

**Draft
Summary
Response to
National
Highways
A66 Northern
Trans Pennine
Project**

**September
2021**



The Importance of the A66 Northern Trans Pennine Project

The A66 Northern Trans Pennine Project (A66 NTP) will deliver a consistent standard of dual carriageway between Junction 40 of the M6 at Penrith and Junction 53 of the A1 (M) at Scotch Corner.

The £1bn investment by National Highways is welcomed by Cumbria County Council. The Council has promoted the need for this investment over recent years and recognises the importance of improvements to east-west connectivity to the local, regional and national road network through improved journey time reliability.

Cumbria County Council acknowledges the A66 NTP's potential to bring a number of benefits to Cumbria:

- Bolster connectivity to support inward investment across Cumbria, supporting the County's ambitious growth proposals;
- Better connect Cumbria to national and internal markets, providing opportunities for Cumbria's transport reliant sectors like energy, nuclear, advanced manufacturing and logistics;
- Bolster resilience of the route and improved safety for all users;
- Better support local trips, providing better access to work, services and education;
- Support national traffic and journeys between Cumbria and Scotland and Yorkshire, Midlands and the South East;
- Enhance Cumbria's visitor economy by increasing Cumbria's reach as a destination.

Cumbria County Council's Key Tests



Whilst there is potential for significant benefits to be realised it is important that any negative impacts are appropriately mitigated. Cumbria County Council has identified a number of areas where mitigation is required in order for the Council to fully support the proposed investment.

Cumbria County Council has set out a number of key tests which need to be met to ensure that the benefits from the A66 NTP are fully realised. These include:

Improving Connections to Local Communities and Minimising Severance

- Having clear and effective junction strategies across the A66 will result in greater junction safety and legibility, supporting both east and west bound journeys;
- Ensuring that there is no loss of connectivity for local communities and key destinations along the route.

Key Junctions Improvements

- Developing effective junction solutions for Kemplay Bank; M6 Junction 40 and Skirsgill Depot.

De-Trunking of the Existing A66

- Developing a clear strategy for sections of the A66 that will be detrunked so that the sections adopted by Cumbria County Council are at an acceptable standard and commuted sums are provided to support future upkeep. The transferred sections of the route should be subject to enhancements where these are considered to best reflect their new role.

Active Travel

- The scheme should seek to support delivery of a Scotch Corner to Penrith “off A66” route suitable for walking, cycling and horse riding. The scheme should incorporate meaningful improvements for horse drawn traffic accessing Appleby Horse Fair.



Network Resilience

- Including more and smarter technology to bolster resilience;
- Enhance the existing strategic diversion routes, specifically the A6 and the A685.

Improved Facilities for HGVs

- Meeting wider service and infrastructure needs through the provision of high quality and dedicated HGV service provision across the A66.

Environmental Mitigation

- Providing adequate environmental mitigation to minimise harm and boost benefit. This is increasingly important in the context of climate change. Opportunities for carbon offsetting need to be considered.

Maximising Socio Economic Benefits

- Opportunity to maximise the economic benefit resulting from scheme and deriving social value and legacy benefits.

