

**RE: A66 Northern Trans-Pennine Development Consent Order (DCO): Non Material Change Application**

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**From** A66 NTP <A66NTP@nationalhighways.co.uk>

**Date** Fri 2026-03-06 17:59

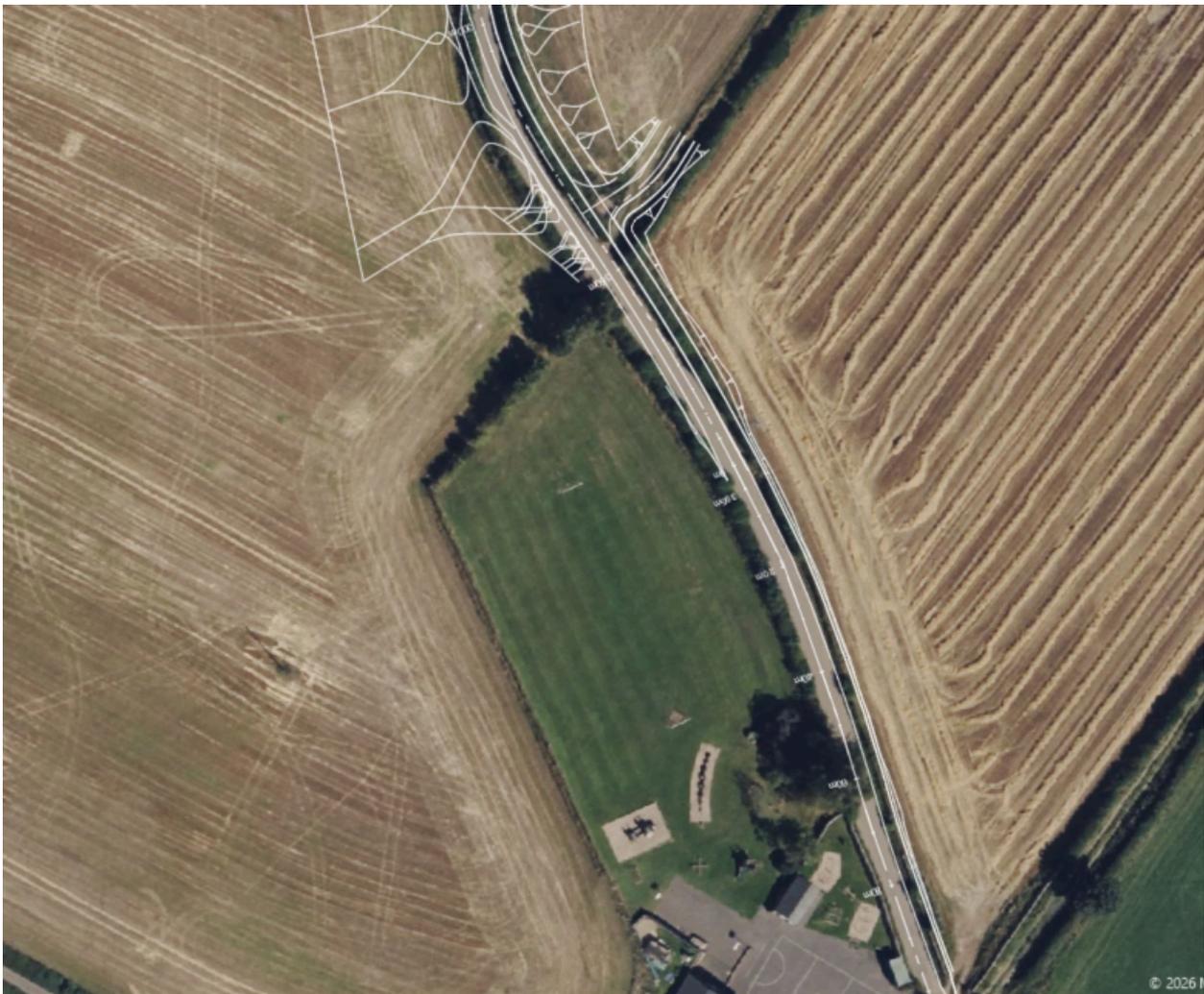
**To** A66 NTP [REDACTED]

 2 attachments (733 KB)

A66NTP Sport England request for comments 04.03.26.docx; HE615324-BBA-HSR-004\_UN5\_SCHEM-SK-CH-000002-P03 REMOVED.pdf;

Dear Stuart

Thank you for meeting us on Wednesday. I've attached the meeting minutes from Wednesday and as agreed, I've got an updated image overlaid on Google maps below. I've also attached the drawing with the cross section marking removed. Please note that the drawing attached on our letter was incorrect and an older iteration of the drawing, the one attached to this email is the correct version and has gone through our designers quality checks in the P03 revision. My sincerest apologies for the confusion. The drawing attached also has the label removed so as better to see where the works begin to the north of the playing field.



