

A66 Northern Trans-Pennine Project

TR010062

6.5 Applicant's Response to Relevant Representations Part 1 of 4

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**NH/AS/6.5 Applicant's Response to Relevant
Representations Part 1 of 4**

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1. Introduction

1.1. Purpose of this document

1.1.1 This document has been prepared by National Highways (the Applicant) for submission to the Examining Authority (ExA). It provides the Applicant's response to the Relevant Representations submitted to the ExA by Interested Parties following the notification of acceptance of the A66 Northern Trans-Pennine Development Consent Order (DCO) Application.

1.1.2 In total, 231 Relevant Representations were submitted to the ExA by the deadline of 4 September 2022 and were published by the ExA on the National Infrastructure Planning Project Webpage.

1.2. Structure of this document

1.1.3 National Highways has reviewed the Relevant Representations submitted to the ExA and has identified matters or 'topics' that have regularly been raised by Interested Parties regarding the Project.

1.1.4 An Interested Party is any member of the public who wishes to make a Relevant Representation, and all Interested Parties will be invited to make further Written Representations and can take part in the Examination at hearings. Under section 102 of the Planning Act 2008, an Interested Party includes: persons with an interest in relevant land who have been notified of the acceptance of the application under section 56(2)(d); the local authorities where the land for development is located; persons who have made Relevant Representations about the application to the ExA; and, if they notify the ExA, local authorities adjacent to the authority in which the development is located, other statutory parties¹, and other persons who have requested and have been granted by the ExA, Interested Party status.

1.1.5 A response to these common topics is provided in this document to clearly set out the position of National Highways on the points that have been raised and provide clarification where required.

1.1.6 Whilst many of the matters raised are addressed in the DCO application documents, National Highways considers that it is helpful to the ExA and those who have made Relevant Representations to provide commentary on these matters and make cross references to relevant DCO application documents where appropriate. Furthermore, the document seeks to confirm the extensive ongoing engagement that National Highways continues to undertake.

1.1.7 In light of the above, National Highways has responded collectively in Section 2 of this document to the identified topics, rather than by providing a detailed response to each individual Relevant Representation.

¹ Department for Communities and Local Government, 2015, Planning Act 2008: Guidance for the examination of applications for development consent.

- 1.1.8 It is, however, recognised by National Highways that some Interested Parties have raised matters that are more specific in nature, particularly amongst those submitted by Affected Persons or Statutory Parties, or by other Interested Parties with which National Highways is already engaged in discussions, such as through a Statement of Common Ground (SoCG). Therefore, the third part of this document sets out detailed responses to individual issues raised through Relevant Representations made by such Interested Parties.
- 1.1.9 In some instances, National Highways has provided a response to Relevant Representations directly to the Affected Person or Interested Party prior to submission of this document as part of our ongoing engagement. National Highways will continue to engage on such matters before and throughout the course of the Examination through ongoing engagement and correspondence with these parties. The fourth and fifth sections of this document therefore provide a summary of these direct responses.
- 1.1.10 Accordingly, this document is split into four separate submission documents and is structured as follows:
- Part 1 of 4 contains Section 1: Introduction and Section 2: Response to Common Topics Raised in Relevant Representations, which have been summarised and responded to collectively.
 - Part 2 of 4 contains Section 3: Detailed Responses to issues raised, presented as verbatim text taken from the Relevant Representations on a topic-by-topic basis.
 - Part 3 of 4 contains Section 4: response to issues raised by Affected Persons, presented as verbatim text taken from the Relevant Representations on a topic-by-topic basis.
 - Part 4 of 4 contains Section 5: responses to issues raised by Interested Parties subject to a Statement of Common Ground, presented as verbatim text taken from the Relevant Representations on a topic-by-topic basis.
- 1.1.11 Full terms have been provided when referring to other DCO application documents but should abbreviated terms require further explanation please refer to the original DCO Application Glossary (Document Reference 1.5, APP-005).

2. Response to Common Topics Raised in Relevant Representations

2.1. Introduction

2.1.1 This section provides National Highways' response to the key topics that were commonly raised in the Relevant Representations. Key topics have been identified by National Highways for the purpose of this document as a commonly raised issue pertinent to the Examination of the application for development consent for the project.

2.1.2 For each topic, Tables 2.1 – 2.20 in each of the sub-sections below provide a summary of the matter(s) raised and the comments received, and then sets out the National Highways position on the matter at the time of writing. Within each table, National Highways has also identified the Reference Numbers of the Relevant Representations who raised these matters.

2.1.3 The following topics are considered and addressed in the remainder of this section:

- Air Quality
- Biodiversity and Biodiversity Net Gain
- Case for the Project
- Climate and Carbon
- Consultation and Engagement
- Cultural Heritage
- DCO - Policy Legislation and Guidance
- Design, Engineering and Construction
- Development of the Project and Alternatives
- Environment and Environmental Management Plan
- Equalities Impact Assessment
- Flooding and Drainage
- Impacts to Land
- Landscape and Visual
- Legal
- Noise and Vibration
- Population and Human Health
- Road Drainage and the Water Environment
- Traffic and Transport
- Walking, Cycling and Horse Riding

2.2. Air Quality

Table 2-1: Response to Relevant Representations related to Air Quality

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-192; RR-189	Specific concern between Temple Sowerby and Crackenthorpe in terms of air quality impact on the residents of Kirkby Thore.	The potential effects on Air Quality of the Project are set out in Environmental Statement Chapter 5: Air Quality (Document Reference 3.2, APP-048), assessing human and ecological receptors within 200m of the A66 alignment (which is the assessment area). Beyond 200m, it is not considered that there would be a significant effect due to distance. There are several modelled points within Kirkby Thore, located within 200m of the DCO boundary, that were used in the assessment of air quality impacts Environmental Statement Figure 5.3 Air Quality Construction Phase Assessment Figure 5.3 sheet 3 of 9 and Air Quality Operational Phase Assessment Figure 5.4 sheet 4 of 14 (Document Reference 3.3, APP-067 to APP-068). From the assessment no significant effects are identified and anticipated in Kirkby Thore during construction or operation of the Project. Section 5.1.4.1 the Environmental Statement Appendix 5.4: Air Quality Assessment Results (Document Reference 3.4, APP-153) sets out any modelled change in air quality at the modelled points throughout the Project including those identified in Kirkby Thore.
RR-192	Concern that the proposals show the road being taken 800m closer to the school at Kirkby Thore, contributing to negative impacts on the respiratory health of children. This could also impact upon the school and its pupil intake.	Section 5.1.4.1 of the Environmental Statement Appendix 5.4: Air Quality Assessment Results (Document Reference 3.4, APP-153) shows that at the two modelled points near to Kirkby Thore Primary School Human Sensitive Receptor (HSR) have a reduction in expected NO ₂ in the operation of the Project. The improved connectivity of the area and the diversion of transport to British Gypsum to the north is considered to be a beneficial effect to the Kirkby Thore school as stated in Section 13.10.57 of the ES Chapter 13: Population and Human Health (Document Reference 3.2, APP-056).

2.3. Biodiversity and Biodiversity Net Gain

Table 2-2: Response to Relevant Representations related to Biodiversity and Biodiversity Net Gain

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-023; RR-036; RR-041; RR-060; RR-144; RR-165; RR-175; RR-072; RR-187; RR-232; RR-213	Concerns raised over protection to habitats in the Special Areas of Conservation (SAC), particularly the River Eden and the Pennine Moors and the wildlife present there. Concern that habitats would be threatened from the proposed development, including those in the North Pennines AONB.	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. Environmental Statement Chapter 6 Biodiversity (Document Reference 3.2, APP-049) and the Habitat Regulation Assessment (Document Reference 3.5, APP-234) assess the potential impacts of the Project upon designated sites, habitats, wildlife, and protected species, amongst others. Section 6.10 details the likely significant effects of the Project whereby no significant effects during construction or operation, following the implementation of mitigation, are predicted for the River Eden SAC and the North Pennine Moors SAC.
RR-226	The southern route is preferred, due to it posing a lesser impact on biodiversity and wildlife.	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. Further detail can be found in the Project Development Overview Report (Document Reference 4.1, APP-244) on how the route was brought forward taking a wide range of considerations into account.
RR-225, RR-230	Specific concern regarding impact of the scheme on the Dyke Nook Community farm and concern that the local community have not been considered regarding the Dyke Nook community farm.	National Highways acknowledges the Interested Party's concerns. National Highways acknowledges that Dyke Nook Community Farm is an aspiration of the community and does not currently exist as a facility. National Highways have received feedback from stakeholders outlining concerns about the proximity of the proposed route to the proposed Dyke Nook Farm and other surrounding properties. In response to this, an alternative design was developed

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		to construct the new eastbound carriageway to the north of the existing A66. The existing A66 will become the westbound carriageway which means National Highways no longer need to build it to the south of the existing A66. This has resulted in reduced land take from the properties and increasing the distance from the properties to the new A66.
RR-072	Acknowledgement that the area of woodland taken for the Blue Route is separated from the Grade II Registered Park and Garden, so the impact of this on the house and grounds will be minimal. Suggestion that there will be plenty of land taken by the scheme to enable appropriate new planting.	The comment is acknowledged. The Blue Route has not been taken forward in the Project design as it does not comply with National Planning Policy because the Blue Route would sever a Registered Park and Garden. Further detail can be found in the Project Development Overview Report (Document Reference 4.1, APP-244) on how the route was brought forward taking a wide range of considerations into account.
RR-144; RR-210	Concern that the extra mileage around Kirkby Thore and Warcop will cause a considerable loss of mature hedgerows, trees and other habitats.	<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 (such as Appendix 6.4 Hedgerow (Document Reference 3.4, APP-157)).</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.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>The development of the design at Kirby Thore and Warcop, 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 the scheme including required mitigation measures for any loss of hedgerows. 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.</p>
RR-006	<p>Concern that greater focus is required to mitigate actions to redress the loss of woodland habitat.</p>	<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 (such as Appendix 6.4 Hedgerow (Document Reference 3.4, APP-257)).</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>

2.4. Case for the Project

Table 2-3: Response to Relevant Representations related to Case for the Project

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-016; RR-036; RR-041; RR-182; RR-186;RR-188; RR-194	General concerns that the scheme presents no value for money.	<p>When considering value for money, the Project needs to be considered alongside all the benefits that it will bring. Chapter 4 of 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"> • 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. • Paragraphs 4.2.16 to 4.2.21 outline the issues caused by the single carriageway sections in terms of journey times and reliability. • Paragraphs 4.2.22 to 4.2.23 discuss the increased likelihood of road closures on the single carriageway sections. • Paragraph 4.2.24 to 4.2.27 discuss the issues of severance, notably within Kirkby Thore. • 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>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>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<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 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>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<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>
RR-016	Concern that the claim that the economic benefit to the Northern Powerhouse is unsubstantiated.	<p>The Northern Powerhouse is a vision for joining up the North's great towns, cities, and counties, pooling their strengths, and tackling major barriers to productivity to unleash the full economic potential of the North. In upgrading the A66, the Project is required to demonstrate that it can meet a number of specified project objectives as defined by the DfT within the Road Investment Strategy 2 (RIS2). Supporting the objectives of the Northern Powerhouse, alongside the Levelling Up agenda were identified as key project objectives to make a significant contribution to the transformational growth envisaged by the Northern Powerhouse initiative.</p> <p>Table 1-3 of the Case for the Project (Document Reference 2.2, APP-008) describes the project's conformity with the Project's objectives, and it describes how it will make a significant contribution to achieving the economic growth objective of the Northern Powerhouse initiative through:</p> <ul style="list-style-type: none"> • Facilitating improved vehicle movements to the A66 route network, and the journey time savings this results in. This has

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		<p>particular economic implications for freight and other business connectivity.</p> <ul style="list-style-type: none"> • Improving strategic, regional, and national connectivity- particularly for hauliers. HGVs account for a quarter of all traffic on the road and any delays to journeys can have an extremely negative effect on business and commerce, including lost working time and missed shipment slots. • Improving access to key tourist destinations such as the North Pennines and Lake District. • In addition to improving the Strategic Road Network, the project will also make improvements to the local road network, with new junctions and 'offline' improvements, removing local traffic from the A66, making local movements more efficient. <p>The technical assessments undertaken, including the Transport Assessment (Document Reference 3.7, APP-236), provide the evidence that there are significant journey time savings and other improvements for journeys on the strategic and local road network that result from the project.</p>
RR-041; RR-182; RR-233; RR-226; RR-235; RR-194	<p>Concern that the scheme is a misuse of public funding. Suggestion that the money would be better spent on public transport and other social infrastructure such as schools and the NHS.</p>	<p>As set out in section 1.3 of the Case for the Project (Document Reference 2.2, APP-008) the Project forms part of the Government's Road Investment Strategy (RIS) which confirms the strategic, long-term vision for the Strategic Road Network ('SRN') in England up to 2050 and the investment plan to achieve this. The need for improvements to the A66 corridor was identified in the Northern Trans Pennine Route Strategic Study (NTPRSS) announced as part of RIS1 in December 2014. The A66 corridor improvements were announced during the 2016 Autumn Statement and committed to in RIS2 in March 2020. The A66 is described in the RIS as:</p>

