic, as highlighted by the fact that HGVs comprise on average 25% of total vehicles on most lengths significantly higher than on comparable roads of this nature</p>

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
			<p>In advance of the next Department for Transport (DfT) approval stages of the business case National Highways is undertaking further development work to prepare the full business case. This includes for example, looking to update our valuation of the BCR (across costs and benefits) to reflect the latest project costs and applying latest data around safety, freight, the impact of the project on levelling-up, environmental impacts etc.</p>
<p>Penrith and Eden Green Party, RR-227</p>	<p>Development of the Project and Alternatives</p>	<p>In addition, it is apparent from the proponent's own evaluation that this project does not provide value for money to meet even its own stated objectives. And we can see no evidence that alternative measures have been explored to address the road safety issues that this proposal is supposed to address.</p> <p>The Department for Transport appears only to have considered dualling the whole stretch of road from Penrith to Scotch Corner and no alternative options have been presented to increase safety at accident hotspots through junction improvements, changes to routing for farm and local traffic, and lower speed limits</p>	<p>The Northern Trans-Pennine Routes Strategic Study (NTPRSS, Highways England, 2016) examined the case for improving connectivity across the Pennines in the north of England. This study considered potential improvements to both the A69 and A66/A685 corridors, including smaller-scale interventions such as junction upgrades or provision of local access routes.</p> <p>However, as there is no direct rail alternative for passenger or freight movements along the A66 corridor, it was recognised that greater strategic benefits could be realised through full dualling of the A66 between M6 Junction 40 and A1(M) Junction 53 Scotch Corner, than a series of discrete, smaller-scale engineering interventions like what was taken forward for the A69 corridor (in addition to upgrades to the Hexham-Carlisle railway).</p> <p>The Project Development Overview Report (PDOR) (Document Reference 4.1, APP-244) provides further information on alternatives considered, to include non-roadbuilding options considered throughout the development of the Project (see Section 3.3), and the</p>

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			<p>NTPRSS referenced above is included in the Appendices to this document (both the Stage 1 Report (Appendix 4 to the PDOR, APP-248) and the Stage 3 Summary Report (Appendix 5 to the PDOR, APP-249)).</p> <p>In addition, the Case for the Project (Document Reference 2.2, APP-008) outlines the strategic need for the project at Section 1.7, noting that the existing A66 is a key national and regional strategic transport corridor carrying high levels of freight traffic as well as being an important route for tourism and connecting nearby communities. This document also considers the traffic case for the Project (Section 4), the economic case (Section 5) and the case for each scheme (Section 6).</p>

### 3.4. Other Statutory Consultees

Table 3-3 Response to Relevant Representations made by other statutory consultees

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
UK Health Security Agency, RR-083	Air Quality	We are satisfied that the promoter will discuss all requirements for air quality and dust monitoring with the local authority and that a dust management plan will be prepared in due course. We would be grateful for clarification on the following point:	Adjustment factors were applied to the predicted road PM10 concentrations in the absence of any monitoring data within the study area with which to calculate a specific PM10 verification factor. The justification for the use of the adjustment factor is



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		<p>We note that no justifications were offered as to why adjustment factors applied to the predicted road NOx concentrations were also applied to the predicted road PM10 concentrations</p>	<p>that it ensured a precautionary approach for the modelling results in urban areas.</p> <p>For further detail of the approach used, see Environmental Statement Appendix 5.4 Air Quality Assessment Results (Document Reference 3.4, APP-153).</p>
<p>UK Health Security Agency, RR-083</p>	<p>Population and Human Health</p>	<p>The structure of Chapter 13 Population and human Health prevents a clear understanding of the findings of the assessment. The Chapter follows the EIA assessment process, rather than considering each of the 8 duelling schemes in turn supported by a route wide assessment. This leads to excessive repetition and prevents the assessment methodology to be followed easily and clearly for each community. It is noted that Chapter 13 is drafted with reference to LA112 and as such no assessment of significance is provided for human health. This does not conform to the requirements of the EIA Regulations and as such an assessment of significance will be required to form part of the ES. This follows recent PINS consideration of this aspect within the Secretary of State's (SoS) Scoping opinion for the National Highways M60/M62/M66 Simister Island scheme. Regulation 18 4(b) requires an ES to 'include the information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment'. In addition, Schedule 4 (5) requires a description of the likely significant effects of the development on the</p>	<ul style="list-style-type: none"> <li>• The human health assessment has considered the requirements of the EIA Regulations 2017, including the requirements relating to the assessment of significance as set out in Regulation 18 and Schedule 4.</li> <li>• Regulation 18(4)(b) states that 'An Environmental Statement must include the information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment'.</li> <li>• Schedule 4 sets out the information to be included in an Environmental Statement, which includes: 'A description of the forecasting methods or evidence used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.'</li> <li>• In line with Schedule 4, the technical difficulties preventing the meaningful prediction of significant effects on health outcomes are described in the ES (Section 13.4 Assessment Methodology)</li> </ul>

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
		<p>environment resulting from, inter alia: (d)the risks to human health, cultural heritage or the environment (for example due to accidents or disasters); The ES reports multiple conclusions of negative health effects, but no conclusion of their level of significance. This prevents an assessment of the adequacy of the proposed mitigation, particularly in relation to vulnerable populations, and does not aid decision making. Recommendation The ES must provide an assessment of significance for those health determinants scoped into the population and human health chapter. The population and human health assessment should draw upon the findings from other relevant chapters, including air quality and noise. As there is not a defined approach to the assessment of significance for population and human health, it is strongly advised that any proposed approach is agreed with OHID/UKHSA and the local Directors of Public Health.</p>	<p>(Document Reference 3.2, APP-056) as follows: 'There is no accepted definition of a significant health effect, nor any statutory framework to guide the reporting of significance for health effects.' On this basis, the following alternative approach is set out in the methodology and has been applied in the ES: 'The assessment follows the methodology set out in DMRB LA112, which provides a framework for assessing, mitigating and reporting the effects of highways projects on population and human health. This includes identifying likely changes to health determinants, considering the sensitivity of the receptor population and ascertaining the likely positive and negative effects on health outcomes. Health outcomes are reported as being positive, negative, neutral or uncertain, in line with DMRB LA112.'</p> <p>The assessment is thereby considered to provide the information reasonably required for reaching a reasoned conclusion on health effects and complies with the EIA Regulations, taking into account current knowledge and methods of assessment, which do not provide a sound basis for drawing conclusions on the significance of health outcomes.</p> <p>The assessment methodology also incorporates the findings of other relevant chapters such as air quality, noise and landscape and visual. This allows a comprehensive assessment of the project impacts upon the determinants of health.</p>

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
UK Health Security Agency, RR-083	Population and Human Health	<p>Temple Sowerby to Appleby Paragraph 13.10.50 reports that Kirkby Thore Primary School sports pitch will be temporarily required to facilitate the diversion of a utility and will be returned to its existing use upon completion of the diversion works. The temporary land take equates to approximately 0.15ha which is approximately 35% of the outdoor space available to the School. This represents a major adverse temporary impact on the very high sensitivity receptor, which will be a very large adverse significant effect. The population and human health chapter does not report any proposed mitigation, however, the EqIA reports that: 'No alternative provisions will be provided during construction of the utility diversion. Works will be planned to be outwith the school opening hours. The playing field will be reinstated to its existing condition upon completion of the works. The replacement lines will be higher than the current provision, thus increasing the vertical clearance above the school playing field.'</p> <p>Recommendation The ES should assess the option to complete works outside of term time to minimise disruption to the school activities and use of the outdoor space. If this is not possible this should be justified and the ES should report on whether the outside space can be utilised during school opening times.</p>	<p>Chapter 13 Population and Human Health of the Environmental Statement (ES) (Document Reference 3.2, APP-056) refers to mitigation outlined within the Environmental Management Plan (EMP). The EMP (Document Reference 2.7, APP-019) provides a list of measures that will be implemented during the construction stage one of which is the following:</p> <p><i>All works to be undertaken within the grounds of Kirkby Thore School (specifically associated with the diversion of overhead power lines) shall be undertaken outside of school opening hours. The contractor shall liaise closely with the school regarding any required works.</i></p> <p>This has been factored into the assessment of significant effects. At the time of writing it was not known how the facility operates outside of opening times and school holidays (i.e. half term holiday camps), however this opening was considered and the ES therefore concluded that there would be a major adverse temporary impact until completion of the works.</p>

