

A66 Northern Trans-Pennine Project

TR010062

6.6 Applicant's Response to Relevant Representations Addendum and Errata

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A66 Northern Trans-Pennine Project
Development Consent Order 202x

**6.5 Applicant's Response to Relevant Representations
Addendum and Errata**

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1. Applicant's Response to Relevant Representations Addendum

1.1 Introduction

- 1.1.1. It has come to the attention of National Highways ("**the Applicant**") that some Relevant Representations were unintentionally omitted from the submitted version of the **Applicant's Response to the Relevant Representations**, which was issued to the Planning Inspectorate (on 16 November 2022) and thereby published on the National Infrastructure Planning website on 17 November 2022 (NH/AS/6.5 and PDL-010-013). This document was submitted ahead of the deadline in the Rule 6 letter in order to assist the Examining Authority and Interested Parties.
- 1.1.2. The Applicant can confirm that it has reviewed and considered the omitted Relevant Representations, which were submitted by the Interested Parties listed below:
- Rosalind Evans, RR-059
 - Cycling UK, RR-064
 - HGV Action Group, RR-065
 - Eden Rivers Trust, RR-064
 - Barnard Castle Town Council, RR-215
- 1.1.3. The Applicant has set out its responses to the matters raised in the Relevant Representations listed above in Table 1 of this document. This document therefore provides an **Addendum to the Applicant's Response to the Relevant Representations**. We hope that this information is useful to the Interested Parties and the Examining Authority.
- 1.1.4. The Applicant has also written directly to those Interested Parties who have registered to attend the upcoming hearings which are scheduled from 29 November 2022 to 2 December 2022, to ensure that the Applicant's response is provided in writing in advance of said hearings.
- 1.1.5. The Applicant has also identified that some of the Relevant Representation references are not included in Chapter 2 of the **Applicant's Response to the Relevant Representations**. We have identified these omissions as a list of errata in Section 2 and Table 2 of this document. It is important to note that the matters raised in these Representations were identified and responded to in Chapter 2 as submitted, however the reference numbers were not included.

Table 1 Addendum

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
Rosalind Evans, RR-059	Development of the Project and Alternatives	I live in (Redacted), and my submission concentrates on the Cross Lanes to Rokeby section; here there are very significant problems with the 'Black Route' design for Rokeby Junction proposed by Highways England (HE) and I strongly oppose this route being approved.	<p>The Project Design Report (Document Reference 2.3, APP-009) provides detail on the history of the design development of the Project and how the Black and Blue routes have been considered throughout the development of the Preliminary Design. Further detail on the assessment of alternatives and the rationale for progressing with the Black route on balance is set out in the Project Development Overview Report (PDOR) (Document Reference 4.1, APP-244) and in particular paragraphs 5.7.33 to 5.7.38 of that Report. In addition, the Route Development Report, which is contained within Appendix 3 to the PDOR (Document Reference 4.1, APP-247) also provides an explanation of the development of the preferred Black route.</p> <p>National Highways has developed the proposed Black Route for the Cross Lanes to Rokeby scheme, having regard to a number of factors including, responses to consultation (as is detailed in Annex N and Annex P of the Consultation Report (Application Document 4.4, APP-252) and current national planning policy as set out in paragraphs 5.8.92 to 5.8.98 of the Route Development Report (RDR) which is</p>

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			contained within Appendix 3 to the PDOR (Document Reference 4.1, APP-247).
Rosalind Evans, RR-059	Design, Engineering and Construction	Rokeby Junction Black Route plan: 1. The design means that vehicles using the Rokeby junction to and from the southern carriageway will have to double back on the de-trunked road. It is counter to the natural and historic lines of the current roads and junctions, and will have a profound harmful and permanent effect on the lives of local residents in Teesdale	<p>The Interested Party is correct in that traffic travelling from the east wishing to use the C165 Barnard Castle Road will divert from the existing Rokeby junction to the proposed Rokeby junction (circa 2.2km). This diversion is not required for traffic from the C165 Barnard Castle Road wishing to travel east as they can join the A66 via a new slip road at the existing Rokeby junction location.</p> <p>The location of the proposed Rokeby junction has been subject to multidisciplinary assessment and reviewed against national policy, in particular with reference to Rokeby Registered Park and Garden. Paragraphs 5.7.6 to 5.7.80 of the Project Development Overview Report (Document Reference 4.1, APP-244) describes this process. It has not been possible to locate the junction any closer to the existing junction due to the direct impact that would have on the Rokeby Registered Park and Gardens, which would not conform with national 4 Registered office Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ National Highways Limited registered in England and Wales number 09346363 policy (see</p>

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			<p>paragraphs 5.131-5.133 of the National Policy Statement for National Networks).</p>
<p>Rosalind Evans, RR-059</p>	<p>Climate Noise and Vibration</p>	<p>2. For the environment it means more tarmac laid, more carbon emissions from vehicles and more noise.</p>	<p>An 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). 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. 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> <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</p>

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			<p>motorways. To ensure the assumption is delivered in this Project the Environmental Management Plan (EMP) (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>
<p>Rosalind Evans, RR-059</p>	<p>Waking, Cycling and Horse Riding</p>	<p>3. Non motorised road users: the provision of the Black Route for anyone not in a motorised vehicle requires a long detour - all due to the overall design concept of moving the junction so unnecessarily out of alignment with our historic network of roads and paths</p>	<p>Please refer to the Walking, Cycling and Horse Riding Proposals (see Section 4.7 Scheme 8 Cross Lanes to Rokeby, 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 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). The location of the proposed grade separated junction at Rokeby is the closest point to the existing junction that avoids direct impact on the</p>

