

Nathan Dyer
Transport Infrastructure Planning Unit

Monica Corso Griffiths
A66NTP Head of Design and DCO
National Highways
5th Floor
3 Piccadilly Place
Manchester
M1 3BN

31 January 2024

Sent by email to:
A66Dualling@planninginspectorate.gov.uk

Dear Mr Dyer,

**A66 Northern Trans-Pennine Project TR010062 (the Project)
DCO Application (the DCO Application)**

**Applicant's response to the Secretary of State's ninth Request for Information
dated 24 January 2024 (the Rfl)**

I am writing in response to the Rfl dated 24 January 2024 issued by the Secretary of State to National Highways (**the Applicant**) in relation to the Development Consent Order (**DCO**) Application for the A66 Northern Trans-Pennine Project (**the Project**).

The Rfl invites the Applicant to provide comments in relation to the following matters:

- the Levelling-Up and Regeneration Act (**LURA**) 2023 – latest submission from Natural England dated 19 January 2024;
- carbon assessment – latest submission from Dr Andrew Boswell dated 19 January 2024;
- Cumbria Police's latest submission dated 18 January 2024; and
- the representations received by the Secretary of State in response to his previous Rfl of 5 January 2024.

In this letter, the Applicant provides responses to these matters in turn, using sub-headings for each matter.

1 – LURA

National Highways provided submissions in relation to section 245 of LURA in its response dated 20 December 2023 to the Secretary of State's seventh Rfl (**the Seventh**

Rfi). The Applicant considers that its submissions are consistent with those made by Natural England in its latest submission dated 19 January 2024.

The Applicant considers that it may be helpful for the Secretary of State to consider the following matters in relation to supporting evidence in considering the application of the new duties.

National Parks

As the Applicant explained previously, the duty in section 11A National Parks and Access to the Countryside Act 1949 (as amended) (**the 1949 Act**) applies when the Secretary of State performs a function “in relation to, or so as to affect, land in any National Park in England”.

Where it applies, the section 11A duty is to “*seek to further the purposes specified in section 5(1)*” of the 1949 Act. Those purposes are:

- (a) of conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas specified in the next following subsection; and
- (b) of promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public.

The Applicant has designed the Project with these purposes in mind.

The Environmental Statement (**ES**) Chapter 13 [**APP-056**] at paragraph 13.10.67 identifies a permanent moderate beneficial residual effect in terms of access to and from the Lake District National Park and no adverse impacts upon the Yorkshire Dales National Park.

ES Chapter 10 [**APP-053**] does not identify any adverse impacts of the Project in landscape or visual terms upon the natural beauty, wildlife and cultural heritage of any National Park.

In relation to the section 11A duty and the National Parks, the Applicant does not consider that there are further measures that could be required in accordance with paragraphs 4.9 or 4.10 of the National Policy Statement for National Networks (**NPSNN**) i.e. which are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects or which are necessary to make the development acceptable in planning terms, directly related to the proposed development and fairly and reasonably related in scale and kind to the development.

As a result, to grant the DCO Application would further the purposes specified in section 5(1) of the 1949 Act and fulfil the duty in section 11A of the 1949 Act.

Areas of Outstanding Natural Beauty (**AONBs**)

Section 245 of LURA also amends the statutory duty in section 85 of the Countryside and Rights of Way Act 2000 (**the 2000 Act**). As a result, that duty applies when the Secretary

of State performs a function “*in relation to, or so as to affect, land in an area of outstanding natural beauty in England*”.

Where it applies, the section 85 duty is to “*seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty*”.

The only AONB which is potentially affected by the Project and in respect of which the section 85 duty could apply is the North Pennines AONB. The Order Limits for the eastern half of Appleby to Brough (Scheme 06) and the western extents of Bowes Bypass (Scheme 07) lie within the North Pennines AONB. The Order Limits were also considered to be within the 'setting' of the North Pennines AONB, given the potential for the Project to affect land within the North Pennines AONB, including the impact of the Project on people's views (ES Chapter 10 **[APP-053]** paragraphs 10.7.304-6).

The existing A66 forms the southern border of the North Pennines AONB but this road corridor does not represent any of the special qualities of the North Pennines AONB. The experience of the North Pennines AONB at this point is diluted by the significant presence of traffic, the roadside buildings and signage primarily associated with the operation of Ministry of Defence land to the north. The landscape is typical managed roadside verge with scrubby trees and untidy grass strips introduced for the purpose of screening (see, for example, ES Chapter 10 **[APP-053]** paragraph 10.10.139).

