

PRINCIPAL AREAS OF DISAGREEMENT - EDEN DISTRICT COUNCIL – UPDATE FOR DEADLINE 3

Issue	Concern	What needs to change/be amended/included so as to overcome the disagreement	Likelihood of the concern being addressed during the Examination stage.
Non-motorised Users	East West connectivity across Junction 40 – The provision for NMU's at Junction 40 remains unchanged. The issue of east west movement for non-motorised traffic is wider than just at Jct 40. There were issues at Coupland Beck Farm which created a break to the suggested route.	Given the nature of the junction National Highways agreed this would ideally be a grade-separated facility, removing interactions with traffic, facilitating improved traffic flow and safe passage of non-motorised users in a convenient and efficient manner.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Public Open Space	Wetheriggs Country Park - proposals include land take and significant loss of mature trees that currently provide visual screening to the park and the residential properties on The Crescent. They will result in an increase in noise, effects on biodiversity, drainage and the overall country park environment	The land take in this section of the A66 seems to be almost entirely for the cyclepath. The Council proposes that the cyclepath be redirected through the park to avoid the loss of the trees. Development of a masterplan has been requested for the country park to address this issue in a more holistic manner.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. NH have agreed to support a masterplan for the area to determine the best arrangement of land uses. Work on this is being progressed
Public Open Space	Potential impact on Wetheriggs Country Park and Ullswater Playing Fields. The scheme falls foul of the requirements of para.5.166 of the NPS NN. POS and playing fields are important community assets and there is insufficient information on the impacts and how they can be mitigated.	A full study is required to be undertaken identifying the options for redesign of the Kemplay area (between the junction with the M6 and the Kemplay roundabout) in order to mitigate the proposals. This will facilitate an agreement on an acceptable way forward. This work should be funded by National Highways and would include discussions with the local FA, current users of the pitches, and other relevant bodies.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. NH have agreed to support a masterplan for the area to determine the best arrangement of land uses. Work on this is being progressed
Demolition	Demolition of Lightwater Cottages is proposed in order to create a new junction to connect with the existing access road heading south from the A66. It is unclear why these need to be demolished when the junction could simply be located either side of them	NH to justify demolition of the cottages and review junction location to consider moving to one or other side of the cottages.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Freight	The scheme as submitted provides only a small number of laybys along each section. Given the route is a key east-west freight route, the number of HGVs are likely to increase significantly. Laybys provide no facilities for drivers forcing them into the towns where they add to congestion.	NH is carrying out work on a freight study. We need to be assured that this will take all relevant factors into account and the conclusions will be arrived at in a timely way to ensure that the design of the DCO proposals takes into account the needs identified and facilitates future provision where appropriate.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Heritage	The proposed Long Marton Lane End junction may still encroach on the wider Roman Camp Scheduled Monument but detail from recent surveys do not appear to have been provided.	Further information to be provided showing the full extent of the Roman Camp SM as currently established and how the new road will affect this.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Heritage	Scheme encroachment on the old Roman Road (archaeological potential) north of the Roman Camp SM and impacts on its setting remain unclear.	More information needs to be provided to understand the impacts.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Biodiversity Net Gain	The Environment Act 2021 sets a requirement to deliver a minimum of 10% biodiversity net gain which will have legal force in March 2023, before the DCO is determined. There is currently insufficient information provided within the ES and DCO plans to demonstrate that this requirement will be met.	National Highways should provide further information on how enhancement measures for biodiversity will be included within the proposals for the Project consistent with Paragraph 5.25 of the National Policy Statement for National Networks (NPS NN), the NPPF and Policy ENV1 of the Eden Local Plan. A detailed calculation of the Scheme's ability to deliver at least 10% BNG should be provided and the location and land on which this will be done clearly identified.	Further information has been provided in the ES but there remains a lack of detail on the delivery of biodiversity enhancements. The Applicant has stated that the DIPs are being incentivised to deliver net gain but there is not further detail on how likely this will happen. The Council needs to see further information on how net gain will be secured and delivered.
Mature Trees	The scheme requires the felling of swathes of woodland and mature trees along the north side of the existing A66 to make way for the new road whilst land to the south is largely fields.	Further justification to be provided for the loss of mature trees and a review of the designs to look at ways to avoid or minimise this.	The Council has requested an Arboricultural Impact Assessment be provided with details of the exact areas of tree felling and replacement. The Council has proposed that significant trees and groups of trees be identified and ringfenced for retention.
Lighting	Eden District Council considers that full details of the proposed lighting scheme should be provided. This is important as some species have difficulty crossing a route when there is lighting, and the Scheme may potentially have the effect of removing ecological corridors and could also hinder the movement of species. The lighting Scheme should also consider and reflect the need to protect and deliver the Cumbrian Dark Skies initiative.	National Highways to provide further details on the proposed lighting which is anticipated to be restricted to the M6 and Kemplay Bank junctions.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.

Horse Drawn Vehicles	The safety of slow-moving vehicles (primarily horse drawn carriages) on the upgraded A66, particularly around Appleby and the potential for an increase in accidents.	The de-trunked sections of the A66 to be improved in terms of provision and junction access to provide a safe segregated option for these vehicles.	Further details are awaited from the Applicant, but this remains an area of disagreement.
Noise	The Council has a particular concern about the Main Street Junction at Kirkby Thore to Fell End. This area represented the most seriously impacted area of housing in Eden in terms of noise as a result of the original proposal. However, the northern junction is now much closer to Sanderson's Croft housing estate and the properties on Fell Lane, areas which had already been identified as being significantly adversely impacted by noise in the previous iteration of the Scheme. It is unclear whether there is sufficient land to provide landscape bunds to mitigate noise impacts	Further information to be provided on the mitigation proposals for the junction in this location. Acoustic barriers are not considered appropriate for the character of the area.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. Information on the mitigation proposals is needed to determine the acceptability of the proposals in this location.