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		<ul style="list-style-type: none"> • one of three projects which 'can underpin a wider economic transformation' as part of the Levelling Up agenda. • has the potential to add a third more capacity to the strategic road network across the Pennines. • is considered to support growth, by both improving connections between regions and helping areas meet their growth potential. <p>As set out in section 3(6) of the Infrastructure Act 2015, the Applicant and SoS 'must comply' with the RIS.</p> <p>As well as these economic benefits there are several social benefits of the Project, as set out in Chapter 5 of the Case for the Project (Document Reference 2.2, APP-008). One of the principal social benefits of the Project is improved safety and consequently reductions in number of accidents. The Project is forecast to save 281 personal injury accidents and 530 casualties. Modal alternatives have been considered within the Project Development Overview Report (Document Reference 4.1, APP-244).</p>
RR-054; RR-194; RR-177	<p>Specific objection based on an insufficient calculation of carbon and Benefit Cost Ratio which goes against national guidance. Concern that the Benefit Cost Ratio is classed as 'poor' value for money by DfT's Value for Money Framework.</p>	<p>Please refer to the value for money response in the row above (i.e., in response to RR-016; RR-036; RR-041; RR-182; RR-186; RR-188; RR-194).</p> <p>The Environmental Statement Chapter 7 Climate (Document Reference 3.2, APP-050) includes the assessment of carbon. As stated in section 7.5.12 the assessment follows the DMRB LA 114 which requires the use of an industry recognised carbon calculation tool(s). For this Project, the tool used was the National Highways Carbon Emissions Calculations Tool. This tool is considered to be in line with national guidance.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-128	Concerns over whether the need for the scheme has been adequately demonstrated	<p>The need for the scheme is set out in section 1.7 of the Case for the Project (Document Reference 2.2, APP-008) – please refer to this document for more details.</p> <p>In summary, paragraph 1.7.6 of the Case for the Project summarises various issues with the current A66 (as outlined in the NTPRSS) including regular closures, variability in average speeds and safety concerns; Paragraphs 1.7.2 and 1.7.3 conclude that:</p> <p>“Despite several upgrades to the route since the 1970s, the A66 still suffers from congestion, unreliable journey times and a higher-than average number of accidents in some lengths of the route, with a number of accident cluster sites. This is because of varying road standards and areas of single carriageway lengths.</p> <p>If the existing A66 route is not improved, it will constrain national and regional connectivity, due to its strategic importance as an east-west connection for freight and other vehicle movements and may threaten the transformational growth envisaged by the Northern Powerhouse initiative and the achievement of the Government ‘Levelling Up’ agenda.”</p>
RR-186; RR-208; RR-226; RR-235; RR-192; RR-194; RR-177	Objection to the Temple-Sowerby to Appleby section amounting to 27% of the total scheme costs.	<p>In general, it is acknowledged that the Temple-Sowerby to Appleby Scheme will contribute to a relatively high proportion of the costs of the total A66 Project costs, when compared with other Schemes within the Project. But the principal strategic benefits of the Project are derived from the dualling of the entire length of the A66 as a whole as was identified in the Northern Trans Pennines Route Strategic Study (NTPRSS), the findings of which are summarised in the Project Development Overview Report (PDOR) (Document Reference 4.1, APP-244). Paragraph 3.2.4 of the PDOR highlights some of the strategic benefits of the A66 dualling that were identified in the NTPRSS as follows:</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<ul style="list-style-type: none"> • Journey time savings, particularly for strategic trips (including freight). • 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). • Improved reliability (dual carriageway sections would reduce delays, incidents, and the need for road closures). <p>There are several problems and issues with the existing A66 within this scheme that the Project is seeking to resolve. These are described in paragraphs 6.4.1 to 6.4.15 of the Temple Sowerby to Appleby Case for the Scheme (section 6.4 of the Case for the Project (Document Reference 2.2, APP-008). For example, parts of the existing route within this Scheme suffer from high accident rates (likely to be associated with the poor horizontal and vertical geometry) which will be addressed through safety improvements associated with this Scheme. How the proposed Scheme will address the problems and issues identified are set out in detail at paragraphs 6.4.16 to 6.4.23 – for example it describes the benefits for Kirkby Thore village as follows: “implementing a bypass along this route is expected to remove many of the current socio-environmental and safety issues associated with traffic movements through the village. Issues of air quality, noise and severance are also expected to be significantly reduced by removing the need for HGVs to access the village, while also significantly reducing the need for many vehicle movements through the village when travelling north.” Table 6-3 provides an overview of the location specific benefits of the Temple-Sowerby to Appleby Scheme considered against the wide Project objectives.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-186	<p>Concern that National Highways are combining 9 different road schemes into one application and that each should be judged on its own merit.</p>	<p>The principal strategic benefits of the Project are derived from the dualling of the entire length of the A66 as a whole. . It is acknowledged that there are also benefits at a Scheme level and these are set out in detail along with the current problems and how these problems are addressed for each Scheme in Chapter 6 of the Case for the Project (Document Reference 2.2, APP-008).</p> <p>The existing A66 is a key national and regional strategic transport corridor that carries high levels of freight traffic as well as being an important route for tourism and connecting nearby communities. Within this context, it is considered that any improvements to the A66 route should be considered collectively at a strategic level given they will directly impact national and regional connectivity and economies.</p> <p>The need for improvements to the A66 corridor was identified in the Northern Trans-Pennine Routes Strategic Study Stage 3 Report ('NTPRSS') announced as part of the first Road Investment Strategy ('RIS1') in December 2014 (Department for Transport ('DfT'), 2015). The study was one of six national strategic studies. Funding for the A66 corridor improvements was committed to in the Road Investment Strategy 2 ('RIS2') in March 2020 (DfT, 2020).</p> <p>The Case for the Project (Document Reference 2.2, APP-008) sets out the overall need and case for the Project. Chapter 3 sets out the description of the Project and the Schemes that sit within it, with Chapter 6 providing further detail of the case for each Scheme within the Project. It is recognised that each Scheme comes with its own challenges, opportunities, and benefits, as detailed in Chapter 6 of the Case for the Project (Document Reference 2.2, APP-008).</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>Each Scheme also delivers a case as to why the proposed work is necessary to improve the A66 and meet the wider Project objectives, as well as collectively forming the Project and overall case to be made for the improvements to the A66. In accordance with the EIA regulations, each proposed Scheme has been assessed for environmental impacts within the Environmental Statement (Document Reference 3.2, APP-043 to APP-059). The development of each Scheme has also been informed by extensive public consultation and stakeholder engagement as detailed within the Consultation Report (Document Reference 4.4, APP-252).</p>
RR-208	<p>Concern that the choice of route at Kirkby Thore has been based on reuniting the Village, which only comprises of 10 houses. Concern that this cannot justify the spending.</p>	<p>The choice of the route at Kirkby Thore was based on an assessment of alternative route options against a range of environmental, social, and economic criteria. The process and consultation/ engagement undertaken for the assessment of alternatives route alignments at Kirkby Thore is set out in the Project Development Overview Report (PDOR) (Document Reference 4.1, APP-244). The findings of the assessment against a range of environmental, social and transport criteria are set out in the Route Development Report that was published for statutory consultation and can be found in Appendix 3 of the PDOR (Document Reference 4.1, APP-247). One of the principal reasons that the blue route (that is now part of the DCO application) was preferred to the alternative (Orange Route) that follows the current alignment through Kirkby Thore is that the alternative orange route is likely not to be in accordance with national policy. Given the impact the Orange Route would have on the Kirkby Thore Roman Fort and Associated Vicus Scheduled Ancient Monument. Paragraph 5.131 of the National Networks National Policy Statement would require the application for development consent to</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>demonstrate exceptional circumstances in order to put forward the orange Route alternative for Examination.</p> <p>This would require a case for the scheme to be made that any potential substantial harm or loss of significance to the Kirkby Thore Roman Fort and Associated Vicus Scheduled Ancient Monument is necessary in order to deliver substantial public benefits that outweigh that loss or harm.</p> <p>As an alternative alignment exists in the Blue Route (now the route that forms part of the DCO application) that does not result in any potential substantial harm or loss of significance to the Kirkby Thore Roman Fort and Associated Vicus Scheduled Ancient Monument, it was concluded that there was a risk that the Orange Route would not be regarded to be in accordance with national policy and therefore there is a risk that a DCO application including the Orange Route would not be likely to secure a grant of consent. These findings are set out in further detail in section 5.5 of the Route Development Report (Appendix 3 of the PDOR (Document Reference 4.1, APP-247).</p> <p>A sifting exercise undertaken on these two routes therefore found that the blue route was preferred to the online Orange Route, principally due to the policy conflict associated with the orange route as set out in full within section 5.5 of the Route Development Report. The benefit of re-uniting the village was not one of the principal considerations that informed this preference.</p>

2.5. Climate and Carbon

Table 2-4: Response to Relevant Representations related to Climate and Carbon

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-016, RR-054, RR-060, RR-144, RR-162, RR-173, RR-186, RR-219, RR-232, RR-233, RR-221, RR-196, RR-208, RR-226, RR-214, RR-235, RR-175	Concerns raised regarding increased carbon emissions at a time when the UK should be working towards reducing emissions.	<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 Greenhouse Gas (GHG) assessment 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>As detailed design progresses opportunities will be sought through construction and design development to reduce the carbon emissions resulting from construction of the Project. Measures to reduce carbon are included within the Environmental Management Plan (Document Reference 2.7, APP-019), see Table 3-2 References D-CL-01 and MW-CL-01.</p>
RR-016, RR-050, RR-060, RR-144, RR-162, RR-232, RR-214, RR-219	Specific concerns about the project not working towards the Government's net zero targets and commitments made at COP26.	<p>Overall compliance with, or attainment of, 'carbon budgets' and 'the 2050 zero target' under the Climate Change Act 2008, and the 'UK's Nationally Determined Contribution' under the Paris Agreement, and any other government commitments made at the UN Climate Change Conference (COP26) 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 states that applicants for road projects should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets.</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>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>Whilst the Green House Gas assessment 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 budgets.</p> <p>As detailed design progresses opportunities will be sought through construction and design development to reduce the carbon emissions resulting from construction of the Project. Measures to reduce carbon are included within the Environmental Management Plan (Document Reference 2.7, APP-019), see Table 3-2 References D-CL-01 and MW-CL-01.</p>
RR-054, RR-144, RR-165, RR-207, RR-219, RR-232, RR-233, RR-196, RR-208, RR-226, RR-214, RR-235	Concerns raised regarding the climate crisis. Concern that the proposals will emit 518,562 tonnes of CO2 during construction and 2,190,452 tonnes over its lifetime.	<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 declarations made by the UK Parliament do not give cause to alter the conclusions of the Environmental Statement assessment and the Project will make an extremely limited contribution to the UK's carbon reduction 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, the greenhouse gas assessment has demonstrated that the Project will not materially affect the ability of Government to meet its carbon reduction targets.</p>
RR-050, RR-165, RR-173	Concerns raised that the scheme does not meet national and international climate and carbon agreements, including the Paris	Overall compliance with, or attainment of, 'carbon budgets' and 'the 2050 zero target' under Climate Change Act 2008, and the 'UK's Nationally Determined Contribution' under the Paris Agreement and any other government commitments made at the UN Climate Change Conference (COP26) are the responsibility of Government

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
	<p>Agreement, the 2008 Climate Change Act, and the UK Sixth Carbon Budget.</p>	<p>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 states that applicants for road projects should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets.</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 and this has been taken fully into account in the development of the Project as can be seen in 3.9 Legislation and Policy Compliance Statement (Document Reference APP-242)</p>
RR-186	<p>Concern that the road is the third highest carbon producer of all road projects, and that the section at Kirkby Thore has the highest carbon production.</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). Table 7-21 reports that the scheme with the highest emissions associated with construction is the Appleby to Brough Scheme at 143,621Tco₂e. The Temple Sowerby to Appleby Scheme is lower at 142,022 Tco₂e.</p> <p>Whilst the Greenhouse gas (GHG) assessment 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 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 assessment has demonstrated that</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>the Project will not materially affect the ability of Government to meet its carbon reduction targets.</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>
RR-207	<p>Specific concern about carbon release from soil by removing agricultural land. Concern that NO₂ emissions from HGVs could create nitric acid when combined with rain which will run into the Troutbeck SAC.</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> <p>The potential construction and operation impact of nitrogen deposition at all affected designated sites has been assessed in the Habitat Regulations Assessment (HRA) 2 Statement to Information Appropriate Assessment (Document Reference 3.6, APP-235) and 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>
RR-177; RR-188, RR-194	<p>Inappropriate use of resources in a climate emergency.</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 declarations made by the UK Parliament do not give cause to alter the conclusions of the</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>Environmental Statement assessment and the Project will make an extremely limited contribution to the UK's carbon reduction targets.</p> <p>National Highways also notes paragraph 5.17 of the National Policy Statement for National Networks 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 Table 3-2 References D-CL-01 and MW-CL-01</p>

2.6. Consultation and Engagement

Table 2-5: Response to Relevant Representations related to Consultation and Engagement

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-028	A number of representations are concerned with the proposed Black route between Cross Lanes and Rokeby. The eastern option would be a small price to pay for safety of walkers and residents. Concerns that consultation on this matter was poor.	The Black Route proposed by the DCO application has emerged from the studies of alternative options and the associated engagement and consultation 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 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.

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>Both consultation and engagement on alternative route alignments was undertaken that was appropriate and proportionate to support the principal objectives for this work. The objectives were to ensure that a preferred alignment could be identified that would comply with policy and legal tests and would minimise the environmental impact of the project, following the incorporation of appropriate mitigation. This work on alternatives and the associated consultation went beyond what is usually undertaken by National Highways for a preliminary design for a DCO application.</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. This included drop-in events at The Witham in Barnard Castle where the project team were available to talk to local communities, landowners, and stakeholders about the alternatives. Leaflets informing people about the alternatives and event were sent to addresses in the local area. The engagement was undertaken to provide additional information for stakeholders and local communities to help them understand the route 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> <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</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		Planning Act (PA 2008) as set out in Chapter 2, Part 5 of the PA 2008.
RR-043	West Layton Community Liaison Group are happy with the level of engagement.	National Highways acknowledge the support of West Layton Community Liaison Group regarding the engagement undertaken on the project.
RR-171	Concern over the Penrith section and whether this will impact upon several heritage sites. Request for further consultation on this matter.	<p>Both consultation and engagement on the Penrith section was undertaken as part of the overall project consultation and engagement which met all the legal tests and accords with the relevant policy and guidance. The Consultation Report (Document Reference 4.4, APP-252) explains how we have complied with the consultation requirements set out in the PA 2008, the Infrastructure Planning (Application: Prescribed Forms and Procedure) Regulations 2009 (APFP Regulations) and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations). The statutory consultation was also in accordance with the approach to consultation set out in the Project's Statement of Community Consultation (Document Reference 4.4, APP-259). As the application has now been submitted there is no requirement for further statutory consultation on the project unless National Highways propose to make material changes to the Project during the Examination.</p> <p>The Consultation Report also sets out detail in Annex N (Document Reference 4.4, APP-271) how National Highways has had regard to all the issues raised, including issues around heritage impacts in the Penrith section. The Environmental Statement Chapter 8 Cultural Heritage (Document Reference 3.2, APP-051) sets out the effect of the Project on heritage assets</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>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).</p> <p>The relevant mitigation measures are contained in Section 8.8, compliance with which would be secured by the DCO, should it be made.</p> <p>The mitigation measures include the development of a heritage mitigation strategy which is set out in the Environmental Management Plan Annex B3 Detailed Heritage Mitigation Strategy (Document Reference 2.7, APP-023) to mitigate effects to cultural heritage.</p>
<p>RR-173; RR-188; RR-187; RR-214; RR-194; RR-177; RR-174</p>	<p>Specific concerns raised over the quality of the consultation. Documents were inaccessible without a weblink, causing distress and confusion. Concern that specific developments of the scheme that were not consulted on throughout the process, including the Northern Route, Appleby to Brough and upgrades to the single carriageway.</p>	<p>Both consultation and engagement met all the legal tests and accords with the relevant policy and guidance. The Consultation Report (Document Reference 4.4, APP-252) explains how we have complied with the consultation requirements set out in the PA 2008, the Infrastructure Planning (Application: Prescribed Forms and Procedure) Regulations 2009 (APFP Regulations) and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations). The statutory consultation was also in accordance with the approach to consultation set out in the Project's Statement of Community Consultation (Document Reference 4.4, APP-259).</p> <p>The Statement of Community Consultation (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.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>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"> • Holding 24 consultation events, along the route in locations accessible to local communities, such as Dalton & Gayles Village Hall, Bowes Village Hall, and the Witham, Barnard Castle • 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. • 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 • 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. • Contacting key community group representatives for them to share information about the consultation with their wider network. • 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. <p>The Consultation Report (Document Reference 4.4, APP-252) also sets out in detail in Annex N (Document Reference 4.4, APP-271) how National Highways has had regard to all the issues raised, including the issues raised around a Northern Route within the</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>Appleby to Brough scheme and other matters raised on the proposed dualling for this section of the route. 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 the PA 2008.</p>
RR-194	<p>Queries why supplementary consultations (January-March 2022) only targeted specific residents when many issues, such as compounds, are general issues</p>	<p>Following the statutory consultation process 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 provisions, the location of construction compounds and landforms. These changes were subject to a targeted supplementary consultation. This targeted consultation involved direct engagement with those impacted by the changes. The preceding statutory consultation undertaken covered on all aspects of the design of the Project as well as the preliminary environmental assessment of the project. All residents along the route had an opportunity to participate in the statutory consultation. The Consultation Report (Document Reference 4.4, APP-252) sets out in detail in Annex N (Document Reference 4.4, APP-271) how National Highways has had regard to all the issues raised at statutory consultation and at supplementary consultations in Annex P (Document Reference 4.4, APP-271).</p>
RR-184	<p>Concern that there was no public consultation in Kirkby Thore, even though it is only one of two villages to be impacted significantly by the scheme</p>	<p>Consultation events were held at Kirkby Thore Memorial Hall, 2 Hall Cottages, Kirkby Thore, Penrith CA10 1UE. Statutory consultation events were on the 1st and 2nd October 2021, supplementary consultation events were held on 3rd and 4th February 2022 and a targeted consultation held on 4th February 2022.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>The publicity for the events and the material provided is described in the Consultation Report (Document Reference 4.4, APP-252). For the two statutory consultation events in combination over 200 attended. In addition to the consultation events there was engagement with the public within the village leading on alternative routes being evaluated. This included an engagement event, on the 13th July, using a tool known as “sound lab” which provided local people the opportunity to experience the potential acoustics of the proposed Project when operational.</p>
RR-210; RR-187; RR-177	Concern that there has been a failure to consult ‘Friends of the Lake District’	<p>The Consultation Report (Document Reference 4.4, APP-252) describes the approach to and the outcomes of engagement and consultation on the Project. It describes the large number of consultation events and engagement activities over several 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 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>The Friends of the Lake District (FLD) were invited to be part of these focus groups (as confirmed in table 2.1 of the Consultation Report).</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>We have also communicated directly with FLD, through correspondence, via a letter sent in February 2022 to address their specific issues and concerns.</p> <p>The feedback from all parties that we have consulted and engaged with, including FLD, has informed the DCO application in relation to the design of the Project, its assessment, and the proposed mitigation measures. 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 (Document Reference 4.4, APP-271) and P (Document Reference 4.4, APP-273) of the Consultation Report.</p> <p>The Planning Inspectorate (by letter date^d 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>