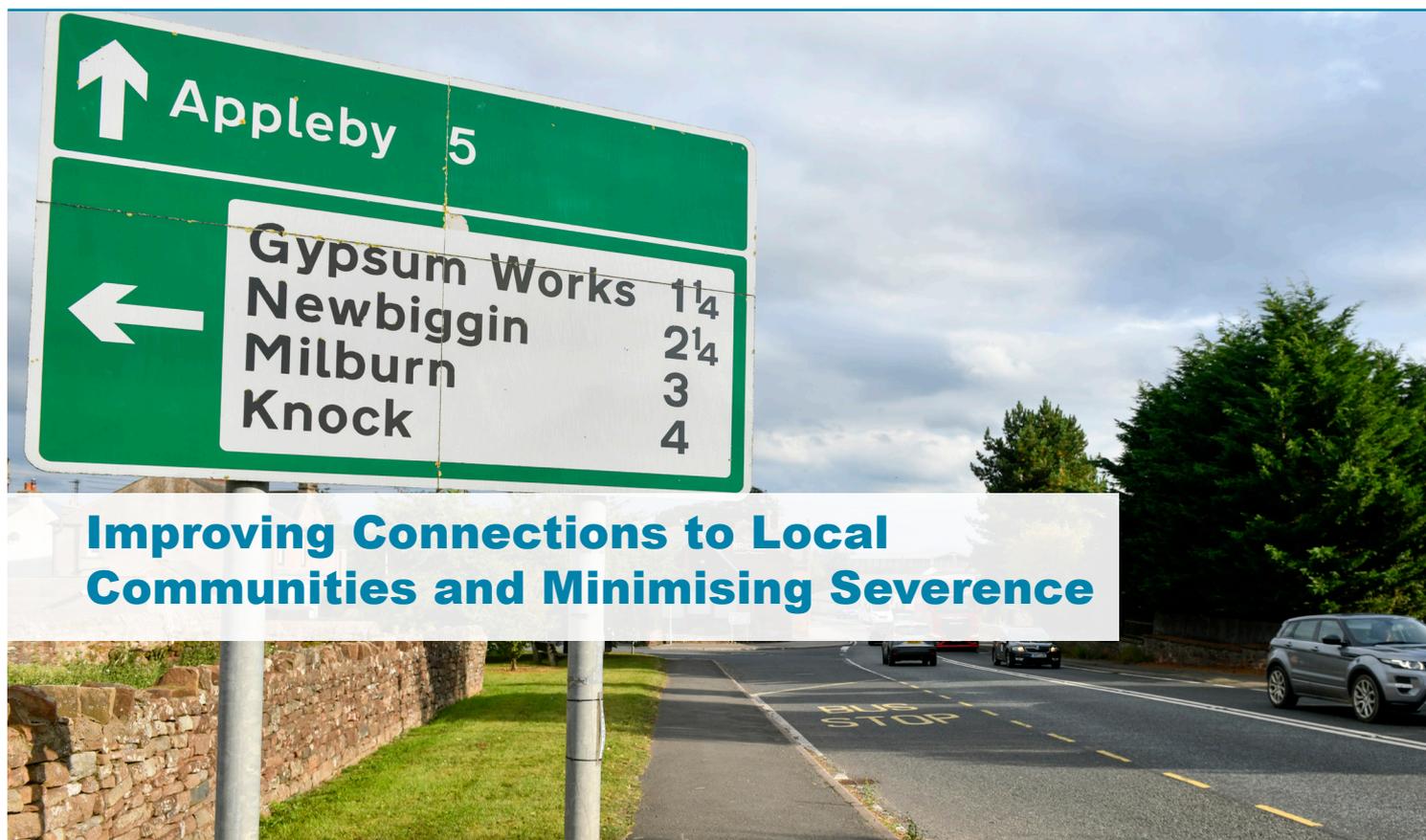
Construction Diversion Routes

- Developing a clear strategy for traffic management and the establishment of alternative/diversion routes to support the construction of the upgraded A66.

Supporting Joint Working with Cumbria County Council

- Facilitating stronger joint working between National Highways and Cumbria County Council ensuring that there are sufficient resources to allow the local authorities to effectively engage in the project beyond the existing planning performance agreement.

Recent pre application discussions with National Highways has enabled the Council to develop its position on the A66 NTP. This document has been prepared in advance of the start of National Highway's Statutory draft Consultation (commencing on 24 September 2021). Cumbria County Council will revisit its position following a detailed assessment and consideration of the consultation material.



Improving Connections to Local Communities and Minimising Severance

The A66 NTP project has the potential to enhance north-south, as well as east-west connectivity along the route for both motorised and non-motorised transport. Further mitigation is required at the following locations in order to minimise severance and improve the resilience of the route:

- Brougham: the scheme needs to cater for right turns during flood / emergency events. This could be in the form of removable safety barriers with the designs allowing for right turn areas on a temporary basis;
- Warcop and Langrigg: further understanding of potential mitigation is required to reduce the impacts associated with additional travel time / distance for journeys from Warcop to the A66 east, and from the A66 west to Langrigg;
- Bolton/Long Marton: consider the impact on the removal of the enhanced junction arrangement (previously proposed by NH) and impact on access for communities on to the A66;
- Further mitigation may be required where the A66 NTP bypasses villages to ensure that appropriate connection points are provided, to retain / improve accessibility to areas that are bypassed.