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
National Grid, RR-053	Legal	<p>This relevant representation is submitted on behalf of NGET in respect of the Project, and in particular with regard to NGET's infrastructure and land which is within or in close proximity to the proposed Order Limits. NGET will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus. NGET's rights of access to inspect, maintain, renew and repair such apparatus must also be maintained at all times and access to inspect and maintain such apparatus must not be restricted. Further, where National Highways (the "Promoter") intends to acquire land or rights, or interfere with any of NGET's interests in land or NGET's apparatus, NGET will require appropriate protection and further discussion is required on the impact to its apparatus and rights. Further detail is set out below. NGET infrastructure within/in close proximity to the proposed Order Limits - NGET owns or operates the following infrastructure within or in close proximity to the proposed Order Limits for the Project: high voltage 400kV electricity overhead transmission line Harker to Hutton 1 and 2, including tower and span number ZX117R. The overhead line, including tower number ZX117R, forms an essential part of the electricity transmission network in England and Wales. NGET is working with the Promoter with regards to concerns about the close proximity of tower number ZX117R to the new shared cycle track and private means of access (Work No. 03-7A) and</p>	<p>Protective provisions for the protection of National Grid Electricity Transmission plc (NGET) have been included in Part 3 of Schedule 9 to the draft Development Consent Order (Document Reference 5.1, APP-285). The Applicant is liaising with NGET in relation to these protective provisions and any related side agreement. The protective provisions and side agreement will cover all of the matters that NGET has raised in its representation including compliance with relevant standards, rights of access and compulsory acquisition powers. The protective provisions ensure that NGET's interests are adequately protected and there will be no serious detriment to NGET's undertaking.</p> <p>The Applicant is confident that agreement with NGET will be reached prior to the close of the Examination.</p>

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
		<p>highway boundary to be constructed as part of the Project. NGET is also working with the Promoter to further understand the clearance associated with the embankments to be located beneath the overhead line. NGET wishes to explore with the Promoter the access arrangements to tower number ZX117R both during and after construction of the Project and the securing of all necessary new land and access rights in this regard. Protection of NGET Assets - As a responsible statutory undertaker, NGET's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. As such, NGET has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the Order Limits of the proposed Project. As noted, NGET's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the Order limits should be maintained at all times and access to inspect and maintain such apparatus must not be restricted. NGET will require protective provisions to be included within the draft Development Consent Order for the Project to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards. NGET is liaising with the Promoter in relation to such protective provisions, along with any supplementary agreements which may be required. NGET requests that the Promoter continues to engage with it to provide explanation and</p>	

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
		<p>reassurances as to how the Promoter's works pursuant to the Order (if made) will ensure protection for those NGET assets which will remain in situ, along with facilitating all future access and other rights as are necessary to allow NGET to properly discharge its statutory obligations. NGET will continue to liaise with the Promoter in this regard with a view to concluding matters as soon as possible during the DCO Examination and will keep the Examining Authority updated in relation to these discussions. Compulsory Acquisition Powers in respect of the Project - As noted, where the Promoter intends to acquire land or rights, or interfere with any of NGET's interests in land, NGET will require further discussion with the Promoter. Further representations - NGET reserves the right to make further representations as part of the Examination process but in the meantime will continue to liaise with the Promoter with a view to reaching a satisfactory agreement</p>	



### 3.5. Parish Councils

Table 3-5: Response to Relevant Representations made by parish councils

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
Rokeby, Brignall and Egglestone Abbey Parish Council, RR-206	<p>Development of the Project and Alternatives</p> <p>Cultural Heritage</p> <p>Landscape and visual</p>	<p>The exposed and imposing Rokeby junction on the Black route, although avoiding the listed Rokeby Park, places the underpass and associated junction at 190m above sea level and will break the current road 'corridor' along the line of the A66 West of St Mary's Church. The junction will change permanently the views of St Mary's to and from the West and South. The Blue route junction although only 500m to the East of the Black is 30m lower and its junction appears to require less land for the junction. We would contend that any harms to the broad visual character around St Mary's Church would more significantly be harmed by the Black route junction as this at a higher elevation would permanently impact on the views to and from the Church and its borrowed landscape. The Black route junction at Rokeby requires the loss of more productive farmland and a more complex junction than the Blue alternate. The Black route junction design simply imposes itself on the landscape and ignores topography and historic considerations.</p> <p>The proposed loss from the Blue route junction would be a block 30-50m (East/West) by 15m (North/South) of the Church Plantation 150m West of the current C165 junction. • None of the</p>	<p>It is acknowledged that there is no viable alternative in this location that avoids harm to the heritage designations in the area. The Black route was taken forward following Statutory Consultation for a number of reasons, including its avoidance of direct impacts on the Registered Parks and Garden, having regard to the requirements of current national planning policy. Policy required to be followed is set out in the Environmental Statement Chapter 8: Cultural Heritage (Document Reference 3.2, APP-051) Section 8.3.</p> <p>Registered Parks and Gardens is a statutory heritage designation which current policy and legislation requires Nationally Significant Infrastructure Projects such as the A66 NTP to give due regard to in terms of avoidance of impacts. Each designation is designated for its own reasons, however land take and severance from a designation is considered a significant effect.</p> <p>The Project must adhere to National Policy Statement for National Networks, which in section 5.131 states "When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State</p>



Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
		<p>35 listed structures within the listed extent of Rokeby Park or its environs would be directly affected by the Blue route proposal. • The Blue route junction will minimally impact the broader visual landscape in particular the tree line and tree canopy. The existing C165 doesn't break the visual connection and tree canopy between the walled Park and Church plantation and the Blue Route junction is similarly unlikely to break this connection. • There is no public path between Rokeby Park and St Marys through the Church Plantation, access to St Marys and its environs is only from the current A66. We would contend that any harms to the broad visual character around St Mary's Church would more significantly harmed by the Black route junction as this at a higher elevation would permanently impact on the views to and from the Church and its borrowed landscape. Both options present the same junction at Cross Lanes. We are in favour of the amended positioning of the link road between Moorhouse and Rutherford Lanes to the North of Cross Lanes Organics parallel to the existing A66 as it reduces the visual impact on Cross Lanes Organics and reduces the loss of farmland, increases the preservation of the wildlife habitat along Tutta Beck and is a simpler and cheaper construction</p>	<p>should give great weight to the asset's conversation; Substantial harm to or loss of designated assets of the highest significance, including; grade I and II* Registered Parks and Gardens should be wholly exceptional." As such according to current policy, for these sorts of impacts to be acceptable, an exceptional circumstances case would need to be demonstrated. Having had regard to this requirement, it was considered that a route having these sorts of impacts would likely be regarded as not according with national policy, having regard to various factors, including the fact that is a technically feasible alternative exists.</p> <p>The potential effects of the Project on St Mary's Church and its setting, is set out in the Environmental Statement Appendix 8.10 Impact Assessment Table (Document Reference 3.4, APP-187) and notes that while the views to the south will be altered, views towards the Rokeby Park will remain unchanged and traffic levels passing in front of the Church will be reduced. Environmental Statement Appendix 10.6 Schedule of Visual Effects (Document Reference 3.3, APP-202) Table 84 notes that there will be a large adverse effect on the view looking south from the Church of St Mary, however once the landscape planting is established by year 15, it is considered to not be a significant effect.</p>

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
			<p>The ES Volume 1 Chapter 8 'Cultural Heritage' (Document Reference 3.2, APP-051) presents an assessment of the alternative junction arrangements against applicable legislation and guidance, including testing against policy to understand the potential harm in terms of loss and setting to all heritage assets and particularly those with the highest significance such as Rokeby Park the Grade II* RPG. It was considered that the eastern junction alternative at Rokeby was likely to be considered as not conforming with national policy; refer to the Case for the Project and the Project Development Overview Report [REF]. National Highways acknowledges the support for the Cross lanes junction and linking Moorhouse Lane and Rutherford Lane.</p> <p>Further information on design development for the Cross Lanes to Rokeby scheme can be found in Section 5.7 of the Project Development Overview Report (PDOR) (Document Reference 4.1, APP-244). For information on the sifting exercise undertaken prior to Statutory Consultation, refer to Section 5.8 of the Route Development Report (Appendix 3 of the PDOR, APP-247).</p>