Both the attached drawing and the overlay on Google Maps show the extents of the works and that the earthworks associated with the side road Cross Street which will go over the new A66 start beyond the boundary of Kirkby Thore Primary School playing field. Our conclusions made in the letter remain the same; that there is no impact to the playing field associated with Proposed Change 1 at Cross Street.

If you have any queries or want to meet again before the deadline for the submission to the Planning Inspectorate, please let me know. Otherwise I'm content to agree our position over email and I will write to the Department for Transport via the Planning Inspectorate with what we've submitted to you. I'd really appreciate if you could confirm your position to National Highways before sending to the Planning Inspectorate so that I can include that in our letter to the Department ahead of the deadline on Tuesday 10 March.

Kind regards

**Project Manager:** DCO & Schemes 9 and 11 on A66

A66 Northern Trans-Pennine Project  
Regional Investment Programme North

National Highways | 9<sup>th</sup> Floor | Piccadilly Gate | Store Street | Manchester | M1 2WD

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**Web:** <https://nationalhighways.co.uk/our-roads/a66-northern-trans-pennine/>

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**From:** A66 NTP

**Sent:** 27 February 2026 13:15

**To:** [REDACTED] 'Planning North'

<Planning.North@sportengland.org>

**Cc:** [REDACTED] >

**Subject:** RE: A66 Northern Trans-Pennine Development Consent Order (DCO): Non Material Change Application

Hi Stuart

Please find our response letter to the request for comments attached to this email. I will send a placeholder meeting for Wednesday which we can hold if needed.

Kind regards

[REDACTED]  
**Project Manager:** DCO & Schemes 9 and 11 on A66

A66 Northern Trans-Pennine Project  
Regional Investment Programme North

National Highways | 9<sup>th</sup> Floor | Piccadilly Gate | Store Street | Manchester | M1 2WD

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**From:** [REDACTED] <[REDACTED]>

**Sent:** 25 February 2026 14:29

**To:** A66 NTP <[A66NTP@nationalhighways.co.uk](mailto:A66NTP@nationalhighways.co.uk)>

**Cc:** [REDACTED]

**Subject:** RE: A66 Northern Trans-Pennine Development Consent Order (DCO): Non Material Change Application

[REDACTED]  
Many thanks Hannah. It would help if you could send to me the relevant drawing that shows the relationship of the amended change with the existing school playing field please. I've tried and failed to find it and just don't have the time to keep hunting for it.

[REDACTED] Principal Planning Manager [REDACTED]

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**From:** A66 NTP <[A66NTP@nationalhighways.co.uk](mailto:A66NTP@nationalhighways.co.uk)>

**Sent:** 25 February 2026 14:25

**To:** [REDACTED] <[\[REDACTED\]@sportengland.org](mailto:[REDACTED]@sportengland.org)>

**Cc:** [REDACTED] <[\[REDACTED\]@nationalhighways.co.uk](mailto:[REDACTED]@nationalhighways.co.uk)>

**Subject:** RE: A66 Northern Trans-Pennine Development Consent Order (DCO): Non Material Change Application

Hi Stuart

Thank you for your response, I wasn't sure if my email had been sent from the inbox yesterday as our staff member is off today, hence the duplication, apologies.

I'll draft a letter response to you which addresses your representation, then you can review before the 4<sup>th</sup> March if you are able. I'll set up a call for 4<sup>th</sup> March and we can discuss then if required, we can always cancel if you are satisfied with our response. As said, it should only take 30 minutes maximum because only one change is close to a playing field and we believe there is no impact.

I'll send an invitation through shortly. Please forward to who you feel needs to attend.