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			<p>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> <p>It is not possible to install a standalone bridge for walkers, cyclists and horse-riders 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>
Rosalind Evans, RR-059	Traffic and Transport	4. Implications for our local road network: The Black Route will have a severe and permanent effect on our local road system, which will cause significant harm to	Chapter 8.1.29 of the Transport Assessment (Document Reference 3.7, APP-236) discusses

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		<p>lives in Teesdale far beyond the corridor of the A66 route. These negative and harmful effects will be on traffic levels on local roads, the safety of residents and visitors, our historic and natural environment and the local economy. Overall the harm of the Black Route junction at Rokeby to the fabric of our lives in Teesdale would be immense and irreversible.</p>	<p>the impact of the Project on the A67 within Barnard Castle.</p> <p>While there is forecast to be an increase in traffic on the Sills (of 520 vehicles per day, which equates to less than 1 vehicle per minute across the day), the impact on Barnard Castle is one of a general reduction in traffic flow. 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>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</p>

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			<p>current issues are identified. Within the last 5 years (2017-2021) there have been no recorded accidents on either the B6277 Moorhouse Lane or B6277 'the Sills'. The last recorded accident was a slight accident which occurred in 2010, and previous to this a further slight accident was recorded to have occurred in 2001. Given the existing safety record of the road, the absolute increase of 520 vehicles per day (or less than 1 vehicle per minute) there is no evidence to suggest that the Project will cause a substantial increase in pedestrian safety issues at this location. 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>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. 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>The potential effects of the Project and individual Schemes (including Scheme 08 Cross Lanes to Rokeby) have been assessed and reported within the Environmental Statement (ES), which covers ten topic</p>

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			<p>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 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 and Schemes against it. They also describe the proposed mitigation required to minimise the effects of the Project and Schemes.</p> <p>Chapter 8: Cultural Heritage of the ES (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 application. Section 8.9.38 and Section 8.9.39 state the conclusions of this</p>

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			<p>assessment as no significant effects as a result of the Cross Lanes to Rokeby scheme to heritage assets. The 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. Paragraphs 3.5.8 to 3.5.13 of the Case for the Project (Document Reference 2.2, APP-008) 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 Project, arising from the consistent standard of dual carriageway, will lead to less accidents.</p>

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Rosalind Evans, RR-059	Cultural Heritage	<p>Before the consultation, Highways England had also designed the 'Blue Route'. The only reason I have been given that the Blue Route should not be pursued is that it would affect a narrow band of woodland at Church Plantation, which is part of a designated parkland. This has resulted in Heritage England objecting to the Blue Route. Heritage England have taken a very narrow and partial view of the historic impact. They have taken no account of the many important historic buildings which would be affected with the increased traffic across County Bridge; there are many listed buildings and historic monuments, which Historic England should be protecting here. Historic England have taken no account of the wider significance of how the parkland was designed to sit in the Teesdale landscape, and the historic significance of the ancient road and path networks. Equally, HE have said that the Blue Route could be tweaked to provide more mitigation against harm to Rokeby Park – however this has not been pursued at all</p>	<p>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 and discounting the Blue Route is set out from paragraph 5.7.33 and 5.7.34 of the Project Development Overview Report (Document Reference 4.1, APP-244), which are copied below.</p> <p><i>“5.7.33 Following this stakeholder engagement event, a further sifting exercise was carried out prior to Statutory Consultation to compare the proposed alternative against the baseline for each of Cross Lanes and Rokeby junctions. They were compared using engineering, environmental, traffic, economic, stakeholder principles with commentary on policy conformity. In addition, National Highways’ three priorities of Safety, Customer and Delivery were considered crucial to assessing the alternatives ahead of Statutory Consultation.</i>”</p>

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			<p><i>5.7.34 Refer to 4.1 for further detail on the assessment process and criteria and Section 5.8 of the Route Development Report produced for Statutory Consultation for detail of the assessments and outcomes. The Red and Blue Route Options were discounted as a result of the sifting exercise undertaken for each junction and as such the Black Route was subsequently identified as the preference to be taken forward for Statutory Consultation.”</i></p> <p>Section 6.5.16 and 6.5.17 of the Consultation Report (Document Reference 4.4, APP-252) explains that we asked questions about the Cross Lanes to Rokeby scheme including on the Black Route preferred alignment and alternatives shown (including Red Route and Blue Route) and provides a summary of the feedback received. Annex N (Cross Lanes to Rokeby) of the Consultation Report sets out more specifically National Highways' response to feedback received.</p> <p>National Highways has worked to minimise the potential effects of the Project on heritage assets. A full assessment of the likely significant effects from the Project on heritage assets is provided within Chapter 8 of the Environmental Statement (Document Reference 3.2, APP-051). The relevant mitigation measures are</p>

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			<p>contained in Section 8.8, compliance with which would be secured by the DCO, should it be made. The mitigation measures include the development of a Heritage Mitigation Strategy which is set out in the Environmental Management Plan (EMP) 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>
Cycling UK, RR-064	Walking, Cycling and Horse Riding	<p>Cycling UK continues to have concerns over the provision of safe cycling infrastructure as part of the proposed route, in accordance with the submitted walking, cycling and horse riding proposals. i) We express concern over the widespread continued use of "Shared cycle/footway" provision (mainly along detrunked sections of the existing A66) rather than properly segregated infrastructure as recommended in LTN1/20.</p>	<p>It is not unusual, particularly in rural areas, for shared cycle/footway provision particularly where usage is low. Such arrangements tend to have lower environmental impacts and require less land to be taken overall when compared with a segregated solution.</p> <p>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 walking, cycling and horse-riding provision and the outcome of that consideration will be discussed with the relevant affected persons in due course.</p>