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
Rokeby, Brignall and Egglestone Abbey Parish Council, RR-206	Development of the Project and Alternatives  Traffic and transport	<p>The Black route traffic projections show an increase in traffic in Startforth and the lower areas of Barnard Castle which will have economic and environmental impacts. Increased traffic on that route along the Sills, the County Bridge, Bridgegate and The Bank will result in traffic congestion at the County Bridge lights, and consequentially through the rest of Barnard Castle. This will adversely affect the economy of Barnard Castle directly and indirectly through disruption for people living in and travelling through Teesdale to and from Bowes and the villages higher up the Dale. Highways England's own modelling shows a marked change in traffic flow into Barnard Castle from the Black route. In particular a large increase in traffic from the A66 into Barnard Castle using the B6277 into Startforth, along the Sills, over the County Bridge, Bridgegate and The Bank to the Butter Market. This will have negative economic and environmental air quality harms on Startforth and lower Barnard Castle. This route and therefore each vehicle journey will be 1.5miles longer than the current route into Barnard Castle via the C165 from Rokeby. The route for traffic continuing to use the Black route via the C165 to access Barnard Castle will be increased by 1.1 miles for each vehicle journey compared to the Blue route Walking, cycling and horse-riding The</p>	<p>Section 8.1.29 of (Document Reference 3.7, APP-236) Transport Assessment discusses the impact of the Project on 'The Sills' within Barnard Castle.</p> <p>While there is forecast to be an increase in traffic on the Sills (of 520 vehicles per day, which equates to less than 1 vehicle per minute across the day), the impact on Barnard Castle is one of a general reduction in traffic flow due to the lower flows on the A67, of around 400 vehicles AADT, including on Barnard Castle Bridge, (County Bridge), Bridgegate, the Bank and on Galgate within the town centre. This reduction on the A67 occurs due to the improved A66 attracting more longer distance east west traffic from the A67.</p> <p>The potential effects of the Project on Noise and Vibration are set out in the Environmental Statement Chapter 12 Noise and Vibration (Document Reference 3.2, APP-055). Figure 12.4 Opening Year Alignment Noise Difference (Document Reference 3.3, APP-115) shows the predicted change in noise level as a result of the Project.</p> <p>The potential effects of the Project on Air Quality are set out in the Environmental Statement Chapter 5: Air Quality (Document Reference 3.2, APP-048). This assessment is based on a model that predicts likely emissions based on the traffic model used for the Project, creating a study area</p>

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
		<p>Black route will impose for NMUs an extra 1.1 miles to all journeys compared to the Blue route. The main harms from the proposed Black route will be negative physical and mental health effects, acute ones from the increased risk of accidents between vehicles and pedestrians in Startforth and lower Barnard Castle and more chronic health effects from reductions in air quality, noise and disturbance. We would also like to challenge the harm that the Blue route would pose to Rokeby Park</p>	<p>that follows the Affected Road Network as per Section 5.6.12. Environmental Statement Chapter 13: Population and Human Health (Document Reference 3.2, APP-056) reports on potential effects of noise and Air Quality changes and their effects on people and communities, including those in Barnard Castle, reported in multiple sections.</p> <p>National Highways acknowledges that the distance for a 11.4 mile round trip to Barnard Castle will be increased for residents of Barningham will be increased by 1.4 miles or 12%, and that the distance for a round trip to Barnard Castle from Greta Bridge will be increased by 18%. However, this should be considered against the overall benefits of the Scheme, as discussed in Chapter 3.5 (Document Reference 2.2, APP-008) Case for the Project. In particular, Paragraphs 3.5.8 to 3.5.13 discuss the benefits of the Project on the local and national economy, namely that the Project improvements represent a significant opportunity to boost east-west connectivity (based on reduced overall journey times) and drive economic growth. Likewise, businesses that are dependent on the A66 for east-west connectivity will benefit from direct cost reductions, an improved environment for maintaining contact with their customers and suppliers, and the ability to access larger markets</p>

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
			<p>and different geographical areas. In addition, paragraph 3.5.2 states the safety benefits of the scheme, arising from the consistent standard of dual carriageway, will lead to less accidents. The main route into Barnard Castle will remain via the Rokeby Junction and the signage designed accordingly. Although the layout will result in a longer distance for traffic travelling from the east, our analysis shows that this route, when compared to a route via the Cross Lanes Junction, is shorter in terms of overall journey time, as traffic can flow more freely</p> <p>Both the black and blue options for Rokeby shown at the Autumn 2021 Consultation would have public benefits. Careful review has determined that the Black Route offers the better option for the scheme, as detailed within the Project Development Overview Report (Document Reference 4.1, APP-244).. Further detail relating this scheme is presented in the ES Chapter 3 Assessment of Alternatives (Document Reference 3.2, APP-046). 4.The Black Route proposed has emerged from these studies of alternative options as the preferred arrangement to address the problems on the existing A66 relating the scheme area and to deliver the Project objectives. This assessment considered various factors including environmental impacts, policy conformity, engineering considerations, the</p>

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
			<p>views of stakeholders and regard to consultation responses. The Case for the Project (Document Reference 2.2, APP-008) provides further details in this regard.</p> <p>The ES Volume 1 Chapter 8 'Cultural Heritage' (Document Reference 3.2, APP-051) presents an assessment of the alternative junction arrangements against applicable legislation and guidance, including testing against policy to understand the potential harm in terms of loss and setting to all heritage assets and particularly those with the highest significance such as Rokeby Park the Grade II* RPG. It was considered that the eastern junction alternative at Rokeby was likely to present an increased consenting risk as it is considered as not conforming with national policy; refer to the Case for the Project and the Project Development Overview Report for further information.</p>
Staindrop Parish Council, RR-070	Consultation and Engagement Process	Reiterates its disappointment that at consultation events, and in consultation materials, no information is provided, or could be provided on request, detailing any modelling about the impact of the proposed changes on the A688 and Staindrop village; because of this lack of information, the Parish Council is unable to offer a view.	A local traffic report formed part of the statutory consultation which provided information about the operational traffic assessments undertaken at that time. The report provided preliminary findings, and explained that the findings from modelling for the Project would be fully reported in Chapter 7 and Chapter 8 of the Transport Assessment (Document reference 3.7, APP-236) which

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		<p>The Parish Council also comments that the 'charge of £10,344' for paper copies of the application documents is by no means 'reasonable'."</p>	<p>accompanies the DCO application (as set out in the point below for RR-070-02).</p> <p>The cost of the application documents was based on the actual printing costs. Consultees were encouraged to inspect printed documents, that were available at designated points along the route, or to view the documents online as there was not only a monetary cost but also an environmental cost with printing the entire application documents.</p> <p>Following the acceptance of the DCO application, the application was available in hard copy at three inspection points:</p> <ul style="list-style-type: none"> <li>• at the A66NTP Hub – to be viewed by appointment;</li> <li>• Penrith Library; and</li> <li>• The Witham, Barnard Castle.</li> </ul>
<p>Staindrop Parish Council, RR-070</p>	<p>Traffic and Transport</p>	<p>The lack of modelling of traffic flow and volumes in the wider area is a flaw and should be addressed.</p>	<p>The traffic modelling undertaken in support of the Project is discussed in Detail within The Combined Modelling and Appraisal Report (Document Reference 3.8 APP-237).</p> <p>The A66 traffic Model has been used to support the Development Consent Order application for the Project. The model uses SATURN software and has been developed using the Northern Regional Transport model (developed by National Highways) which provides a starting point for the development of detailed scheme specific models</p>



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			<p>such as the A66 Project. The A66TM is a strategic model which extends across England, Scotland and Wales with an 'Area of Detailed Modelling' covering the north of England. The modelling process has been undertaken in line with the Department for Transport's (DfT) Transport Analysis Guidance (TAG) and agreed with National Highways' Transport Planning Group, and through consultation with Stakeholders.</p> <p>The A66 Transport Model is a variable demand model. This means that the model forecasts how the travel patterns in the area would change once the Project is built and provides additional road capacity along the Trans-Pennine route. These responses include changes to the frequency of making trips, the time of day at which those trips are made, the transport mode used and the destination of trips. The model then estimates the route they use, which provides information on how many vehicles are using each part of the road network and how long it takes to complete a journey.</p> <p>Staindrop Village is on the edge of the Affected Road Network (ARN) where the impacts of the Project are of a lower magnitude than those reported in Chapter 8 of (Document Reference 3.7 APP-236) Transport Assessment. The traffic modelling shows that with the Project the AADT</p>