Noise & Air Quality	The noise and air quality impacts of the proposals on the proposed housing on the site to the north of The Old Rectory. This site, on Newbiggin Road is very close to the current proposals. It has planning permission (19/0270) for 26 homes.	Information to be provided identifying the noise and air pollution impacts on the proposed housing and the proposed mitigation in order to determine the acceptability of the road line.	The noise assessment in the ES does not provide sufficient detail on proposed mitigation to satisfy the Council's concerns. Further modelling and testing of mitigation solutions are required.
Kirkby Thore	The impact of the junction being moved closer to properties on air quality, but no updated modelling information has been provided. Whilst the consultation material mentions mitigation measures, it is difficult to see what these measures could comprise in such a tight space, and Eden District Council is concerned that these measures may not be effective in adequately protecting residents.	Updated air quality modelling results to be provided together with details of the proposed mitigation measures confirming impacts will not be significant.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Appleby to Brough	Impact on noise transmission as a result of elevating sections of the proposed new carriageway over the becks at Warcop Sufficient information has not been provided to understand the impact that this proposal will have on noise or air quality, other than an acceptance that there could be 'slightly higher noise impacts on properties already identified as potentially being affected'.	Further information to be provided on the assessment of noise and air quality at these locations to confirm the predicted noise levels and air quality impacts together with proposals for mitigation.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Brough	The proposed Brough Hill Fair site is considerably smaller than the existing site and is further reduced as a result of a large balancing pond and service area within it, as well as combined bridleway and private means of access running across it. Concerns also about traffic management during the event.	Assurance sought that the site is actually deliverable and will not limit the size of future fairs. National Highways to confirm who will be responsible for traffic management during events. Provision of a suitable east-west route for horse drawn carriages. NH to prepare a Traffic Management Plan to mitigate its proposals.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Brough	The impact on residential amenity for the two properties immediately adjacent to the proposed Brough Hill Fair site, both of which will be more or less surrounded by fair activities for 4 full days each year.	NH to provide sufficient information and detail to enable an assessment of the impact on residential amenity at these properties, together with NH's proposals for mitigating the impacts to enable EDC to provide meaningful input to the strategy.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Brough	EDC is concerned at the very limited consultation on the proposals to relocate Brough Hill Fair site and that the decision on the final location may not reflect the current and future needs of the Fair.	A full programme of consultation should be undertaken with all interested and affected parties to allow comment on and input to the final location.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Brough	It is not known whether there are any covenants/agreements with local landowners relating to the existing site which will need to be addressed as a result of the proposal to move the fair to a new location, or whether there are any covenants/agreement which will need to be put in place to protect the future of the Fair.	The Council requests that National Highways provide a clarification of the position. NH to provide further detail on the effect the grant of a DCO would have on any licensing or permitting requirements for the new site, and also confirm who the intended landowner would be going forward.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Construction Compounds	Construction compounds not to include accommodation for workers other than normal welfare facilities. Worker travel time to be within 30 mins from main compound to work area.	National Highways to confirm compound locations and worker accommodation provision.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Construction Compounds	EDC notes that there are several construction compound locations across their authority. EDC would advise that a single central compound be used as the main site and the others be satellite sites just for equipment storage overnight. This would minimise the need for construction traffic to move along the route during the peak travel period.	National Highways to confirm main and satellite compound locations within each section.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Soil Storage	Soil storage compounds to not require permanent foundations or be located close to rivers and watercourses such as proposed to the east of the Cumbria Police HQ at Kemplay Bank.	National Highways to confirm arrangements for all soil storage locations and any measures required to prevent run off to rivers and watercourses.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Soil Storage	Location of proposed soil storage compound and balancing pond to the east of the Cumbria Police HQ at Kemplay Bank lies within Flood Zones 3 and 2, which is subject to regular flooding.	Further information to be provided that demonstrates no adverse impact on the flood plain and that soil will be retained within the compound during flood events.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.

Soil Storage	Lack of information regarding the construction of all soil storage compounds and how the land will be reinstated to its former use post-construction.	National Highways to provide further detail on construction and reinstatement together with details of how biodiversity net gain will be achieved (minimum 10%).	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
M6J40- Kemplay Bank	Proposed compound adjacent to the Cumbria County Council depot at Kemplay Bank. Concerns about the viability of the site and the adequacy of access/egress using the slip road only. Concerns about the need for alteration to or effects on the operation of the depot. NH should note that the proposed compound would be located on filled ground as confirmed by EDC local records. The site was formerly a sand/gravel quarry and would require an appropriate assessment and foundation, suitable to the geomorphology present.	NH confirm the access arrangements to the A66. NH also to confirm the compound will not require alteration to or affect the current operations of the CCC depot buildings. EDC also seek confirmation this is a main compound due to its size and location, with the majority of plant for the western section of develop stationed here. Due to its strategic location EDC want clarification on the foundations of the construction compound and its ability to support future commercial development in Penrith. EDC and CCC wish to consider the possibility of using the construction compound at Kemplay Bank as a possible future site to support employment opportunities or HGV services. EDC further seek confirmation that the access arrangements provided for the compound is suitable to support permanent operation of the site as an employment area, as designated by the EDC Local Plan (2018).	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Soil Storage	The soil storage area overlaps the proposed route, junction, earthworks and attenuation pond east of Lane End School House adjacent to the new GS junction for Centre Parcs.	A phasing plan of the construction process is required to confirm the approach and evolution of the large storage area. Details of the connection between the north/south WCH routes need to be confirmed whether this is an under pass or flyover of the proposed A66. The two WCH routes on the flyover junction do not join and this need to be confirmed.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Soil Storage	There is a temporary soil storage site that overlaps the proposed WCH route west of Winderwarth Farm.	A programme of works is necessary to understand the impact on the WCH route becoming operational.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Soil Storage	There are multiple soil storage compounds located between Kirkby Thore and the proposed alignment of the A66. EDC are concerned about the location of the soil storage compound south of the proposed junction at Kirkby Thore which results in compounds being proposed in close proximity to Kirkby Thore Primary School on Priest Lane. EDC is concerned about negative noise and air quality impacts that this might have on Kirkby Thore Primary School and potential impacts on children's learning and health.	NH should locate soil storage areas and general compounds further away from the school to avoid these potential impacts.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Soil Storage	Potential closure of an existing PRoW that transects the proposed soil storage compound east of Kirkby Thore.	