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Cycling UK, RR-064	Traffic and Transport	We also express concern that clear proposals for speed limit and traffic calming measures on these detrunked sections remain missing.	<p>National Highways continue to engage and work with the relevant local authorities on the de-trunking proposals.</p> <p>The Planning Act 2008 established an infrastructure planning regime with the aim, among other matters, of providing a single consent process which avoids the potential delays associated with having the same project being considered through the lens of multiple authorisation regimes. The draft DCO (Document Reference 5.1, APP285) contains all the necessary statutory powers and authorisations required to construct, operate and maintain the Project. This includes development consent (an authorisation broadly equivalent to the grant of planning permission under the Town and Country Planning Act 1990), the authorisation to carry out works to side roads (as would normally be contained in a side roads order made under section 14 and other enabling powers under the Highways Act 1990) and to regulate traffic (as would normally be contained in Traffic Regulation Order made under the Road Traffic Regulation Act 1984).</p> <p>The key statutory powers and provisions concerning streets and highways included in the draft DCO include:</p>

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			<ul style="list-style-type: none"> • article 4 provides for the grant of development consent for the authorised development described in Schedule 1 to the draft DCO. • article 9 sets out which parties are responsible for maintaining the highways constructed, altered or diverted through the implementation of the powers in the draft DCO. It also sets out that where such highways are to be maintained by a party other than National Highways, the works must be carried out to the reasonable satisfaction of the party that is to maintain them. • article 10 permits National Highways to stop up streets and private means of access permanently, as shown on the rights of way and access plans (Document Reference 5.19, APP-342 to APP-349) and as specified in Schedule 2 to the draft DCO. These provisions are analogous to a side roads order made under the Highway Act 1980 and the rights of way and access plans have been prepared with regard to the guidance that applies to the preparation of the Site Plans that would accompany side roads order. • article 40 provides for the classification of roads as set out in Schedule 7. That Schedule makes reference to the classification of roads plans (Document Reference 5.20, APP-350 to APP-356) and also includes descriptions of

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			<p>roads to be de-trunked, with reference to the de-trunking plans (Document Reference 5.21, APP-357 to APP-363).</p> <ul style="list-style-type: none"> articles 41 and 42 make provision for clearways and traffic regulation measures in relation to the roads to described in Schedule 8 to the draft DCO, by reference to the traffic regulation measures (clearways and prohibitions) plans (Document Reference 5.22, APP-364 to APP-370) and the traffic regulation measures (speed limits) plans (Document Reference 5.23, APP-371 to APP-377). These provisions are of equivalent effect to a traffic regulation order made under the Road Traffic Regulation Act 1984.
Cycling UK, RR-064	Walking, Cycling and Horse Riding	<p>ii) We express concern over the continued reluctance to secure full east-west connectivity for vulnerable road users. In particular, we express frustration that the scope of the scheme appears to have artificially limited itself to the provision of connectivity along those stretches of the route that are being dualled, without securing similar east-west connectivity along stretches of the route that have *already* been dualled. Retrofitting existing sections with safe provision must be seen as a vital part of the overall scheme in order to deliver the proposed goals - otherwise provision of cycle infrastructure only within the bounds of the new scheme is futile. We believe a *full* assessment of</p>	<p>Annex B6 (Document Reference 2.7, APP-026) of the Environmental Management Plan (EMP) provides an expanded essay plan of the Public Rights of Way Management Plan that will be further developed and implemented at construction stage.</p> <p>In addition to this the EMP provides an expanded essay plan for the Public Rights of Way Management Plan which sets out the operation mitigation for walkers, cyclists and horse riders and other users of rights of way/highway with public access.</p>

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		<p>cycle provision covering the overall dualling scheme (including existing dualled sections rather than only new dualling proposals) is vital.</p>	<p>A parallel east west shared pedestrian and cycle route has been provided along all the route of the existing A66 which will provide a safer alternative than using the proposed A66 carriageway and associated junctions. In addition, following submission of our DCO application, we have had requests from the British Horse Society (BHS) to consider additional equestrian provision. These facilities are being considered across the whole project and will be developed and incorporated where possible.</p>
Cycling UK, RR-064	Walking, Cycling and Horse Riding	<p>iii) Particular attention is drawn to the gap in east-west walking/cycling/horseriding provision across Bowes Moor. This offers a significant gap in safe provision over an exposed area with no nearby alternative routes. We believe that the disused railway track across Bowes moor should be brought within the scheme as a restricted byway, in order to deliver a safe, traffic free alternative route for the full length of the overall scheme. We note in particular that the creation of a restricted byway here would allow horse drawn traffic to safely cross the moors on their way to the Appleby horse fair without need to access the dualled sections of the A66 as at present - which has resulted in fatal road traffic collisions in the past.</p> <p>We also express concern that although this proposal has been raised as part of the consultation, it has not</p>	<p>The suggestion that the disused railway track across Bowes moor should be brought within the Project as a restricted byway has not been considered as it is outside of the scope of the proposed dualling of the single carriageway sections of the A66.</p> <p>Designated funds are ring fenced funds within National Highways that go above and beyond the traditional highways investment and are used to find new ways to improve our road network and its surroundings. Designated funds projects are funded separately to any major project and are therefore not part of the DCO application. Any external stakeholder can apply for designated funds including local authorities, community groups, members of the public and</p>
Cycling UK, RR-064	Funding and Delivery		