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			<p>(Annual Average Daily Traffic) on the A688 through Staindrop will be reduced by 480 vehicles. This is because the improved (faster) A66 attracts more longer distance east west traffic from the A67 and A688 between Cumbria and County Durham.</p> <p>(Please note I could provide a diagram that shows further detail if this will help)</p> <p>Chapter 11 of Application document 3.7 Transport Assessment (Document Reference 3.7, APP-237) details the modelling undertaken of the Construction Scenarios. There are seven construction scenarios which have been modelled in the A66TM to derive the impacts on road users, based on the different construction phases / temporary traffic management arrangements that are proposed.</p> <p>The worst-case impact on Staindrop will be an increase in AADT of 700 vehicles due to the traffic management on the A66, and will occur in construction Scenario D. This is shown in Figure 13-18 in Appendix G2.</p> <p>We anticipate that this will be a worst case, as the following should be noted:</p> <p>Paragraph 11.7.4 states;</p> <p><i>“The impacts identified within this assessment will help inform the potential issues that may arise during construction such that mitigation can be</i></p>

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			<p><i>considered and implemented where possible. The project team will monitor the journey times on the A66 to ensure excessive delays are not occurring due to the works. If delays on the A66 are causing inappropriate local routes to be used then the project team will consider if any adjustments can be made to the TTM (Temporary Traffic Management) with the aim of reducing the delays.”</i></p> <p>Annex B13 of the Environmental Management Plan (EMP) (Document Reference 2.7, APP-033) provides an extended essay plan for the Construction Traffic Management Plan (CTMP) for the Project. It will be completed on an iterative basis by the Principal Contractor (PC) as the Project progresses through detailed design and will set out the Temporary Traffic Management (TTM) measures for implementation during the construction of the Project.</p>
Kirkby Thore Parish Council, RR-193	Consultation and Engagement process	Kirkby Thore Parish Council [KTPC] made detailed submissions about potential impacts of the road design during both A66 consultations. Some were acknowledged, but others have been dismissed, and others are not mentioned in the consultation report. We understood National Highways had accepted some other suggestions, but these do not appear on the current detailed design.	We have considered feedback from all parties, including Kirkby Thore Parish Council, throughout the consultation and engagement on the proposed design of the project, its assessment, and the proposed mitigation measures (as presented at statutory consultation and as part of the supplementary consultation). All have informed the design for the DCO application. The process of how the consultation feedback has informed the design is set out in the Consultation

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		<p>Anecdotally we understand this was due to landowner objections, which throughout the consultations appear to have been given greater weight than the acknowledged adverse effects the design will have on the village.</p> <p>1) Incomplete PEIR and other documentation during the formal consultations, so the effects of the different route options and designs on our local community and the environment could not be adequately considered or informed comment made. We were not included in the separate consultation on walking, cycling, landform and compounds.</p> <p>2) KTPCs repeated offers to work on the detailed proposals for road design visual impact, environmental, and recreation impacts were not accepted. In particular, KTPC's proposals in areas which are in closest proximity to the village were not taken on board.</p>	<p>Report (Document Reference 4.4, APP-275) with details on our responses to each consultation issue set out in Annex N and P. National Highways confirm that all the issues or all parties who formally responded to the statutory and supplementary consultations are captured in these Annexes, along with a specific response to the issues raised. We engaged by phone with the clerk of Kirkby Thore Parish Council to explain how the Consultation Report was set out and how to find their response. In some instances, during consultation, an issue was raised by more than one party and so we have addressed these together in a single response. National Highways acknowledges all submissions made by Kirkby Thore Parish Council and confirms that each has been given due regard. Furthermore, the design of the project will continue to evolve over the coming months as we enter the detailed design phase, and we will continue to liaise with the Parish Council through the Community Liaison Group.</p> <p>Following the statutory consultation process and ongoing engagement with stakeholders, changes to walking, cycling and horse-riding provisions and the location of construction compounds were proposed. These proposed design changes, as set out in Table 7.1 of the Consultation Report (Document Reference 4.4, APP-252), were</p>

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			<p>subject of a supplementary consultation. The supplementary consultation targeted those parties affected by the design changes (in the case of these specific changes landowners and local authorities were consulted) had the opportunity to provide feedback on the changes and for that to be taken into account in the final submission. The consultation documents were publicised and were made accessible to these parties, as set out in section 7.4 of the Consultation Report (Document Reference 4.4, APP-252). The supplementary consultations were conducted in line with the principles of pre-application statutory consultation as set out in the Planning Act 2008 (PA 2008) and principles and methods in the Project's Statement of Community Consultation (Document Reference 4.4, APP-259) to the extent they were relevant for these supplementary consultations.</p> <p>In 2020 Kirkby Thore Parish Council were approached to be part of the project's newly established community liaison group. Since then, members of the parish council have regularly sat on that group. In addition, members of the PC have regularly attended consultation and engagement events and engaged directly with the project team. In addition, the design lead and stakeholder lead met with the chair of the parish council in summer 2021 to address her concerns.</p>

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			<p>In relation to the provision of incomplete documentation in point 1 of the matter raised, the Preliminary Environmental Information Report (PEIR) described the project and alternatives considered along with the likely significant environmental effects of the project based on the preliminary information available at the time of its publication in September 2021. It recognised that some aspects of the design of the project were still under development.</p> <p>The Planning Inspectorate (by letter dated 19th July 2022) has accepted the DCO application and in doing so has confirmed that the consultation undertaken accords with the requirements of the Planning Act (PA 2008) as set out in Chapter 2, Part 5 of PA 2008.</p>
Kirkby Thore Parish Council, RR-193	Population and Human Health	<p>We are particularly concerned about the 70 households on Sanderson's Croft where many vulnerable and disadvantaged families live.</p> <p>The new road alignment means the village will be closely surrounded on three sides by a dual carriageway that carries very significant HGV traffic (27%). Whilst the current design is an improvement, there remain significant adverse impacts on a large part of the population and the environment which are not adequately mitigated.</p> <p>In particular, the design of the southern part of the main northern village junction immediately</p>	<p>Chapter 13 Population and Human Health within the Environmental Statement (Document Reference 3.2, APP-056) assess the potential impacts upon local communities.</p> <p>Sanderson Croft is considered within the Human Health assessment. During construction neutral effects upon Sanderson Croft are expected in relation to construction air quality impacts with temporary negative health effects as a result of localised construction disruption from lighting</p> <p>During operation Sanderson Croft, will experience adverse noise effects on 57 properties and there</p>

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		<p>adjacent to Sanderson's Croft could be changed to a motorway style junction without tightly curving slip roads. This junction is extremely close to a significant proportion of the population and a change could reduce impacts. The current compact junction and overbridge design will require rapid deceleration from 120kmh to 30kmh plus equal acceleration by the very large number of HGVs accessing the Gypsum works, with associated increased noise, pollution and headlight sweep.</p>	<p>will be adverse visual effects in this area during the early years of operation.</p> <p>As reported in Chapter 12 Noise and Vibration (Document Reference 3.2, APP-055) due to engineering constraints the noise barrier could not be designed to mitigate these residual effects, therefore the residual effects remain in relative noise assessment terms, at Sandersons Croft.</p> <p>However, these effects will lessen over time, as planting becomes established, and the community becomes used to the presence of the new bypass. This is assessed as a negative health effect in the early years of operation, reducing to neutral in year 15 of operation. This is of particular relevance for landscape and visual effects as mitigation planting will have established in time.</p> <p>The mitigation and monitoring required in relation to the issues raised will be secured through the Environmental Management Plan (Document Reference 2.7, APP-019). The landscape mitigation strategy is illustrated on Environmental Mitigation Maps (Document Reference 2.8, APP-041) which show the environmental mitigation strategy. The landscape planting design would include a range of measures designed to complement the local landscape character using species of local provenance with appropriate consideration of climate change resilient species.</p>



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			<p>Mitigation planting may also function as visual screening when it has become established and reaches a reasonable height</p> <p>The potential for increased headlight sweep and night sky pollution near the British Gypsum site has been accounted for in the Chapter 10 Landscape and Visual (Document Reference 3.2, APP-053) operational assessment, see 10.10.103. It is reported that there would be introduction of headlights into a new area, but the surrounding context of Kirkby Thore and British Gypsum existing lighting pollution would not cause a notable effect due to the proposed planting. Therefore, there would be no significant effects from lighting during the operational phases of the scheme.</p> <p>In regard to the potential for increased noise pollution close to British Gypsum site, three properties along Maiden Way which leads to British Gypsum were assessed. None were identified as being likely to experience significant noise and vibration effects (Document Reference 3.4, APP-215).</p>
Kirkby Thore Parish Council, RR-193	Environment and EMP	The new road alignment means the village will be closely surrounded on three sides by a dual carriageway that carries very significant HGV traffic (27%). Whilst the current design is an improvement, there remain significant adverse	The Environmental Statement (Document Reference 3.2, APP-044 to APP-059) assesses the Project and reports the likely significant effects. Across each of the technical assessments embedded and essential mitigation is reported in