The Applicant has designed the Project with the duty to conserve and enhance the natural beauty of the North Pennines AONB in mind (ES Chapter 10 **[APP-053]** paragraph 10.7.40).

The assessment has paid careful regard to the special qualities on the North Pennines AONB as identified in the North Pennines AONB Management Plan and identified no impact upon those qualities (see for example ES Chapter 10 **[APP-053]** paragraph 10.1.141-142 and Table 10-10). Thus, no significant effect upon these special qualities was identified as a result of the Project.

The Applicant has also taken a landscape-led approach to its design for the Project – see, for instance, the Case for the Project **[APP-008]** paragraph 6.5.143: “*Furthermore, National Highways has taken a landscape-led approach to the Project design which has sought to minimise or avoid adverse effects on the North Pennines AONB landscape and its special qualities and where possible, sought to identify opportunities for enhancement...*”.

The Applicant also notes that: (1) the boundary of the North Pennines AONB that runs along the northern edge of the road at Warcop would, as a result of the Project, benefit from the establishment of woodland belts and effective screen planting; and (2) the buildings, signage and other Ministry of Defence paraphernalia would be rationalised to create a neater and more contiguous boundary to the North Pennines AONB (ES Chapter 10 **[APP-053]** paragraphs 10.8.55 and 10.8.63).

The Project Design Principles **[REP8-061]** will also seek to have positive benefits for the North Pennines AONB, including:

a) *“Opportunities should be explored through the detailed design to further reduce impacts upon designated and valued landscapes and heritage assets as far as reasonably practicable, or where appropriate, to improve the presentation of such features and their relationships to one another”.* (Project Design Principles **[REP8-061]** Ref VL02); and

b) *“Conserve and where reasonably practicable seek to enhance long views for road users across designated landscapes which create a strong sense of driver and passenger experience, such as views across the North Pennines, Yorkshire Dales and across to the Lakeland Fells, taking into account (where relevant), the need for the design to seek to avoid or minimise adverse landscape and visual effects”.* (Project Design Principles **[REP8-061]** Ref VR02).

Specifically in respect of Appleby to Brough (Scheme 06):

a) *“Planting design to be irregular woodland edge / blended and ‘mosaic’ landscape interface with the North Pennines AONB to integrate junctions, the Ministry of Defence replacement facility and the scheme with the nationally designated landscape context and its setting”* (Project Design Principles **[REP8-061]** Ref 06.06);

b) *“Road infrastructure within the North Pennines AONB is to be designed sympathetically in relation to that AONB and its relevant Special Qualities, and consultation must be sought with the joint advisory committee”* (Project Design Principles **[REP8-061]** Ref 06.08); and

c) *“Any barrier required between the A66 and local roads to prevent headlight glare is to be designed to be sympathetic to the North Pennines AONB, with planting to soften the visual impact over time”* (Project Design Principles **[REP8-061]** Ref 06.09).

The Environmental Management Plan (**EMP**) **[REP8-005]** includes a number of provisions to control any temporary effects during construction in the Register of Environmental Actions and Commitments (**REAC**):

a) temporary haul roads and site compound/material storage areas required during construction of the Project will be located outside of ecologically sensitive sites as shown on ES Figure 6.1 Statutory and Non-Statutory Designated Sites **[REP7-021]**, areas of Priority habitats as identified in Chapter 6: Biodiversity **[APP-049]** and as shown on ES Figure 6.3 Phase 1 Habitat and Terrestrial Invertebrate Survey **[REP7-023]**, and any specific habitats and trees identified as being retained in the Project Design Principles **[REP8-061]** (Environmental Management Plan, Register of Environmental Actions and Commitments Ref D-BD-03 **[REP8-005]**); and

b) during the construction of the Project, excavations within the North Pennines AONB United Nations Educational, Scientific and Cultural Organization Global Geopark shall be limited to the minimum reasonably required (as far as reasonably

practicable) to deliver the Project to minimise disturbance (Environmental Management Plan, Register of Environmental Actions and Commitments Ref D-GS-03 [REP8-005]).

The Applicant considers that, in respect of these effects, it has adopted all measures that can be required in accordance with paragraphs 4.9 or 4.10 of the NPSNN i.e. which are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects or which are necessary to make the development acceptable in planning terms, directly related to the proposed development and fairly and reasonably related in scale and kind to the development.