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		<p>been put forward for designated funding consideration (chapter 5) despite assurances that this would be considered.</p>	<p>public bodies. Our Designated Funds Plan sets out how, during the current Route Investment Strategy (RIS) period, we are investing £936 million to improve our road network and surroundings including walking, cycling and horse-rider routes via the Users and Communities theme. In RIS1 we invested in over 160 cycle routes and completed 62 schemes which improve integration with other transport infrastructure.</p>
<p>Cycling UK, RR-064</p>	<p>Walking, Cycling and Horse Riding</p>	<p>iv) We express further concern that no clear proposal has been identified for the location or design of a safe crossing of the A66 where it meets with the authorised proposals for the Pennine Bridleway National Trail Northern Extension (in the area of Coupland Beck). We believe that much greater thought, and engagement with natural England and other interested parties, needs to go into the development of this crossing point. Comparison is drawn with the extensive design and remediation works for the 'green bridge' proposed for the existing Cotswold Way National Trail, where it crosses the A417 as part of the 'air balloon' missing link works identified under Highways England project TR010056. See: https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010056/TR010056-000604-7.11CotswoldWayNationalTrailDiversionReport.pdf</p>	<p>National Highways acknowledge that the Pennine Bridleway Northern Extension has been approved by the Secretary of State but is yet to be implemented. National Highways will seek to engage directly with Pennine National Trails Partnership in relation to details of this extension including the proposed timescales for its implementation with regard to the co-ordination with the A66 Project. We will update relevant Interested Parties on this matter following this engagement.</p> <p>Annex B6 Public Rights of Way (PRoW) Management Plan (Document Reference 2.7, APP-026) of the Environmental Management Plan (EMP) provides an extended essay plan of the Public Rights of Way (PRoW) Management Plan that will be further developed as the project progresses through detailed design and will be</p>

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			<p>implemented at construction stage. The plan will detail the proposed diversions and new routes before and during construction, which seek to mitigate impacts on the PRow network. It will also set out a hierarchy of mitigation to help maintain access across the PRow network during construction, for example through the use of appropriate signage, diversions and/or public liaison where necessary. The preparation and delivery of the detailed Public Rights of Way Management Plan will incorporate inputs from the local community through the appointed Principal Contractor(s) Public Liaison Officer. In addition to this the EMP provides an extended essay plan for the Public Rights of Way Management Plan as referenced above which sets out the operation mitigation for WCH and other users of rights of way/highway with public access. The Public Rights of Way Management Plan as referenced above is required through the Register of Environmental Actions and Commitments which forms part of the Environmental Management Plan which will be secured through the DCO, should it be made.</p>
<p>HGV Action Group, RR-065</p>	<p>Cultural Heritage Traffic and Transport</p>	<p>The HGV Action Group are a local pressure group, who have campaigned over many years to try to ensure the safety of residents, the fabric of our ancient buildings and bridges, and our environment; all of which are endangered daily by traffic through Barnard</p>	<p>Further detail on the assessment of alternatives and the rationale for progressing with the Black route is set out in the Project Development Overview Report (PDOR) (Document Reference 4.1, APP-244) and in particular paragraphs</p>

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	Walking, Cycling and Horse Riding	<p>Castle. We are well acquainted with the issues of our small local roads, and the interface with the major regional roads, such as the A66 and the A68. Our bridges in Teesdale are ancient, mostly single track and some with weight restrictions. The first modern bridge across the River Tees from its source is on the A1(M) just west of Darlington – the A66 runs south of the River Tees, and our major towns, cities and the A68 are to the north. The ancient market town of Barnard Castle is in a very vulnerable position for damage from traffic. Over the years, the HGV Action Group has engaged with the community, parish and County councils, hauliers and other groups such as cyclists – and now the A66 Liaison Group, convened by Highways England.</p> <p>We are extremely concerned about the decision of Highways England to opt for the 'Black Route' for the Rokeby Junction. The Black Route design will have a severe and permanent effect on our local road system. This proposed route will cause significant harm to lives in Teesdale and far beyond the corridor of the A66 route. One specific harm of particular concern to the HGV Action Group is that it will cause a change in traffic flow patterns, putting more vehicles along the unsuitable B6277, along a narrow section of country road which is used as a footpath, across the ancient, listed, single track County Bridge and up the steep, narrow Bank, passing numerous listed historic</p>	<p>5.7.33 to 5.7.38 of that Report. In addition, the Development of Preferred Route section (paragraph 5.6.35) of the Route Development Report, which is contained within Appendix 3 to the PDOR (Document Reference 4.1, APP-247), also provides an explanation of the development of the preferred Black route. 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 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>Section 8.1.29 of the Transport Assessment (Document Reference 3.7, APP-236) discusses the impact of the Project on the B6277 'The Sills' in Startforth within Barnard Castle. While there is forecast to be an increase in traffic on the (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</p>

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
		<p>buildings and disturbing the environment of the river banks at Startforth.</p>	<p>traffic flow due to the lower flows on the A67, of around 400 vehicles Average Annual DT, 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, as described in the Transport Assessment (Paragraph 3.1.92 in Document Reference 3.7, APP-236). Total traffic at Barnard Castle's Traffic Light controlled County Bridge is reduced by 150 vehicles per day therefore the Project will relieve this the pressure on this junction, and therefore congestion in Barnard Castle and Startforth.</p> <p>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. The mitigation measures include the development of a heritage mitigation strategy which is set out in the Environmental</p>