EDC would seek confirmation that this WCH route would remain operational during the construction period and require details of any temporary diversion to ensure this.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Environmental Management Plan	There is a relative lack of information about what is proposed, and EDC expect to receive information in the draft Environmental Management Plan (dEMP) prior to the finalisation of the design. The EMP should include an assessment of the likely significant effects of noise, dust and light pollution emanating from the compound location prior. There is currently no guidance on the volume or height the soil storage may comprise, EDC would seek to minimise the height of the storage, particularly in this location to the sensitive residential properties.	NH to confirm the volumes and area of topsoil storage at each of the sites. NH to also confirm that in accordance with BS3882:2015 topsoil spoil heaps will not exceed 3 m in height, including topsoil existing on site, and will be used within 12 months (reference BS 4428:1989 Code of practice for general landscape operations).	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Soil Storage	The soil storage compound located north of Cross Street, Kirkby Thore overlaps an existing EDC planning approval for a residential development. Northern Trading Cumbria Ltd applied for planning permission to construct 26 units. The proposed development was approved by EDC planning committee on the 22nd January 2022.	NH would need to alter the DCO to avoid land interest conflicts. The PEIR Chapter 2 confirms the construction period for the A66 would be 5 years, it is therefore possible the soil storage area could be adjacent to occupied housing units. The EMP would need to consider the potential for residential properties being on this site.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Soil Storage	EDC has concerns regarding the potential for large quantities of soil to be stored in close proximity to the watercourse Trout Beck. The soil storage is located within the flood plain and directly adjacent to the water channel.	EDC would ask that this location be re-examined and a mitigation strategy produced to ensure environmental impacts on the fluvial network are not detrimental.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Appleby - Brough	The construction compound east of Moor Beck Bridge does not show an access route. It is unlikely the construction compound will be directly accessed from the A66 and instead construction traffic will enter from the south. This route is unsuitable for construction traffic due to it only being a single lane bounded by field boundaries comprises stone walls. The access route would also run past several residential properties who would be subject to increased disturbance.	Detail required on the proposed access into the compound with appropriate consideration of the route to/from and its suitability for HGVs and construction plant.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.

Non-motorised Users	It is not clear if the proposed WCH routes extend the full length of the scheme. At Coupland Beck the route appears to stop abruptly with no indication of whether this will join an existing pathway.	A full set of design proposals needs to be provided showing the proposed new WCH routes and how they will connect with existing pathways to provide a full east-west route for NMUs. This is an issue of great importance to EDC.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Non-motorised Users	The plans provide a useful tool for identifying the lineal route of the WCH provision. However, the plans lack information denoting the location and standard of WCH crossing points where the WCH route transects the local highway network.	EDC would require information on all the crossing points prior to the finalisation of design. EDC would require that all crossing points for walkers, cyclists and equestrians be in accordance with the Design Manual for Roads and Bridges (DMRB) (CD 143) and Cycle infrastructure design (LTN 1/20) and location of all highway crossing points be confirmed.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Non-motorised Users	A signage strategy is needed for the route to be confirmed prior to the finalisation of design. The signage strategy is an important aspect due to the scale of change proposed to local WCH provision in Eden and the safety implications to keep non-motorised users (NMU) off the dualled A66. Similarly, signage for WCH routes will need to be confirmed, particularly where existing PRow are to be diverted along the new walking/cycling route.	Signage strategy to be developed and agreed with EDC. EDC also require additional design detail regarding the standard of the proposed WCH routes so that the provision does not have an over engineered appearance that would be detrimental to the existing landscape.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Non-motorised Users	Segregation of pedestrian and cyclists under LTN /1/20 guidance is required to ensure the safety of all users in urban areas. At the M6 J40 and Brougham Castle, segregation between cyclists and pedestrians is appropriate and a 2.0m minimum width footway will be required, segregated from a 3.0m minimum width cycleway. In rural areas the width of the path should be a minimum of 3.0m where cyclist flows are up to 300 per hour and a minimum 4.5m width path for greater than 300 cyclists per hour (see LTN 1/20 table 6-3). In instances where the new WCH provision meets and existing PRow or Bridleway, NH should ensure the width is consistent to avoid sudden changes in provision causes accidents or riders to dismount. EDC are opposed to the use of physical barriers as a means of inter NMU segregation, as it would adversely affect the rural setting and contributed to an over engineered approach The plans currently provide no information on the proposed location, length, type or height of vehicle restraint systems (VRS) on the A66 Trans-Pennine route.	designs of WCH routes to meet LTN/1/20 requirements as noted. Details to be agreed with EDC.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Non-motorised Users	EDC and CCC have previously stated that the provision for NMU access between Junction 40 of the M6 and Brougham Castle is currently poor and undermines the opportunities for those living east of Penrith and the M6 to access local facilities. It is noted that no changes have been proposed to improve the provision as part of the current or autumn 2021 consultation design reviews.	Consideration should be given to the potential of locating the WCH route alongside Wetheriggs Country Park within the country park rather than along the roadside to provide a more attractive environment for users. This would need to be considered in the context redesigning the Wetheriggs country park and sports playing field provision as requested in the Councils response to Kemplay Bank Open Space consultation. The existing alignment is adjacent to the A66. EDC believe the alignment of the route alongside the A66 is undesirable and NH should take advantage of widening works and subsequent mitigation (noise) and consider positioning the cycleway inside the park and to provide a higher quality of NMU provision. This would also reduce the necessary land take within the woodland strip adjacent the road thereby retaining much of the visual screening currently afforded park users and residential properties along Clifford Road.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Non-motorised Users	The current provision for WCH routes does not provide a connection between Castle Lodge and the Blue light facilities to the north. This also includes no provision made for WCH between Kemplay Bank roundabout and the B6262 Brougham Castle Lane leading to Moor Lane. The proposed link is via Frenchfield which provides a high-quality route in terms of views and tranquillity but does not sit within in the DCO boundary.	National Highways needs to confirm how the continuity of the WCH provision will be created if outside the DCO boundary remit. The bridleway and underpass located on Frenchfield is also in a poor state and does not conform to LTN 1/120 standard for minimum width for shared NMU use.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Non-motorised Users	EDC supports the provision to improve WCH access to cultural heritage assets as a benefit to the wider development. The current design shows a new dedicated access the Countess Pillar (Temple Sowerby to Penrith Sheet 1-3) south of the proposed A66 route. There appears to be two parallel routes running east/west. One solely to the Countess Pillar and the other connecting the new WCH route east. EDC believes that this dual route is unnecessary and would appear “over engineered” in the rural landscape to the south.	The east/west route could incorporate an access point to the Countess Pillar reducing the land take. Should NH require both routes, EDC would request the inclusion of appropriate landscaping to mitigate the visual intrusion of both route on the landscape view. The extension of the WCH route to the Countess Pillar would also provide access to the Larma Karma Café, for which there is currently no dedicated NMU access proposed.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.