Key Junction Improvements



Junction 40 M6

The southbound off slip of the M6 and the A592 Ullswater Road arm and A66 (east) arm, already experiences unacceptable levels of congestion particularly on Fridays and weekends. Traffic volumes on the A66 are set to double by 2051. Whilst the scheme proposals show an increase in the capacity at the junction in the number of approach arms to Junction 40, there is no assurance that this is sufficient to meet future capacity demands.

Cumbria County Council require further discussion with National Highways to understand the scheme's potential impacts on the local road network (particularly Penrith Town Centre) to ensure that the future operation of this junction is within appropriate operational capacity and thresholds, so as to avoid congestion and adverse environmental and community impacts.



Skirsgill Depot Access

Skirsgill Depot is a strategically important operational facility. National Highways must continue to work with Cumbria County Council to ensure that the scheme designs do not have any significant impacts on the depot's operation or key highway activities such as essential winter gritting.

It is currently difficult for traffic to exit Skirsgill Depot and manoeuvre into the outside lane so that they are in the correct position to enter the roundabout to make the right turn towards Penrith or A66 eastbound. This issue will be exacerbated as the scheme designs are to widen the carriageway to four lanes at the entry to the M6 J40 roundabout.

The gradient of the proposed access road joining the A66 is such that HGVs and public service vehicles may find it difficult to exit and accelerate from the depot onto the A66, creating a safety risk in an area of weaving with mainline traffic. Furthermore, the scheme design doesn't currently support safe and direct access for pedestrians and cyclists

The scheme designs also show the closure of the access on the M6 south bound slip. This removes the flexibility of access to the depot and results in longer drive times for routes from the M6, A66 (west) or Ullswater Road. Cumbria County Council does not support the closure of this access.



Kemplay Bank

Although access to the blue light services at Kemplay Bank remain the same, Cumbria County Council has noted that there is only one approach lane to the roundabout from the A66 (north and south). Cumbria County Council recommend that the number of approach lanes is increased to provide sufficient capacity for local traffic and will prove critical when the route is required as a main diversion route.

The proposals at this junction do not support Active Travel. The route for pedestrians and cyclists is indirect and requires amendment to be acceptable.

Further work is also required to understand how the new layout may impact on Eamont Bridge during normal operation, and also when it is used as a diversion route.



De-Trunking of Existing A66



Significant sections of the existing A66 will be de-trunked as a consequence of the A66 NTP. These de-trunked sections offer the opportunity to form part of the strategic local road network and improve connections to and from the A66. With the necessary investment from National Highway's de-trunked sections of the A66 can provide a direct east to west walking and cycling corridor.

The de-trunked sections of the A66 do not currently come within the scheme 'red line' boundary. It is essential that National Highways provide Cumbria County Council with the necessary funding to bring the de-trunked sections up to an acceptable standard before handover and adoption. The condition of the proposed de-trunked sections need to be independently assessed, which would include undertaking condition surveys to understand deterioration of the asset once construction work commences until the de-trunking date. Furthermore, the extent of de-trunking needs to be discussed and agreed with Cumbria County Council prior to establishing de-trunking agreements.

Active Travel



The A66 NTP could lead to severance of the local active travel networks, particularly where new alignments cut off or restrict movement, resulting in circuitous, indirect re-routing, and therefore discouraging active travel.

Walking, Cycling and Horse Riding is considered by Cumbria County Council to be a critical element of the A66 NTP design, which strongly aligns with National and Local Policies and could result in significant health benefits. Gear Change: a bold vision for cycling and walking (DfT, 2020) sets out a commitment to the provision of cycle infrastructure for all new A road schemes:

“We will ensure that new local and strategic A road schemes include appropriate provision for cycling and walking” Source: Gear Change Dft 2020



The current scheme designs lack the provision of a continuous active travel network. There are a number of design solutions that can be incorporated into the A66 NTP to enable improved east-west connectivity for active travel, to enable both commuting trips between towns, and leisure trips to access the wider tourist economy. Where new dualled sections are created, there are opportunities to design a segregated cycleway parallel to the upgraded section. On offline sections, there are opportunities to use the de-trunked sections of the A66 to form an active travel corridor.