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		<p>impacts on a large part of the population and the environment which are not adequately mitigated.</p>	<p>sub section 9 whilst likely significant effects are reported in subsection 10 of each chapter, and account for the mitigation measures outlined. Kirkby Thore has been assessed within the Temple Sowerby to Appleby scheme.</p> <p>Illustrative mitigation plans are set out on the Environmental Mitigation Maps (Document Reference 2.8, APP-041) and mitigation requirements are secured in the Environmental Management Plan (Document Reference 2.7, APP-019).</p> <p>Further information would be required regarding the specific concern in order to provide a more detailed response.</p>
<p>Long Marton Parish Council, RR-233</p>	<p>Population and Human Health</p> <p>Consultation and Engagement Process</p>	<p>The Parish Council wishes to make representation about the moving of the junction and the removal of the junction at Appleby. As the removal of the Appleby Junction has been totally removed we believe there a number of knock on effects for the community of Long Marton that we have not been able to express due to the timing of the changes. Furthermore we have not been able to comment on mitigation measures as these were not completed at the stages we were able to comment on</p>	<p>Chapter 13 Population and Human Health within the Environmental Statement (Document Reference 3.2, APP-056) assesses the potential impacts upon local communities and likely significant effects reported in Section 13.10. Further information would be required regarding the specific concern in order to provide a more detailed response.</p> <p>Long Marton Parish Council were engaged throughout the supplementary consultation in January 2022. A detailed briefing was also given to the Community Liaison Group (CLG) ahead of the consultation to explain the rationale for adding a full junction at Long Marton and removing</p>

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			<p>improvements at the Appleby junction. The local community was also leafleted on the proposals.</p> <p>National Highways also held an additional drop-in session in local venues to explain the changes at Long Marton and Appleby, which the local community were invited to. This was attended by the project team to answer questions.</p> <p>The decision to introduce a full junction at Long Marton came as a result of strong representations from several community and parish councils during our autumn consultation. The material in our Consultation Report (Document Reference 4.4, APP-252), explains in full why both junctions were not required.</p> <p>The rationale for the removal of the junction at Appleby from the design is detailed within Chapter 3 Assessment of Alternatives (Document Reference 3.2, APP-046). Table 1-11 details the environmental reasons for excluding the junction with the proposals for a junction performing adversely in comparison to a design without a junction across multiple criteria.</p>
Romaldkirk Parish Council, RR-014	Traffic and Transport	Having been advised of the forecasted increase in traffic travelling to/from Barnard Castle via the B6277/The Sills in Startforth and the Barnard Castle County Bridge, the Parish Council believes that this level of traffic is totally inappropriate and unacceptable for three specific	Chapter 8.1.29 of (Document Reference 3.7, APP-236) Transport Assessment discusses the impact of the Project on 'The Sills' within Barnard Castle. While there is forecast to be an increase in traffic on the Sills (of 520 vehicles per day,

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		<p>reasons: the increased risk to pedestrian safety, as pavements along The Sills are very narrow and passing heavy traffic leaves very little room for pedestrians; traffic queueing at the three-way traffic lights at the County Bridge already cause congestion and this will be exacerbated; and the impact of increased traffic crossing the historic and Listed County Bridge structure will be significant.”</p>	<p>which equates to less than 1 vehicle per minute across the day).</p> <p>The impact on Barnard Castle is one of a general reduction in traffic flow due to the lower flows on the A67, of around 400 vehicles AADT, including on Barnard Castle Bridge, and on Galgate within the town centre. This reduction on the A67 occurs due to the improved A66 attracting more longer distance east west traffic from the A67. Given that the total traffic approaching the traffic signals at Barnard Castle Bridge will reduce by 150 vehicles per day, there will be less queueing and congestion around the traffic signals as traffic will not need to wait as long for an opportunity to cross.</p> <p>When considering the need for interventions to improve road safety, STATS 19 is typically used to identify the severity of safety issues at locations where accidents frequently occur. The STATS19 dataset provides detailed road safety data about the circumstances of personal injury road collisions in Great Britain, the types of vehicles involved and the consequential casualties. The statistics relate only to personal injury collisions on public roads that are reported to the, and subsequently recorded, using the STATS19 collision reporting form. Studies generally look at data from the last 5 years, and older data is usually excluded to ensure only</p>

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			<p>current issues are identified. Within the last 5 years (2017-2021) there have been no recorded accidents on either the B6277 Moorhouse Lane or B6277 'the Sills'. The last recorded accident was a slight accident which occurred in 2010, and previous to this a further slight accident was recorded to have occurred in 2001. Given the existing safety record of the road, the absolute increase of 520 vehicles per day (or less than 1 vehicle per minute) there is no evidence to suggest that the Project will cause a substantial increase in Pedestrian safety issues at this location.</p>
Romaldkirk Parish Council, RR-014	Cultural Heritage	<p>Having been advised of the forecasted increase in traffic travelling to/from Barnard Castle via the B6277/The Sills in Startforth and the Barnard Castle County Bridge, the Parish Council believes that this level of traffic is totally inappropriate and unacceptable for three specific reasons: the increased risk to pedestrian safety, as pavements along The Sills are very narrow and passing heavy traffic leaves very little room for pedestrians; traffic queueing at the three-way traffic lights at the County Bridge already cause congestion and this will be exacerbated; and the impact of increased traffic crossing the historic and Listed County Bridge structure will be significant."</p>	<p>The study area of the Cultural Heritage assessment is defined in Section 8.4.4 and 8.5.5 of Chapter 8: Cultural Heritage (Document Reference 3.2, APP-051). The study area was agreed upon with Historic England as part of the statutory consultation process and is detailed within the EIA Scoping Opinion (Document Reference 3.4, APP-149).</p> <p>The bridge described has not been assessed within the Environmental Impact Assessment for the A66 project as it is outside of the scoped study area i.e., 1km from the Order Limits.</p>

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Startforth Parish Council, RR-015	Traffic and Transport	<p>Startforth Parish Council objects to the proposals laid out for the Rokeby junction of the A66 dualling project. The reasons for the Parish Council's objections are as follows: 1. The proposed route will add approximately 2 miles of extra travel to Barnard Castle via the Abbey Bridge. 2. The diversion towards Cross Lanes will encourage many drivers to proceed further westwards to Cross Lanes and then access Barnard Castle via the narrow Sills Road at Startforth, the County Bridge and The Bank in Barnard Castle – routes which are already congested and frequently grid-locked. Durham County Council modelling suggests that this route would at least DOUBLE the traffic on this route; other suggestions by critics of the scheme put it in the region of TREBLING the volume of traffic. Whichever is correct, it does not bode well for Startforth and Barnard Castle and their residents, thus presenting serious danger to atmospheric and noise pollution, congestion and inconvenience, particularly for Startforth residents. 3. Under National Highway' preferred option, there are no additional safety measures described in the consultation, as National Highways is only responsible for, and are only consulting on, the A66 proposals. Routes linking the A66 to and from Barnard Castle fall within the remit of Durham County Council (DCC). 4.</p>	<p>In response to point (1), National Highways accepts that for the residents of Barningham the distance for the 11.4mile round trip to Barnard Castle will be increased will be increased by 1.4 miles or 12%. It also accepts that the distance for a round trip to Barnard Castle from Greta Bridge will be increased by 18%. This should be considered against the overall Benefits of the Scheme, as discussed in Chapter 3.5 of Application (Document Reference 2.2, APP-008) Case for the Project. In particular, Paragraphs 3.5.8 to 3.5.13 discuss the benefits of the Project on the local and national economy, namely that the Project improvements represent a significant opportunity to boost east-west connectivity (based on reduced overall journey times) and drive economic growth. Likewise, businesses that are dependent on the A66 for east-west connectivity will benefit from direct cost reductions, an improved environment for maintaining contact with their customers and suppliers, and the ability to access larger markets and different geographical areas. In addition, paragraph 3.5.2 states the safety benefits of the scheme, arising from the consistent standard of dual carriageway, will lead to less accidents.</p> <p>In response to point (2), Chapter 8.1.29 of Application Document 3.7 (Document Reference 3.7, APP-236) Transport Assessment discusses</p>