Non-motorised Users	Plans show WCH routes also functioning as maintenance access routes for attenuation ponds. This dual functionality occurs across the proposed scheme between M6 J40 and Brough. The maintenance of these ponds would presumably require vehicular access. To accommodate vehicle movement, the WCH would understandably be widened in these locations. Despite this widening, EDC have concerns regarding the possibility maintenance vehicles will be parked in the WCH routes during periods of inspection and block the route. This also raises concerns regarding safety should vehicle and NMU interact in the confined space. Finally, EDC would require information regarding the potential need for a retractable barrier to restrict unauthorised vehicle access to member of the public would not in use. The use of a retractable barrier should ensure WCH facilities are not impeded as a result.	Further information should be provided on the design and operation of the access roads for agreement with EDC.	Further information is still awaited from the Applicant to address the Council's concerns. The matter remains unresolved.
Non-motorised Users	North of Crackenthorpe, there is currently a PROW footpath (east) and bridleway (west), both of which are designed to link up with the proposed new WCH route connecting to the Roman Road to the south.	EDC seeks confirmation that the new route would match the design standard of the bridleway, not the footpath, to ensure no reduction in width and continued use for equestrian users. In addition to this, EDC would request NH confirm the approach to the existing PROW and Bridleway, specifically if they are to be extinguished and the potential extent of this.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Non-motorised Users	The WCH crossing provision west of Trout Beck requires additional information. There appears to be two crossing points proposed. Point A, appears to cross the A66 but does not connect with the WCH route to the north due to the presence of a culvert. Point B is extended in length along the carriageway east before crossing and returning west. The route appears considerably longer and would be unpleasant for WCH use due to the proximity to the carriageway.	EDC would prefer a shorter more direct connection. NH to revise the alignment accordingly.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Non-motorised Users	The current route of the WCH provision between Moor Beck Bridge and Market Borough (Sheet 3 to 5) is unsatisfactory. The WCH route is located in between the new A66 dualled route and the de-trunk section of the existing A66 open to local traffic. In places the WCH route is directly adjacent to both these routes, to the north and south. The proximity of these roads and their position surrounding NMU would result in poor quality of provision. The route would not benefit from rural landscape views and intimate users, notably equestrians. It is unclear if the location of the route would be subject to noise and particle emissions without an appropriate environmental assessment being undertaken. The location of the WCH route between the two A66 routes restricts the number of opportunities for NMU to gain access or leave the route between Moor Beck Bridge and Market Brough.	NH to review route of WCH provision and move to the north of the de-trunked A66 or otherwise move away from being between the old and new roads.	It is understood the Applicant is proposing changes to the layout in this location which would move the WCH to the north of the road. However, further design information will be required and subject to the ExA's approval to include in the Examination. As such, this issue remains unresolved.
Landscape	EDC note the presence of several large-scale landforms across the proposed route between J40 M6 and Brough. The Council notes that the consultation does not provide sections or elevation drawings that allow the authority to evaluate the impact of such landforms in terms of land removal or height of the landform. In the absence of this information, EDC is unable to comment upon the suitability of scale and location of these features on the visual landscape or as acoustic mitigation bunds.	EDC requests Section drawings of these landforms prior to design finalisation. EDC would like to recommend, in addition to soil storage areas, that appropriate baseline surveys are undertaken at all landform locations prior to the commencement of construction. This will help facilitate the implementation of BNG as part of their operational design.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Structures	The importance of the A66 in the landscape, visitors' perceptions of the area, and the sensitivity of the landscape that the route travels through.	EDC need to see full details of the proposed structures. These designs will require visual integration into the surrounding landscape character to reduce visual impacts.	Further information on the visual treatment of structures has been requested by the ExA and the Council agrees with this. Issue remains unresolved.
Parking	Parking problems in Penrith are likely to intensify following the completion of the A66 upgrades as more people travel to the town.	EDC wish to see NH assist with the provision of parking spaces within the Town.	No further information has yet been provided by the Applicant. Issue remains unresolved.
Traffic Flows/Modelling	There is a concern that the removal of the junction for westbound traffic entering the A66, will mean that significantly more traffic will utilise the old A66 west of Appleby which will make it less conducive for use by non-motorised travellers.	Junction and slip road to be provided to westbound carriageway of new section A66.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Structures/Flood Risk	At Warcop, the alteration to the viaduct across Moor Beck and Cringle Beck may provide improvements from a watercourse geomorphology perspective but they do not take account of local flood risk.	The watercourse crossing proposals need to be better linked with the CCC (EA funded) Cumbria innovative flood resilience programme, which is proposing to install a range of Natural Flood Management (NFM) interventions in the Warcop area to reduce flood risk.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Access Roads	The new plans for Warcop show the addition of an extensive length of access track along the full length of this scheme. The ownership, designation, maintenance liability and design of this new asset will need to be clarified as it serves multiple purposes.	Further information is to be provided on the WCH route along this section. EDC expects the route to contiguous with the sections either end.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.