Kind regards

[REDACTED]  
**Project Manager:** DCO & Schemes 9 and 11 on A66

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Regional Investment Programme North  
National Highways | 9<sup>th</sup> Floor | Piccadilly Gate | Store Street | Manchester | M1 2WD

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**From:** Stuart Morgans <[REDACTED]@sportengland.org>  
**Sent:** 25 February 2026 13:55  
**To:** Hannah Coates <[REDACTED]@nationalhighways.co.uk>  
**Subject:** FW: A66 Northern Trans-Pennine Development Consent Order (DCO): Non Material Change Application

[REDACTED]  
Hi Hannah,

I responded to the email address you provided initially which presumably hasn't made its way to you as yet.

Many thanks

[REDACTED] Principal Planning Manager [REDACTED]

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**From:** [REDACTED]  
**Sent:** 25 February 2026 11:05  
**To:** 'A66 NTP' <A66NTP@nationalhighways.co.uk>; Planning North <Planning.North@sportengland.org>  
**Subject:** RE: A66 Northern Trans-Pennine Development Consent Order (DCO): Non Material Change Application

Hi Hannah,

Further to your email below, as previously explained we are extremely short of staff capacity currently. I may be able to arrange a short call to discuss, however of the times you have suggested I'm only available on 4<sup>th</sup> March at 15:30pm. If this is still something you wish to arrange, perhaps you can send me a Teams call invitation for that time.

Many thanks

[REDACTED] Principal Planning Manager [REDACTED]

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**From:** A66 NTP <[A66NTP@nationalhighways.co.uk](mailto:A66NTP@nationalhighways.co.uk)>

**Sent:** 24 February 2026 13:17

**To:** Planning North <[Planning.North@sportengland.org](mailto:Planning.North@sportengland.org)>; [REDACTED]

**Subject:** A66 Northern Trans-Pennine Development Consent Order (DCO): Non Material Change Application

Dear Stuart

I will take this time to introduce myself; I am Hannah Coates and the Development Consent Order Project Manager on the A66 Northern Trans-Pennine Project. I have just called you on your landline and mobile and left you a voicemail on your mobile.

As detailed in that message, the Department for Transport has issued a Request for Comments via the Planning Inspectorate website today: <https://nsip-documents.planninginspectorate.gov.uk/published-documents/TR010062-002628-Consultation%20Letter%203%20-%20A66%20NMC.pdf>

In that National Highways and Sport England are invited to agree a position on the comments raised in Sport England's representation on the Non-material change application. I know you have previously said that there is no availability to have a meeting, but understand this was prior to the Request for Comments letter being issued. I do feel this would be the easiest and quickest way to address your comments raised in the representation where a targeted consultation on this change application was requested. I would be available to have a meeting at the following times and dates:

- Wednesday 25 February 15:00-17:00
- Friday 27 February 13:00-17:00
- Monday 2 March 10:00-12:00
- Wednesday 4 March 15:30-17:00

A meeting would only need to be maximum 30 minutes. If you are unable to make a meeting, then we will write to you to set out our position, and you would need to respond to us and the Department for Transport through a letter or email. Examples of our recent Request for Comments with two other parties are available to view on the Planning Inspectorate website where we agreed our position and issued the correspondence afterwards to the Planning Inspectorate. As communicated in yesterday's email, we would also include this in our Consultation and Publicity statement

Please can you let me know how you would like to proceed either by a meeting and/or a letter so that we can resolve and address Sport England's comments as soon as possible?

Please do not hesitate to get in touch via the project inbox on [A66NTP@nationalhighways.co.uk](mailto:A66NTP@nationalhighways.co.uk)

Kind regards

[REDACTED]  
**Project Manager:** DCO & Schemes 9 and 11 on A66

A66 Northern Trans-Pennine Project  
Regional Investment Programme North

National Highways | 9<sup>th</sup> Floor | Piccadilly Gate | Store Street | Manchester | M1 2WD

[REDACTED]

[REDACTED]

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[REDACTED]  
Project Manager  
A66 Northern Trans-Pennine Project  
National Highways  
9<sup>th</sup> Floor  
Piccadilly Gate  
Store Street  
Manchester  
M1 2WD

National Highways Customer  
Contact Centre: 0300 123 5000

Date: 27 February 2026

Dear Stuart Morgans,

**Planning Act 2008 and The Infrastructure Planning (Changes To, and Revocation Of, Development Consent Orders) Regulations 2011**

**Application for a Non-Material Change to the A66 Northern Trans-Pennine Development Consent Order 2024 (SI 2024/360), as corrected by the A66 Northern Trans-Pennine Development Consent (Correction) Order 2025 (SI 2025/1084)**

**Applicant's response to the Department for Transport's Request for Comments dated 24 February 2026 (the RfC)**

I am writing in response to the RfC issued by the Department for Transport to National Highways ("the Applicant") on 24 February 2026 in relation to the Application above.