As a result, to grant the DCO Application would further the purpose of “*conserving and enhancing the natural beauty of the area of outstanding natural beauty*” specified in section 85 of the 2000 Act (as amended).

2 – Carbon Assessment

The Applicant notes the comments made by Dr Boswell of Climate Emergency Policy and Planning (**CEPP**) and others regarding traffic modelling, which were submitted on 19 January 2024.

The Applicant does not accept CEPP’s submissions and considers that it has addressed Heavy Goods Vehicles (**HGVs**), Light Goods Vehicles (**LGVs**) and freight appropriately and in accordance with the relevant sections of the Transport Analysis Guidance (**TAG**) within its traffic modelling and the associated impact assessment. The Applicant submits that there has been no underestimate of traffic modelling including of HGVs, LGVs and freight associated with the Project.

It is important in responding to CEPP’s submission to clarify two traffic modelling concepts, which appear to have been conflated by CEPP. These two concepts are (i) induced traffic; and (ii) trip generation, which are explained by the Applicant below.

Turning first to the concept of induced traffic, as explained in the Seventh RfI Response (see page 6), the Applicant has applied the concept of induced traffic as set out in paragraph B.2.4 of TAG Unit: Guidance for the Technical Project Manager. This identifies that induced traffic is the additional traffic, beyond the level of traffic that would use the network without the intervention (i.e. without the Project). An alternative way to look at this is to consider it as demand suppressed traffic that is released through a road scheme improvement.

The second concept, trip generation, refers to trips generated by individual proposed developments that have been identified and are included within the core scenarios i.e. within the future case do minimum and something scenarios. These individual proposed developments have been assumed to come forward either with or without the Project, as required by paragraph 7.5.1 of TAG Unit M4 Forecasting and Uncertainty.

Induced Traffic

The Seventh RfI Response explains that TAG has been followed in relation to induced traffic. The growth in freight has been modelled through the application of Road Traffic Forecasts 2018 growth factors developed by the Department for Transport, thus incorporating outputs from the Great Britain Freight Model. In addition, the reassignment of freight traffic onto the A66, which is the only form of induced traffic applicable in the case of HGVs, has been provided for within the assignment model. Further details are provided under the 'Paragraph 4' heading of the Seventh RfI Response.

The Seventh RfI Response referred to the forecasting of future HGV movements as a 'simple factoring method', as this is a term that is used within TAG to describe the general forecasting approach that it advises for HGVs, LGVs and freight. This term was used in the response in the context of a discussion on induced traffic. Further commentary is provided below on the detailed methodology, including the trip generation calculations within the so called 'simple factoring method'.

Trip Generation

In terms of Trip Generation, CEPP's comments are incorrect, because an approach that accounts for HGVs, LGVs and freight traffic from specific proposed developments has been adopted.

The Applicant's forecast matrix development methodology is described in paragraphs 5.5.1 to 5.5.13 of the Combined Modelling and Appraisal Report (**ComMA**) [APP-237]. This includes the Applicant's methodology for modelling freight traffic in relation to all of the developments identified in CEPP's submission dated 19 January 2024. These developments are all included and explicitly represented in the core scenario (i.e. within the future do minimum and do something scenarios). This includes the following developments:

- C2615 – Scotch Corner Designer Outlet;
- C2618 – Scotch Corner Garden Centre;
- C2457 – Eden 41 Business Park; and
- C630 – Employment development at Ingenium Parc.

Paragraph 5.5.1 of the ComMA states:

“Trips for developments selected to be explicitly represented in the model forecast demand have been included as follows:

- *Trip generation – establish the number of trips produced or attracted to a development sites based on quantum of households or jobs;*
- *Trip distribution – distribute the development trips across the model zone system, based on existing distributions within the model; and*

- *Constraining to Balancing Areas – controlling overall trip growth so that the development and background trips comply with NTEM growth forecasts. The NTEM control is applied using designated balancing areas.”*

Paragraphs 5.5.2 to 5.5.8 of the ComMA discuss how bespoke trip generation, including goods vehicles trip generation, from each development site has been modelled using the best available data including:

- the uncertainty log of proposed developments within the area;
- peak hour trip rates for total vehicles from the Transport Assessments available for each of the proposed developments;
- daily trip rates (separately for both car and LGVs and HGVs) obtained from the TRICS 7.6.2 database, selecting a comprehensive set of sites across England, Wales and Scotland; and
- National Trip End Model (**NTEM**) car trip rates by Local Authority area.