Access Roads	The new plans for Warcop show the addition of an extensive length of access track along the full length of this scheme.	The ownership, designation, maintenance liability and design of this new asset will need to be clarified as it serves multiple purposes. As stated in previous consultation responses, it is the Councils' expectation that WCH will be accommodated along this route.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Nutrient Neutrality	The addition of new sections of carriageway and access roads etc together with the potentially significant increase in traffic using the A66 as a result of the Scheme has the potential to add to nutrient load, specifically, phosphorous (TP) and nitrogen (TN), in local rivers and watercourses within the Eden catchment. This could exacerbate the nutrient neutrality problem faced by housing development resulting in potentially significant costs and delays.	The proposed drainage and balancing ponds should be designed so that discharge to watercourses achieves nutrient neutrality. Designs and nutrient load calculations should be provided and agreed with EDC and Cumbria CC.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Warcop	Warcop West - The retention of the small copse of broadleaved woodland is welcomed. There is insufficient information included within the consultation material to comment further on the adequacy of any mitigation proposals for protected species that may be present in the coniferous woodland to the north.	The Councils therefore expect full details to be provided in the ES and further to comments raised previously, expect enhancement opportunities to be included within the proposals.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Warcop	Warcop Central - It is welcomed that earthwork embankments within the floodplain have been removed and in principle it is agreed that placing the A66 NTP on a viaduct will have a positive effect upon protected aquatic species present within Moor Beck and Cringle Beck (rather than culvert) and hence the integrity of the SAC. However, until the Councils are provided with information on what these 'protected species' are and with GA drawings that show the alignment of the carriageway relative to the watercourses, we are unable to comment on whether the proposals are adequate or indeed preferable to the previous design.	NH to provide sufficient information and detail to enable an assessment of the impact protected species.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
GHG Emissions	The potential GHG emission sources during the construction and operational phases are considered to be appropriate for the size and nature of the Project. However, the PEIR does not provide justification for scoped out emission sources, such as decommissioning.	It is recommended that the ES includes a complete list of the PAS 2080 lifecycle stages and justification for why each emission source has been scoped in or out of the assessment.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
GHG Emissions	Environmental Mitigation – Climate - Eden District Council have declared a Climate Emergency.	EDC and Cumbria County Council would expect to see reductions in the emissions associated with the construction phase of the A66.	The Council remains very concerned about the GHG emissions from the Scheme and that the method used in the ES does not properly and robustly account for all emissions. Issue remains unresolved.
Noise	There are likely to be significant increases in road traffic noise at a number of sensitive receptors, especially for options to the north of Kirkby Thore.	The mitigation measures proposed are not yet adequately presented and further noise attenuation measures are required. Highways England should also pay particular attention to the increase in noise at Kirkby Thore Primary School and the Councils expect greater detail on the precise increase and mitigation that is proposed. NH should consider and provide further information on how acoustic mitigation measures can be complimentary to the landscape and biodiversity enhancement measures so that environmental benefits across all three disciplines can be realised. (notably on Kirkby Thore)	The Council continues to engage with the Applicant on this issue and further meetings are proposed. However, the issue remains unresolved.
Noise	Warcop Central - The revised proposals will lead to an increase in noise that the Applicant has stated will be 'slightly higher'. We infer therefore that the change is not significant although this can only be confirmed through detailed noise modelling. Information in the PEIR showed that noise sensitive receptors in Warcop may be subject to significant effects and therefore any increase in the noise level that they experience is of concern.	NH must provide detail on the mitigation proposals for noise that will be included within the design of the A66 NTP. This will allow an evaluation of whether the mitigation is adequate or whether further measures are required.	The Council continues to engage with the Applicant on this issue and further meetings are proposed. However, the issue remains unresolved.
Worker Accommodation	Insufficient information is known as to the number of construction workers that will be required throughout the construction phase and where they will be accommodated so as not to put undue pressure on local resources, potentially affecting tourism and the local rented housing market.	An Accommodation Strategy should be prepared identifying where construction workers are anticipated to live during the construction of the Scheme and any dedicated facilities proposed to be provided by NH. The location of such facilities should be included within the DCO boundary and appropriately assessed to confirm operational suitability.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Social Value	Insufficient information is known on the nature and scale of social value to be delivered by the Scheme. Given the size of the project EDC would expect a significant social value contribution to be included. This is also linked to the accommodation strategy.	NH to provide details of the social value to be delivered by the Scheme. Although it is likely the Contractor will, as part of the procurement process, it is important to understand the social benefits to the communities along the route that will be delivered.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties. T
Diversions and construction impacts	Insufficient information is available on the proposed diversion routes and other temporary traffic management measures that will be put in place for the works, particularly in key locations such as the new junctions where existing junctions will be closed while the works take place. EDC is concerned that in some locations, such as Ullswater Road and Clifford Road in Penrith, the impact of diversions could significant on local residents in terms of congestion, noise and air quality.	A detailed traffic management and route diversion strategy is required to enable EDC and CCC to be confident the disruption to users of the A66 and the adjacent local road networks is minimised as far as practicable. The strategy should include an assessment of the condition and capacity of the proposed roads to accommodate increased traffic flows.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.

Contaminated Land	Contaminated Land and known burial/burn sites for Foot and Mouth: the potential for parts of the project to encroach in these areas could have implications for contamination. EDC has provided National Highways with numbers of possible sites, but have not seen any assessment of the sites in relation to this development.	National Highways to undertake an assessment of the potential impact on contaminated land sites and provide to the Council to agree.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Air Quality	Air Quality - previously have alerted Applicant to steps Council has taken to declare AQMA on Castlegate and raised queries with the modelling and conclusions drawn. Also recommended that monitoring be undertaken, in conjunction with EDC for a period of at least twelve months and to start as soon as possible (Dec 2021)	National Highways to provide details of the assessment to confirm it has included the increased traffic flows.	The Council has sought some additional modelling to confirm the impacts in this sensitive area but Applicant does not consider it necessary. Issue remains unresolved.