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		<p>National Highways' objection to the previously proposed 'blue' route hinged on its impact on a small strip of land which is part of the Rokeby Park and Gardens, between the existing junction and Rokeby Church. This is no longer contiguous with the grounds of Rokeby itself and most of the woodland was felled approximately three years ago. This small strip of land is of little agricultural or aesthetic value and is in effect little more than scrubland but is registered as an 18th century-designed parkland. The argument to keep this stretch of land is spurious and not a good enough reason to instead favour the route now proposed. The alternative 'blue' route would affect no more than two or three mature trees. 5. The proposed route would lead to many vehicles heading for Barnard Castle continuing along to the Cross Lanes Junction and then entering Barnard Castle by way of the B6277.</p>	<p>the impact of the Project on 'The Sills' within Barnard Castle.</p> <p>While there is forecast to be an increase in traffic on the Sills (of 520 vehicles per day, which equates to less than 1 vehicle per minute across the day), the impact on Barnard Castle is one of a general reduction in traffic flow due to the lower flows on the A67, of around 400 vehicles AADT, including on Barnard Castle Bridge, and on Galgate within the town centre. This reduction on the A67 occurs due to the improved A66 attracting more longer distance east west traffic from the A67.</p> <p>As a result, total traffic at Barnard Castle's Traffic Light controlled County Bridge is reduced by 150 vehicles per day therefore the project will relieve this the pressure on this junction, and therefore congestion in Barnard Castle and Startforth.</p> <p>The potential effects of the Project on Air Quality are set out in the Environmental Statement Chapter 5: Air Quality (Document Reference 3.2, APP-048). This assessment is based on a model that predicts likely emissions based on the traffic model used for the Project, creating a study area that follows the Affected Road Network as per Section 5.6.12. Environmental Statement Chapter 13: Population and Human Health (Document Reference 3.2, APP-056) reports on potential effects of noise and Air Quality changes and their</p>



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			<p>effects on people and communities, including those in Barnard Castle, reported in multiple sections.</p> <p>The potential effects of the Project on Noise and Vibration are set out in the Environmental Statement Chapter 12 Noise and Vibration (Document Reference 3.2, APP-055). Figure 12.4 Opening Year Alignment Noise Difference (Document Reference 3.3, APP-115) shows the predicted change in noise level as a result of the Project. In response to point (3), improvements beyond the red line boundary of the scheme is beyond the scope of the scheme. In response to point (4), both the black and blue options for Rokeby shown at the Autumn 2021 Consultation would have public benefits. Careful review has determined that the Black Route offers the better option for the scheme, as detailed within paragraphs (5.7.35 to 5.7.38) of the Project Development Overview Report (Document Reference 4.1, APP-244). These Paragraph state:</p> <p><i>The principal consideration in the preference for the black route (with a western junction at Rokeby) is the impact on the Grade II* Registered Park and Garden at Rokeby Park. The eastern junction would create harm to the Grade II* Registered Park and Garden at Rokeby Park. Whilst impacts on some key views of the eastern</i></p>

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			<p><i>junction could be mitigated through careful landform design and reinstatement, the impacts cannot be completely avoided as the eastern junction would still lead to additional fragmentation of the site.</i></p> <p><i>National policy requires a very strong justification for any harm to a nationally designated asset, and evidence to show that there is not a viable alternative. National planning policy, paragraph 5.131 of the NNNPS states that: "Once lost, heritage assets cannot be replaced, and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Given that heritage assets are irreplaceable, harm or loss affecting any designated heritage asset should require clear and convincing justification...Substantial harm to or loss of designated assets of the highest significance, including...grade I and II* Registered Parks and Gardens should be wholly exceptional."</i></p> <p><i>If there is substantial harm to the Rokeby Park heritage asset the DCO application would need to set out exceptional circumstances for the Rokeby east junction alternative. These exceptional circumstances would need to be demonstrated in terms of substantial public benefits which outweigh any harm or loss, or alternatively other</i></p>

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			<p><i>strict criteria apply as set out in paragraph 5.133 of the NNNPS.</i></p> <p><i>It was considered that the eastern junction alternative at Rokeby was likely to be regarded as not conforming with national policy and therefore there was a risk that a DCO application including the alternative eastern Rokeby junction would not secure a grant of consent. As such, the western Rokeby junction was identified, as part of the black route as the preferred solution at Statutory Consultation.</i></p> <p>The Black Route proposed has emerged from studies of alternative options as the best solution to address the problems on the existing A66 relating to the scheme area and to deliver the Project objectives taking into account various factors including environmental impacts, policy conformity, engineering considerations, the views of stakeholders and having regard to consultation responses.</p> <p>The Black Route proposed has emerged from studies of alternative options as the best solution to address the problems on the existing A66 relating the scheme area and to deliver the Project objectives taking into account various factors including environmental impacts, policy conformity, engineering considerations, the views of stakeholders and regard to consultation responses. Further detail can be found in ES</p>

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			<p>Chapter 3 Assessment of Alternatives (Document Reference 3.2, APP-046).</p> <p>The ES Volume 1 Chapter 8 'Cultural Heritage' (Document Reference 3.2, APP-051) presents assessment of the alternative junction arrangements against applicable legislation and guidance, including testing against policy to understand the potential harm in terms of loss and setting to all heritage assets and particularly those with the highest significance such as Rokeby Park the Grade II* RPG. It was considered that the eastern junction alternative at Rokeby was likely to be considered as not conforming with national policy; refer to the Case for the Project and the Project Development Overview Report for further information.</p> <p>The main route into Barnard Castle will remain via the Rokeby Junction and the signage designed accordingly.</p>
Startforth Parish Council, RR-015	Walking, Cycling and Horse Riding	The Sills section of this road at Startforth is an important and frequently used pedestrian route, including by primary school children. However, the footpath is narrow, and at times, virtually non-existent, thereby putting all pedestrians at significant risk of serious injury	Chapter 8.1.29 of the Transport Assessment (Document Reference 3.7, APP-236) discusses the impact of the Project on 'The Sills' within Barnard Castle and Startforth. While there is forecast to be an increase in traffic on the Sills (of 520 vehicles per day, which equates to less than 1 vehicle per minute across the day), the impact on Barnard Castle is one of a general reduction in traffic flow due to the lower flows on the A67, of

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			<p>around 400 vehicles AADT, (Annual Average Daily Traffic) including on Barnard Castle Bridge, and on Galgate within the town centre. This reduction on the A67 occurs due to the improved A66 attracting more longer distance east west traffic from the A67.</p> <p>Footpaths in Barnard Castle town are outside of the Project scope. Any concern about the adequacy of existing footpaths should be passed on to Durham County Council as the responsible local authority.</p> <p>When considering the need for interventions to improve road safety, STATS 19 is typically used to identify the severity of safety issues at locations where accidents frequently occur. The STATS19 dataset provides detailed road safety data about the circumstances of personal injury road collisions in Great Britain, the types of vehicles involved and the consequential casualties. The statistics relate only to personal injury collisions on public roads that are reported to the, and subsequently recorded, using the STATS19 collision reporting form. Studies generally look at data from the last 5 years, and older data is usually excluded to ensure only current issues are identified. Within the last 5 years (2017-2021) there have been no recorded accidents on either the B6277 Moorhouse Lane or B6277 'the Sills'. The last recorded accident</p>

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			<p>was a slight accident which occurred in 2010, and previous to this a further slight accident was recorded to have occurred in 2001. Given the existing safety record of the road, the absolute increase of 520 vehicles per day (or less than 1 vehicle per minute) there is no evidence to suggest that the Project will cause a substantial increase in Pedestrian safety issues at this location.</p>
<p>Startforth Parish Council, RR-015</p>	<p>Noise and Vibration</p>	<p>The proposed route would create more noise pollution, adversely affecting 195 homes and 8 non-residential buildings compared with only 16 homes and one non-residential building for the alternative 'blue' route (p.84 HE's Statutory Consultation booklet).</p>	<p>In relation to the availability of more suitable routes environmental assessments were undertaken to determine the likely significant impacts of each route based on the information that was available at the time. A summary of the environmental assessments undertaken on alternatives that have been considered in the Preliminary Environment Information Report (PEIR) presented as part of the Statutory Consultation. Environmental Assessment Chapter 12 Noise and Vibration (Document Reference 3.2, APP-055) has determined there is overall a beneficial effect on Barnard Castle (Table 12-45 of this document).</p> <p>An assessment of the alternatives that have been considered throughout the Project development process is provided within Chapter 3 of the Environmental Statement (Document Reference 3.2, APP-046). The Chapter outlines how environmental impacts have been considered to</p>

