



Historic England

WRITTEN REPRESENTATIONS

ON BEHALF OF THE

HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND

(HISTORIC ENGLAND)

(“HE”)

Application by

**National Highways for an Order granting Development Consent for the
A66 Northern Trans Pennine Project**

PINS Reference No: TR010062

Historic England References: PL00586663 / PL00756505

PINS Unique References: A66D-EIA007 & A66D-0004

**Deadline 1 Submission
18 December 2022**

Historic England considers that the historic environment has generally been addressed appropriately in this application.

Although discussions have allowed some issues to be avoided and others to be minimised, harm to the historic environment within our remit will still be caused by the Project.

We have set out the harm to the historic environment within our remit. It is now for the ExA to balance this harm against the public benefits (alongside all other relevant issues) in coming to its decision.

The proposed mitigation works are supported by Historic England provided that the ExA concludes that the benefits of the scheme outweigh the harms, and that the Project is justified according to the policies of the NPSNN (2014)

There remain a series of issues which need to be addressed:

- The Environmental Statement does not address the issue of potential impacts to the Lake District World Heritage Site. At present the ES does not seem to have examined such indirect impacts, and this needs to be addressed through an appropriate heritage impact assessment (HIA) in line with UNESCO guidance.
- We have set out our concerns about the novel use of the EMP in this DCO in Section 8 of our written representations. There are matters for the Applicant to address during the examination in order to satisfy us that the historic environment will be protected can be delivered.

The Project also has the potential to provide wider public benefit in the form of heritage benefits. These include:

- Seeking to maintain the historic line of the Roman route where possible.
- Taking the route off-line west of Rokeby Registered Park and Garden in order to maintain the integrity of the Park and move much of the current traffic further away from this precious landscape

- Setting out a research framework for the Project which will maximise the benefits of the scheme in increased understanding of the historic environment, assist in directing where resources may be required, and help to direct public engagement activities.

Historic England is keen to continue to work with the applicant to best ensure that the matters highlighted in our Written Representations are addressed.

This will then ensure that harmful impacts of the Project will be minimised and, where harms cannot be avoided, they are mitigated appropriately, and this secured as part of the DCO.