2.7. Cultural Heritage

Table 2-6: Response to Relevant Representations related to Cultural Heritage

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-009	Concern about disruption to Iron Age limestone blocks located in a field running south reaching down to the River Greta, which are the only remains of an Iron Age field system, proof of the first permanent human settlement close to Bowes.	<p>The Environmental Statement Chapter 8: Cultural Heritage (Document Reference 3.2, APP-051) sections 8.6.195 to 8.6.201 describes the Iron Age archaeology present in the vicinity of Bowes Bypass scheme.</p> <p>The Project has developed a heritage mitigation strategy which is set out in the Environmental Management Plan Annex B3 Detailed Heritage Mitigation Strategy (Document Reference 2.7, APP-023) to</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
	<p>Concerns also raised regarding a row of similar stones marking an Iron Age agricultural terrace system.</p>	<p>mitigate effects to cultural heritage. Where cultural heritage assets require removal, that removal will be undertaken with appropriate care and recording of archaeological value made in accordance with the heritage mitigation strategy.</p> <p>This Mitigation Strategy must be developed in consultation with stakeholders and approved by the Secretary of State as part of the second iteration of the EMP prior to the start of works.</p>
RR-023	<p>Concern about impact on Brough Castle.</p>	<p>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 the DCO, should it be made.</p> <p>The mitigation measures include the development of a heritage mitigation strategy which is set out in the Environmental Management Plan Annex B3 Detailed Heritage Mitigation Strategy (Document Reference 2.7, APP-023) to mitigate effects to cultural heritage. This Mitigation Strategy must be developed in consultation with stakeholders and approved by the Secretary of State as part of the second iteration of the EMP prior to the start of works.</p> <p>The Environmental Statement Chapter 8: Cultural Heritage (Document Reference 3.2, APP-051) section 8.6.169 describes Brough Castle. The Environmental Statement Appendix 8.10 Impact Assessment Table (Document Reference 3.4, APP-187) notes a slight adverse effect on Brough Castle because of changing setting, which is not considered significant. The assessment of effects takes into consideration the embedded mitigation which is secured as part of the DCO as previously described.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-023	Concern about the impact on Grade 2 listed Rokeby Park.	<p>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 the DCO, should it be made.</p> <p>The Project has developed a heritage mitigation strategy which is set out in the Environmental Management Plan Annex B3 Detailed Heritage Mitigation Strategy (Document Reference 2.7, APP-023) to mitigate effects to cultural heritage. This Mitigation Strategy must be developed in consultation with stakeholders and approved by the Secretary of State as part of the second iteration of the EMP prior to the start of works. The Project Design Principles (Document Reference 5.11, APP-302) include landscaping requirements for the area of Rokeby Park to minimise effects of the Project. The detailed design of the project must be compatible with these Principles (as secured in article 54 of THE dDCO [REF]).</p> <p>The Environmental Statement Chapter 8: Cultural Heritage (Document Reference 3.2, APP-051) discusses Rokeby Park in multiple contexts and locations, but sections 8.6.277 to 8.6.280 describe the heritage of the park itself. The Environmental Statement Appendix 8.10 Impact Assessment Table (Document Reference 3.4, APP-187) notes a slight adverse effect on Rokeby Park because of changing setting, which is not considered significant. The assessment of effects takes into consideration the embedded mitigation which is secured as part of the DCO as previously described.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-023	Concern about the impact on the Eden Valley Railway.	<p>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 the DCO, should it be made.</p> <p>The mitigation measures include the development of a heritage mitigation strategy which is set out in the Environmental Management Plan Annex B3 Detailed Heritage Mitigation Strategy (Document Reference 2.7, APP-023) to mitigate effects to cultural heritage. This Mitigation Strategy must be developed in consultation with stakeholders and approved by the Secretary of State as part of the second iteration of the EMP prior to the start of works</p> <p>The Environmental Statement Chapter 8: Cultural Heritage (Document Reference 3.2, APP-051) sections 8.6.179 describes Eden Valley Railway, specifically the heritage asset of Warcop Railway Station. The Environmental Statement Appendix 8.10 Impact Assessment Table (Document Reference 3.4, APP-187) notes a slight adverse effect on Warcop Railway Station because of changing setting, which is not considered significant. The assessment of effects takes into consideration the embedded mitigation which is secured as part of the DCO as previously described.</p>
RR-041	General concern about impacts on and loss of the archaeological landscape.	The Environmental Statement Chapter 8: Cultural Heritage (Document Reference 3.2, APP-051) describes the archaeological value of the Project. An assessment of the likely significant effects upon archaeological features and landscape is detailed within Section 8.10.

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>More detail would be required on the specific locations of concern in order to provide a response.</p> <p>more detailed The Project has developed a heritage mitigation strategy which is set out in the Environmental Management Plan Annex B3 Detailed Heritage Mitigation Strategy (Document Reference 2.7, APP-023) to mitigate effects to cultural heritage. This Mitigation Strategy must be developed in consultation with stakeholders and approved by the Secretary of State as part of the second iteration of the EMP prior to the start of works. Where cultural heritage assets require removal, that removal will be undertaken with appropriate care and recording of archaeological value made in accordance with the heritage mitigation strategy..</p>
RR-058	<p>Concern that the “A66NTP Preliminary Design Consultation Sept 2021 Route Development Report Volume 1” discusses that the Black route was preferred over to the blue route based solely on the designation of a small piece of land deemed to be part of a historic landscape.</p>	<p>There are a variety of reasons for the selection of the Black Route. Further detail about the process, the alternatives considered, and the wider factors that have informed the decision-making is set out in Section 5.7 of the Project Development Overview Report (PDOR) (Document Reference 4.1, APP-244) and Section 5.8 of the Route Development Report (appended to the PDOR, Document Reference 4.1, APP-247).</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 conservation. 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.”</p> <p>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. The</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>principal consideration in the preference for the Black route (with a western junction at Rokeby) is the impact the Blue Route would have had on the Grade II* Registered Park and Garden at Rokeby Park. Whilst impacts on some key views of the blue route junction could be mitigated through careful landform design and reinstatement, the impacts cannot be completely avoided as the Blue route junction would still lead to additional fragmentation of the site. It was therefore considered that the blue route junction at Rokeby was likely to be regarded as not conforming with national policy and therefore there was a risk that a DCO application would not secure a grant of consent.</p>
RR-221	<p>Concern that the choice of the Black Route will lead to increased risk to many heritage assets.</p> <p>Statement that Historic England have cited air pollution as a risk to St Mary's Rokeby as part of their opposition to the Blue alternative route.</p>	<p>National Highways acknowledges the Interested Party's concerns. The concern regarding the Blue alternative route have not been addressed as the option was not taken forward as part of the design.</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 (PDOR), Document Reference 4.1, APP-247).</p> <p>As is set out in section 5.7 of the PDOR (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.</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</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>Environmental Statement Chapter 3 Assessment of Alternatives (Document Reference 3.2, APP-046) provides further information in this regard.</p> <p>The Environmental Statement (ES) Chapter 8: Cultural Heritage (Document Reference 3.2, APP-051) has assessed the potential effects on heritage assets as a result of the Black Route which has since been developed into the design submitted as part of the DCO. Section 8.9.38 and Section 8.9.39 state the conclusions of this assessment as no significant effects as a result of the Cross Lanes to Rokeby scheme to heritage assets.</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> <p>Chapter 8.1.29 of the Transport Assessment (Document Reference 3.7, APP-236) discusses the impact of the Project on the A67 within Barnard Castle.</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 (Average Annual Daily Traffic), including on Barnard Castle Bridge, (including Bridgewater and 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>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>The Environmental Statement Appendix 8.10 Impact Assessment Table (Document Reference 3.4, APP-187) notes a slight adverse effect on the Barnard Castle Conservation Area which is a result of potential visibility between the Barnard Castle Conservation Area and the Project.</p>
RR-221	<p>Concern that National Highways have not produced heritage assessments for the buildings in town. Concern that the preferred route will cause more damage than Historic England suggest.</p>	<p>National Highways have assumed that the reference to 'in town' is referring to near The Bank.</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). As such there has not been a specific heritage assessment for all individual listed buildings in the location in question.</p> <p>However, Barnard Castle Conservation Area has been included in the heritage assessment of the aforementioned ES. ES Appendix 8.10 Impact Assessment Table (Document Reference 3.4, APP-187) notes a slight adverse effect on the Barnard Castle Conservation Area which is a result of potential visibility between the Barnard Castle Conservation Area and the Project. This effect is not considered significant.</p> <p>National Highways cannot comment on the opinions of Historic England, however, have worked to minimise the potential effects of the Project on heritage assets. The Project has developed a heritage mitigation strategy which is set out in the Environmental Management Plan Annex B3 Detailed Heritage Mitigation Strategy (Document Reference 2.7, APP-023) to mitigate effects to cultural heritage. This Mitigation Strategy must be developed in consultation with stakeholders and approved by the Secretary of State as part of</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>the second iteration of the EMP prior to the start of works. The Project Design Principles (Document Reference 5.11, APP-302), which the detailed design of the project must be compatible with article 54 of the draft DCO (Document Reference 5.1, APP-285), including landscaping requirements for the area of Church of St Mary to minimise effects of the Project, such as 08.06 that specifies planting to enhance the existing boulevard and restore historic field patterns among others.</p>

2.8. DCO – Policy Legislation and Guidance

Table 2-7: Response to Relevant Representations related to DCO – Policy Legislation and Guidance

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-060	<p>Concern that the Benefit to cost is under 1 so the harm of the landscape, wildlife etc will not be outweighed by benefits of the scheme. Highlights that the NN NPS states that road widening should not occur in an AONB unless benefits can be shown.</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 Transport Analysis Guidance (TAG). 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.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>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 latest data around safety, freight, the impact of the project on levelling-up, environmental impacts etc.</p> <p>The North Pennines 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 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</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>– 5.153 of the NNNPS). 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>

2.9. Design, Engineering and Construction

Table 2-8: Response to Relevant Representations related to Design, Engineering and Construction

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-011	Concern regarding the junction layout for Flitholme and Langrigg.	<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 detailed design stage.</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>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-017	Suggestion that the scheme should extend eastwards to include the Wycliffe junction at Thorpe Grange Farm. Suggestion that a deceleration lane should be provided as part of the scheme, to enable the junction to meet the design standards for the A66.	The Wycliffe junction is situated on an existing dual section outside of the Cross Lanes to Rokeby scheme extents and is therefore not part of the A66 Northern Trans Pennine Route Project.
RR-019	Specific request for ring road at Beacon Edge to spread traffic between J40 and J41 of the M6.	Traffic modelling has been carried out along the route and key junctions, including M6 J40, which has confirmed that the improvements to the junction can be accommodated to an adequate level of performance in the design year. The details of this assessment at Junction 40 are included in Section 8.2 of the Transport Assessment (Document Reference 3.7, APP-236). Works at Beacon Edge between J40 and J41 are beyond the scope of the project.
RR-028	Queries as to why the Western Junction is proposed to the detriment of walkers, as there is no footpath or walkway present through the parkland at Rokeby on the land that would be required for development. Request to reconsider the decision to develop the Western Junction at Rokeby.	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 set out details of the proposed north-south and east-west connectivity for each of the respective scheme including Cross Lanes to Rokeby. The Black route (including the western junction at Rokeby) was taken forward following Statutory Consultation for a number of reasons, including its avoidance of direct impacts on the Rokeby Registered Park and Garden, which is a requirement in 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). 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).

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-034	Suggests that it would be better to keep the all-direction junction at Rokeby for traffic to access the town along Westwick Road. Preference, therefore, for the Blue Route.	National Highways' proposals for the new Rokeby junction are to provide movements in all directions, similar to the existing provision. All HGV traffic from the A66 wishing to travel to Barnard Castle will be directed to the Rokeby junction and C165 Barnard Castle Road, as per the existing scenario but via new signage. Detail on the development of the Cross Lanes to Rokeby scheme, including the junction design can be found in the Project Development Overview Report (Document Reference 4.1, APP-244).
RR-058	Concern that preference for the Black route was based on the designation of a small piece of land deemed part of a historic landscape. Queries as to why this piece of historically designated land needs protecting as the land looks like any other field. Highlights that the adjacent land was separated from the historical parkland when the existing road was upgraded in 1978, and that the damage to the park occurred over 40 years ago.	The Black route was taken forward following Statutory Consultation for a number of reasons, including its avoidance of direct impacts on the Rokeby Registered Parks and Gardens, which is a requirement in current national planning policy. The Policy which must be followed is set out in Chapter 8 of the Environmental Statement: 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).
RR-070	Highlights the need for clear signage to indicate the A66 as the preferred route for goods vehicles.	Traffic signs (including signs for local services and places of interest and strategic routes for all traffic, including HGVs) within the scheme extents will be upgraded as part of the works and developed in the detailed design stage. Signage for the scheme will be provided in accordance with the Government's Traffic Signs Manual guidance to ensure the safety of all road users.
RR-126	Request that suitable arrangements be put in place to ensure businesses, including the farms that will be impacted, can continue to operate during the construction phase.	Accommodation works, which have been designed to ensure continued operation and access to existing homes, businesses and land have been outlined in the DCO application. These include the provision of replacement private means of access where existing accesses are proposed to be stopped up by the Project, as shown on the Rights of Way and Access Plans (Document Reference 5.19, APP-342 to APP-349 inclusive). We will look to mitigate disruption

