



North Yorkshire County Council
and
Richmondshire District Council

A66 Northern Trans-Pennine Project

Summary of Relevant Representations
Submitted 2 September 2022

Examination Deadline 1 – 18th December 2022



Please consider the following submission made on behalf of both North Yorkshire County Council and Richmondshire District Council (the Authorities)

The full relevant representation submitted to the ExA on 2nd September 2022 is at Appendix A

Summary of the Written Representations

Support for the Scheme	The Authorities support the scheme in principle and consultation with the Authorities has been good. Design work is ongoing and the Authorities expect dialogue to continue.
	<p><u>Local Users</u> The Authorities expect full junction configuration, not just on the new junctions but existing ones as well to support increased safety and legibility.</p> <p><u>Diversion Routes</u> The Authorities expect a full diversion routes strategy to be developed to support the construction and operation phases of the scheme.</p> <p><u>De-trunking</u> A clear and detailed strategy is required for the section of the A66 that are to be 'de-trunked'. This should secure no maintenance backlog, details of commuted sums and details of enhancements where appropriate.</p> <p><u>PRoW</u></p>

	<p>The north south connectivity should be enhanced where the A66 severs the network. The Authorities support the offline route strategy.</p> <p><u>Drainage</u> A full drainage strategy should be considered including combining drainage ponds to reduce costs and land take.</p>
Landscape	<p><u>LVIA Assessment</u> The Authorities are satisfied with the assessment subject to the inclusion of selected illustrations. The application should also include an explanation of good design principles.</p> <p><u>Structures</u> Evidence of the stated aesthetic review of structures or the project design principles are not evident in the application.</p> <p><u>Mitigation Principles</u> The illustrative layouts are not intended to be secured through the DCO. The Authority wishes to see an outline Landscape Strategy, incorporating mitigation, to be secured by the DCO. This should also include long term maintenance and management responsibilities.</p>
Ecology	<p>The Authority welcomes the opportunity to work with the applicant relating to the adverse effects on barn owls during the operational phase of the development. The Authority also advocates a 10% metric of Biodiversity net gain.</p>

Cultural Heritage	<p>Overall these assessments provide a comprehensive review of the significance of the archaeological resource and the impact of the scheme upon it.</p> <p>Various measures have been taken to limit the impact of the proposal on the Scheduled Monument at Carkin Moor by restricting the width of the easement and limiting the amount groundwork.</p> <p>a Historic Environment Mitigation Strategy will be produced within the EMP. The Authorities would be happy to continue working with the design team and other partners in agreeing a suitable strategy.</p>
Local Planning Authority	<p><u>TCPA Application</u> Work is ongoing to understand the scope and timing of additional Town and County Planning Act application to run alongside the DCO application.</p> <p><u>Discharge of Requirements</u> More work is needed to understand the role of the Authority within the discharge of requirements, Should the role of the Authority become burdensome it is expected that appropriate resources are put in place to support the Authority.</p>
Environmental Health	<p>The assessment of noise and vibration levels in the relevant chapter of the ES can be broadly agreed with.</p>
PRoW	<p>The Authorities set out specific drafting errors within the DCO relating to Pubic Rights of Way</p>

Relevant Representation of North Yorkshire County Council and Richmondshire District Council

The following representation is made on behalf of North Yorkshire County Council (NYCC) and Richmondshire District Council (RDC) only. It is likely that further submissions and in particular the Local Impact Report and Statement of Common Ground will be prepared jointly between NYCC and RDC.

The Authority has no strategic concern and is supportive of the project in principle. The consultation with the Authorities has been good and importantly, it is felt that the Applicant has taken on board comments from officers from earlier rounds of consultation. It is understood that design work is ongoing and we expect the dialogue to continue.

It is understood the applicant is keen to submit an early draft of the Statement of Common Ground. Whilst there are still areas of discussion we are confident any issues will be worked through in an effective way.

The following represent the current position from key service areas.

Highway Design

Improvements made between the Stephen Bank to Carkin Moor section have the potential to deliver significant benefits to journey times that will free up the existing A66 to support all local users and journeys. The Council expects that clear and effective junction configurations should be developed, not just on the newly dualled section but also the existing junctions on the route. We consider that the scheme should see greater junction safety and legibility.

The Council requires a clear strategy for the establishment of alternative/diversion routes. It is therefore important that detailed consideration is given to official diversion and “rat-run” routes to support both the construction and operational period of the route and that, where necessary, upgrades are delivered on the local road network to support this. Currently within the DCO submission there are no traffic management details included for the scheme.

A clear and detailed strategy is required for the section of the A66 that is to be “de-trunked”. It is assumed that any “de-trunked” sections of the existing A66 do not include a maintenance backlog, and that commuted sums will be provided by National Highways to support future up keep. We also consider that transferred sections of the route should be subject to enhancements where these are considered to best reflect their new role, for example improved junction arrangements or the introduction of improved facilities for non-motorised users.

