

With regard to Scheme 6 of the A66 dualling project; Appleby to Brough. While I fully appreciate the need, as stated by National Highways, to pay attention to two key sets of policy tests to be addressed for 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 (Document Reference 2.2, APP-008 and Document Reference 3.9, APP-242) I am not yet convinced that the key policy tests as set out in the National Networks National Policy Statement (NNNPS) for the AONB do not apply to a potential route that would take the rest of Section 6 to the north of the existing A66.

NH has put forward a very convincing case for the need for incursion into the AONB in the central length of scheme 6, to the north of Warcop and again in the eastern section – in total this incursion comes to 3'775m out of a total length in this section of 8'130m. Sections 6.5.66- 6.5.205 of Document 2.2 (APP-008) go into great detail about the justification for acceptance of this incursion, including this statement in section 6.5.148; –the existing A66 forms the southern border of the AONB in this location, but this road corridor does not represent any of the special qualities of the AONB.– This is also true of the section of the road between the two areas of incursion, which is why I have requested an additional site visit; trees have been planted along the road in this area, but they form a narrow belt, and in some areas are relatively newly planted. Table 6.12, the impact on AONB Special Qualities, is instructive in that the special qualities are shown as not being impacted by the proposed incursion – it is highly unlikely that, were the remaining 4'335m of this section to run through the AONB that there would be any change to this. In section 5.5 –Appleby to Brough' of the Project Development Overview Report (PDOR) (Document Reference 4.1, APP- 244) there is a detailed explanation of the changes made to the initial proposals, including a sifting exercise to compare the route options for the Appleby to Brough scheme. Although options were assessed on a wide range of criteria I cannot find any suggestion that once the original –northern route' that was put forward was rejected there was any attempt to re-consider whether the whole of section 6 could be re-aligned north of the existing A66, while at the same time considerations of noise and disruption that were considered to be factors in the suggested incursions (APP -244, 5.5.56) have not been taken into consideration elsewhere, as well as many other factors that have been put forward to support incursion into the AONB.

I did not find that the Issue Specific Hearing where this matter was discussed gave any satisfactory reasons why the whole of Section 6 should not now go to the north of the existing A66; this, together with the details above leads me to continue to object to the current preferred route, and to ask that a re-assessment of this section takes place with a view to re-locating it to the north of the existing road.