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>to landowners and their businesses during construction through the development of thorough local traffic management and access plans to enable businesses to continue to operate during construction wherever possible. The dialogue will continue with all affected persons throughout the Examination and detailed design stages of the Project.</p> <p>The scope of reasonable accommodation works to be provided for affected persons is being progressed through ongoing engagement with affected persons to the extent that is appropriate to do so in light of the information available of the emerging detailed design.</p>
RR-221	<p>Preference for the Blue Junction, which will be better for traffic balancing. Raises concerns about the impact of the proposed junction on local people's lives and on the town.</p> <p>Highlights that Bridgegate is the first main road in Barnard Castle that is affected by the choice of junction at Rokeby, for the Cross Lanes to Rokeby section of the A66 dualling scheme. Concern that the traffic modelling predicts that the Rokeby junction of the preferred route (the Black route) will significantly increase traffic down a local resident's road, owing to the extra distance to the Rokeby junction from Cross Lanes, and the extra-long U-turn that traffic will need to take to get back to town along the C165 Barnard Castle Road.</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 (Average Annual 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>HGV traffic has been accounted for in the traffic modelling and will continue to be signed to the Rokeby Junction, and Abbey Bridge as it will remain the route to/from Barnard Castle.</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>
RR-205	<p>Concern that the current Appleby-Brough and Temple Sowerby sections contain extensive slip roads and underpasses. Preference for the northern route which would remove the need for these.</p>	<p>One of the key considerations in the design development work for these Schemes 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. A route north of the existing A66 would potentially have a major impact on the Ministry of Defence</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
	<p>Concern that the representations parents' property will become surrounded by sink ponds, access and slip roads, and hard standing.</p>	<p>training camp, requiring significant, costly accommodation works to relocate required facilities. Please refer to the Project Design Principles (Document Reference 5.11, APP-302).</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 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.</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> <p>No land is proposed to be acquired directly from the Interested Party's parents. Please refer to the Environmental Statement Chapter 14 Population and Human Health (Document Reference 3.2, APP-056) for further details as to how National Highways have assessed the impact of the Project on local communities.</p>

2.10. Development of the Project and Alternatives

Table 2-9: Response to Relevant Representations related to Development of the Project and Alternatives

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-008, RR-037, RR-057, RR-058, RR-216, RR-072	A number of responses are in favour of, and would prefer, the Blue Route Option for the Cross Lanes to Rokeby scheme.	<p>National Highways acknowledges the Interested Parties' 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 Appendix 3 to the Project Development Overview Report (PDOR) (Document Reference 4.1, APP-247).</p> <p>As is set out in section 5.7 of the PDOR (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 shown in the Blue Route 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> <p>The Black Route avoids direct impacts on the Registered Parks and Garden, in conformity with the National Policy Statement for National Networks. Environmental Statement Chapter 8 Cultural Heritage (Document Reference 3.2, APP-051) 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</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		Statement Chapter 3 Assessment of Alternatives (Document Reference 3.2, APP-046)
RR-037, RR-058, RR-216, RR-072	<p>Concern that the route chosen will require traffic to travel through Startforth, along a narrow and winding road, with narrow pavements, and is a popular route for pedestrians who must walk in the road to cross each other. Concern that traffic entering the town from Scotch Corner will be directed along this route, meaning traffic will have to cross the river and travel up The Bank in Barnard Castle, which is already a traffic bottleneck. Preference, therefore, for the blue Option which would keep the all-direction junction at Rokeby for traffic to access the town along Westwick Road.</p>	<p>Although the Relevant Representations submitted do not specify, from the information provided National Highways have assumed these are referring to Scheme 08 Cross Lanes to Rokeby.</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 Average AnnuaDT, 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>There is no proposed change, therefore HGV traffic will continue to be signed to the Rokeby Junction, and Abbey Bridge as it will remain the route to/from Barnard Castle, as described in the Transport Assessment (Para 3.1.92 in Document Reference 3.7, APP-236).</p> <p>In terms of route options, paragraph 5.7.34 of the Project Development Overview Report (Document Reference 4.1, APP-244) outlines that the red and blue options were discounted as a result of the sifting exercise undertaken, and as such the Black Route was subsequently identified as the preference to be taken forward for Statutory Consultation (and ultimately forming part of</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>the DCO application). 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 – more detail is set out from paragraph 5.7.35 onwards.</p>
RR-038	<p>Concern that NH's decision to follow the Black Route is flawed and would cause harm to the local area and community</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> <p>The Black Route avoids direct impacts on the Registered Parks and Garden, in conformity with the National Policy Statement for National Networks. Environmental Statement Chapter 8 Cultural Heritage (Document Reference 3.2, APP-051) provides further information in this regard.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		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).
RR-043	Indication that the community at West Layton are generally content with the proposals and are keen to see the project completed due to the current safety issues. Concern that other representations made could result in substantive changes to the proposals. Expressed wish to be kept updated of any changes so there is an opportunity to respond.	Comments duly noted. Having made a relevant representation, RR-043 is an interested party and can participate in the examination of the Project, to include making written representations and attending hearings. All updates on the progress of this application can be found on the webpage for the Project on the Planning Inspectorate's 'National Infrastructure Planning' website. National Highways will continue to engage with the community at West Layton throughout the course of the Examination.
RR-050; RR-192; RR-189; RR-177, RR-060, RR-196, RR-205, RR-192, RR-189, RR-177	National Highways should be developing alternative ways of addressing safety issues such as reduced speed limits, junction improvements and the use of underpasses for farm crossings.	The Project will enhance journey safety through replacing the existing, low-capacity single carriageway sections of the A66 with a new high performing two lane dual carriageway road. The benefits that the Project will bring are identified in the Case for the Project (Document Reference 2.2, APP-008). The dualled road will significantly increase capacity and lead to improved journey times, less congestion and fewer delays. The route proposed has emerged from studies of alternative options as the best solution to address the problems on the existing A66 and to deliver the Project objectives included under the themes of economic, transport, community, and environmental objectives (refer to Table 1 of the Project Development Overview Report (Document Reference 4.1, APP-244). These objectives align with National Highways' three priorities of

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>Safety, Customer and Delivery and informed the development of the design for the Project alongside various factors including but not limited to environmental impacts, policy conformity, engineering considerations, the views of stakeholders and regard to consultation responses. Further information on the alternative options appraisal and route selection can be found in the Project Development Overview Report (Document Reference 4.1, APP-244) and Case for The Project (Document Reference 2.2, APP-008).</p>
<p>RR-060, RR-210, RR-232, RR-177</p>	<p>States that road safety could be improved on single carriageway sections of the A66 without needing to dual through and adjacent to the AONB. General concerns regarding impact on the AONB and opposition to the scheme on environmental grounds.</p>	<p>The Project will enhance journey safety through replacing the existing, low-capacity single carriageway sections of the A66 with a new high performing two lane dual carriageway road. The benefits that the Project will bring are identified in the Case for the Project (Document Reference 2.2, APP-008). The dualled road will significantly increase capacity and lead to improved journey times, less congestion, and fewer delays. The route proposed has emerged from studies of alternative options as the best solution to address the problems on the existing A66 and to deliver the Project objectives included under the themes of economic, transport, community, and environmental objectives (refer to Table 1 of the Project Development Overview Report (PDOR) (Document Reference 4.1, APP-244). These objectives align with National Highways' three priorities of Safety, Customer and Delivery and informed the development of the design for the Project alongside various factors including but not limited to environmental impacts, policy conformity, engineering considerations, the views of stakeholders and regard to consultation responses. Further information on the alternative options appraisal and route selection can be found in</p>

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		<p>the PDOR (Document Reference 4.1, APP-244) and Case for The Project (Document Reference 2.2, APP-008).</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 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 (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.</p> <p>With regard to 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 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,</p>

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		<p>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 to the north of the existing A66.</p> <p>Further information on the environmental assessments undertaken during design development can be found in paragraphs 1.5.47 to 1.5.71 of Environmental Statement Chapter 3 Assessment of Alternatives (Document Reference 3.2, APP-046).</p>
<p>RR-181</p> <p>RR-183</p>	<p>States that the boundary of the AONB is not the current A66. Questions whether it would be possible to make use of this unattractive area and avoid bringing harm to those living in the area.</p> <p>The road in the section between Appleby and Brough, and especially around Flitholme and the Great Musgrave turning, section should ALL be built to the north of the current road. Here, the land to the north is unattractive scrubland and uninhabited, whereas the landscape it is planned to carve up south of the current road is attractive farmland and very inhabited.</p>	<p>The boundary of the Area of Outstanding Natural Beauty (AONB) and therefore the extents of the designation and protection afforded to it by legislation and policy are not within National Highways' control and therefore National Highways need to promote a route that minimises the impact of and potential damage to the North Pennines AONB.</p> <p>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 boundary of such an area, and those applicable to developments outside such areas but that have an impact on</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>them; refer to Sections 6.5 and 6.6 of the Case for the Project (Document Reference 2.2, APP-008) and Section 3.3 of the Legislation and Policy Compliance Statement (Document Reference 3.9, APP-242) for further information. 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 as there were alternative alignments that presented minimal incursion into the AONB and therefore impacts on the designated site.</p> <p>With regard to 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 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</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>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 to the north of the existing A66.</p>
RR-195, RR-230	<p>Preference for the northern route as this would limit the impact of the scheme on Dyke Nook Community Farm</p>	<p>National Highways acknowledges the Interested Party's concerns. National Highways acknowledges that Dyke Nook Community Farm is an aspiration of the community and does not currently exist as a facility. National Highways received feedback from stakeholders outlining concerns about the proximity of the proposed route to Dyke Nook Farm and other surrounding properties during the statutory consultation. Further details can be found in Consultation Report (Document Reference 4.4, APP-254); see Annex N Tables evidencing regard had to consultation responses (Document Reference 4.4, APP-271) and Annex P Tables evidencing regard had to supplementary consultation responses (Document Reference 4.4, APP-273). In response to this, an alternative design was developed to construct the new eastbound carriageway to the north of the existing A66. This suggestion was consulted on in January/February 2022. Leaflets were distributed and two drop-in sessions were held in the local area to gather feedback. Under these plans the existing A66 will become the westbound carriageway which means National Highways no longer need to build it to the south of the existing A66 (refer to paragraphs 5.5.78 to 5.5.80 of the Project Development Overview Report (Document Reference 4.1, APP-244)).</p> <p>This has resulted in reduced land take from the properties and increasing the distance from the properties to the new A66.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-211	<p>Concern that the only filling station between Scotch Corner and Penrith is very popular, and that siting a junction at the north of the Village risks traffic flowing through the village to access the station.</p> <p>No follow up consultation made regarding how the southern orange route could have been improved at the only filling station on the route, south of Kirkby Thore.</p>	<p>The most direct route to the filling station would be for westbound drivers to exit the A66 dual carriageway at the proposed Long Marton Junction, and to travel along the detrunked A66 to the petrol filling station. To get back to the A66, drivers would continue travelling on the detrunked section of the A66 through Kirkby Thore directly to the Temple Sowerby Junction to regain access on to the dual A66. Eastbound drivers would use the same route but would exit the A66 dual carriageway at the Temple Sowerby Junction, and re-access the dual A66 at the proposed Long Marton junction. Therefore, there would be no need for drivers to use Main Street in Kirkby Thore or to use the proposed Fell Lane Junction</p> <p>At July 2021 stakeholder engagement events, National Highways presented a series of proposed route alignments for the Temple Sowerby to Appleby Scheme. One of these, the Orange Route, proposed online dualling of the existing A66, through the village of Kirkby Thore and past the filling station to the east of the village.</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 is in conformance with national planning policy, including the National Policy Statement for National Networks. A sifting exercise was carried out as part of design development for this scheme, which identified that the Orange Route would have a direct negative impact on the Scheduled Ancient Monument at Kirkby Thore Roman fort and vicus. Further information on this assessment can be found in Section 5.5 of the Route Development Report (Appendix 3 of the Project Development Overview Report, (Document Reference 4.1, APP-247)).</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>This assessment concluded that as an alternative alignment for the Temple Sowerby to Appleby Scheme (the Blue Route) that presented less harm to the significance of the designated heritage asset of the SAM, existed it was considered that the Orange Route is likely not to be in accordance with national policy. As such, the Orange Route was discounted from further consideration and therefore no follow-up consultation was carried out regarding this route.</p>
RR-211	<p>Concern that the problem of HGVs in the village due to British Gypsum could have been solved by the Southern Route. Concern that NH did not consider suggestions to include a designated road for Gypsum traffic from Priest Lane directly to Gypsum.</p>	<p>Paragraphs 5.5.101 to 5.5.102 of Appendix 3 of the Project Development Overview Report (Document Reference 4.1 APP-247) state the reasons that National Highways discounted the Orange (southern) Route between Temple Sowerby and Appleby. Given the impact the Orange Route would have on the Kirkby Thore Roman Fort and Associated Vicus Scheduled Ancient Monument, the application for development consent would therefore have to demonstrate exceptional circumstances in order to put forward the orange Route alternative for Examination. This would require a case for the scheme to be made that potential substantial harm or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm. As an alternative alignment exists in the Blue (northern) Route, it is considered that the Orange Route is likely not to be in accordance with national policy and therefore there is a risk that a DCO application including the Orange Route would not be likely to secure a grant of consent. The issue of HGVs travelling through Kirkby Thore was therefore not a deciding factor in route selection.</p>
RR-225, RR-177, RR-191, RR-188	<p>Supportive of the need for a new section of road but would prefer a northern route. Suggestion of a new dual carriageway between Appleby and</p>	<p>National Highways acknowledges the Interested Parties' concerns.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
	<p>Brough which would avoid the need for the proposed junctions, slip roads and bridges. Suggests this would also enable the current A66 to become a local road.</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 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 (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. With regard to 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 (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</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>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 to the north of the existing A66.</p>
RR-234	<p>Objection to the Temple Sowerby - Appleby section as it will change the landscape of the Eden Valley and north Pennine area, which will impact on the respondent's holiday business in the Eden Valley.</p>	<p>National Highways acknowledges the Interested Party's concerns.</p> <p>A series of Project-wide Design Principles have informed design development of the routes, including the over-arching theme of "Designs that are integrated in context and express character and a sense of place". Further information on this and other themes can be found in Chapter 3 of the Project Design Principles (Document Reference 5.11, APP-302).</p> <p>Impacts of the chosen route on the landscape, integration into it, and mitigation and enhancement measures, are outlined in Sections 10.8 and 10.9 of Environmental Statement Chapter 10 Landscape and Visual Effects (Document Reference 3.2, APP-053), with a Summary of Significant Effects provided in Tables 10-11 and 10-12 of that same document.</p>
RR-221	<p>Concern that the choice of Black Route will impact on the residents of Bridgegate.</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 Bridgegate within Barnard Castle is one of a general reduction in traffic flow. This is due to</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>the lower flows on the A67, of around 400 vehicles (Average Annual 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>
RR-196	<p>Highlights that an upgrade to The Settle - Carlisle line as not been considered as an alternative, as this connects to both the East and West coast mainline.</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.</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 NTPRSS referenced above is included in the Appendices to this document (both the Stage 1 Report (Appendix 4 to the PDOR, (Document Reference 4.1, 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</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>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>
RR-208	<p>Concern that the proposed route at Kirkby Thore is longer than the existing route. This will add to commuters' journey times and fuel costs.</p>	<p>Table 7-8 within the Transport Assessment (Document Reference 3.7, APP-236) shows that the travel time savings on the route between the M6 J40 and the A1(M) Scotch Corner with the delivery of the Project are between 10 and 13 minutes. Between Appleby and Temple Sowerby, the travel time savings are expected to be between 3 and 4 minutes.</p> <p>National Highways accepts that some journeys will be around 600m longer due to the alignment of the proposed A66 Kirkby Thore bypass, and that therefore some journeys will be marginally more expensive.</p> <p>However, this increase in journey lengths for some specific journeys should be considered against both the time savings stated above and 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 addition, the route was selected based on assessment of a range of criteria, including but not limited to 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 national planning policy (refer to section 5.4 of Project Development Overview Report (Document Reference 4.1, APP-244) for further information).</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-072	<p>Concern that sufficient regard has not been given to the impact of the proposed junctions on the existing road network, namely Rokeby/C165, and the signage at Cross Lanes/B6277 and Bowes/A67.</p>	<p>Chapter 5.7 of the Project Development Overview Report (PDOR (Document Reference 4.1, APP-244)) provides details of the development of the Cross Lanes to Rokeby Scheme, detailing the design development across various stages including National Highways' Project Control Framework Stage 3 (Preliminary Design) which included the following stages:</p> <ul style="list-style-type: none"> • Development of junction proposals from Preferred Route Announcement (para 5.7.16 to 5.7.19). • Development of junctions following Winter 2020 Project Update (para 5.7.20 to 5.7.21). • Design development of Cross Lanes junction alternatives (para 5.7.22 to 5.7.25). • Design development of Rokeby junction alternatives (para 5.7.26 to 5.7.29). • Presentation of junctions' alternatives at August 2021 stakeholder engagement event (para 5.7.30 to 5.7.32). • Alternatives sifting for Statutory Consultation (para 5.7.33 to 5.7.38). • Statutory Consultation Autumn 2021(para 5.7.39). <p>Paragraph 5.7.53 states: Throughout PCF Stage 3, traffic modelling of the junctions at Cross Lanes and Rokeby, and the interaction between these has been undertaken and refined to reflect the developing design along the route. This modelling includes the projected increased traffic flows resulting from the upgrade works to ensure that potential negative impacts on surrounding areas can be identified and mitigated (refer to the Transport Assessment (Document Reference 3.7, APP-236) for further information).</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>Chapter 8.1.29 of the 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 (Average Annual 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>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>In terms of HGV access, the scheme description within Chapter 5.7 of the PDOR (Document Reference 4.1, APP-244) states within para 5.7.73 that:</p> <p>The new Rokeby Junction would maintain HGV access to Barnard Castle via the C165 Barnard Castle Road.</p> <p>Further information on the National Highways Project Control Framework process for project delivery can be found in Section 3.2 of the PDOR (Document Reference 4.1, APP-244), with Sections 3.3, 3.4 and 3.5 providing further information on how the A66 project developed prior to PCF Stage 3 Preliminary Design.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-189	<p>Objection to the Temple Sowerby – Appleby section as it runs through the Eden River SAC/SSSI. Suggests that the best solution is to upgrade the existing road and extending the 40ph speed limit. Concern that this option was never offered at consultation despite NH meeting minutes recognising that this would be the option most attractive to the villagers of Kirkby Thore and the least damaging to the environment.</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.</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, including smaller-scale interventions like upgrading the existing road and 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, (Document Reference 4.1, 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.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>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> <p>At July 2021 stakeholder engagement events, National Highways presented a series of proposed route alignments for dualling the Temple Sowerby to Appleby Scheme. One of these, the Orange Route, proposed online dualling of the existing A66, through the village of Kirkby Thore and past the filling station to the east of the village.</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 is in conformance with national planning policy, including the National Policy Statement for National Networks. A sifting exercise was carried out as part of design development for this scheme, which identified that the Orange Route would have a direct negative impact on the Scheduled Ancient Monument at Kirkby Thore Roman fort and vicus. Further information on this assessment can be found in Section 5.5 of the Route Development Report (Appendix 3 of the PDOR, (Document Reference 4.1, APP-247)).</p> <p>This assessment concluded that as an alternative alignment for the Temple Sowerby to Appleby Scheme (the Blue Route) that presented less harm to the significance of the designated heritage asset of the SAM existed it was considered that the Orange Route is likely not to be in accordance with national policy. As such, the Orange Route was discounted from further consideration and therefore no follow-up consultation was carried out regarding this route.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-189	<p>Concern that justification was given for the decision to build a northern route, such as the road impacting on the milk quality of cows, when the farm on the southern route operates a No Graze/Total Confinement system which inevitably minimises exposure to pollution as its cows are indoors.</p>	<p>At July 2021 stakeholder engagement events, National Highways presented a series of proposed route alignments for dualling the Temple Sowerby to Appleby Scheme. The most southerly of these, the Orange Route, proposed online dualling of the existing A66, through the village of Kirkby Thore.</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 is in conformance with national planning policy, including the National Policy Statement for National Networks. A sifting exercise was carried out as part of design development for this Scheme, which identified that the Orange Route would have a direct negative impact on the Scheduled Ancient Monument at Kirkby Thore Roman fort and vicus. These assessments also considered 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 and cultural heritage assets. Further information on this assessment can be found in Section 5.4 of the Route Development Report (Appendix 3 of the PDOR, (Document Reference 4.1, APP-247)).</p> <p>This assessment concluded that as an alternative alignment for the Temple Sowerby to Appleby Scheme (the Blue Route) that presented less harm to the significance of the designated heritage asset of the SAM, existed it was considered that the Orange Route is likely not to be in accordance with national policy.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		As such, the Orange Route was discounted from further consideration and therefore no follow-up consultation was carried out regarding this route.
RR-189	Suggests that the southern route provided an opportunity to reduce pollution to the river Eden by removing the agricultural run-off which has led to several interventions from the Environment Agency.	The southern (Orange) route as shown in Figure 9 of the Project Development Overview Report, (Document Reference 4.1, APP-244) was discounted as the proposed route in the DCO application document presented less harm to the designated scheduled ancient monument and the River Eden Special Area of Conservation. Removal of existing agricultural run-off was not a key consideration of the route selection process, while this may have resulted in a secondary benefit, unauthorised discharge of pollutants to a watercourse from agricultural businesses is a matter to be enforced by the Environment Agency.
RR-188. RR-177, RR-194	Concern that the southern route has been justified on the grounds that the North is an AONB. Suggestion that the minutes from a meeting (PINS sec 51, Advice Library, 17/03/2022) admit the initial boundary was arbitrary.	National Highways acknowledges the Interested Parties' concerns. The boundary of the Area of Outstanding Natural Beauty (AONB) and therefore the extents of the designation and protection afforded to it by legislation and policy are not within National Highways' control and therefore National Highways need to promote a route that minimises the impact of and potential damage to the North Pennines AONB. 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 boundary of such an area, and those applicable to developments outside such areas but that have an impact on