Air Quality/Noise	Air Quality and Noise - significant changes have been made to road layouts and junctions since the PEIR, but the applicant has not carried out any assessments for the revised changes	A detailed assessment of Air Quality and Noise impacts upon receptors needs to be undertaken and mitigation identified where levels exceed or are likely to exceed Objective levels (Air Quality, NO2, PM2.5, PM10) and the LOAEL and SOAEL (Noise). This has already been drawn to the applicant's attention (see WP 14 Acoustic enhancements)	A noise and air quality assessment has been provided in the ES but the Council remains concerned that mitigation measures are not sufficiently developed to properly close out this issue.
Lighting	Lighting impact upon residential receptors; EDC would have expected an assessment to be provided.	Further information on the assessment and mitigation, if required, to be provided.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Landscape	There is concern about the impacts of the scheme on the AONB particularly in locations close to the boundary. It is unclear whether adequate landscape mitigation is being proposed to reduce the impacts on the AONB.	NH to provide more detail on the AONB impacts and the proposed mitigation. This may require consultation with the AONB as well as EDC.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Biodiversity	Lack of information about monitoring wildlife and natural habitats lost or degraded during the construction work. This will be necessary in order to confirm accurate records of the areas of habitats lost and hence how much biodiversity gain is achieved.	NH needs to provide further information about the monitoring process and how this will be reported to the councils.	
Biodiversity	Concern over water pollution, run-off and the function of the attenuation basins/balancing ponds. It is not clear what the risk will be in terms of direct and indirect impacts on biodiversity, fresh water ecosystem and Nutrient Neutrality. The scheme must not increase the risk increasing eutrophication in watercourses in the Eden District.	Further details of the form and function of the ponds to be provided, particularly how they will minimise risks to biodiversity and nutrient load in receiving watercourses. EDC will need to be satisfied that the ponds and surface run-off will not exacerbate existing problems.	The Applicant is of the view that the drainage strategy for the Scheme will not worsen the existing conditions, but further detail is needed to confirm this.
Biodiversity	There is a lack of information about the replacement of lost habitats during construction (where are they going to be). It is unclear whether NH is going to replace some existing habitat with new ones (e.g. lost grassland replaced with planted woodland).	NH needs to provide more information about their habitat replacement strategy.	It is understood the Applicant is updating the biodiversity calculations and also incentivising the DIPs to achieve net gain; however, there is no certainty this will be delivered
Climate	Lack of details on mitigation actions overall, including land use change.	NH needs to provide more information about their Carbon Management Strategy for the Project	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Climate	There does not appear to be a carbon offsetting solution proposed. EDC has declared a climate emergency and this scheme could impede the council's ability to achieve net zero.	NH needs to provide more information about their Carbon Management Strategy for the Project	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Climate	Lack of information about carbon emissions monitoring for the Project. The nature of the work and construction materials might change due to unforeseen issues which in turn might increase the total of CO2e emitted.	The Council would like to see ongoing monitoring and recording of construction related carbon emissions and a commitment to produce a carbon emissions statement reporting the actual CO2e emissions from the construction phase.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Climate	There is a lack of information on adaptation measures for extreme climatic events.	NH needs to provide more information about their long-term climate change adaptation and resilience plan	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Structures	Structure designs will require visual integration into the surrounding local landscape character to reduce visual impacts.	Consideration will need to be given to materials for construction, finishes, in combination with materials for construction – e.g. stone clad in local stone, paint colours for painted metallic elements, etc, large expanses of concrete to be avoided, particularly wingwalls, abutments, piers, retaining walls for such structures that can be viewed from a position other than the A66 main line. More detail around proposals should be discussed and agreed with the Councils.	See earlier comment above.

De-trunking A66	Legacy assets to be passed to the Councils for de-trunking shall be of a standard agreed with the local highway authority, and the extent of works required to achieve this shall be agreed between National Highways and the Councils.	This will entail clear identification of all such assets for which future inspection, maintenance and demolition responsibility to reside with the Councils. Clear understanding of currently assessed capacities and condition and clear identification of work bank for such structures, and associated costs, etc would be required. Asset management work is required to understand whole life cost of asset, including consultancy fees, council management regime (new assets usually carry a 120-year life). National Highways and the Councils need to carry out analysis of structures to understand the most likely routing / impacts etc. Further work is required to explore options as to how the road will be used in the future; its look, feel and classification etc. The Council recommends an options appraisal is undertaken as part of the process.	The Council will continue to engage with the Applicant to agree details. Until then, the issue remains unresolved.
Drainage	It appears that long access tracks are proposed to serve drainage ponds. However, at some locations access to these ponds is gained from lay-bys on the A66 mainline.	National Highways should provide the risk assessment hierarchy for determining each access. If access tracks are being provided for the sole purpose of maintenance of drainage ponds, then a consistent approach, should be applied where feasible to minimise impact on the local roads and land take.	Issue remains unresolved.
Drainage	Impact of drainage basins and/or access tracks on planned and potential development/ regeneration sites along the A66 corridor e.g. land to east of Skirsgill Depot (M6, J40) should be considered in more detail to mitigate any potential impact.	National Highways need to provide further information and clarity on how the basins and access tracks will be integrated with existing and future land uses on and adjacent to the sites. These will need to be agreed with the Councils. Further detail should also be provided to the Councils to confirm how the design of these assets has been optimised to reduce land take, landowner and environmental impacts; improve the sustainability of the drainage proposals; and reduce overall scheme costs.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
M6 Junction 40 to Kemplay Bank	For cyclists and pedestrians passing through J40 there is no betterment to provision and the need to pass through several signalised crossings (six for the movement from A66 west to Skirsgill Depot) to navigate the junction is a barrier to the necessary growth in active travel set out in local and national policy. The approaches to the junction will be widened and additional traffic attracted as a result of the scheme, both of which make the junction more hostile and less attractive for pedestrians and cyclists. The quality of the design is not of the expected standard and falls short of meeting the core design principles of LTN 1/20 and CD195 under Coherence, Directness, Comfort and Attractiveness.	The use of the central island of the roundabout could be acceptable if a separate on-demand stage can be introduced where both the entry and exit are held on red, while cyclists can cross to and from the central island in one diagonal movement (See para. 10.7.27 in LTN 1/20).	No further detail has been provided that resolves this issue to the Council's satisfaction. The concerns remain regarding the safety and suitable access for cyclists and pedestrians through this busy junction.
