

Kirkby Thore Parish Council

Written submission to Planning Inspectorate on A66 Trans-Pennine dualling

Deadline 5

14th March 2023

1 - As noted in the Issue Specific hearing on 2nd March 2023 Kirkby Thore Parish Council (KTPC) wishes to comment on three aspects of the evidence discussed during the Issue Specific Hearing:

- 1) The Visualisations produced by National Highways.
- 2) The principle for planting Woodland
- 3) Details on the mitigation planting around Kirkby Thore
And in addition
- 4) Provision of Rights of Way

We comment on each in turn below:

1) The Visualisations produced by National Highways.

We specifically wish to comment on TRO10062-001409-visualisation-View A.

KTPC does not consider that the Viewpoint A visualisation produced to demonstrate the landscape context and appearance of the viaduct over Trout Beck from the field gate at Sleastonhow Farm is an accurate representation of how people perceive this view at this location. This visualisation does not appear to have been produced in accordance with the current relevant guidance on visualisations in the technical note from the Landscape Institute [LI], TGN 06/19: Visual Representation of development proposals. We believe that the guidance indicates that a Type 4 visualisation using a photomontage taken in clear conditions would have provided a more accurate representation of the landscape and visual context at this point. The baseline photography was taken on a day when the unbroken cloud base was very low. It thus fail to show the long-distance views of the Howgills and Orton Fells (Yorkshire Dales National Park) and the High Street Ridge and Shap Fells (Lake District National Park) which form the striking mountainous backdrop. The mountains views of two different national parks are the reason why this viewpoint is unusual and a popular stopping point for long distance walkers on Lady Anne's Way and the terminus for many of the daily dog walkers from Kirkby Thore who stop here and pause to admire the view leaning on the gate, before turning round and going back to the village. The omission of the mountainous backdrop from the visualisation means that an important element of the landscape and visual context is missing, thus reducing the utility of the visualisation for assessing this context.

The Technical Note provided with the visualisations (7.28 Viaduct Visualisations Technical Note) does suggest that an appropriate survey and photographic verification process was carried out on the baseline photography which was used, but the extremely wide field of view chosen (180 degrees), the cylindrical projection required for such a wide field of view, lack of re-projection back to a planar view and the lack of 150% enlargement as required by the LI Guidance, has resulted in a significant distortion of the representation of this viewpoint, which makes the new road alignment and vehicles on it appear unrealistic and considerably further away than they would in reality. The text in 2.2.23

states that “A degree of interpretation was required in the development roughs, to correct the optical distortion which is inevitable with panoramic photographs produced in cylindrical projection.”

KTPC does not feel that the degree of interpretation applied has been sufficient to remove this distortion completely, with the result that the new viaduct and road alignment within the field in the foreground appears much further away than it would be perceived in reality. The visualisation was checked in the field by a member of KTPC (who is a qualified landscape architect), in particular to consider whether vehicles were represented at an appropriate scale in relation to known landscape features.

We consider that the representation of vehicle size on the new road alignment makes HGV vehicles appear significantly smaller than they would be in reality, particularly where the road is in closest proximity to this viewpoint. For example, in the visualisation, two lorries are shown to the west of the viaduct, either side of an existing tree. See Figure 1 below. This tree is useful for considering the relative sizes of vehicles. The image suggests HGVs would appear much smaller than the tree, even though vehicles (and the road) will be considerably nearer to the viewpoint than the telescopic handler shown right next to the same tree in Figure 2 below. This tree is a small, young ash tree currently about 6m high and is accurately represented at its current size on the finished visualisation (ie not shown with additional 15 years growth). Figure 2 shows the size of the tree by comparison to a telescopic handler. HGV's are typically 4.5m high and about 16m long. The telescopic handler is only 2.59m high to roof of cab and 5m length and yet despite this its cab reaches almost all the way up the clear trunk of the tree below the forking of the branches when it is immediately adjacent. The HGVs will be considerably closer to the viewpoint than this tree yet the height of the lorries shown on the visualisation appear to be only just taller than the height of the bare trunk.



Figure 1: Detail from View A, road to the west of viaduct showing HGVs passing in front of an existing ash tree



Figure 2: Photograph of same view showing ash tree drawn in visualisation A with telescopic handler

In addition, Figure 2 shows a red HGV on the existing A66 to the right of the distinctive group of Scots pines on the photo which is also clearly shown on the visualisation in Figure 1. This HGV is very significantly further away than lorries will be on the new road alignment and yet it appears not dissimilar in size to those on the visualisation of lorries on the new alignment.

2) The principle for planting Woodland

At the Issue Specific hearing the Ecology Lead for this project explained that their principle for planting replacement woodlands was that the Eden Valley is an “open landscape” and thus woodlands should not be provided in linear form along the route or in large areas but small blocks of woodland dotted across the landscape. KTPC disputes that the area of the Eden Valley around the village has been “open” for most of its history. A great many hedgerows containing mature full-sized trees at intervals have been removed all around the village of Kirkby Thore in recent decades, including even within the last couple of years resulting in a much simplified and denuded landscape. There are however still many remaining lines of trees following small watercourses and roads in this area (see Figure 2 example above). For example, along the neighbouring section of dual carriageway from Winderwath to Low Moor, there is a virtually unbroken screen of trees and high hedges on the fell-ward side providing good visual screening to the village of Temple Sowerby from the road. Likewise the existing stretch of the A66 from the village of Kirkby Thore to Long Marton is also a tree lined linear route, so this kind of mitigation on the new route would mirror the current situation along this existing stretch of the A66.