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>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 (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. With regard to 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 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 to the north of the existing A66.</p>

2.11. Environment and Environmental Management Plan

Table 2-10: Response to Relevant Representations related to Environment and Environmental Management Plan

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-194; RR-232; RR-041; RR-128; RR-182; RR-188; RR-217; RR-177; RR-041, RR-194	General concern raised on the potential impacts on the environment, nature and habitats and amount of agricultural land being taken away.	<p>The environment has been taken into consideration throughout the development of the Project, which has allowed for environmental protection to be integrated into the design (e.g., the Trout Beck viaduct which has been designed to minimise effects on the Trout Beck which forms a part of the River Eden Special Area of Conservation).</p> <p>The design has also sought to minimise land required where possible, such as integrating the existing A66 carriageway into the new A66 dual carriageway where feasible to reduce the land and construction effort required.</p> <p>Habitats lost as a result of the Project are being mitigated by replacement planting and habitat creation and will be secured through the Environmental Management Plan (Document Reference 2.7, APP-019).. The Environmental Mitigation Maps (Document Reference 2.9, APP-041) demonstrate the illustrative mitigation plans for the Project. Impacts to agricultural land are being discussed with individual landowners across the Project, however there is further detail on the Project wide effects in the Environmental Statement Chapter 13: Population and Human Health (Document Reference 3.2, APP-056) and Chapter 9 Geology and Soils (Document Reference 3.2, APP-052).</p> <p>The potential effects of the Project have been assessed and reported within the Environmental Statement which covers ten topic chapters: Chapter 5: Air Quality (Document Reference 3.2, APP-048), Chapter 6: Biodiversity (Document Reference 3.2, APP-049), Chapter 7: Climate (Document Reference 3.2, APP-050), Chapter 8: Cultural Heritage (Document Reference 3.2, APP-051), Chapter 9: Geology and Soils (Document Reference 3.2, APP-052), Chapter</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>10: Landscape and Visual (Document Reference 3.2, APP-053), Chapter 11: Material Assets and Waste (Document Reference 3.2, APP-054), Chapter 12: Noise and Vibration (Document Reference 3.2, APP-055), Chapter 13: Population and Human Health (Document Reference 3.2, APP-056) and Chapter 14: Road Drainage and Water Environment (Document Reference 3.2, APP-057). Each of these chapters sets out the existing baseline for their topics and assesses the impact of the Project against it. They also describe the proposed mitigation required to minimise the effects of the Project.</p> <p>The Environmental Statement Non-Technical Summary (Document Reference 3.1, APP-043) gives a shorter summary of the Environmental Statement and its conclusions, including the residual likely significant effects anticipated.</p>
RR-217; RR-042; RR-182; RR-189	<p>Specific concerns regarding environmental impact to the River Eden (SAC and SSSI). These responses raise concern surrounding the addition of roads within a floodplain that will inevitably impact upon the River Eden and levels of pollution in the River. Concern that the Eden Rivers Trust's objections have been ignored.</p>	<p>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. The Trout Beck Viaduct shall be open span and the length of the crossing minimised to reduced impacts on the aquatic environment and allow natural river processes to continue, unless otherwise agreed with Natural England and the Environment Agency as set out in the Environment Management Plan (EMP (Document Reference 2.7, APP-019)) and EMP Annex C1 Working in and Near SAC Method Statement (Document Reference 2.7, APP-036) will specify working methods required to be followed in the construction of the Project. This will be developed in further detail as part of the second iteration of the EMP, in consultation with stakeholders and which will be subject to approval by the Secretary of State prior to the start of the relevant works. The Project Design</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>Principles (Document Reference 5.11, APP-302) includes Design Principle Reference 0405.04 which requires any design changes to the viaduct to be kept in-keeping with the principle of spanning the SAC. The detailed design of the project must be compatible with these Principles (see article 54 of the draft DCO (Document Reference 5.1, APP-285)).</p> <p>The Project will also not prevent the River Eden's Trust scheme to re-naturalise the Trout Beck in this location from going ahead. National Highways are working with the River Eden's Trust to facilitate this scheme.</p>
RR-041; RR-182; RR-188; RR-194; RR-177; RR-023; RR-054; RR-128; RR-192; RR-042	Concerns raised over level of carbon emissions	An assessment of the likely carbon emissions of the Project are set out in Environmental Statement Chapter 7: Climate (Document Reference 3.2, APP-050).
RR-042; RR-182	Concern that there will be direct impacts on North Pennines Area of Natural Beauty (AONB) and the habitats of many endangered species.	<p>The Project has worked to minimise the effects on the North Pennines Area of Outstanding Natural Beauty (AONB), with encroachment into its designated area within the Appleby to Brough Scheme. There is an Exceptional Circumstances case for doing so which is set out in the Case for the Project (Document Reference 2.2, APP-008). In summary, it was considered that a route that incurs slightly into the AONB boundary would have a lesser overall impact on the landscape value of the designation than the alternative route that does not encroach, due to the topography of land resulting in a route outside of the AONB designation required to be at a substantial height. The proposed route also allows for the protection of watercourses in the area which are a functional part of the River Eden Special Area of Conservation.</p> <p>The North Pennines AONB designation border follows the existing A66 alignment. It is acknowledged that the DCO Application requires construction within the AONB designated area in some</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>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). 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>Potential effects on protected species and habitats that support them have been assessed in Chapter 6: Biodiversity (Document Reference 3.2, APP-049). Mitigation planting is proposed to minimise the effects. These proposals are shown on the Environmental Mitigation Maps (Document Reference 3.2, APP-042), though it must be noted that this mitigation is illustrative and not considered fixed. The mitigation design will develop alongside the Project design.</p>
RR-042; RR-182	Concern that there will be direct impacts on the Pennine Moors SAC.	Effects to the North Pennine Moors Special Area of Conservation (SAC) have been assessed as part of the Habitat Regulations Assessment (HRA) Stage 2 Statement to Inform Appropriate Assessment (Document Reference 3.6, APP-235). Section 1.6.32 concludes that there is no adverse effect on the North Pennine Moors SAC as a result of the project.

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-178	<p>Concern that the chosen route around Kirkby Thore will require a large amount of mitigation due to the large adverse effects on the population. Suggests that this mitigation should be improved.</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-044 to APP- 059) with mitigation proposals detailed within each topic assessment.</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) in order to manage construction and operation related impacts. These include specific measures to mitigate impacts to the residents of Kirkby Thore such as 0405.05 which requires the creation of landscape sensitive bunding around the new A66 to the north of the village to reduce noise effects and to aid in blending the new road into the landscape, and 0405.06 which requires the use of local stone and drystone walling. The detailed design of the project must be compatible with the Principles, as secured by article 54 of the draft DCO (Document Reference 5.1, APP-285).</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 the scheme including in the location of Kirkby Thore. The required mitigation measures are to be secured by via the mechanisms outlined previously.</p>

2.12. Equalities Impact Assessment

Table 2-11: Response to Relevant Representations related to Equalities Impact Assessment

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-194; RR-177	Potential infringement of the Equality Act 2010 and the Human Rights Act. Scheme contradicts government policy prioritising rail and river. Infringement of Equality Act 2010/Human Rights Act.	<p>The Public Sector Equality Duty under section 149 of the Equality Act 2010 puts a duty on all public bodies to have due regard to the need to eliminate discrimination, harassment, victimisation and other conduct prohibited by the Act; advance equality of opportunity between people who share a protected characteristics and people who do not; and foster good relations between people who share a protected characteristic and people who do not. The duty relates to the protected characteristics outlined in the Act and includes age; disability, gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion; sex; and sexual orientation. National Highways has 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, as set out in the Equality Act 2010.</p> <p>Consideration of the Human Rights Act 1998 is contained in Section 6 of the Statement of Reasons (Document Reference 5.8, APP-299). National Highways has sought to avoid or minimise impacts on residential properties wherever possible. Where there are human rights implications as a result of the Project, the Statement of Reasons explains why any infringement would be proportionate and legitimate, would be in the public interest and would be in accordance with national and European Law.</p>

2.13. Flooding and Drainage

Table 2-12: Response to Relevant Representations related to Flooding and Drainage