M6 Junction 40 to Kemplay Bank	The vehicular access from Skirsgill Depot north onto A6 has been replaced by an access approximately 100m to the east. This is helpful for vehicles exiting Skirsgill Depot and enables them to manoeuvre into the correct lane on the approach to M6 J40 roundabout. However there doesn't appear to be a dedicated pedestrian access onto A66 . A pedestrian access could be provided on approximately the same alignment as the existing vehicular access and this would save a 200m detour. It would appear that grass verges are being provided alongside the new access into Skirsgill Depot. Footways would be preferable. Internally, the vertical alignment of the depot access / egress will be altered by the proposal, making it difficult for drivers, particularly lorry/ wagon drivers to negotiate the proposed gradients. It is recommended that further analysis of levels is explored to mitigate this.	A dedicated pedestrian access to be provided onto the A66. Further investigation of the levels and gradient for the new vehicular access to be undertaken and the plans modified to enable better access/egress.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
M6 Junction 40 to Kemplay Bank	The retention of only 3 lanes on the M6 J40 overbridges and the retention of traffic signals on the slip roads onto M6 north and A66 west, may limit capacity of this junction despite the proposed scheme providing additional lanes on the approaches. By moving the pedestrian and cycle movements onto the central island, it may be possible to move the 3 lanes on the overbridges further to the nearside, thus eliminating the requirement for traffic signals on the slip roads leading off the roundabout, thereby improving capacity and lessening the likelihood of traffic backing up from these signals and blocking the roundabout.	Consider moving the pedestrian and cycle movements onto the central island, opening up the possibility to move the 3 lanes on the overbridges further to the nearside, thus eliminating the requirement for traffic signals on the slip roads leading off the roundabout, thereby improving capacity and lessening the likelihood of traffic backing up from these signals and blocking the roundabout. Additionally, a new pedestrian/cycle overbridge across the M6 would provide an alternative to pedestrians/cyclists having to negotiate round the periphery of this large roundabout. This would allow an additional traffic lane to be incorporated on the M6 overbridges, improving capacity of this junction (subject to bridge assessments).	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
M6 Junction 40 to Kemplay Bank	It would appear that, with limited detail on the consultation GAs, there is only a single lane exit from A66 eastbound onto the A6 Kemplay roundabout. This is on the diversion route for traffic from the M6 when the M6 is closed either north or south of J40.	Consideration should be given to providing 2 lanes rather than a single lane on the approach to this signal-controlled roundabout over a distance of say 200m to help satisfy the need to maximise capacity at this junction. The additional construction required (two 3.65m lanes plus 1m hard strip versus one 3.7m lane plus 3.3m hard shoulder) would be minimal and appears to present better value. Provision of a two-lane approach to the traffic signal-controlled roundabout, should also be considered for westbound A66 off slip on the opposite side of the roundabout.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.

M6 Junction 40 to Kemplay Bank	The existing Public Rights of Way and the intentions for their stopping up or diversion are unclear e.g. to the west of Kemplay roundabout existing PRoWs are severed but there don't appear to be proposals for stopping up or diversions.	Further information and plans to be provided indicating where existing PRoWs will be either stopped up or diverted. Diversion routes to be clearly identified on plans.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
WCHR Safety	There is no apparent physical separation between the shared use path and the dual carriageway. Given the 70mph speed limited it is considered unsafe for users to be in such close proximity.	National Highways to share details of the safety audit/risk assessment undertaken for the design. Consideration to be given to the inclusion of some form of safety barrier between the road and shared use path.	Issue remains largely unresolved, and the Council remains concerned about WCH safety along the A66.
Penrith to Temple Sowerby	The Project provides a cycle track/private means of access that runs parallel to the A66 from the B6262 to the new Center Parcs junction. There is insufficient detail shown in the General Arrangement plan (TR010062/APP/2.5) to show whether this will be a public right of way for pedestrians, cyclists and horse riders. The Project should provide this link for all non-motorised users if it can be demonstrated that it can be safely shared with farm vehicles and those used for maintaining drainage ponds, assumed to be at a minimal level of traffic. However, the proposed width of the access tracks is not deemed sufficient for overtaking cyclists and should be a minimum of 4.5m, following guidance within LTN 1/20 for bus lane widths. If the tracks cannot be opened up for non-motorised users, then the Project should create a parallel route for non-motorised users to provide an alternative to using the A66, which is unsuitable for these users. This parallel route should provide appropriate protection and priority for users when crossing side roads. The provision of an off-highway route for Walking, Cycling and Horse-riding for this section aligns with the preferred route for an cycle route as set out by the Councils which connects key communities along the route.	National Highways to confirm the intended final use of the track and widen as needed to allow for safe use by NMUs, failing which, an alternative route should be provided.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Penrith to Temple Sowerby	Opposite Whinfell Park Cottages there is an existing Byway Open to All Traffic (BOAT) running north from the A66. The Project restricts access to this Public Right of Way as the junction with the A66 will become left in/left out.	The current level of accessibility, for all traffic, should be retained and it appears that the access track that crosses the A66 at this location could perform this function if designated as a BOAT, therefore allowing right turn movements in and out to be replicated.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Penrith to Temple Sowerby	At Whinfell Park Cottages, an underbridge (underpass) is proposed taking an access track beneath the proposed A66 mainline. Underpasses usually need to be illuminated which presents an ongoing maintenance liability. Tprovision of energy, replacement electrical components, vandalism. There are also issues with cleaning/litter picking / removal of graffiti. If used as a brideway, there can be issues relating to keeping the underpass clean and fit for purpose as an underpass will not self-cleanse.	Responsibility for maintenance of underpasses must be agreed. There are a considerable number of underpasses proposed on the Project and these same issues will manifest at other locations.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Penrith to Temple Sowerby	The access track overbridge (circa 200m west of Barn Owl Cottage) is shown perpendicular to A66 mainline.	By introducing a slight skew (say 20 degrees) the horizontal alignment of the access track would be improved and it would avoid the sharp 90-degree bends as depicted. This would add 1.2m to the span of the overbridge. This situation occurs at several other locations on the scheme.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Temple Sowerby to Appleby	The scheme at Temple Sowerby creates local access routes via the existing A66 and Priest Lane. There is insufficient detail shown in the General Arrangement drawings to show what provision will be made on either of these routes for pedestrians and cyclists or the level of traffic that will remain on these roads once the scheme is in place.	The appropriate provision on these local routes should be guided by LTN 1/20 in respect to vehicle flows and speeds. The Councils preferred route for a walking and cycle route follows the de-trunked A66 at this location.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Temple Sowerby to Appleby	The diverted brideway running under the new A66 alignment at Priest Lane presents an opportunity to create a traffic free route into Kirkby Thore and should be surfaced for use by road cyclists so that the link between the two sections of Priest Lane can be made, forming a low traffic/traffic free route into the settlement.	National Highways to confirm the surface treatment for the brideway.	Issue remains unresolved.