This methodology was developed based on the guidance provided within paragraph 7.3.6 of TAG Unit M4 Forecasting and Uncertainty:

“Forecast trip ends for land use developments should be consistent with a Transport Assessment where such evidence is available. Where insufficient evidence on trip ends from developments is available from Transport Assessments, a separate trip generation model may be required.”

Paragraphs 5.5.9 to 5.5.11 of the ComMA detail how trip distribution has been considered, i.e. where the trips are coming from and going to in respect of each development.

Paragraphs 5.5.12 to 5.5.13 of the ComMA describe how the overall level of growth from all of the developments does not exceed the growth identified within the NTEM as required by Paragraphs 7.3.5 of TAG Unit M4.1. As NTEM does not contain goods vehicle projections, use is made of RTF18 as the appropriate Department-based projection. Overall national/balancing area growth is developed from the simple factoring method, whereby regional RTF18 forecasts are applied to the base year trip matrix.

Thus, the Applicant has undertaken detailed trip generation calculations which are included within the modelling and which take into account freight growth associated with the proposed large employment sites identified in the core scenario. The Applicant confirms that such traffic is included in both the economic and environmental assessments of the Project (including noise, air quality and greenhouse gases).

Reporting Error

In producing this response, the Applicant has identified a reporting error within Table 5-14 of the ComMA. This is a presentational error and not one which has carried through to the data used in any assessment or modelling undertaken for the Project.

The Applicant takes this opportunity to correct the presentational error, as follows:

Table 5-14 of the ComMA should be replaced with the following substitute Table 5-14. This table states the number of LGVs and HGVs as a proportion of total vehicle traffic generated from each site within the uncertainty log.

Table 5-14: Goods vehicle trip rate proportions calculated from TRICS (corrections in red)

Local Authority	LGV	HGV
Retail	5%	1%
Office	5%	1%
Business Park	5% 6%	1%
Industrial Unit	5% 13%	1% 9%
Industrial Estate	6% 23%	1% 8%
Warehousing	13% 40%	9% 33%
Hotels	23% 8%	8% 2%
Residential	40% 9%	3% 1%

To confirm, the proportions contained in the table above are those that have been used within the Applicant's appraisal.

Incorrect Paragraph Reference

The Applicant's note also that CEPP's submission dated 19 January 2024 queried a reference to 'paragraph 5.2.33' of the ComMA. The Applicant has checked and confirmed that the reference to paragraph 5.2.33 of the ComMA should indeed reference paragraph 5.4.1 of the ComMA.

Conclusion on Carbon Assessment

In summary, the Applicant has accounted for HGVs, LGVs and freight traffic appropriately and in accordance with TAG advice within its traffic modelling for the Project. The Applicant has explained how its modelling has accounted for this data within both 'Induced Traffic' and 'Trip Generation' categories. There has been no underestimation of this traffic within the Applicant's modelling and assessment and it has not been left out of account.

3 – Cumbria Police

In response to the latest submission from Cumbria Police dated 18 January 2024, the Applicant has produced at **Appendix 1** to this letter a table addressing each point of this submission in turn.

4 – any other comments

The Applicant notes that it has been invited to provide any other final comments on the representations received by the Secretary of State in response to his previous Rfl of 5 January 2024.

The majority of the points raised in these representations have been the subject of detailed submissions by the Applicant throughout the Examination of the DCO Application and in subsequent correspondence, which all interested parties have had an opportunity to respond to. The Applicant has therefore chosen not to repeat its previous submissions in this letter, which mirrors the approach taken by the Applicant in its response to previous Rfls. However, in order to assist the Secretary of State, the Applicant has provided a list of cross-references to its responses to previous Rfls (which, in turn, contain cross-references to submissions by the Applicant throughout the Examination of the DCO Application) on a topic-by-topic basis, addressing the key points contained in these representations:

- LURA – see response at point 1 above and pages 10-14 of the Seventh Rfl Response;
- HGVs and carbon assessment – see response at point 2 above, pages 6-10 of the Seventh Rfl Response, page 4 of the Applicant’s response dated 5 October 2023 to the Secretary of State’s fourth Rfl (**the Fourth Rfl Response**), pages 5-10 of the Applicant’s response dated 22 September 2023 to the Secretary of State’s third Rfl (**the Third Rfl Response**) and page 5 of the Applicant’s response dated 7 September 2023 to the Secretary of State’s second Rfl (**the Second Rfl Response**);
- North Pennine Moors SAC – see pages 2-3 of the Applicant’s response dated 16 January 2024 to the Secretary of State’s eighth Rfl (**the Eighth Rfl Response**), Annexes 5 and 6 to the Applicant’s response dated 27 October 2023 to the Secretary of State’s fifth Rfl (**the Fifth Rfl Response**), pages 2-3 of the Fourth Rfl Response, page 2 of the Third Rfl Response and pages 2-3 of the Applicant’s response dated 25 August 2023 to the Secretary of State’s first Rfl;
- Benefit Cost Ratio – see page 9 of the Third Rfl Response and pages 3-5 of the Second Rfl Response;
- Arboricultural Impact Assessment – see Annex 1 of the Seventh Rfl Response and page 11 of the Applicant’s response dated 29 November 2023 to the Secretary of State’s sixth Rfl (**the Sixth Rfl Response**);
- Article 54 of the draft DCO – see Annex 1 of the Seventh Rfl Response and pages 12-18 of the Sixth Rfl Response;

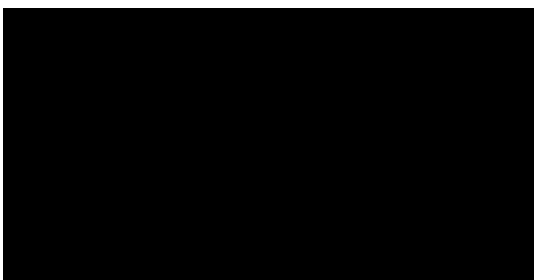
- Brough Hill Fair, including article 36 of the draft DCO – see pages 3-5 of the Eighth Rfl Response and pages 2-6 of the Seventh Rfl Response; and
- Speed limits – see page 4 of the Fifth Rfl Response and pages 2-3 of the Fourth Rfl Response.

The Applicant therefore refers those who have made these representations and the Secretary of State to these previous submissions and correspondence, and the points raised in these representations are not to be taken as accepted by the Applicant.

The only exceptions to the above approach relate to the representations of David Sparrow dated 19 January 2024 and Simon Heptinstall dated 10 January 2024 (including supporting video evidence), which contain a matter which the Applicant considers it would be helpful to address specifically. Mr Sparrow's representation details his concern "*if...there...[is] no right turn into Barnard Castle (coming from the east) and that all the extra traffic will come through Startforth...then that has to be changed*", whilst Mr Heptinstall's representation details his concern "*with the effects of the Cross Lanes to Rokeby and the Bowes sections of the development and the possible increase in HGV traffic through the town. Of particular concern is the B6277 through Startforth*". The Applicant notes that a right turn movement is provided for at the eastern end of Cross Lanes to Rokeby (Scheme 08) via a safer grade separated junction (local to Rokeby and west of Greta Bridge), which enables traffic to travel to Barnard Castle via the C165 Barnard Castle Road (which is also the designated HGV route). In addition, access is still provided to the Sills and Startforth via the safer grade separated junction local to the western end of Cross Lanes to Rokeby (Scheme 08). By retaining the principal movements at the current locations, it is not the case that all of the traffic will travel west towards Cross Lanes and then up through the Sills to access Barnard Castle.

If you have any further queries or comments, I can be contacted by email at A66NTP@nationalhighways.co.uk.