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-041; RR-217; RR-225; RR-234; RR-194; RR-177; RR-188	<p>Concern that increased tarmac and loss of permeable surfaces will increase risk of flooding at the Eden River Valley, as well as causing pollution to the river.</p> <p>Concern that the proposals will enhance threat to the River Eden.</p>	<p>Ponds and drainage systems have been designed to store the additional run-off produced by the Project and restrict the peak flow rate to no greater than the existing green field run off rates as identified in Environmental Statement Appendix 14.2 Flood Risk Assessment and Outline Drainage Strategy (Document Reference 3.4, APP-221). The Outline Drainage Strategy makes provision for the appropriate treatment of surface water run-off before it re-joins the water environment.</p>
RR-212	<p>Concern that Warcop is already prone to flooding so an increase in road network will negatively impact this threat further. Highways drainage being taken to Crooks Beck is a significant flood risk to consider and there is a poor record of houses flooding in this locality.</p>	<p>The design team are aware of the existing flood risk in the village of Warcop from Crooks Beck. The proposed highways drainage systems that discharge to the Crooks Beck tributaries have been designed to ensure there is no increase in peak flows. Ponds and other drainage features have been designed to store the additional run-off produced by the Project and restrict the peak flow rate to no greater than the existing green field run off rates. Exceedance flow paths have been considered in the design to ensure properties are not at risk of flooding in the event of drainage blockages or storm events in excess of the designed capacity. Where flood plains are affected, flood compensation areas have been designed to ensure the Project does not increase flows downstream. Refer to section 14.2.5 and the Annexes, Environmental Statement Appendix 14.2 Flood Risk Assessment and Outline Drainage Strategy (Document Reference 3.4, APP-221). Further details will be developed in the detailed design stage.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>In addition to the above, work is ongoing in collaboration with National Highways, Cumbria County Council and the Environment Agency to look at ways to further reduce the pre-existing flood risk in the village.</p>
RR-221	<p>Concern that the drainage of the Black Route is in opposition to the NPPF with regards to climate. Concern, therefore, that the choice of Rokeby junction is in opposition to national and local planning, through failure to produce impact studies that could impact negatively on the environment, including flooding.</p>	<p>The drainage design has been prepared in compliance with the Design Manual for Road and Bridges document LA113 which includes all relevant National Planning Policy Framework (NPPF) requirements. The design and flood risk assessment also conforms with the National Networks National Policy Statement requirements for flood risk.</p> <p>The Flood Risk Assessment and Outline Drainage Strategy (Document Reference 3.4, APP-221) has been prepared for the current proposed design and includes hydraulic modelling of the watercourses and drainage systems. The modelling and risk assessment show that the flooding impacts resulting from the Project have been mitigated (see section 14.2.7).</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 Appendix 3 to the Project Development Overview Report (PDOR (Document Reference 4.1, APP-247)).</p> <p>As is set out in section 5.7 of the PDOR (Document Reference 241, 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.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>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> <p>The Black Route avoids direct impacts on the Registered Parks and Garden, in conformity with the National Policy Statement for National Networks.</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 PDOR (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>
RR-226	Specific concern regarding the Sleastonhow Lane farm and a proportion of low-lying land that will be impacted.	<p>The June 2020 Preferred Route Announcement alignment design did impact the low-lying areas adjacent to Sleastonhow Farm. Alternative alignment options were developed to reduce the impact on the flood plain in advance of the Autumn 2021 Statutory Consultation. The revised design resulting from the option review minimises the impact on the flood plain by repositioning the alignment to higher ground and using an open span structure to cross Trout Beck and its flood plain. Further details can be found in section 5.4 of Project Development Overview Report (Document Reference 4.1, APP-244).</p>
RR-217	Concern on the impact of the scheme on the River Eden. The A66 currently contributes to run off which pollutes the river, including with microplastics. Concern that the introduction of a major trunk road into the floodplain will cause harm.	<p>The drainage system design includes provision for treating the run-off from the road prior to discharging it to all watercourses, including the River Eden and its tributaries. The systems intercept a wide range of suspended solids (including plastics), dissolved metals and hydrocarbon based contaminants from the road run-off.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>The drainage system also includes pollution control devices that can be used in the event of a spillage on the highway.</p> <p>Water quality assessments have been undertaken in accordance with the design standards set out in LA113 of the Design Manual for Roads and Bridges. This assessment shows that the mitigation measures included in the drainage system design reduce the risk of pollution entering the watercourse to or below the required levels. See section 14.3.2 of Environmental Statement Appendix 14.3 Water Quality Assessment (Document Reference 3.4, APP-222) for further detail. The design will be refined further in the detailed design stage.</p>
RR-217	<p>Concern over the loss of agricultural land which acts as flood storage. Land taken from local farmers means it is less likely that land will be available for future mitigation.</p>	<p>During the design optioneering and development several options have been considered to minimise the impact on flood plains and the associated biodiversity. Refer to the Project Development Overview Report (Document Reference 4.1, APP-244) for further details.</p> <p>Where the proposed dual carriageway or associated infrastructure is within the flood plain, flood compensation areas will be provided to ensure there is no reduction in flood storage and there is no increase in flows downstream. This flood mitigation does potentially reduce the amount of land available for future mitigation. Refer to Environmental Statement Appendix 14.2 Flood Risk Assessment and Outline Drainage Strategy (Document Reference 3.4, APP-221). Further details will be developed in the detailed design stage.</p>
RR-234	<p>Concern that there is a significant flooding problem in Cumbria, which is just downstream of the Temple Sowerby section, and that the plan for this section sees the road enter the Troutbeck SAC, which will</p>	<p>National Highways is aware of the Trout Beck River Restoration Scheme and have been working with Eden Rivers Trust to ensure the proposed structure carrying the dual carriageway across the flood plain does not prevent the river restoration scheme from progressing or limit the benefits it will provide.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
	compromise the Eden River Trust floodplain restoration project.	Please refer to section 14.9.21 of Environmental Statement Chapter 14 Road Drainage and the Water Environment (Document Reference 3.2, APP-057) for further details.

2.14. Impacts to Land

Table 2-13: Response to Relevant Representations related to Impacts to Land

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-085	Concern that there will be a devaluation of respondent's property given proximity of new dual carriageway,	<p>National Highways have carried out detailed environmental assessments, that include assessment of noise, landscape and visual impact and socioeconomics. Further detail can be found in Environmental Statement Chapter 10 Landscape and Visual (Document Reference 3.2, APP-051), Chapter 12 Noise and Vibration (Document Reference 3.2, APP-055) and Chapter 13 Population and Human Health (Document Reference 3.2, APP-056).</p> <p>The value of residential properties located close to new improvement works to roads can be both positively and negatively impacted.</p> <p>If development consent is granted for the Project and if the value of a property is adversely impacted and no land has been acquired in connection with the scheme then the house owner may be able to make a claim under Part 1 of the Land Compensation Act 1973. This compensation is for the devaluation of the property due to the use of the public works but only in so far as the physical factors are impacted. These factors are listed in the Act as noise vibration, smell, fumes/smoke, artificial lighting or the discharge of solid or liquid on to the lands. A claim under this Act can be made on the first anniversary of the scheme being opened to traffic and is based on values as at the relevant date (this being the first claim date).</p>

2.15. Landscape and Visual

Table 2-14: Response to Relevant Representations related to Landscape and Visual

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-006; RR-016; RR-035; RR-036; RR-050; RR-060; RR-128; RR-185; RR-173; RR-213; RR-226; RR-194; RR-177	Concerns raised that there will be a loss of attractive landscape, open countryside, and agricultural land, including the North Pennines AONB.	<p>A full assessment of the likely significant environmental effects of the Project is provided within the Environmental Statement (ES (Document Reference 3.2, APP-043 to APP-049)) with mitigation proposals detailed within each topic assessment.</p> <p>ES Chapter 10 Landscape and Visual (Document Reference 3.2, APP-053) assesses the impacts of the project upon the local landscape. Section 10.10 states that the effects upon the North Pennines Area of Outstanding Natural Beauty for both construction and operation has been assessed as slight adverse (not significant).</p> <p>Specific locations of concern would need to be provided to allow for a bespoke response of the particular areas of concern.</p>
RR-060	Concern that there will be a loss of tranquillity and a negative visual impact on the landscape of the North Pennines AONB and its setting, due to increased traffic and faster vehicles. Concern that this cannot be mitigated, and the project will leave a legacy of landscape harm.	<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 049) with mitigation proposals detailed within each topic assessment.</p> <p>Chapter 10 Landscape and Visual (Document Reference 3.2, APP-053) assesses the impacts of the project upon the local landscape. Section 10.10 states that the effects upon the North Pennines Area of Outstanding Natural Beauty for both construction and operation has been assessed as slight adverse (not significant).</p>
RR-210	Highlights the recreational use of the AONB in the Kirby Thore area due to its accessibility for visitors to Centre Parcs and the presence of local communities. Considers that preserving the character and integrity of this landscape is important.	<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 049) with mitigation proposals detailed within each topic assessment.</p> <p>National Highways recognises the importance of the character and integrity of this landscape. Chapter 10 Landscape and Visual (Document Reference 3.2, APP-053) assesses the impacts of the project upon the local landscape. Section 10.10 states that the effects upon the North Pennines Area of Outstanding Natural Beauty for</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		both construction and operation has been assessed as slight adverse (not significant).
RR-194	Concern that there have been limited photomontages provided to show the theoretical impact on the landscape.	Chapter 10 Landscape and Visual (Document Reference 3.2, APP-053) of the Environmental Statement (ES) is supported by Figure 10.9 Viewpoint Photomontages (Document Reference 3.3, APP-110). The number of Photomontages and the viewpoints from which they are located was agreed with the relevant statutory bodies through a series of Technical Working Group Meetings throughout the production of the assessment. Additional Photomontages will not be produced to supplement those provided within the ES.
RR-177	Concern that the ugly roadworks will destroy the beautiful landscapes and erode the attractiveness of the area as a tourist destination.	Impacts to landscape have been set out in the Environmental Statement Chapter 10 Landscape and Visual (Document Reference 3.2, APP-053). Where significant effects have been identified mitigation to reduce the potential effects have been described within the relevant section of the chapter and have informed the development of the Environmental Management Plan (Document Reference 2.7, APP-019) and associated Annexes, including an outline landscape management plan. These documents will develop alongside the design of the Project.
RR-226	Specific concern over the proposed Kirkby Thore section due to its setting within the North Pennine AONB	Environmental Statement Chapter 10 Landscape and Visual (Document Reference 3.2, APP-053) assesses the impacts of the project upon the local landscape. Specifically, section 10.10 of Chapter 10 states that the effects upon the North Pennines Area of Outstanding Natural Beauty for both construction and operation has been assessed as a slight adverse (not significant) effect.
RR-226	Considers that the southern by-pass appears to be a less damaging option to the landscape, given that it largely follows the existing route of the A66 and does not encroach towards the AONB.	An assessment of the alternatives that have been considered throughout the Project development process is provided within Environmental Statement Chapter 3 Assessment of Alternatives (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 (Document Reference 4.1, APP-244).

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<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).</p> <p>Sections 6.5 and 6.6 of the Case for the Project (Document Reference 2.2, APP-008) sets 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. These sections also 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>

2.16. Legal

Table 2-15: Response to Relevant Representations related to Legal

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-194; RR-177	Problematic first iteration of Project Speed: National Highways apparently infringing their licence.	National Highways note the reference to a 'problematic iteration of Project Speed'. Based on the representation we are not clear on the specific issues raised regarding Project Speed, however as outlined in section 1.4 of the Case for the Project (Document Reference 2.2, APP-008) the Project has been identified as one of the key infrastructure projects subject to the UK Government's Project Speed initiative, which aims to bring forward proposals to

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>deliver public investment projects more strategically and efficiently. In line with Project Speed, a number of actions have been taken in order to expedite the Project, as set out in the Case for the Project at section 1.4.3, which include preparing the Scoping Opinion alongside the Preliminary Environmental Information Report, earlier engagement with relevant bodies to ensure an effective statutory consultation period, proactively promoting the use of Planning Performance Agreements, optimising the Local Authority Engagement Strategy and preparing the Environmental Management Plan to embody requirements which would normally form part of the Pre Commencement Requirements of the DCO.</p> <p>We also note the comment regarding National Highways' licence, although it is not clear what the alleged infringement relates to. National Highways was established under the Infrastructure Act 2015 and appointed and licensed as a strategic highways company by the Secretary of State (SoS) for Transport on 1 April 2015. The licence sets out conditions and guidance for how we must act. In respect of the Project, the A66 corridor improvements were committed to in Road Investment Strategy (RIS) 2 in March 2020. As set out in section 3(6) of the Infrastructure Act 2015, the Applicant and SoS 'must comply' with the RIS. National Highways is in compliance with its obligations in promoting the Project.</p> <p>The Applicant would be happy to discuss either of the above issues further with the Interested Party as the development and Examination of the Project progresses, in order to establish the specific details behind the concerns and appropriately address these.</p>

2.17. Noise and Vibration

Table 2-16: Response to Relevant Representations related to Noise and Vibration

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-006, RR-036, RR-041, RR-085, RR-173, RR-225, RR-194, R189	General concerns raised regarding impact from noise during construction and during operation.	<p>Chapter 12: Noise and Vibration of the Environmental Statement (Document Reference 3.2, APP-055) sets out the potential effects of changing noise as a result of the A66 during both construction and operation. Mitigation measures for both construction and operation are outlined within the chapter with the residual likely significant effects reported in Section 12.10. The Environmental Management Plan (Document Reference 2.7, APP-019) Annex B5 Noise and Vibration Management Plan details how construction related noise and vibration will be managed.</p> <p>More detail would be required on the specific locations of concern in order to provide a more tailored response.</p>
RR-009	Concern about road surface noise and requests that the road surface chosen minimises noise.	<p>Chapter 12: Noise and Vibration of the of the Environmental Statement (Document Reference 3.2. APP-055) sets out the noise modelling parameters utilised for the assessments, see Section 12.4. Table 12-15 Modelling parameters states that it has been assumed that all National Highways owned roads will have low noise surface, this includes principal A-roads and motorways.</p> <p>To ensure the assumption is delivered in this scheme the Environmental Management Plan (Document Reference 2.7, APP-019) Ref D-NV-06 secures the need for low noise surfacing. Compliance with the EMP would be secured by the DCO, should it be made.</p>
RR-041	Concern that noise pollution will be acute where the road is proposed between the existing road and the villages, due to the numerous extra flyovers and tunnels proposed.	Section 12.8 of Chapter 12: Noise and Vibration of the Environmental Statement (Document Reference 3.2, APP-055) sets out the potential impacts of changing noise as a result of the A66 during both construction and operation.

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>The assessments of impacts consider all design features including the potential impacts as a result of the flyovers and tunnels. Mitigation measures for both construction and operation are outlined within the chapter with the residual likely significant effects reported in Section 12.10. The Environmental Management Plan (Document Reference 2.7, APP-019) Annex B5 Noise and Vibration Management Plan details how construction related noise and vibration will be managed.</p> <p>More detail would be required on the specific locations of concern in order to provide a more tailored response.</p>
RR177, RR-194	General concern around noise from traffic due to increased speed limit	<p>Chapter 12: Noise and Vibration of the Environmental Statement (Document Reference 3.2, APP-055) sets out the potential effects of changing noise as a result of the A66 during both construction and operation. Mitigation measures for both construction and operation are outlined within the chapter with the residual likely significant effects reported in Section 12.10. The Environmental Management Plan (Document Reference 2.7, APP-019) Annex B5 Noise and Vibration Management Plan details how construction related noise and vibration will be managed.</p> <p>More detail would be required on the specific locations of concern in order to provide a more tailored response.</p>
RR-189	Concern that residents of Kirkby Thore will experience higher levels of noise pollution than current. Concern that there is no reference to WHO air pollution targets.	<p>Chapter 12: Noise and Vibration of the Environmental Statement (Document Reference 3.2, APP-055) sets out the potential effects of changing noise as a result of the A66 during both construction and operation. Mitigation measures for both construction and operation are outlined within the chapter. The Environmental Management Plan (Document Reference 2.7, APP-019) Annex B5 Noise and Vibration Management Plan details how construction related noise and vibration will be managed with the residual likely significant effects reported in Section 12.10. The effects upon</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>Kirkby Thore reported in Section 12.10.69 to 12.10.84 as part of the Temple Sowerby to Appleby assessment of likely significant effects. More detail would be required on the specific locations of concern in order to provide a more tailored response.</p> <p>Chapter 5: Air Quality of the Environmental Statement (Document Reference 3.2, APP-048) states that the effects of the construction phase and operational phase are both predicted to be not significant.</p> <p>The World Health Organisation Global Air Quality guidelines are not currently part of UK legislation or policy requirements. The air quality assessment undertaken has been undertaken in accordance with current legislation and is compliant with policy such as the National Policy Statement for National Networks. The air quality assessment can be found in Environmental Statement Chapter 5 Air Quality (Document Reference, 3.2, APP-048).</p>
RR-177	<p>Concern that increased noise pollution will be up to hearing impairment levels when working outside, which was demonstrated by a noise-reduction demonstration during a consultation.</p>	<p>Chapter 12: Noise and Vibration of the Environmental Statement (Document Reference 3.2, APP-055) sets out the potential effects of changing noise as a result of the A66 during both construction and operation. Mitigation measures for both construction and operation are outlined within the chapter with the residual likely significant effects reported in Section 12.10. The Environmental Management Plan (Document Reference 2.7, APP-019) Annex B5 Noise and Vibration Management Plan details how construction related noise and vibration will be managed.</p> <p>More detail would be required on the specific locations of concern in order to provide a more tailored response.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-036; RR-041; RR-173; RR-189	General concerns raised regarding noise and light pollution from road traffic, and the resultant impacts on the surrounding environment and landscape.	The potential effects of the Project on the environment and human receptors from changes to noise and light have been assessed. This assessment is reported in the Environmental Statement Chapter 10: Landscape and Visual (Document Reference 3.2, APP-053) and Chapter 12: Noise and Vibration (Document Reference 3.2, APP-055). These chapters set out the potential effects and proposed mitigation required to minimise these effects throughout the Project. Please also refer to the Environmental Management Plan Annex B1 Outline Landscape and Ecology Management Plan (Document Reference 2.7, APP-021), B4 Air Quality and Dust Management (Document Reference 2.7, APP-024) and B5 Noise and Vibration Management Plan (Document Reference 2.7, APP-).