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			inform the decision-making process. Further detail about the process, the alternatives considered, and the wider factors that have informed the decision-making is set out in the Project Development Overview Report (PDOR) (Document Reference 4.1, APP-244). Chapter 12 of the Environmental Statement (Document reference 3.2, APP-055) provides detail on the noise impacts and mitigation considered and proposed for the Project.
Startforth Parish Council, RR-015Council	Impacts to Land	The alternative 'blue' route would cause the loss of significantly less productive farmland than would the proposed 'black' route. This could be reduced even further by re-aligning the 'blue' route approach road from the North and giving the 'blue' approach from the South a similar layout to the existing Bowes Junction. This layout has worked very successfully for many years and is simply being added to under current proposals	An assessment of the alternatives that have been considered throughout the Project development process is provided within Chapter 3 of the Environmental Statement (Document Reference 3.2, APP-046). The Chapter outlines how environmental impacts have been considered to inform the decision-making process. Further detail about the process, the alternatives considered, and the wider factors that have informed the decision-making is set out in the Project Development Overview Report (PDOR) (Document reference 4.1, APP-244).
Startforth Parish Council, RR-015	Traffic and Transport	8. The Parish Council received a presentation from a local resident highlighting numerous parts of the B6277 where there are serious issues of Health & Safety which will be greatly exacerbated by the potential three-fold increase in traffic if the proposed route is adopted. We can provide several photos pin-pointing these issues. These	Chapter 8.1 of (Document reference 3.7, APP 236) Transport Assessment discusses the impact of the Project on the B6277 Moorhouse Lane, and states that there will be an 53% increase in traffic on this road.



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		<p>photos visually show the potential risk to the public (pedestrians, cyclists, horses, and motorists). As mentioned above, there are no additional safety measures described in the proposed route consultation</p>	<p>The document then points out the impact of this traffic on 'The Sills' within Barnard Castle in paragraph 8.1.29. While there is forecast to be an increase in traffic on the Sills (of 520 vehicles per day, which equates to less than 1 vehicle per minute across the day), the impact on Barnard Castle is one of a general reduction in traffic flow due to the lower flows on the A67, of around 400 vehicles AADT, including on Barnard Castle Bridge, and on Galgate within the town centre. This reduction on the A67 occurs due to the improved A66 attracting more longer distance east west traffic from the A67.</p> <p>When considering the need for interventions to improve road safety, STATS 19 is typically used to identify the severity of safety issues at locations where accidents frequently occur. The STATS19 dataset provides detailed road safety data about the circumstances of personal injury road collisions in Great Britain, the types of vehicles involved and the consequential casualties. The statistics relate only to personal injury collisions on public roads that are reported to the, and subsequently recorded, using the STATS19 collision reporting form. Studies generally look at data from the last 5 years, and older data is usually excluded to ensure only current issues are identified. Within the last 5 years (2017-2021) there have been no recorded</p>

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			<p>accidents on either the B6277 Moorhouse Lane or B6277 'the Sills'. The last recorded accident was a slight accident which occurred in 2010, and previous to this a further slight accident was recorded to have occurred in 2001. Given the existing safety record of the road, the absolute increase of 520 vehicles per day (or less than 1 vehicle per minute) there is no evidence to suggest that the Project will cause a substantial increase in Pedestrian safety issues at this location.</p>
<p>Hope and Scargill Parish Council, RR-020</p>	<p>Traffic and Transport</p>	<p>The proposed positioning of the Greta Bridge junction is too near to the Cross Lanes junction which will result in increased traffic for the Cross Lanes junction and a consequent increase of traffic at Barnard Castle's Traffic Light controlled County Bridge which is already a bottleneck.</p>	<p>Chapter 5.7 of the Project Development Overview Report (Document Reference 4.1 APP-245) discusses the development of the scheme design at Cross Lanes and Rokeby (Greta Bridge). The junctions at Cross Lanes and Rokeby are needed to provide access for local communities to the A66.</p> <p>Chapter 8.1.29 of (Document reference 3.7, APP-236) Transport Assessment discusses the increase in traffic using the Cross Lanes junction. The result of this increase is that more traffic will be routed onto 'The Sills' within Barnard Castle. While there is forecast to be an increase in traffic on the Sills (of 520 vehicles per day, which equates to less than 1 vehicle per minute across the day), the impact on Barnard Castle is one of a general reduction in traffic flow due to the lower flows on the A67, of around 400 vehicles AADT,</p>

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			<p>including on Barnard Castle Bridge, and on Galgate within the town centre. This reduction on the A67 occurs due to the improved A66 attracting more longer distance east west traffic from the A67. As a result, total traffic at Barnard Castle's Traffic Light controlled County Bridge is reduced by 150 vehicles per day therefore the project will relieve this the pressure on this junction.</p>
Musgrave Parish Council, RR-022	Consultation and Engagement process	<p>Serious concerns of the A66 route near Langrigg, it has changed again since we told what the route would be, it has not been a consultation, Highways England seem to do whatever they want and take no notice of local concerns.</p>	<p>Musgrave Parish Council were invited to attend the Community Liaison Groups which have been running during Stage Three.</p> <p>The Langrigg Junction has evolved in response to feedback in advance of and from the Autumn 2021 Statutory Consultation. Access to the local road (former A66) is provided via an underpass local to Flitholme. A connection to the east, links this access to the Langrigg Lane. The provision of a westbound junction local to Langrigg Lane has been included in order provide direct connectivity with the new A66.</p> <p>Public consultation and engagement has been a critical part of the preparation of the DCO application and has been underpinned by the Government's Consultation Principles. A large number of consultation events and engagement activities over a number of years have been undertaken to fully understand the concerns of</p>

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			<p>the local communities and the wider public and where possible resolve their issues. The approach taken and how it accords with the legal requirements and government guidance, and dates is set out in the Consultation Report (Application Document 4.4, APP-252).</p> <p>As well as statutory consultation for the full project supplementary consultation was also undertaken with respect of proposed design changes in specific parts of the route (where this met the legal tests for further consultation). The changes consulted on are set out in Table 7.1 of the Consultation Report (including changes between Appleby and Brough). The changes at Langrigg did not meet these tests. The supplementary consultations targeted those parties affected by the design changes to ensure statutory consultees and local communities had the opportunity to provide feedback on the changes and for those comments to be taken into account. The supplementary consultations were also conducted in line with the principles of pre-application statutory consultation as set out in the Planning Act 2008 (PA 2008) and principles and methods in the Project's Statement of Community Consultation (Document Reference 4.4, APP-259) to the extent they were relevant for these supplementary consultations.</p>

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			<p>These changes were made in line with feedback from statutory consultation. The process of how the consultation feedback has informed the design is set out in the Consultation Report with details on our response to each consultation issue set out in Annex N (Document Reference 4.4, APP-271 and Annex P (Document Reference 4.4, APP-273).</p> <p>The Planning Inspectorate (by letter dated 19th July 2022) has accepted the DCO application and in doing so has confirmed that the consultation undertaken accords with the requirements of the PA 2008 as set out in Chapter 2, Part 5 of PA 2008.</p>
Barningham Parish Council, RR-049	Traffic and Transport	<p>As Barnard Castle is the nearest centre to Barningham for shopping, services, employment and education the journey between the two is that made most frequently by residents. The form of the improvements to the A66 will therefore have a direct and significant impact on them in terms of journey time, length and convenience. The need for traffic to divert to the proposed Rokeby West Junction would add approximately 2 miles to any journey into the town, with adverse effects in terms of distance, time, inconvenience and additional emissions. The substantive objection by National Highways to the Rokeby East Junction, proposed earlier in the consultation (the Blue Route), appears to be that</p>	<p>National Highways accepts that for the residents of Barningham the distance for the 11.4 mile round trip to Barnard Castle will be increased will be increased by 1.4 miles or 12%. It also accepts that the distance for a round trip to Barnard Castle from Greta Bridge will be increased by 18%, as shown in Application Document 2.5 General Arrangement Drawings Scheme 08 Cross Lanes to Rokeby (Document Reference 2.5, APP-016). This should be considered against the overall Benefits of the Scheme, as discussed in Chapter 3.5 of The Case for the Project, (Document Reference 2.2, APP-008). In particular, Paragraphs 3.5.8 to 3.5.13 discuss the benefits of the Project on the local and national</p>