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
			Management Plan Annex B3 Detailed Heritage Mitigation Strategy (Document Reference 2.7, APP-023) to mitigate effects to cultural heritage.
HGV Action Group, RR-065	Cultural Heritage	<p>The Highways England decision to put forward the Black Route is against the advice and views of the majority of local people, including the A66 Liaison Group. The 'Blue Route' was discussed and preferred by the community – but withdrawn even before the consultation. This is because of a single objecting voice from Heritage England concerning a very narrow section of land at Rokeby Park. Heritage England have not engaged with the community on this issue, nor have they taken a wider view of harms to the historic environment, which are demonstrable. Their stance of harm to the Rokeby designated park is outweighed by the harm to the residents of Startforth and Barnard Castle; the harm to the park is marginal but the harm to Barnard Castle and Startforth is severe. Highways England withdrew the Blue Route, despite there being further opportunities for mitigation against harms at Rokeby Park</p>	<p>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 considerations which must be followed are set out in detail in Chapter 8 of the Environmental Statement: Cultural Heritage (Document Reference 3.2, APP-051). The Project must adhere to National Policy Statement for National Networks, which addresses Registered Parks and Gardens in section 5.131 where it states <i>“When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset’s conversation...Substantial harm to or loss of designated assets of the highest significance, including...grade I and II* Registered Parks and Gardens should be wholly exceptional.”</i> 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. Further detail on the reasoning for progressing with the Black route is</p>

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
			<p>set out from paragraph 5.7.33 of the Project Development Overview Report (Document Reference 4.1, APP-244).</p> <p>National Highways have developed the proposed Black Route, having regard to a number of factors including, responses to consultation on the Black route and alternatives (the Red and Blue Routes) within the Cross Lanes to Rokeby scheme (as explained in the Consultation Report (APP-252) and as detailed in Annex N (Document Reference 4.4, APP-271) of the Consultation Report. Section 6.5.16 and 6.5.17 of the Consultation Report explains how we consulted and the questions we asked about the Black route and the alternatives within the Cross Lanes to Rokeby scheme and provides a summary of the feedback received. Annex N (Cross Lanes to Rokeby) of the Consultation Report sets out more specifically, National Highways response to feedback received.</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</p>

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
			<p>assessment as no significant effects as a result of the Cross Lanes to Rokeby scheme to heritage assets. 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> <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. As discussed above, 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 Bridgegate 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> <p>National Highways acknowledge the views of Historic England and further details of their comments and our response to them can be found within Annex N of the Consultation Report (Document Reference 4.4, APP-271). The decision on the preferred route has been the</p>

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			<p>result of our own assessment which has considered various factors including environmental impacts, policy conformity, engineering considerations, the views of stakeholders and regard to consultation responses.</p> <p>We have worked to minimise the potential effects of the Project on heritage assets through the development of the heritage mitigation strategy, which is set out in the Environmental Management Plan Annex B3 Detailed Heritage Mitigation Strategy (Document Reference 2.7, APP-023). 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>
Eden Rivers Trust, RR-122	Environment and EMP Flooding and Drainage	Eden Rivers Trust (ERT) is the only conservation charity standing up for Eden's rivers; changing the way they are protected, enhanced and used so that people and nature can thrive. We have been working directly with landowners, agencies and private companies to improve the management of the land and water in the Eden Catchment for over 25 years. ERT believes it is imperative that the route chosen for the A66 dualling should have no adverse impacts on the River Eden SAC/SSSI (the river, its geomorphology, associated habitat and wildlife); biodiversity net gain should be	A Habitat Regulation Assessment (HRA) has been undertaken for the project and submitted with the DCO application (see Document Reference 3.5, APP-234 and Document Reference 3.6, APP-235). This assessment fully considers impacts that could arise during construction and operation and sets out the assumptions made regarding construction methodology and the required mitigation during construction. A detailed Method Statement for working within the Special Area of Conservation

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
		<p>achieved and there should be an overall benefit to the river Eden included reduced flood risk to local communities through natural measures. We are concerned this is not currently the case, though it is difficult to discern due to the lack of detailed and specificity in some areas of the documents that still appear to be 'draft' and open to change despite design principles being agreed.</p>	<p>(SAC) is required to be provided and consulted upon as set out in Section 1 of the EMP (Document Reference 2.7, APP-019). This method statement will set out in detail the methods to be used, and how it complies with the HRA undertaken already.</p> <p>It is acknowledged that the mitigation measures are considered 'draft' or preliminary and are based on the preliminary design of the Project as submitted in the DCO Application. They are based on the identified Likely Significant Effects of the Project as identified in the Environmental Statement (Document Reference 3.2, APP-043 to APP-059), which have been used to develop principles set out in the EMP (Document Reference 2.7, APP-019) and the Project Design Principles (Document Reference 5.11, APP-302), both of which will be examined as part of the DCO submission and will become certified documents, should the DCO be made. This includes activity around the River Eden SAC and Site of Special Scientific Interest (SSSI). These two documents and their annexes will secure the mitigation required. The detailed design will be required to take account of the mitigation outlined in these documents and will not result in effects worse than that which was assessed within the Environmental Statement, submitted with the DCO application.</p>