Temple Sowerby to Appleby	New brideways crossing the A66 should be designed to enable different user types to pass as per the typical cross sections shown in the plans and profiles document, with 5m width shown. There does not appear to be sufficient width allowed in the GA drawing (sheet 4 of 11) to allow for the diverted brideway running along the road between Halefield Farm and Kirkby Thore Primary School to be of the standard as shown in the typical cross sections.	National Highways to confirm sufficient width has been provided and if not, to widen as needed.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Temple Sowerby to Appleby	Currently there are two public rights of way (one footpath and one brideway) that run from the Roman Road southwards to the north of Crackenthorpe. The Project shows the brideway being diverted via an underpass, however the public footpath is cut off by the new alignment of the A66.	The PROW here should be maintained as close to the current alignment via a footbridge or divert the footpath along the farm track and create a shared footpath/brideway that uses the underpass.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.

Temple Sowerby to Appleby	The existing compact grade separated junction at the very start of this scheme appears to be constructed to old design standards which are not consistent with the design of other junctions on the proposed scheme (auxiliary lane, tapers, radii).	National Highways to demonstrate that an operational safety assessment has confirmed this is appropriate.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Temple Sowerby to Appleby	There are many instances where new link/connector roads are proposed to replace sections of the existing A66. Often these link roads replace sections of the A66, picking up local traffic and connecting to the proposed A66 mainline at new junctions. A good example is shown on this consultation GA sheet.	If the intention is that these link roads are to be offered to the Councils for adoption and future maintenance, this should be subject to a formal adoption procedure and agreement and the links should be designed to the Councils' standards and specification. Drainage, street lighting, traffic signs and signals, structures, maintenance including routine, structural, winter, soft landscaping, fences and hedges etc would all be considered in this agreement. Note that these agreements would be separate to de-trunking agreements relating to the adoption of sections of existing A66 which will no longer be required as part of the A66 trunk Road.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Temple Sowerby to Appleby	Priest Lane is shown as being severed by the proposed A66 mainline. An access track/PRoW is shown being diverted to the west of where Priest Lane is severed by the A66 mainline.	National Highways should consider an alternative to diverting Priest Lane, with an underbridge constructed on the alignment of Priest Lane (with an approximate skew of 45 degrees) which would also serve as the diversion route of the access track/PRoW. A slight realignment of Priest Lane would be required. The additional cost of constructing an 8m wide skewed underpass versus a 3m wide underpass to the west would be offset against the cost of constructing the Priest Lane diversion to the north, which would have extensive earthworks and environmental impact. The retention of Priest Lane on its approximate existing alignment would obviate the need for the maintenance liability for the diversion route being transferred to the Councils.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Temple Sowerby to Appleby	The Kirkby owl junction does not appear to allow for "Right In" or "Right Out" traffic movements at the connection of the Link Roads with Main Street.	National Highways should consider if all traffic movements were permitted at the connection of these Link Roads with Main Street.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Temple Sowerby to Appleby	On the north side of the Kirkby Thore junction there is a proposed new road running west and then north leading off Main Street. Running parallel to this road there is also an access track/road approximately 400m long which runs at the top of the embankment. The typical distance between the road and the track is 15m wide, which leaves a very narrow grass/landscape area 400m long, which the Councils would not wish to take on ownership and would be difficult to maintain.	National Highways to consider if the access can be provided from the new road instead.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Temple Sowerby to Appleby	The central reserve of the A66 mainline through this section appears to be very wide, even allowing for sight lines.	National Highways to justify the carriageway alignment and additional land take.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Temple Sowerby to Appleby	The proposed local diversion of Sleastonhow Lane crosses the A66 Mainline on an approximate 20-degree skew. To comply with sight lines and minimum radii on the approaches, this produces a horizontal alignment which is convoluted, takes up large amounts of land and requires wide highway verges.	Consideration should be given to increasing the skew on the bridge. This would increase the span but would bring about a significant improvement in alignment, reduce highway construction and reduce land take. This proposal would also minimise "sterile" land between the existing and proposed alignments which the Councils would not look to adopt.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.
Appleby to Brough	There is a need to provide an off-carriageway link between Appleby and the old A66 at Kemplay. This section of the A66 is well used, as evidenced by Strava data, as it provides the most direct route to link local roads and settlements. The scheme will add additional traffic to the route making it much less suitable for cycling.	Without a link at this location, the opportunity of creating a walking and cycling route utilising the de-trunked A66 sections at Kirkby Thore, Crackenthorpe and Warcop will be lost. The Councils' preferred route is for a parallel link to the A66 at this location.	These issues can be addressed and resolved during the examination stage with the timely cooperation of relevant parties.