Yours sincerely



Monica Corso Griffiths
Head of Design and DCO
A66 Northern Trans-Pennine Project

APPENDIX 1 – RESPONSE TO LATEST SUBMISSION FROM CUMBRIA POLICE

	Points raised	Applicant's response
1	From a Cumbria Police Headquarters Estates Perspective:	<p>The Applicant notes, by way of introduction, that it has engaged with Cumbria Police throughout the development of the preliminary design of the Project that was submitted as part of the DCO Application. The Applicant is familiar with the aspects included in Cumbria Police's latest submission dated 18 January 2024 as many of them were raised and discussed in exchanges in 2021 and 2022, prior to the submission of the DCO Application.</p> <p>The detailed design for the Project is currently being developed by the Applicant's appointed contractors in advance of construction commencing during 2024 (subject to the DCO being granted by the Secretary of State).</p> <p>The Applicant is very familiar with the access and egress arrangements for Cumbria Police and has considered this throughout the life of the Project. As the detailed solutions continue to be developed, the Applicant will continue engagement with Cumbria Police to review how the construction and operation phases of the Project will meet its requirements in respect to critical operations.</p>
1.1	The final design drawings outlining exact access and egress arrangements to Cumbria Police / Cumbria Fire & Rescue Headquarters Site including levels.	Detailed design is ongoing, therefore final design drawings are not yet available. The principal access and egress arrangements remain similar to those submitted as part of the DCO Application and will be shared with Cumbria Police once they have been developed.
1.2	The anticipated duration of build-phase is currently unknown.	The appointed contractors are currently preparing their detailed construction programmes and anticipate that construction will start later in 2024 and run for the majority of the 5-year construction period. The Applicant will share the

	Points raised	Applicant's response
		key dates with Cumbria Police once we have accepted the programme.
1.3	Arrangements for temporary diversions around the site and around Kemplay Roundabout during the build phase,	Traffic management solutions to support the detailed construction programme continue to be developed. The Applicant's construction team hold a monthly traffic management meeting, to which Cumbria Police are invited, through which the Applicant provides regular updates on progress and provides the opportunity for any issues or concerns to be tabled and fed back to the Applicant's design teams.
1.4	Arrangements for temporary access and egress to and from the site during the build phase.	See 1.3 above.
1.5	Impact on traffic flow to A686 Carleton Avenue – how will access be maintained?	<p>It is the Applicant's intention to maintain access through the Carleton underpass for the vast majority of the construction works programme, although at times this will be under 2-way traffic signals. Some planned closures of the underpass will be required, and these will be scheduled for nights/weekends following engagement with all affected parties.</p> <p>Discussions have taken place with the fire service to allow police response vehicles to enter Kemplay Roundabout through their access when the underpass is closed.</p> <p>A temporary access road has been proposed, and is being considered, to run from the A6 south of Kemplay Roundabout to the road at the back of the fire service headquarters building to allow entry and exit to the police estate during these closures. The entrance and exit to the A6 would be marshalled during these times by the construction team. More detail on the access arrangements will be</p>

	Points raised	Applicant's response
		discussed with all interested parties as the detailed design progresses.
1.6	Impact on traffic flow to A6 Eamont Bridge – how will access be maintained and where is the diversion? Impact on J40 of the M6?	The A6 Eamont Bridge will not be used as part of any planned diversion during construction of the Project.
1.7	Assurance of continuity of services into and out of the site during the build phase and emergency arrangements for the potential event of interruption of these services.	See 1.5 above.
2	From a Cumbria Police Operational Perspective:	
2.1	Kendal Calling 1st to 4th August 2024 (Repeated yearly) – The A66 / A6 / M6 are strategic arterial routes which are used for diversions and increase in traffic volume due to the event and increased visitors from out of county.	All traffic management plans implemented during construction will account for major events and will be developed in discussion with the police, relevant local authorities, event organisers etc. A regular monthly traffic management meeting has been set up to discuss such matters with interested parties, including the emergency services. It is not expected that the Project will lead to any change in the current strategic arterial diversion routes.
2.2	Appleby Fair – May (Phase 1) to June 6th to 9th (Phase 2) – The A66 is the strategic arterial route which is used for access / egress to the event, including an increase in vulnerable road users (Horse / Carts).	See 2.1 above, and the Applicant notes that it has been, and will continue to, engage with the Multi-Agency Strategic Co-ordinating Group.
2.3	The following critical functions are located at Cumbria Police HQ – Control Room, Firearms Training, Driver Training, ICT, Radio, Dog Section, Learning & Development, Occupational Health – in addition there are hundreds of staff who either work full time at this location or use this site for training / welfare purposes.	See responses in section 1 above.