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			<p>It should be noted that Article 53 of the draft DCO (Document Reference 5.1, APP-285) requires that the EMP is developed in consultation with various parties and then submitted to the Secretary of State for approval prior to the start of works. This EMP iteration will contain detailed management plans (where relevant) that will be informed by the detailed design and construction methodologies been developed, including in relation to biodiversity matters. Compliance with an approved EMP is secured by article 53 and as such is a legally enforceable obligation.</p>
Eden Rivers Trust, RR-122	Flooding and Drainage	<p>We are particularly concerned about the route around Kirkby Thore where it crosses the Troutbeck catchment, we have been working on river related habitat improvement here for over 25 years. The northern route around Kirkby Thore chosen (from several early options) will be the most damaging for the river as it has the greatest impact on the Trout Beck floodplain which is an important catchment where ERT have worked on habitat improvements over the last 25 years. A river restoration project planned along this route by ERT with the landowners, has been 'adopted' as a mitigation measure, however the chosen route is longer and needs more materials for construction, more fuel will be used in cars, there will be more long term costs relating to maintenance, more lay down areas/compounds, overall impact will be huge e.g. loss</p>	<p>Environmental Statement Chapter 3 Assessment of Alternatives (Document Reference, 3.2, APP-046) sets out a comparative assessment of alternative routes within the Temple Sowerby to Appleby scheme in section 1.5.21 to 1.5.47. For further detail on the decision-making process involved in the route selection, see the Project Design Overview Report (Document Reference 4.1, APP-244); specifically, from paragraphs 5.4.19 onwards.</p> <p>National Highways is aware of the River Eden Special Area of Conversation (SAC) and Site of Special Scientific Importance (SSSI) and has</p>

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		<p>of farmland bird habitat during construction phase. The proposed new river crossing is acknowledged as having the potential to adversely impact water quality in the River Eden SAC/SSSI, which is not acceptable. The discarded southern (orange) route option would have utilised the existing Trout Beck crossing so be less of an impact and provide further opportunities for improving biodiversity. In addition, impacts to Thacka Beck (NY 527292), the proposed new discharges to the River Eamont water quality, are also of concern</p>	<p>worked with Natural England and the Environment Agency on ensuring that the potential effects of the Project are minimised. National Highways are also working with the Eden Rivers Trust to facilitate the proposed river restoration scheme at Sleastonhow through Designated Funds. Eden Rivers Trust decided that the start of the feasibility study for the river restoration should wait until the detailed design for the A66 NTP was undertaken. National Highways have therefore agreed to postpone the use of the approved funding and the start of the feasibility until during detailed design with an estimated start date of April 2023, subject to landowner agreement. National Highways confirm that the A66 NTP project will not prevent the river restoration Designated Fund project in this location from going ahead.</p> <p>The Environmental Statement (ES) Chapter 14: Road Drainage and the Water Environment (Document Reference 3.2, APP-057), the Habitat Regulations Assessment (HRA) Statement to Inform Appropriate Assessment (Document Reference 3.5, APP-234) and (Document Reference 3.6, APP-235) and the Environmental Statement Appendix 14.1 WFD Compliance Assessment (Document Reference</p>

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			<p>14.1, APP-220) set out the potential effects of any changes to water run-off on watercourses, including the River Eden and its catchment. Based on these assessments, coupled with embedded avoidance and mitigation measures in the outline drainage design, and the EMP (Document Reference 2.7, APP-019) and Annex B7 Ground and Surface Water Management Plan (Document 2.7, APP-027), ES Chapter 14 sections 14.10.13 to 14.10.14 and section 14.10.44 to 14.10.50 notes that there are no significant effects on water quality to any surface water receptor (including the River Eden catchment) in construction or operation.</p> <p>Section 1.5.38 and section 1.5.42 of the HRA Stage 2 Statement to Information Appropriate Assessment (Document Reference 3.6, APP-235) notes that without mitigation there is risk of runoff affecting the River Eden SAC, however as noted in Section 1.5.293 it is considered that with embedded avoidance and mitigation measures (that the Project has worked closely with Natural England and the Environment Agency to design) that adverse effects on the integrity of the River Eden SAC can be ruled out.</p>

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
			<p>The Orange Route did not use the existing Trout Beck crossing as the existing structure is too narrow. A new viaduct was proposed to the south of the existing to cross Trout Beck and the River Eden SAC. The biodiversity impacts and opportunities were assessed as part of the option sifting and determined to be neutral between the Orange and Blue Route options. The additional length of the blue route compared to the orange route and the associated impacts such as quantity of materials and land take has also been considered as part of the option sifting. The sifting has separate assessments for the construction phase and operation. Refer to paragraphs 5.5.67 to 5.5.73 (description of the orange alignment) and Appendix A2 (sifting matrix) and B2 (sketches of alignment options sifted) of Project Development Overview Report - Appendix 3 A66 Northern Trans- Pennine Project Route Development Report (Document Reference 4.3, APP-247).</p> <p>National Highways can confirm there are no impacts to Thacka Beck and there would be no discharges as a result of the Project.</p> <p>Water quality of discharges from road drainage systems has been assessed see the</p>

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			<p>Environmental Statement Appendix 14.3 Water Quality Assessment, (Document Reference 4.3, APP-222) and mitigation measures included in the drainage design for all affected watercourses including Thacka Beck and River Eamont. Please refer to the water quality sections (one per scheme) of Environmental Statement Appendix 14.2 Flood Risk Assessment and Outline Drainage Strategy, (Document Reference 3.4, APP-221) and its annexes for more information.</p> <p>In addition, the Environmental Management Plan (Document Reference 2.7, APP-019) submitted as part of the DCO application includes the drainage design compliance commitments as follows:</p> <ul style="list-style-type: none"> • Flow volume and water quality control measures shall be incorporated into the scheme design to provide a sustainable drainage system (SuDS). • The carriageway drainage shall consist of a multi-stage treatment network to remove and retain soluble and suspended pollutants to ensure discharges to groundwater or local watercourses are at acceptable levels.