KTPC wishes to see woodland mitigation planting around Kirkby Thore of a type which is entirely consistent with the mitigating planting for the Temple Sowerby bypass on the immediately adjacent stretch of the A66, where extensive woodland and tree planting was carried out alongside the road which was considered appropriate to the landscape character of the area in that stretch of the road. The National Character Area Profile for the Eden Valley (NE502-GOV.UK) states that the key characteristics of the Eden valley, amongst other things include:

‘Distinctive features of glacial deposition, including ... meltwater channels, drumlins and... ‘

‘Medium to large rectilinear fields enclosed by mature hedgerows and hedgerow trees giving a well wooded character’ and ‘Managed estate and farm woodlands characterise the valley floor with numerous shelterbelts, copses and mature hedgerow trees giving a well wooded character.’

KTPC thus feels that mitigating planting and other measure such as those seen along the Temple Sowerby bypass and also as suggested in our previous submissions to National Highways would be entirely consistent with the key Characteristics of the area as described in the relevant National Character area description. We would be very happy to work further with NH to ensure that proposed mitigating planting is appropriate and is of a type that does not impinge on fell views where residents wish these to be kept (for instance using small locally native tree species such as bird cherry, birch, hazel, hawthorn etc). We are concerned however that the DCO boundary is now drawn so tightly around the road in the three most sensitive locations that there is no longer sufficient room for adequate mitigating planting or other measures to protect the population. The original DCO boundary consulted on during the statutory consultation was significantly larger in places than it is now, providing more scope for mitigation measures.

Whilst the current landscape in the immediate vicinity of Kirkby Thore is now open and lacking in hedges and trees, consideration of OS mapping from recent back to first edition demonstrates significant past and ongoing field boundary loss, leading to the recent loss of the previously characteristic features of this area, though linear hedges and lines of trees, small woods and copses do remain slightly further out from the immediate vicinity of the village. Elsewhere on the proposed A66 route the proposed mitigation mapping in some places makes a positive point of plans to reinstate long lost ‘strip’ or other fields and hedgerows in other areas which are similarly currently open, so could this not apply in the immediate vicinity of Kirkby Thore too? Such planting would

provide an additional role in screening moving traffic from view where the new road will be at grade in very close proximity to the village. Screening is arguably more important than other more purist landscape considerations in reducing the significant adverse effect of the road on population in these areas. We consider that in the current NH documentation and decision making, insufficient weight is being placed on the need to protect the inhabitants of large numbers of houses in the village which will be severely adversely affected by noise and visual intrusion (as identified in the ES) compared with the need to minimise land take costs or loss of agricultural land.

The NH were concerned about providing wildlife corridors and instead of linear planting were proposing “scrub mosaic” to encourage wildlife to move across open ground to nearby shelter. KTPC would suggest that a linear road is a great opportunity to create an adjacent corridor for wildlife and this could be made up by varying plantings from forest trees through scrub areas to wide hedges. This would also have the benefit of leading wildlife to any designated wildlife crossings.

3) Details on the mitigation planting around Kirkby Thore

These were requested by the Planning Inspectorate at the meeting on 2nd March so KTPC have not had the opportunity to see these details before this submission. However, we accept that the noise/visual screening could take many forms at different points around the village and where significant earth embankments are not suitable then a planting solution could vary from forest trees down to attractive flowering scrub species and small trees such as bird cherry and birch that would not obscure the views of the fells.

If the patchwork of woodland concept is to be maintained by NH then the key positions for these blocks, as discussed in KTPC’s previous submissions direct to NH, would be a) between the road and Low Moor b) the primary school and Dunfell view, c) Sanderson’s Croft and d) where the new road crosses the fields below Sleastonhow Lane in full view of houses on the elevated part of the village on the Roman fort, facing all along the Trout Beck valley to the new viaduct. The three of these sites where the road is at grade should be given greater mitigation than is currently allowed for by the very tight drawing of the DCO boundary in these areas which does not allow sufficient room for adequate visual impact mitigation to be included in these areas.

4) Provision of Rights of Way

We understand that any proposed reductions in the Works by NH have not been communicated to the Planning Inspectorate, but as there may be no further opportunity for KTPC to comment should these changes be submitted, then we note some of our outline thoughts about the footpath provisions, which we previously have not emphasised. The most recent consultation from NH has proposed changes to the application that would have a negative effect on Rights of Way provision compared with the current application and would result in a reduction in choice of routes out of the village and mean that all remaining routes out would require road walking and crossing the new A66 and the few current off-road sections of RoW near the village would be lost and replaced with fenced off narrow footpaths adjacent to new private means of access tracks. KTPC has objected to these changes.

If proposed changes to the DCO are submitted to the Inspectorate, then we would wish to comment further at either Deadline 6 or 7 in relation to Rights of Way provision.