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		<p>it would cause unacceptable harm to the Rokeby Park Registered Park and Garden (RPG). However, very substantial damage was done to that designated area some years ago when improvements to the A66 severed part of the Park and an access drive from the rest. The limited area of the RPG on which the Blue Route would impinge is of very modest importance in historical and landscape terms and would not be substantial in terms of National Networks Policy Statement 2014. The benefits of the Blue Route would significantly outweigh any harm caused in terms of the same Statement</p>	<p>economy, namely that the Project improvements represent a significant opportunity to boost east-west connectivity (based on reduced overall journey times) and drive economic growth. Likewise, businesses that are dependent on the A66 for east-west connectivity will benefit from direct cost reductions, an improved environment for maintaining contact with their customers and suppliers, and the ability to access larger markets and different geographical areas. In addition, paragraph 3.5.2 states the safety benefits of the scheme, arising from the consistent standard of dual carriageway, will lead to less accidents.</p> <p>Both the black and blue options for Rokeby shown at the Autumn 2021 Consultation would have public benefits. Careful review has determined that the Black Route offers the better option for the scheme, as detailed within paragraphs (5.7.35 to 5.7.38) of the Project Development Overview Report (Document Reference 4.1, APP-244). These Paragraph state:</p> <p><i>The principal consideration in the preference for the black route (with a western junction at Rokeby) is the impact on the Grade II* Registered Park and Garden at Rokeby Park. The eastern junction would create harm to the Grade II* Registered Park and Garden at Rokeby Park. Whilst impacts on some key views of the eastern</i></p>

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			<p><i>junction could be mitigated through careful landform design and reinstatement, the impacts cannot be completely avoided as the eastern junction would still lead to additional fragmentation of the site.</i></p> <p><i>National policy requires a very strong justification for any harm to a nationally designated asset, and evidence to show that there is not a viable alternative. National planning policy, paragraph 5.131 of the NNNPS states that: "Once lost, heritage assets cannot be replaced, and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Given that heritage assets are irreplaceable, harm or loss affecting any designated heritage asset should require clear and convincing justification...Substantial harm to or loss of designated assets of the highest significance, including...grade I and II* Registered Parks and Gardens should be wholly exceptional."</i></p> <p><i>If there is substantial harm to the Rokeby Park heritage asset the DCO application would need to set out exceptional circumstances for the Rokeby east junction alternative. These exceptional circumstances would need to be demonstrated in terms of substantial public benefits which outweigh any harm or loss, or alternatively other</i></p>



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			<p><i>strict criteria apply as set out in paragraph 5.133 of the NNNPS.</i></p> <p><i>It was considered that the eastern junction alternative at Rokeby was likely to be regarded as not conforming with national policy and therefore there was a risk that a DCO application including the alternative eastern Rokeby junction would not secure a grant of consent. As such, the western Rokeby junction was identified, as part of the black route as the preferred solution at Statutory Consultation.</i></p> <p>The Black Route proposed has emerged from studies of alternative options as the best solution to address the problems on the existing A66 relating to the scheme area and to deliver the Project objectives taking into account various factors including environmental impacts, policy conformity, engineering considerations, the views of stakeholders and having regard to consultation responses.</p> <p>Further detail relating to this scheme is presented in ES Chapter 3 Assessment of Alternatives (Document Reference 3.2, APP-046).</p> <p>Further detail regarding the assessment of the alternative junction arrangements against applicable legislation and guidance, including testing against policy to understand the potential harm in terms of loss and setting to all heritage</p>

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			assets and particularly those with the highest significance such as Rokeby Park the Grade II* RPG can be found in The ES Volume 1 Chapter 8 'Cultural Heritage' (Document Reference 3.2, APP-051)
Phillip Gate representing East Layton Parish Council, RR-044	Traffic and Transport	The majority of residents of East Layton do not want a junction on Moor Lane in the new A66 project. Moor Lane will attract an increased daily flow of vehicles which will all come through the village of EAST Layton causing danger to walkers, cyclists, joggers and horse riders. We have hardly any foot paths in the village making it a dangerous place. The new intersection should be much nearer to the Ravensworth junction making the existing Moor Lane junction LEFT TURN ONLY to the East	Chapter 8.1 of Transport Assessment (Document Reference 3.7, APP-263 ) contains details of the impact of the Scheme, including the proposed junction at Moor Lane, on the Local Roads around East Layton. Figure 8-24 shows that East of East Layton on West Lane, there is a 63 vehicle AADT increase. To the west of East Layton on West Lane there is a -33 vehicle Average Annual Daily Traffic (AADT) decrease. The increase on Moor Lane itself is forecast to be 101 vehicles. It should be recognised that these changes in traffic flows are very small. 100 vehicles per day is equivalent to around 10 vehicles per hour, or 1 vehicle every 6 minutes. Considering the overall change on the local road network due to the Project, these are mostly small (less than 500 vehicles per hour, which corresponds to less than 1 vehicle per minute). In many cases, reductions in flow occur on the local roads because traffic is drawn to the A66 for more of its journey such that advantage is taken of the higher speeds. This is because the dual A66 adds around 15-20mph compared to the speed on the unimproved single carriageway. This

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			<p>reassignment of traffic to higher standard roads, with better safety records (i.e. the upgraded A66) leads to the overall improvement in safety. Section 9.4 of the Transport Assessment (Document reference 3.7, APP-236) describes the impact of the Project on Road Safety. It forecasts that the Project will save 530 casualties (including 14 fatalities) over the 60-year appraisal period.</p>
<p>Warcop Parish Council, RR-013</p>	<p>Design, Engineering and Construction</p>	<p>However, we would suggest that some minor adjustments can still be made to improve the route: 1. We feel that the new dual carriageway from Café 66 to Dyke Nook should be built completely to the north of the existing road, thereby avoiding the need to destroy about a mile's worth of existing trees. The new road would therefore be screened by the trees. It is not in the A.O.N.B. area. 2. In order to preserve the existing historic, cultural Brough Hill Fair site for the gypsy and traveller community, we believe the new road could go slightly further north from the east of Warcop to avoid this site, before joining on the agreed alignment. The proposed alternative site is too close to local houses and businesses.</p> <p>We believe that the junction at Langrigg is far too complex and too close to properties and an alternative design could be achieved. A new small link road seems to have appeared since the</p>	<p>One of the key considerations in the design development work for this Scheme has been to ensure that the design of the route alignment minimises the impact of and potential damage to the Area of Outstanding Natural Beauty (AONB) and MoD training facilities. A route north of the existing A66 would potentially have a major adverse impact on the functionality of this nationally important MoD training camp, requiring significant, costly accommodation works to relocate required facilities.</p> <p>The development of the design for the Project, including alternative routes considered and the decision making process is set out in the Project Development Overview Report (Document Reference 4.1, APP-244). National Highways has sought to achieve a balance between minimising land take and securing sufficient land to deliver</p>

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		consultation documents which effectively surrounds a cottage.	<p>the scheme including required mitigation measures</p> <p>The proposed alignment and associated junctions have been designed in accordance with the Design Manual for Roads and Bridges in terms of geometry and visibility requirements. The alignment and junctions will be further developed and assessed in the detail design stage in consultation National Highways.</p> <p>In addition, a Road Safety Audit will be carried out by an independent team to ensure that any safety issues are considered and recommendations made accordingly to mitigate.</p>
Warcop Parish Council, RR-013	Walking, Cycling and Horse Riding	A new footpath across the field to the primary school, church and Parish Hall would take cyclists, walkers, children, wheelchair user and prams etc off the dangerous road	The Project will not adversely impact this route and so the additional land acquisition required for a new footpath at this location cannot be justified. Furthermore, it is not the responsibility of the Applicant to deliver a new footpath as it is outside the scope of the Project.
Royal Mail, AS-050	Traffic and Transport	Royal Mail has three operational facilities within 6 miles of the A66 Northern Trans-Pennine Project: Penrith DO (c. 0.5 miles), Appleby Doomgate Garage (c. 0.5 miles), and Barnard Castle DO (5.2 miles). The A66 Penrith to Scotch Corner is a strategically important distribution route for Royal Mail services, important to mail handling and delivery at the regional and national levels. Accordingly, Royal Mail welcomes National	National Highways acknowledge that this Relevant Representation was received and published after the deadline and National Highways are seeking to meet with representatives of Royal Mail to discuss matters raised.

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		<p>Highways' proposed improvements which, once complete, will improve journey times and reduce delays to mail and parcel distribution / deliveries. However, all Royal Mail vehicles / services that use the affected section of the A66 are at risk of any traffic congestion and delays that occur during the construction period. In exercising its statutory duties, Royal Mail vehicles also use all of the adjacent local roads to this section of the A66 on a daily basis. Any additional congestion on these roads during the construction phase has the potential to significantly disrupt Royal Mail's operations. Royal Mail therefore requests to reserve its position as an Interested Party to be able to submit a consultation response/s at a later stage in the consenting process and to give evidence during the Examination process.</p>	