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
			<ul style="list-style-type: none"> • Where ponds are designed for highway run-off attenuation (as retention ponds), they must have sufficient capacity to retain run-off from all events with an annual exceedance probability of greater than 1%, plus allowance for climate change in line with DMRB CG 501 and Environment Agency guidance. Such highway run-off attenuation ponds must be located outside Flood Zone 3. • Highway runoff will not be allowed to discharge freely, instead attenuation basins and swales shall be incorporated into the drainage design to manage this. • The design of the road drainage network shall consider necessary measures and treatment to provide appropriate protection to aquifers from potential water quality deterioration. Where there is potential interaction with groundwater levels than these are appropriately assessed based upon the groundwater monitoring network.
Eden Rivers Trust, RR-122	Biodiversity and BNG Flooding and Drainage	Creating (off route) floodplain meadow at Ormside Hall (NY707176) to offset biodiversity loss and provide additional flood storage should be considered. The scheme provides the ideal opportunity to reduce flood risk in Warcop using natural flood measures (to improve biodiversity) as well as the hard engineering	National Highways are in communication with the design consultant that is preparing the natural flood management (NFM) options to reduce flood risk in Warcop village for the collaborative group (NH, CCC, EA, ERT). The National Highways hydraulic model is being

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
		<p>solutions offered by HE so far. ERT, CCC, the EA and local landowners are already working on a scheme but interest from HE is low.</p>	<p>used to help identify opportunities and test the intervention options available. At this time (November 2022) National Highways are waiting for the draft options to be shared with all parties in the collaborative group for review by the Project design team. National Highways is committed to continued engagement with the collaborative group and will also continue to engage directly with the Eden Rivers Trust on these matters.</p>
<p>Barnard Castle Town Council, RR-215</p>	<p>Development of the Project and Alternatives</p> <p>Cultural Heritage</p> <p>Environment and EMP</p>	<p>We believe that the Black route conflicts with the National Planning Policy Framework Revised 2021 [NPPF] under sections 6 (strong, competitive economy), 7 (the vitality of town centres), 8 (promoting healthy and safe communities), 9 (promoting sustainable transport), 15 (conserving and enhancing the natural environment), and 16 (conserving and enhancing the historic environment).</p> <p>We further believe it is not reflective of the requirements of the National Networks National Policy Statement 2014 [NPS] on linear infrastructure development in terms of heritage, the environment and safety.</p> <p>We also believe it is in breach of the NPS with regards to at least 5.127, 5.128 and 5.133. Historic England have stated their opinion that the Blue Route will cause “substantial harm” to two heritage assets. Given the</p>	<p>The Project Design Report (Document Reference 2.3, APP-009) provides detail on the history of the design development of the Project and how the Black and Blue routes have been considered throughout the development of the Preliminary Design. Further detail on the assessment of alternatives and the rationale for progressing with the Black route on balance is set out in the Project Development Overview Report (PDOR) (Document Reference 4.1, APP-244) and in particular paragraphs 5.7.33 to 5.7.38 of that Report. In addition, the Route Development Report, which is contained within Appendix 3 to the PDOR (Document Reference 4.1, APP-247) also provides an explanation of the development of the preferred Black route. National Highways have developed the proposed Black Route for the Cross Lanes to</p>

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		<p>opinion that “substantial harm” would be caused to heritage assets, National Highways have returned to the Black route at the Rokeby junction based on their obligation to avoid harm under NPS 5.133. The NPS allows consent to be granted - even when “substantial harm” might be expected to heritage assets – if “it can be demonstrated that the substantial harm or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm [NPS 5.133]” (language that is mirrored in NPPF 201).</p>	<p>Rokeby scheme, having regard to a number of factors including, responses to consultation (as is detailed in Annex N and Annex P of the Consultation Report (Application Document 4.4, APP-252) and current national planning policy as set out in paragraphs 5.8.92 to 5.8.98 of the Route Development Report (RDR) which is contained within Appendix 3 to the PDOR (Document Reference 4.1, APP-247). Paragraph 5.133 of the NN NPS requires in circumstances where there is potential for substantial harm to a designated heritage asset the DCO application would need to demonstrate that the substantial harm or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm. The RDR concludes that the public benefit of the eastern junction alternative would not outweigh the potential harm to the Registered Parks and Garden (RPG). Although National Highways does acknowledge the identification of the Blue junction route for consideration as an alternative assuming it offered the necessary public benefits, in circumstances where there is an alternative, in the Black route (which provides a similar if not identical level of public benefit) National Highways concluded that the eastern alternative would conflict with national policy. Paragraph 5.8.97 of the RDR therefore</p>

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			<p>concludes that: "As an alternative junction location and layout exists, it is considered that the eastern junction alternative at Rokeby is likely to be regarded as not to conform to national policy and therefore there is a risk that for this scheme, a DCO application including the alternative eastern Rokeby junction would not be likely to secure a grant of consent." The potential effects of the Project and individual schemes (including Scheme 08: Cross Lanes to Rokeby) 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 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</p>

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	National Highways Response
			<p>existing baseline for their topics and assesses the impact of the Project and schemes against it. They also describe the proposed mitigation required to minimise the effects of the Project and schemes. It is acknowledged that the black route (that forms part of Scheme 08: Cross Lanes to Rokeby) will have environmental effects and these are reported in the Environmental Statement, alongside any measures that are required to mitigate the effects. For example, the Environmental Statement Appendix 8.10 Impact Assessment Table (Document Reference 3.2, APP -187) details that there will be effects upon both the Church of St Mary and the Gate Piers of Rokeby Park within the Cross Lane to Rokeby scheme. The ES concludes that the impacts on these heritage assets would be slight adverse during both construction and operation phases, which would not be significant. The ES also reports that there will continue to be traffic in the setting of the Church of St Mary, however it is considered to be less compared to the existing scenario as it will no longer be passing between the Church of St Mary and the Old Rectory. The Project Design Principles (Document Reference 5.11, APP -302) sets out a number of specific requirements of landscaping in this location in order to maintain the current historic setting</p>