	Points raised	Applicant's response
2.4	Where are the strategic diversion 'blue routes' for all emergency services travelling East of Penrith?	<p>There will be no change to the strategic diversions for emergency services travelling east of Penrith following completion of the Project.</p> <p>The relevant local authority and the police will be consulted if any diversion that is required during construction utilises routes other than the A66, e.g. Brough to junction 38 of the M6.</p>
2.5	There are risks associated with Serious & Organised Acquisitive Crime on the Eastern border of Cumbria with Durham – does the project include sufficient preventative measures such as ANPR / CCTV / HGV parking facilities that are secure and well lit? Stainmore Café is the only current facility that provides little security or road safety initiatives. This has been subject to criminality and KSI collisions.	<p>Signing improvements on the A66 were carried out in February 2023, to increase driver awareness of Stainmore Café and its junction with the A66.</p> <p>The scope of the Project does not include for the provision of ANPR.</p> <p>The Project includes CCTV masts to the south of Penrith and provision of a police observation point on the Kemplay Bank overbridges for speed enforcement purposes.</p> <p>In respect to HGV facilities National Highways is undertaking a separate nation-wide freight. The aim of the study is to identify locations where new freight services and parking might be feasible on the Strategic Road Network. This is discussed in more detail in section 2.7 of the Applicant's Deadline 2 Submission – 7.9 Applicant's Comments on Local Impact Report – Rev 1 [REP2-018].</p> <p>Observation platforms have also been included to the rear of laybys on Schemes 03, 06, 08 and 09 in both east and westbound directions. These can be seen on the following drawings:</p>

	Points raised	Applicant's response
		<p>Scheme 03 – [REP7-006] Deadline 7 Submission – 2.5 General Arrangement Drawings Scheme 03 Penrith to Temple Sowerby (Rev 2)</p> <p>Scheme 06 – [REP8-004] Deadline 8 Submission – 2.5 General Arrangement Drawings (Rev 3)</p> <p>Scheme 08 – [APP-016] 2.5 General Arrangement Drawings Scheme 08 Cross Lanes to Rokeby</p> <p>Scheme 09 – [REP7-004] Deadline 7 Submission – 2.5 General Arrangement Drawings Scheme 09 Stephen Bank to Carkin Moor (Rev 2)</p>
2.6	<p>The A66 east of Penrith is a high harm area in respect of KSI collisions in the county – what preventative measures are being implemented to prevent this and will activity be linked to the Cumbria Road Safety Partnership? Is there any consideration to implementing average / fixed speed cameras, similar to that of the A590 to improve road safety? The speeds on this stretch of road will be higher given dual carriageway status. Will the speed limit be 70 MPH throughout? Will there be locations for safe vehicle stops and safety camera van enforcement zones.</p>	<p>Following a detailed review of historic injury accidents, a package of safety measures on the A590 between Greenodd and Ayside were delivered in December 2023. These consisted of alterations to road markings and extra traffic signs, as well as changes to the signed speed limit at three discrete locations and installation of average speed cameras (ASCs).</p> <p>These measures are targeted at sections of the road where there are heightened safety risks, clusters of accidents and multiple hazards (such as substandard road alignment, reduced forward visibility, uncontrolled pedestrian crossing points, uncontrolled field accesses and side road junctions). The changes will also convey to drivers (whether familiar or</p>

	Points raised	Applicant's response
		<p>unfamiliar with these parts of the A590) of the need to proceed with extra care and attention.</p> <p>ASCs have been installed on the A590 as there is no safe location where the police can monitor and enforce the signed speed limits. Works to connect the ASCs to a power supply will be complete by the end of February 2024, at which point they will become operational.</p> <p>The same heightened safety risks as experienced on the existing A590 between Greenodd and Ayside will not be present on the A66 once the Project is complete as we will upgrade the single carriageway sections to a modern standard dual carriageway (including the bypass of Kirby Thore).</p> <p>A 70mph speed limit will apply for the project, save for the length to the south of Penrith. A 50mph speed limit is proposed from the east of Kemplay Bank roundabout and continues through to M6 junction 40. As referenced in point 2.5 above, provision has been included on the Kemplay Bank overbridges for mobile speed enforcement vehicles.</p> <p>The Applicant notes that laybys represent the only provision for safe vehicle stops, and refers to 2.5 above in relation to safety camera van enforcement zones.</p> <p>National Highways are an active member of the Cumbria Road Safety Partnership (CRSP) attending monthly operational meetings and quarterly tactical meetings as well as contributing to the preparation of CRSP policy documents.</p>

	Points raised	Applicant's response
2.7	Cumbria Police authorise Abnormal Load Movements and Escorts between counties to strategic locations – HGVs account for around 25% of total traffic on the A66 – is there any consideration around the impact on other routes such as A69 / A65?	The current abnormal load routes will not be affected by the Project during construction and operation.