The scheme should seek to improve north-south connectivity where the existing PRoW network has been severed by the A66 in the past. The Council supports an offline route strategy for walking and cycling between M6 and A1(M) as an important endeavour for this scheme, that will bring a meaningful benefit for local communities and other road users. In particular we consider that the scheme should

seek to support delivery of a Scotch Corner to Penrith “off A66” route suitable for walking and cycling. This would include enhancements along the de-trunked section of the A66.

A drainage review should consider the combining of drainage ponds to reduce costs / land take, along with rationalising of the maintenance of the drainage ponds to be owned by the Council. The current drainage strategy submitted as part of the DCO, gives concern to NYCC, over the existing flooding of the A66 which is to be de-trunked and therefore the responsibility of the Council. This issue remains unresolved.

Landscape and Visual

The Authority is satisfied that the DCO Application includes an adequate Landscape and Visual Impact Assessment (LVIA) subject to inclusion of selected illustrations (elevations, cross sections and photomontages) to help explain significant effects and illustrate key features of the scheme in a wider context (such as the proposed overbridges). The Application should also include an explanation of the design principles in order to demonstrate good design.

The Applicant states that the Structures have undergone an aesthetic review to ensure they comply with the overarching design aspirations (ES 10.9.4). Reference is also made to a Project Design Principles document (PDP) (Application Document 5.11). However, this review or PDP document are not clear or evident in the Application.

It is acknowledged that illustrative layouts of the key mitigation principles are shown on the visual Environmental Mitigation Maps (Application Document 2.8). However, these are illustrative layouts not intended to be secured by the DCO (ES 2.7.4).

The Authority would wish to see an outline landscape strategy (incorporating mitigation) secured through the DCO and would welcome an opportunity to continue to work with the Applicant on detailed aspects of the landscape and visual mitigation, to ensure an appropriate response.

The Authority would also wish to see further information and clarification for long-term maintenance and management of proposed landscape mitigation including responsibilities and how landscaping is secured as a permanent element of the scheme through the Order.

Ecology

The DCO application includes an ecological impact assessment, with associated figures and appendices. The authority has not yet had the chance to review all of these technical documents in detail and will provide comments through the Local Impact Report. The ES identifies that a residual adverse effect remains in relation to barn owl during the operational phase of the development. The authority wishes to work with the applicant to identify appropriate mitigation to minimise the residual effect as far as possible. In relation to Biodiversity Net Gain, the authority welcomes the use of the metric and whilst it is not yet mandatory we would advocate for 10% net gain across area based, linear and river habitats.

Cultural Heritage

The Environmental Statement includes a Cultural Heritage chapter that is supported by a number of specialist assessments. These include a desk based assessment (Appendix 8.1), a geoarchaeological assessment (Appendix 8.3) and an assessment of aerial photographs and LIDAR data (Appendix 8.4). The desk based work is supplemented by the results of archaeological field evaluation in the form of geophysical survey (Appendix 8.5) and trial trenching (Appendix 8.6). I am pleased to see that a Historic Environment Research Statement (Appendix 8.9) has also been produced to guide the assessments and any future mitigation.

The part of the scheme in North Yorkshire between Stephen Bank and Carkin Moor will have a direct impact on the Scheduled Monument of Carkin Moor Roman fort and native settlement. The various assessments, particularly the field evaluations, have demonstrated that significant archaeological remains are likely to extend beyond the Scheduled area in the form of a Roman vicus with industrial areas.

Various measures have been taken to limit the impact of the proposal on the Scheduled Monument at Carkin Moor by restricting the width of the easement and limiting the amount of groundwork. The Cultural Heritage chapter states that a Historic Environment Mitigation Strategy will be produced within the EMP. This strategy will set out the methodology for recording both known and unknown heritage assets of archaeological interest. I have not seen this document as yet but would be happy to continue working with the design team and other partners in agreeing a suitable strategy.

Planning Authority

Work is ongoing to understand the scope and timing of additional Town and County Planning Act application to run alongside the DCO application. The Authority welcomes these discussions. More work is needed to understand the role of the Authority within the discharge of requirements, should the role of the Authority become burdensome it is expected that appropriate resources are put in place to support the Authority.

Environmental Health

The assessment of noise and vibration levels in the relevant chapter of the ES can be broadly agreed with. It is important that all aspects of the scheme are considered fully. Further assessment of the adequacy of dealing with these effects will form part of the Local Impact Report.

Public Rights of Way

Drafting errors

Scheme 09 sheet 3 Footpath 20.23/8/1 change **northwards** to **southwards**

Scheme 09 sheet 4 Reference M change **46** to **82** metres

Scheme 09 sheet 4 Reference M – junction is BW 20.33/17/1 and **Warrener Lane** (not **A66**)

Scheme 09 sheet 4 Bridleway 20.30/8/1 **Carking Moor Farm** replace with **Warrener House** and change **south-east to south**

Scheme 09 sheet 4 Reference N - junction is BW 20.33/17/1 and **Warrener Lane** (not **A66**)

Scheme 09 sheet 4 Reference N change **180** metres to **222** metres, replace **easterly** with **westerly**

END