2.18. Population and Human Health

Table 2-17: Response to Relevant Representations related to Population and Human Health

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-023	General concern about the impact on health and wellbeing, particularly related to the loss of nature.	Chapter 13 Population and Human Health of the Environmental Statement (Document 3.2, APP-056) details and addresses the likely significant effects, as a result of both the construction and operation of the Project, in regard to relevant receptors included in the assessment. This includes an assessment of the impacts to open spaces and human health.
RR-126, RR-188, RR-195	Specific concern about the impact on farm business viability due to loss of land.	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. Agricultural land holdings will largely be impacted as a result of temporary land take required for the Project.

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>This assessment concludes the following during the construction phase:</p> <ul style="list-style-type: none"> • Significant permanent adverse effects on three agricultural land holdings: Coach House, Whinfell Park and Leeming. • Significant permanent adverse effects on two agricultural land holdings: Winderwath Estate and Brougham Castle Farm. • Significant permanent adverse effects on 12 agricultural land holdings – Spitals, West View, Low Moor Caravan Park, Crossfell House Farm, Roman Vale, Street House, Fremington, Rogerhead, West View Farm, Far Broom Lodge, Redlands Bank and Nicholson. • Significant permanent adverse effects on six agricultural land holdings – High Green Farm, Low Bank End, Coupland Beck Farm, Wheatsheaf Farm, Roseleigh and Wilson. • Significant permanent adverse effects on 11 agricultural land holdings – The Old Armoury, Old Police House, West End Farm, Black Lodge Farm, Bowes Cross Farm, Middle Lowfield, Streatlam Grove Farm, Lyndale House, High Broats, 2 Low Row and Myre Keld Farm. • Significant permanent adverse effects on seven agricultural land holdings – Trees House Farm, Tipton Hill Farm, Moss, Mortham Estates, Thorsgill, Tutta Beck and Harrison. • Significant permanent adverse effects on three agricultural land holdings – Browson Bank, Pond Dale and East Layton Hall. <p>During the operation, the Project is expected to result in the following effects on agricultural land holdings:</p> <ul style="list-style-type: none"> • 49 agricultural land holdings may be affected in operation by changes to noise and air quality through changes to traffic flows affecting farming operations.

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>As part of the assessment process agricultural landowners were consulted in order to understand how their businesses operated. This has been factored into the assessment of likely significant effects. The dialogue will continue with affected persons throughout the Examination and detailed design stages of the Project in order to minimise and mitigate impacts as far as practicable. The Compulsory Acquisition Schedule and Temporary Possession Schedule (Document Reference 5.9, APP-300) sets out the purpose for which each plot of land is required. The Project has been designed to minimise disruption to property and land take where possible.</p>
RR-182, RR-184	<p>General concern about air/noise pollution impacting health. Concern that the introduction of a rat run through the village (unspecified) has not been assessed in relation to how this will increase residents' exposure to air and noise pollution.</p>	<p>The potential effects of the project in terms of traffic flows on Main Street in Kirkby Thore is described in Chapter 8 of the Transport Assessment (Document Reference 3.7 APP-236).</p> <p>Table 8-3 shows that the daily traffic flows on Main Street will be substantially reduced (by 86%). A particular benefit of this scheme is that the HGV traffic from British Gypsum will no longer need to access the A66 via Main Street, as it can access the A66 at the proposed Fell Lane Junction.</p> <p>The potential effects on Air Quality of the Project are set out in Environmental Statement Chapter 5: Air Quality (Document Reference 3.2, APP-048), assessing human and ecological receptors within 200m of the A66 alignment which is the assessment area. Beyond 200m, it is not considered that there would be a significant effect due to distance. There are several modelled points within Kirkby Thore used within the assessment of operational air quality changes, there is no significant effect anticipated in Kirkby Thore in the operation of the Project. Section 5.1.4.1 of the Environmental Statement Appendix 5.4: Air Quality Assessment Results (Document Reference 3.4, APP-153) sets out</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		the modelled change in air quality at the points throughout the Project.
RR-184	Concern that National Highways have not included an assessment of the impact of pollution to properties on Main Street.	<p>The potential effects of the project in terms of traffic flows on Main Street in Kirkby Thore is described in the Transport Assessment Chapter 8 (Document Reference 3.7 APP-236).</p> <p>Table 8-3 shows that the daily traffic flows on Main Street will be substantially reduced (by 86%). A particular benefit of this scheme is that the HGV traffic from British Gypsum will no longer need to access the A66 via Main Street, as it can access the A66 at the proposed Fell Lane Junction.</p> <p>The potential effects on Air Quality of the Project are set out in Environmental Statement Chapter 5: Air Quality (Document Reference 3.2, APP- 048), assessing human and ecological receptors within 200m of the A66 alignment which is the assessment area. Beyond 200m, it is not considered that there would be a significant effect due to distance. There are several modelled points within Kirkby Thore used within the assessment of operational air quality changes, there is no significant effect anticipated in Kirkby Thore in the operation of the Project. Section 5.1.4.1 he Environmental Statement Appendix 5.4: Air Quality Assessment Results (Document Reference 3.4, APP-153) sets out the modelled change in air quality at the points throughout the Project.</p>
RR-188, R-177	Concern that there is an unnecessary impact on individuals, properties, communities, and the local agricultural and tourism businesses through uneconomic land use.	The various chapters within the Environmental Statement (Document Reference 3.2, APP-044 to APP-059) detail the likely significant effects upon properties, communities, local agricultural land holdings and businesses. The design has sought to minimise impacts as far as reasonably practicable and where impacts are unavoidable mitigation has been proposed where practicable. Specifically, Chapter 13: Population and Human Health (Document

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>Reference 3.2, APP-056) assesses the impacts on residential properties, community assets, agricultural land holdings and businesses with the likely significant effects reported in Section 13.10.</p> <p>The Compulsory Acquisition Schedule and Temporary Possession Schedule (Document Reference 5.9, APP-300) sets out the purpose for which each plot of land is required. The Project has been designed to minimise disruption to property and land take where possible.</p>
RR-195, RR-177	<p>Specific concern about the impact on vulnerable people that get support from Dyke Nook Farm. Considers that the Northern Route will have less impact on the community at Dyke Nook Farm. Concern that the purpose of the community farm will be curtailed.</p>	<p>National Highways acknowledges the Interested Party's concerns. National Highways acknowledges that Dyke Nook Community Farm is an aspiration of the community and does not currently exist as a facility. National Highways received feedback from stakeholders outlining concerns about the proximity of the proposed route to the proposed Dyke Nook Farm and other surrounding properties during the statutory consultation. Further details can be found in the Consultation Report document 4.4 (APP-254). In response to this, an alternative design was developed to construct the new eastbound carriageway to the north of the existing A66. This suggestion was consulted on in January/February 2022. Leaflets were distributed and two drop-in sessions were held in the local area to gather feedback. Under these plans the existing A66 will become the westbound carriageway which means National Highways no longer need to build it to the south of the existing A66. This has resulted in reduced land take from the properties and increasing the distance from the properties to the new A66. Please refer to the Project Development Overview Report (Document Reference 4.1, APP-244).</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-192	<p>Objection to the project on the grounds of air pollution and its impact on public health. Concern around the impact of air pollution on children in Kirkby Thore and at Kirby Thore School as the route proposed takes the road 800 metres closer to the school.</p>	<p>Chapter 5: Air Quality of the Environmental Statement (Document Reference 3.2, APP-048) has identified a large construction dust risk potential for high-sensitivity receptors within 100m of the draft Order Limits. Kirkby Thore Primary School and the residential area of Dunfell View and Sandersons Croft will therefore be at risk of adverse impacts on wellbeing from dust effects in the absence of any mitigation. However, requirements for dust mitigation set out in Chapter 5: Air Quality are considered to remove any significant impacts. The Air Quality assessment has not identified any significant effects during construction and therefore the health effects are assessed as neutral.</p> <p>Section 5.1.4.1 of the Environmental Statement Appendix 5.4: Air Quality Assessment Results (Document Reference 3.4, APP-151) shows that at the two modelled points near to Kirkby Thore Primary School Human Sensitive Receptor (HSR) have a reduction in expected NO₂ in operation of the Project. The improved connectivity of the area and the diversion of transport to British Gypsum to the north is considered to be a beneficial effect to the Kirkby Thore school as stated in Section 13.10.57 of the ES Chapter 13: Population and Human Health (Document Reference 3.2, APP-056).</p>
RR-192	<p>Concern about the viability of Kirkby Thore School if the road is constructed. Concern that several families do not have cars so would not be able to attend another school should this one close.</p>	<p>The project does not propose to close Kirkby Thore School and any potential effects upon the receptor have been assessed within the Environmental Statement (ES (Document Reference 3.2, APP-043 to APP-059)) and are summarised below.</p> <p>The potential impact upon the school has been assessed throughout the ES. During construction Kirkby Thore Primary School will be impacted by construction noise as reported in Chapter 12: Noise and Vibration (Document Reference 3.2, APP-055). Construction noise effects will combine with significant visual</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>effects reported in Chapter 10: Landscape and Visual Effects (Document Reference 3.2, APP-053) in residential areas on the western and northern edges of Kirkby Thore, including Kirkby Thore Primary School. This is assessed as a negative health effect.</p> <p>The operational noise levels at Kirkby Thore Primary School are provided in Appendix 12.4: Operational Assessment Results (Document Reference 3.4, APP-214) and an assessment is provided in Section: 12.10 Assessment of likely significant effects. As reported in Chapter 12: Noise and Vibration of the Environmental Statement (Document Reference 3,2, APP-055) there will be a major beneficial noise and vibration impact in the short term which are significant for Kirkby Thore Primary School.</p> <p>Chapter 5 Air Quality of the Environmental Statement (Document Reference 3.2, APP-048) has identified that there would be no significant air quality impacts during operation at the receptors. As reported in Chapter 13 Population and Human Health (Document Reference 3.2, APP-056) which considers the effect of air quality and noise on local receptors a neutral effect was identified when considering operational effects on Kirkby Thore Primary School.</p> <p>Accessibility to the School will be maintained during construction and operation, as per the requirements of the Environmental Management Plan (Document Reference 2.7, APP-019) and the engineering design.</p>
RR-192	Specific concerns about air pollution levels exceeding WHO limits. Queries what the air pollution levels will be if the road is moved north.	Chapter 5 Air Quality of the Environmental Statement (Document Reference 3.2, APP-151) has identified that there would be no significant air quality impacts during operation at the receptors. As reported in Chapter 13 Population and Human Health (Document Reference 3.2, APP-056) which considers the effect of air quality

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		and noise on local receptors a neutral effect was identified when considering operational effects on Kirkby Thore Primary School.
RR-194, RR-177	Concern that the scheme will affect livelihoods and quality of life, with properties being destroyed by new roads, or surrounding properties by roads. Concern that the scheme will reduce property land, particularly during construction.	The various chapters within the Environmental Statement (Document Reference 3.2, APP-044 to APP-059) detail the likely significant effects upon properties, communities, local agricultural land holdings and businesses. The design has sought to minimise impacts as far as reasonably practicable and where impacts are unavoidable mitigation has been proposed where practicable. Specifically, Chapter 13: Population and Human Health (Document Reference 3.2, APP-056) assesses the impacts on residential properties, community assets, agricultural land holdings and businesses with the likely significant effects reported in Section 13.10.

2.19. Road Drainage and the Water Environment

Table 2-18: Response to Relevant Representations related to Road Drainage and the Water Environment

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-041	Concern that increased tarmac will increase the already high risk of flooding along the Eden Valley.	<p>The Project's drainage design, presented in Appendix 14.2 of the Flood Risk Assessment and Outline Drainage Strategy (Document Reference 3.4, APP-221) and assessed in the Road Drainage and the Water Environment Environmental Statement (ES) Chapter 14 (Document Reference 3.2, APP-057) has been developed to capture, treat, and discharge water to watercourses.</p> <p>The requirement for the Project to ensure flood risk is not increased as a result of the scheme is secured in clause D-RDWE-02 in the Environmental Management Plan, (Document Reference 2.7, APP-019), and outlined below.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>The proposals lead to an increase in impermeable area draining to local watercourses throughout the scheme and including the Eden Valley. In accordance with DMRB CG 501, the proposed drainage design will ensure that there is no increase in peak runoff rates as a result of the proposals. To achieve this, existing runoff rates have been assessed, and flow control devices incorporated into the drainage systems. Storage for the additional flows generated by the Project has been provided using attenuation ponds, ditches, and pipe networks. The proposed drainage design makes an allowance for potential climate change.</p> <p>In accordance with DMRB CG 501, a 20% increase to peak rainfall intensity has been accommodated within the drainage design in order to account for potential climate change. Sensitivity checks in accordance with the Environment Agency's guidance for climate change allowances have been undertaken. Climate change allowances relating to increased peak rainfall intensity for small and urban catchments guidance states that both the central and upper end allowances should be assessed to understand the range of impact, therefore 20% and 40% allowances have been assessed. Additionally, a 50% climate change allowance for catchments within Cumbria (the River Eden and its tributaries) has been included as a sensitivity check, in line with Environment Agency guidance that was proposed at the time of the DCO submission.</p> <p>Floodplains impacted by the Project have also been assessed to ensure that any reduction in flood plain is mitigated by providing an equivalent area elsewhere to ensure the pass forward flows are not increased as a result of the Project. This has been assessed using hydraulic river models and includes a 94% increase in flows in accordance with Environment Agency's guidance for climate change allowances for critical infrastructure.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		Peak flows to watercourses as a result of the Project will not be increased over the baseline conditions and no increased likelihood of flooding is anticipated due to the Project's drainage design.