The Council has developed a proposed route corridor to support east-west active travel connectivity along the A66 as shown in the plan below. An east-west active travel network will benefit Penrith, Center Parcs, Temple Sowerby, Kirkby Thore, Crackenthorpe, Appleby-in-Westmoreland, Warcop, and Brough. Other communities that could benefit from cycling and walking proposals along the A66 include Culgaith, Newbiggin, Cliburn, Bolton, Long Marton, Brampton, Coupland, Hilton, Murton, Sandford and Great Musgrave. The route should be delivered either directly by National Highways or funding provided through S106 contributions and designated funds.

Horse drawn vehicles attending Appleby Fair should be provided with an alternative safe route along the Local Road Network, which has dedicated facilities for the travelling community and visitors to the event. Furthermore, Flashing Lane is a focal point of the Fair and is the main showcasing 'run' for horses being traded. It is near the tie in of the A66 NTP, and therefore the designs must not negatively impact on this part of the local road network or encroach on the event field itself.

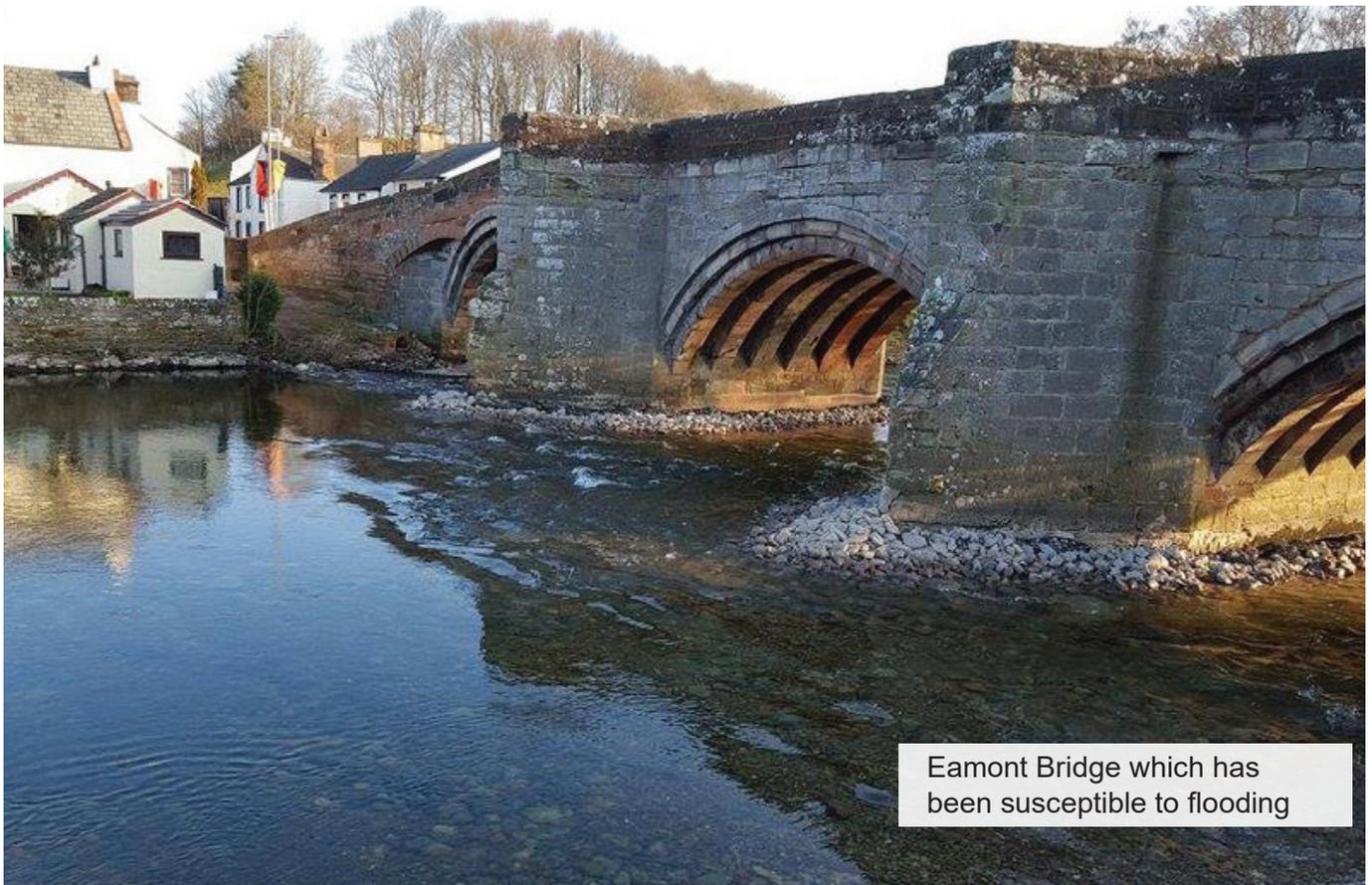




Low Bridge on A685

The existing A66 has no closed circuit television within the scheme area and is almost entirely without VMS provision. The A66 NTP provides the opportunity to develop a future proofed network of technology that combines the existing infrastructure with the latest technologies. This technology would improve the end-to-end journey experience, with the user kept informed and able to make sensible travel decisions. The opportunities to improve technology across the A66 and improve the resilience of the network include:

- Installing strategic CCTV traffic surveillance cameras and collaborate with the highway authorities across the route to enable CCTV sharing;