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			<p>(see Section 4.6 of the Project Design Principles). The relevant legislation and policies which the Project is subject to, and accords with, are outlined in detail within the Legislation and Policy Compliance Statement (LPCS) (Document Reference 3.9, APP - 242) , which accompanies National Highways Development Consent Order (DCO) application. Under section 104(3) of the Planning Act 2008, the application for the DCO must be determined in accordance with any relevant national policy statement (NPS), except where the Secretary of State is satisfied that one or more of the sections 104 (4) to – (8) applies. In the case of the Project, the National Networks National Policy Statement 2014 (NN NPS)) is the relevant NPS. The LPCS covers in detail how the project conforms with the relevant policies within the NN NPS, as this is the primary basis for decision making . The LPCS (Document Reference 3.9, APP 242), includes Appendix A: National Networks National Policy Statement (NN NPS) Conformity table. Pages 3.9 -162 to 3.9 -164 of 373 respond specifically to paragraphs 5.127 and 5.128 of the NN NPS, whilst page 3.9 -169 of 373 responds to paragraph 5.133 . These tables demonstrate accordance with these policies. The overall strategic aims of the National Planning Policy</p>

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			<p>Framework (NPPF) and the National Networks National Policy Statement (NN NPS) are consistent (e.g. , to achieve sustainable development) and the same NPPF topics (as referenced in the Town Council's representation) are covered within the NN NPS but are specific for Nationally Significant Infrastructure Projects. National Highways note that the Secretary of State may consider the NPPF as a relevant and important matter when determining the DCO application to the extent relevant to this particular Project (s.104(2)(d) Planning Act, 2008), (NPPF, paragraph 5), (NN NPS, paragraph 1.18). Consideration is therefore given to the NPPF, as well as development plans of the local authorities as set out in section 3.4 of the LPCS. For example , section 3.4, with respect to the sustainable development and environmental objectives of the NPPF, concludes that sustainable development is an inherent element of the Project, which has been developed to ensure the best balance between maximising benefits and minimising environmental impacts. The Project objectives, set out in Section 5.5 of the Case for the Project (Application Document 2.2, APP -008), also ensure that net gain is achieved across the three inter-related sustainable development objectives set out in</p>

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			<p>the NPPF (economic, social and environmental). The benefits of the Project are defined in further detail in chapter 3 of the Case for the Project (Application Document 2.2, APP-008). Furthermore, the LPCS found that the environmental mitigation is integrated into the design of the Project, with habitats lost to the Project being replaced on a like-for-like or better basis, as required by the NPPF. In conclusion, the Black Route proposed has emerged from studies of alternative options as the best solution to address the problems on the existing A66 relating to the scheme area and to deliver the Project objectives taking into account various factors including environmental impacts, policy conformity, engineering considerations, the views of stakeholders and having regard to consultation responses. Furthermore, the LPCS (Document Reference 3.9, APP-242) demonstrates that the Project accords with the relevant policies identified.</p>

2. Applicant's Response to Relevant Representations Errata

2.1. Introduction

- 2.1.1. This section identifies the relevant page number, the Relevant Representations references (as listed in the Examination Library) as stated in the published Applicant's Response to Relevant Representations, the summary of the matters raised in those Relevant Representations, and the Examination Library reference numbers which were not included and should therefore be added to the entry identified.
- 2.1.2. Please note that the page numbers below are related to Chapter 2 of the **Applicant's Response to Relevant Representations** (Part 1 of 4) document (Document Reference 6.5, PDL-010) only.

Table 2 Errata

Page Number of Applicant's Response to Relevant Representations (Part 1 of 4) (Examination Library reference PDL-010)	Relevant Representation reference numbers referred to in Applicant's Response	Summary of Matters Raised in Relevant Representation(s)	Relevant Representation reference numbers to be added to Applicant's Response
Page 44	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.	RR-179
Page 44	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.	RR-052
Page 47	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.	RR-056
Page 48	RR-037, RR-058, RR-216, RR-072	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	RR-067, RR-068, RR-069, RR-179

Page Number of Applicant's Response to Relevant Representations (Part 1 of 4) (Examination Library reference PDL-010)	Relevant Representation reference numbers referred to in Applicant's Response	Summary of Matters Raised in Relevant Representation(s)	Relevant Representation reference numbers to be added to Applicant's Response
		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.	
Page 61	RR-208	Concern that the proposed route at Kirkby Thore is longer than the existing route. This will add to commuters' journey times and fuel costs.	RR-069
Page 69	RR-194; RR-232; RR041; RR-128; RR-182; RR-188; RR-217; RR177; 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.	RR-179
Page 94	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.	RR-179
Page 96	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.	RR-067, RR-068, RR-179
Page 110	RR-007, RR-008, RR028, RR-034, RR-037, RR-038, RR-176	Concern that the Old County Bridge users would be at risk due to the narrow footpath on only one side of the bridge. Concern regarding the safety of the Sills in	RR-067, RR-068

Page Number of Applicant's Response to Relevant Representations (Part 1 of 4) (Examination Library reference PDL-010)	Relevant Representation reference numbers referred to in Applicant's Response	Summary of Matters Raised in Relevant Representation(s)	Relevant Representation reference numbers to be added to Applicant's Response
		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.	
Page 112	RR-023, RR-034	General concern about the project impacting walking and cycling and that impacts to walking and cycling routes have only been considered as an afterthought.	RR-027