2.20. Traffic and Transport

Table 2-19: Response to Relevant Representations related to Traffic and Transport

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-004, RR-007, RR-008, RR-017, RR-028, RR-037, RR-176, RR-072	Concern that the route chosen at Rokeby will lead to increased traffic on the Sills, due to the 1.5 mile detour for Westbound traffic to Barnard Castle. Concern that this road is narrow and winding, with narrow pavements, and is a popular route for pedestrians who have to walk in the road to cross each other.	<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>The 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>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. This is due to the lower flows on the A67, of around 400 vehicles (Average Annual Daily Traffic), including on Barnard Castle</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<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>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 Police, and subsequently recorded, using the STATS19 collision reporting form.</p> <p>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>
RR-013	Concerned that additional traffic generated by the scheme will impact on Warcop Village country lanes.	<p>Paragraphs 8.1.19 to 8.1.22 and Figures 8-13 to 8-14 of the Transport Assessment (Document Reference 3.7, APP-236) highlight the impact of the Project around Warcop by considering the change in flow both with and without the project on all modelled links within the area. Paragraphs 8.1.1 to 8.1.4 highlight the methodology followed.</p> <p>The impact on the local lanes is generally very small.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<ul style="list-style-type: none"> • The largest change, away from the A road network is from the B6259 where a reduction in flow of 220 vehicles (Annual Average Daily Traffic) occurs on the eastern approach to Warcop. This equates to a (reduction in) flow of around 20 vehicles per hour, which is one vehicle every three minutes. • The largest increase occurs on the Lane between Great Musgrave and the A66 where an additional 81 vehicles per day occur due to the scheme. This is equivalent to 8 vehicles per hour, or 1 vehicle every 7 and a half minutes. <p>Given such small changes, it is unlikely that any operational issues will be experienced by users.</p>
RR-013, RR-016, RR-019, RR-036, RR-038, RR-041, RR-128, RR-144, RR-210, RR-187, RR-177	General concern about increased traffic as a result of the scheme.	<p>For details on how the traffic generated by the project impacts upon the road network please refer to Chapter 8 of the Transport Assessment (TA (Document Reference 3.7, APP-236)). This describes the forecast local highway network performance with and without the Project in place.</p> <p>It is accepted that the Project leads to an increase in traffic, particularly on the A66, as detailed in Chapter 7.2 of the TA. The growth seen without the Project from 2019 to the forecast years is due to national changes in; population, trip rates, GDP and income, cost of driving, licence holding, and demand for goods. The growth due to the Project is due to the provision of a higher standard route, and as such this increase in traffic flow reflects people benefiting from the opportunity that the dualling offers.</p> <p>The increase in traffic flows 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</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>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>RR-034, RR-037, RR-057</p>	<p>Specific concern about the safety of the narrow road at Startforth</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 in 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 (AVERAGE ANNUAL 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>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 Police, 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.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>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>
RR-036	<p>Concern that there are issues with the junctions (unspecified) which will impact on safe access for local traffic.</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. Please refer to the Project Development Overview Report (Document Reference 4.1, APP-244) and the General Arrangement Drawings (Document Reference 2.5, APP- 011 to APP-018) for further details on the specific junctions.</p>
RR-041, RR-0207, RR-196	<p>Suggest that there should be average speed cameras along the whole length of the route. Request for signage and additional barriers. Concern as to why these alternatives have not been considered.</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 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 and full details of these options can be found in the PDOR.</p> <p>Paragraphs 3.3.24 to 3.3.26 describe the recommendations of the study, namely that a recommendation was made that PCF Stage 1 development of A66 dualling should be undertaken.</p> <p>To consider interventions such as Speed Cameras or Safety barriers being installed along the whole route, the issues that the Project is trying to resolve should be considered.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<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 of the Case for the Project, 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. The installation of average speed cameras and additional barriers would not meet this key objective of the scheme as:</p> <ul style="list-style-type: none"> • Journey times would not be improved as the speed limit on the 60mph sections would remain in force. • 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. • 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.
RR-041	<p>Queries where traffic will go during the construction works and concern that this will go through the villages, impacting upon road safety.</p>	<p>The Environmental Management Plan (EMP (Document Reference 2.7, APP-019)), which National Highways is required under the draft DCO to submit a second iteration of to the Secretary of State for approval prior to commencing any part of the authorised development, provides that no part of the Project can start until a Construction Traffic Management Plan (CTMP) has been approved which will include (amongst other requirements) the following:</p>

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		<ul style="list-style-type: none"> • Details of proposed traffic management measures, including phasing plans, route restrictions and speed limits. • Details of planned carriageway and local road closures, including proposed stakeholder and community engagement protocols in advance of closures. • Details of proposed diversion routes, durations of use and proposals for encouraging compliance with designated diversion routes (with consideration for potential noise impacts). • Diversion routes to be discussed with the Local Highway Authority in advanced of required closures. • Specific mitigation measures to be developed for diversion routes in relation to noise and vibration, such as monitoring of usage of diversion routes, use of multiple diversion routes for different closures to reduce exposure of individual receptors. <p>The CTMP, to the extent applicable to a relevant part of the Project, will need to be developed in detail in substantial accordance with the essay plan included in Annex B 13 of the EMP (Document Reference 2.7, APP-013), and be subject to stakeholder consultation as described in Chapter 1 and has been approved in relation to that part.</p>
RR-184	Specific concerns about Kirkby Thore junction becoming a 'rat run.'	Should an accident occur on either part of the proposed Kirkby Thore Bypass, i.e., either east of west of the proposed Fell Lane grade separated junction, then the operational policy will be that the whole Kirkby Thore Bypass be shut between the proposed Long Marton Junction and the existing Temple Sowerby Junction. Therefore, the diversion route would be along the de-trunked section of the A66 through Kirkby Thore and would therefore not result in diversions via Main Street.
RR-008, RR-041, RR-184, RR-038,	General concerns about increased accidents and traffic build up	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

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		<p>the Project will save 530 casualties (including 14 fatalities) over the 60-year appraisal period.</p> <p>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> <p>The increase in traffic flows should be considered against the overall Benefits of the Project, 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.</p>
RR-210	<p>Concern that the physical boundary created by the Eden River means that between Penrith and Temple Sowerby there is no possibility for traffic from the A66 to filter onto local roads when there is an incident on the A66. This is increasingly an issue and causes real risk to users of the fellside roads in particular runners, cyclists, and horse riders.</p>	<p>Paragraph 4.2.22 and 4.2.23 of the Case for the Project (Document Reference 2.2, APP-008) detail the frequency of road closures on the A66 and highlight that single carriageways are 40% more likely to have a closure along the route than dualled lengths. When closures do take place on single carriageway lengths, they are likely to take place for up to 50% longer than dualled lengths. Therefore, once the Project has upgraded the route to dual standard the number and length of road closures will be reduced, meaning that the prospect of traffic being required to use local roads as a result of any incidents between Penrith and Temple Sowerby will be significantly reduced.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-177	General concern that local delivery traffic and farming traffic will be negatively impacted.	<p>For details on how the traffic generated by the Project impacts upon the road network please refer to Chapter 8 of the Transport Assessment (TA (Document Reference 3.7, APP-236)). This describes the forecast local highway network performance with and without the Project in place.</p> <p>It is accepted that the Project leads to an increase in traffic, particularly on the A66, as detailed in Chapter 7.2 of the TA. The growth seen without the Project from 2019 to the forecast years is due to national changes in; population, trip rates, GDP and income, cost of driving, licence holding, and demand for goods. The growth due to the Project is due to the provision of a higher standard route, and as such this increase in traffic flow reflects people benefiting from the opportunity that the dualling offers.</p> <p>The increase in traffic flows 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>
RR-187	Highlights that National Highways should consider the LDNP policy which aims to reduce journeys by car. Concern that National Highways have not engaged with the LDNP and are ignoring their policy by funnelling more traffic into the park.	Improving access to key tourist destinations, such as the Lake District National Park (LDNP) is identified as one of the key benefits of the Project (see Chapter 3.5 of the Case for the Scheme (Document Reference 2.2, APP-008)). Outputs from the Strategic Transport Model as described in Chapter 4 of Combined Modelling and Appraisal Report, (Document Reference 3.8 APP-237) have been interrogated to quantify the additional

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>daily traffic that is anticipated as a result of the Project. Analysis of an east west screen line cutting roads as the cross the national park boundary to the west of the M6 (between the A595 at Dalston in the north, and the A6 at Milnthorpe in the south) has been undertaken to quantify the increase in traffic in and out of the Park. In 2019 there are 49,700 modelled vehicle trips per direction per day. By 2044, 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. With the Project in place there are an additional 350 trips in 2044, which represents an increase of 0.5% in total trip making into the Park.</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 have engaged with the LDNP through the invitation to be part of the Environmental Interest Focus Group. The LDNP also engaged with National Highways by making representations to the statutory consultation process.</p>
RR-072	Suggests that the Blue Route should be chosen as every vehicle travelling will cover less distance, resulting in less pollution.	<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 Project, as detailed within section 5.7 of the Project Development Overview Report (Document Reference 4.1, APP-244).</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 regard to consultation responses. However as set out in paragraph 5.7.35, the principal consideration in the preference for the Black route (with a western</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>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. The Black route has been carried through to the DCO application, with the key factor being conformance with national planning policy.</p> <p>Further details can also be found in ES Chapter 3 Assessment of Alternatives (Document Reference 3.2, APP-046).</p>
RR-072	<p>Highlights the importance of new signage at all junctions to highlight the weight limitations of the County Bridge, to discourage HGVs. Concern that it is likely that the improved junction at Bowes may lull drivers into the belief that the A67 from Bowes to Barnard Castle, and routes onward on the A67 to Darlington, and on the A67 & A688 to Bishop Auckland can take HGVs, LGVs and cars towing large caravans - but it will still not be able to because of the weight restriction on the County Bridge, and the steep narrow road, The Bank, into Barnard Castle</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, as described in the Transport Assessment (Application Document 3.7, APP-236) paragraph 3.1.92 which states that:</p> <p>“The new Rokeby Junction would maintain HGV access to Barnard Castle via the C165 Barnard Castle Road”.</p>
RR-235	<p>Concern that the main objective of the scheme is to improve the road for freight traffic which is limited to 60mph, but the road is designed to facilitate 70mph.</p>	<p>Chapter 1.7 of the Case for the Project (Document Reference 2.2, APP-008) describes the need for the Project. While it identifies the high levels of freight traffic, it also emphasises that it is an important route for tourism and connecting nearby communities.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>It also notes, within paragraph 1.7.3 that if the existing A66 route is not improved, it will constrain national and regional connectivity, due to its strategic importance as an east-west connection for freight and other vehicle movements and may threaten the transformational growth envisaged by the Northern Powerhouse initiative and the achievement of the Government 'Levelling Up' agenda.</p> <p>Chapter 4 of 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"> • Paragraph 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. • Paragraph 4.2.16 to 4.2.21 outline the issues caused by the single carriageway sections in terms of journey times and reliability, in part due to the lack of overtaking opportunities where faster moving vehicles such as cars are delayed by freight traffic. • Paragraph 4.2.22 to 4.2.23 discusses the increased likelihood of road closures on the single carriageway sections. • Paragraph 4.2.24 to 4.2.27 discuss the issues of severance, notably within Kirkby Thore. • Paragraph 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>In response to these issues the Project Objectives have been developed, which are outlined in paragraph 1.7.10 and Table 1-2.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>The increase in car traffic speeds (and therefore reduced journey times) are a key driver of 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.</p> <p>Paragraph 2.2.1 of the Combined Modelling and Appraisal Report (Document Reference 3.8, APP-237) states that in 2019 on the A66, between 18 to 28% (depending on scheme section and location) of vehicles were Heavy Goods Vehicles. From the traffic survey information available described in Chapter 3.2 of Appendix B of the Combined Modelling and Appraisal Report (Document Reference 3.8, APP-238), van users were found to make up between 4% and 14% of the traffic on the A66. This means that the remaining 58% to 78% of traffic are car users who are permitted to travel at 70mph.</p>

2.21. Walking, Cycling and Horse Riding

Table 2-20: Response to Relevant Representations related to Walking, Cycling and Horse Riding

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
RR-004	<p>Specific concern over lack of walking or cycling provision at Rokeby, meaning that walkers and cyclists will have to use a 1.5 mile diversion to the junction. Preference for the Blue Route as this avoids this issue.</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>There are a variety of reasons for the selection of the Black route. Further detail about the process, the alternatives considered, and the wider factors that have informed the decision-making is set out in Section 5.7 of the Project Development Overview Report (PDOR (Document Reference 4.1, APP-244)) and Section 5.8 of the Route Development Report (appended to the PDOR, APP-247)</p> <p>The location of the proposed grade separated junction at Rokeby is the closest point to the existing junction that avoids direct impact on the Rokeby Registered Park and Gardens, St Marys Church and the Old Rectory. The proposed junction provides an opportunity to align with the proposed strategy for existing pedestrian, cyclist and horse riding facilities that would be severed by the dualling works to be reconnected via grade-separated crossings, allowing a safer crossing of the A66 dual carriageway. Walkers and cyclists cross the A66 dual carriageway safely and can then choose to head west to Cross Lanes via a new shared cycle way provision or head east along the de-trunked A66/ Barnard Castle Road and also links to the existing public rights of way at St Marys Church.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>It is not physically possible to install a standalone WCH bridge at the existing Rokeby junction without direct and indirect impacts on the Rokeby Registered Park and Garden, which would contravene the national policy National Policy Statement for National Networks. Environmental Statement Chapter 8 Cultural Heritage (Document Reference 3.2, APP-051) provides further information in this regard</p>
<p>RR-007, RR-008, RR-028, RR-034, RR-037, RR-038, RR176</p>	<p>Concern that the Old County Bridge users would be at risk due to the narrow footpath on only one side of the bridge.</p> <p>Concern regarding the safety of the Sills in Startforth as the pavement is too narrow for two people to walk down, which due to the popularity of this route, causes people to frequently walk in the road. Concern that increased traffic on this road will exacerbate the problem.</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>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. This is due to the lower flows on the A67, of around 400 vehicles (AVERAGE ANNUAL 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>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> <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, 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 previous to this a further slight accident was recorded to</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		<p>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>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>
RR-182	Concern that local communities will be cut off from each other and the rights of way network will be disrupted.	Please refer to Environmental Statement Chapter 13 Population and Human Health (Document Reference 3.2, APP-056) for further details as to how the severance of communities has been addressed. Regarding the concern that the rights of way network will be disrupted, 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-342 to APP-349).
RR-019, RR-210	Specific concern about the safety of footpath/cycle lanes from Penrith	<p>It is proposed that shared pedestrian and cycle facilities will be provided at M6 Junction 40 and link to Kemplay Bank roundabout. In addition, a parallel east west cycle link (offset from the main A66 traffic) will be provided from the western end of Scheme 03 at Brougham and link through to the existing cycle facility at the western end of the Temple Sowerby bypass.</p> <p>National Highways' proposals are summarised in the Walking, Cycling and Horse-ridings Proposals document (Document Reference 2.4, APP-010), and shown on the Rights of Way and Access Plans (Document Reference 5.19, APP-342 to APP-349 inclusive) and are described in Schedule 2 to the draft DCO (Document Reference 5.1, APP-285).</p> <p>Whilst we recognise that there is a desire from some landowners to separate WCH routes from replacement private means of access. It is not unusual, particularly in rural areas, for private means of vehicular access to exist over public rights of way in relation to which there is no general public right of vehicular access. Such arrangements tend to have lower environmental impacts and require less land to be taken overall when compared with a segregated solution.</p>

Examination Library Reference	Summary of Matters Raised in Relevant Representation(s)	National Highways Response
		Nonetheless, National Highways is giving further consideration, as part of the detailed design process, as to the extent that it is able to accommodate requests for segregated private means of access and walking, cycling and horse riding provision and the outcome of that consideration will be discussed with the relevant affected persons in due course.
RR-023, RR-234	General concern about the project impacting walking and cycling and that impacts to walking and cycling routes have only been considered as an afterthought.	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).