- Explore the introduction of Air Quality Management sites across the route to monitor and control air quality as traffic levels increase. These can be used as an indicative measure to enable strategic plans to be implemented to reduce or maintain congestion at pre determined levels;
- If more technological equipment is added to the A66, the communications infrastructure should be expanded, and could help to facilitate other wider statutory undertaker developments, such as 4G/5G mobile phone coverage and support communities accessing enhanced broadband connectivity;
- An enhanced VMS system across the A66, interlinked with Local Authority infrastructure, can provide a comprehensive management and control mechanism for the whole network, providing seamless advice for drivers. This system will also improve the management of major events such as abnormal weather and Appleby Horse Fair;
- The A66 NTP project should be used as a catalyst to explore data sharing opportunities and improved collaboration with key stakeholders. For example the link to the Police Command and Control System would be particularly valuable for dealing with major events and incidents that may not be entirely traffic related.



The A66 NTP should reduce the number of occasions when the A66 needs to be closed and will help to reduce the frequency of accidents. However, with the increase of traffic set to double by 2051 on the A66, this will put pressure on existing permanent diversion routes. These strategic diversion routes, A6 and A685, currently fall outside the scheme red line boundary. National Highways need to work with Cumbria County Council to identify the key pinch points along the strategic diversion routes and provide funding to mitigate the impact of extra traffic using these routes.



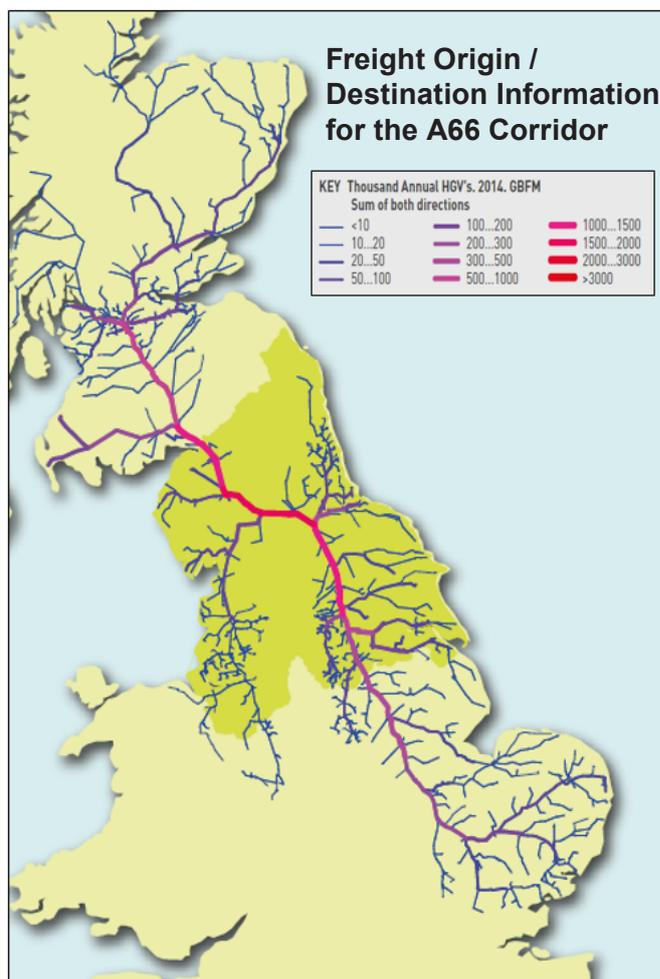
Improved Facilities for HGVs

The A66 has a disproportionately high freight flow, with commercial vehicles comprising over 20% of total vehicles on most sections of the route between Scotch Corner and Penrith.

Nuisance and illegal HGV parking in areas of Penrith is already problematic. This can also result in safety hazards on both the strategic and local road network and requires significant resources to enforce. The delivery of the A66 NTP will see an intensification of HGV traffic and there is a need to provide dedicated and high quality HGV facilities along the A66 to support this future demand and to address current shortfall in facilities.

The National Planning Policy Framework in relation to lorry parking facilities sets out that:

“Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance (paragraph 109, page 31 NPPF).”



Moreover, there is a need for the delivery of adequate provision where shortages have been identified which could lead to parking in locations with inadequate facilities. There is an existing gap in provision between the A1(M) south of the A66 Stainmore Services according to guidance set out by the DfT. The Stainmore Service Area is strategically located in the middle of the route to cater for traffic using the A66, however the existing facilities including access arrangement and parking is sub-standard and is inappropriate for the level of future traffic demand.

In partnership with Cumbria County Council and the other strategic highway authorities, it is recommended that further assessment of the need for a service station is required, including identifying and acquiring an appropriate site which is both compliant with the DfT Circular 02/2013 and with NPPF and local policies. Engagement with NH to future proof a site (including any design considerations that are needed for the A66 project) must be progressed. Sites at Penrith, Appleby and Stainmore should be considered and assessed further.

Further mitigation will be required to address any safety issues arising from increased illegal HGV parking. The Council will also require further resources to enforce restrictions on the local highway network.





Environmental Mitigation

National Highway’s Preliminary Environmental Impact Report (PIER) will set out the preliminary assessment of the A66 NTP’s environmental impact.

Cumbria County Council is seeking appropriate environmental mitigation measures that will reduce the magnitude of environmental impacts across the A66 NTP. In line with Cumbria County Council’s statutory function as host authority these are:

Topic	Sub-topic	Response
Biodiversity	Designated sites	County Wildlife Sites and other similar designations (i.e. those that aren’t managed by Natural England) could be impacted directly, or through changes in aquatic and airborne pollutants. National Highways should identify the nature of any such changes and how they will impact the nature of the asset.
	Protected species	Protected species are known to be present across the length of the A66 NTP in Cumbria. Red squirrels, reptiles, badger, great crested newts and otter have all been identified as present. The degree of mitigation will depend upon the location of these protected species and the extent to which they will be harmed by the construction and operation of the A66 NTP scheme.

Topic	Sub-topic	Response
Climate	Climate resilience	The A66 NTP will need to be designed to meet the challenges of a changing climate and wetter conditions. Ensuring that flood mitigation measures are adequate will primarily be the responsibility of the Environment Agency, but Cumbria County Council will have an integral role for those Ordinary Watercourses for which they have responsibility.
	GHG emissions	The nature of a highways scheme is such that the GHG emissions associated with the construction process are likely to be significant. Cumbria County Council will have a role in challenging the material usage to ensure that GHG emissions are not unnecessarily excessive and that opportunities for mitigation and offsetting are implemented.
Cultural Heritage	Archaeology	Cumbria County Council has a statutory duty to protect undesignated heritage assets (designated assets are the remit of Historic England). National Highways trial trenching programme will not be complete in time for the submission of the Environmental Statement and therefore it will be necessary for Cumbria County Council to ensure that adequate controls are in place so that these assets are appropriately mitigated prior to the construction of the A66 NTP scheme.
Population and Health	Human health	Impacts upon human health are multi-faceted and encompass noise and air quality as well as matters relating to accessibility and opportunities for recreation and exercise. It will be important that National Highways demonstrate that the A66 NTP does not impinge significantly on any human health factors that cannot be appropriately mitigated.
Water Environment	Flood risk	Ensuring that flood risk is not exacerbated in unacceptable locations is a role which the EA and Cumbria County Council, as Lead Local Flood Authority, will have joint responsibility. There is an opportunity to reduce the number of attenuation ponds currently included within the scheme through agreed joint management arrangements. Furthermore, Cumbria County Council is encouraged by National Highways engaging with partner organisations on wider flood management matters specifically around Warcop.
	Water pollution	Any runoff from the A66 NTP that will flow to an Ordinary Watercourse will be of interest to the Council. We would expect that adequate pollution control measures would be proposed to ensure that highway runoff is of an appropriate quality prior to discharge from the scheme.



Maximising Socio Economic Benefits

The A66 NTP is a major investment with the potential to support Cumbria's, and the wider region's economy. Cumbria County Council, in partnership with the Local Enterprise Partnership and Eden District Council will seek to work with National Highways to maximise the economic benefits resulting from the scheme and would like to see National Highways making commitments to deliver the following:

- Ensuring that employment, supply chain and procurement opportunities are advertised and accessible locally;
- Ensuring that local supply chain opportunities are maximised using a range of measures including supply chain charters to set out actions and key principles, targets for local contracts awarded (number and value);
- Producing a procurement strategy which enables local businesses to access opportunities by creating a range of size and value of contracts (including low value and small contracts) and providing support to local businesses in accessing tendering opportunities and participating in procurement processes;
- Provision of local labour agreements;
- Providing contributions to support for training and up-skilling, including in local schools and colleges as well as through the provision of mentoring, training and apprenticeship schemes and requiring contractors to participate in such schemes;
- Using local Higher Education institutions to deliver courses;
- Identifying opportunities to derive legacy benefits and social value;
- The development of an accommodation strategy, to ensure that the workforce accommodation is suitable, accessible by sustainable transport modes and can be repurposed for the benefit of the wider community when no longer required by the project is essential.

Construction Diversion Routes



The impacts as a result of construction of the upgraded A66 need to be minimised through early joint working with the local highway authority and Eden Local Committee. The temporary traffic management diversion routes during construction of the A66 NTP will need to be agreed with the Council to ensure minimal disruption and impact, both on the delays caused to drivers, the condition of local road assets and impact on local communities. Mitigation measures on the temporary diversion routes and against “rat running” will be required. It is essential that mitigation measures are completed before the scheme moves into the construction phase. The impacts on local bus services must be considered and replacement shuttle services must be provided in the case that bus services are prevented from accessing key settlements during construction of the A66 project. All diversion routes will require condition surveys to be undertaken prior to being utilised as formal diversion routes.



Supporting Joint Working with Cumbria County Council

Cumbria County Council welcome the Planning Performance Agreement with National Highways, as it secures the Councils input and supports the technical evolution of the A66 NTP. As the A66 NTP develops, and further issues emerge, it is recognised that further funding will be required from National Highways to undertake activities such as:

- Reviewing further preliminary and detailed designs;
- Developing strategies and concepts to address operational, socio-economic, maintenance, and connectivity issues;
- Engagement during the examination Development Consent Order;
- Post Development Consent Order - including construction and operation of A66 NTP.

Ongoing engagement with National Highways has added value to the development of the project and Cumbria County Council's understanding of the scheme designs. This continued close working is critical for the successful delivery of the A66 NTP and will avoid the risk of delays to the project programme.