The RfC invites the Applicant and Sport England to agree a position on any impacts on playing fields or other sport facilities, including adjacent areas at risk of ball strike, and where necessary, set out any agreed additional mitigation measures that would be required. It also asks for detailed plans from the Applicant to allow consideration of any potential impacts of the Application on the playing field sites identified in Sport England's response, as well as potential new impacts on other playing field sites.

Your representation submitted to the Planning Inspectorate on 5 February 2026 said that in 2022, you provided comments on the A66 Northern Trans-Pennine Project and your records indicated that we signed a Statement of Common Ground that covered the following sites that included playing fields:

- Kirkby Thore Primary School.
- Wetheriggs Country Park, Penrith.
- MOD Playing Field at Warcop.
- Ullswater Community College, Penrith.

The Application Statement submitted to the Department for Transport in December 2025 as part of the Application details the location of each of the Proposed Changes in paragraph 1.1.7 and Figure 1. The Application Statement describes and provides an explanation for



each Proposed Change. Of the locations that you have raised in your representation as set out above, Proposed Change 1 - Cross Street is the only Proposed Change that is adjacent to a playing field (Kirkby Thore Primary School) and this was why you were identified as a consultee in National Highways' reduced consultation letter to the Department for Transport dated 28 August 2025 and set out in Annex A of the Application Statement. The other sites highlighted in your representation are unaffected by the other Proposed Changes. This is because Wetheriggs Country Park and Ullswater Community College, both in Penrith, are west of Kemplay Bank roundabout and Proposed Change 6 is located east of Kemplay Bank roundabout as illustrated in Figure 7 of the Application Statement. The MOD Playing Field at Warcop is located on Scheme 6 Appleby to Brough and there are no Proposed Changes in this Application being sought for Scheme 6 of the Project.

Proposed Change 1 - Cross Street seeks to keep the alignment of the existing Cross Street for longer, thus reducing land take. This will minimise the impact on the playing field at Kirkby Thore Primary School as less new road will be constructed and it will retain the existing road layout, therefore the playing field will be subject to less impact from construction than the currently consented design. There are no new impacts on this playing field as a result of this Proposed Change. An extract of the drawing showing how the proposed alignment would change from the DCO design if accepted is included in Figure 2 of the Application Statement, however the full drawing showing both alignments of Cross Street is appended to this letter. Annex B of the Application Statement illustrates which individual drawings sheets accompany this Non-Material Change Application, along with the corresponding drawing sheet of the Certified Documents to be Certified that will be replaced.

For clarity, the consented de-trunking plan shows the location of the consented scheme on sheet 2: [DCO Consented De Trunking Plan for Scheme 0405](#)

This Application seeks to change sheet 2 of the above plan with the following sheet which follows the already existing alignment of Cross Street adjacent to Kirkby Thore Primary School: [Proposed Change 1 Cross Street De Trunking Plan Sheet 2](#)

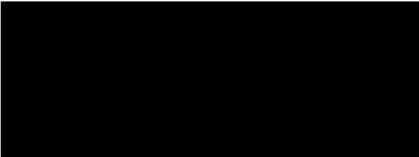
A statutory utilities diversion is still required in this location as with the consented scheme. This was agreed in the Statement of Common Ground in issue 3-1.1 with you and this remains unaffected by this Proposed Change.

In summary, only Proposed Change 1 is adjacent to a playing field, namely the field at Kirkby Thore Primary School, and the Proposed Change does not give rise to any new or different impacts on this playing field. Wetheriggs Country Park, Penrith; MOD Playing Field, Warcop; and Ullswater Community College, Penrith are not located adjacent to and are therefore unaffected by Proposed Changes 2 to 8.

On this basis, we would be grateful for confirmation from Sport England that these responses from National Highways relating to the Application are acceptable to you, and that the Proposed Changes do not have an impact on the sites with playing fields identified.

If you have any further queries or comments, I can be contacted by email at [A66NTP@nationalhighways.co.uk](mailto:A66NTP@nationalhighways.co.uk).

Yours sincerely



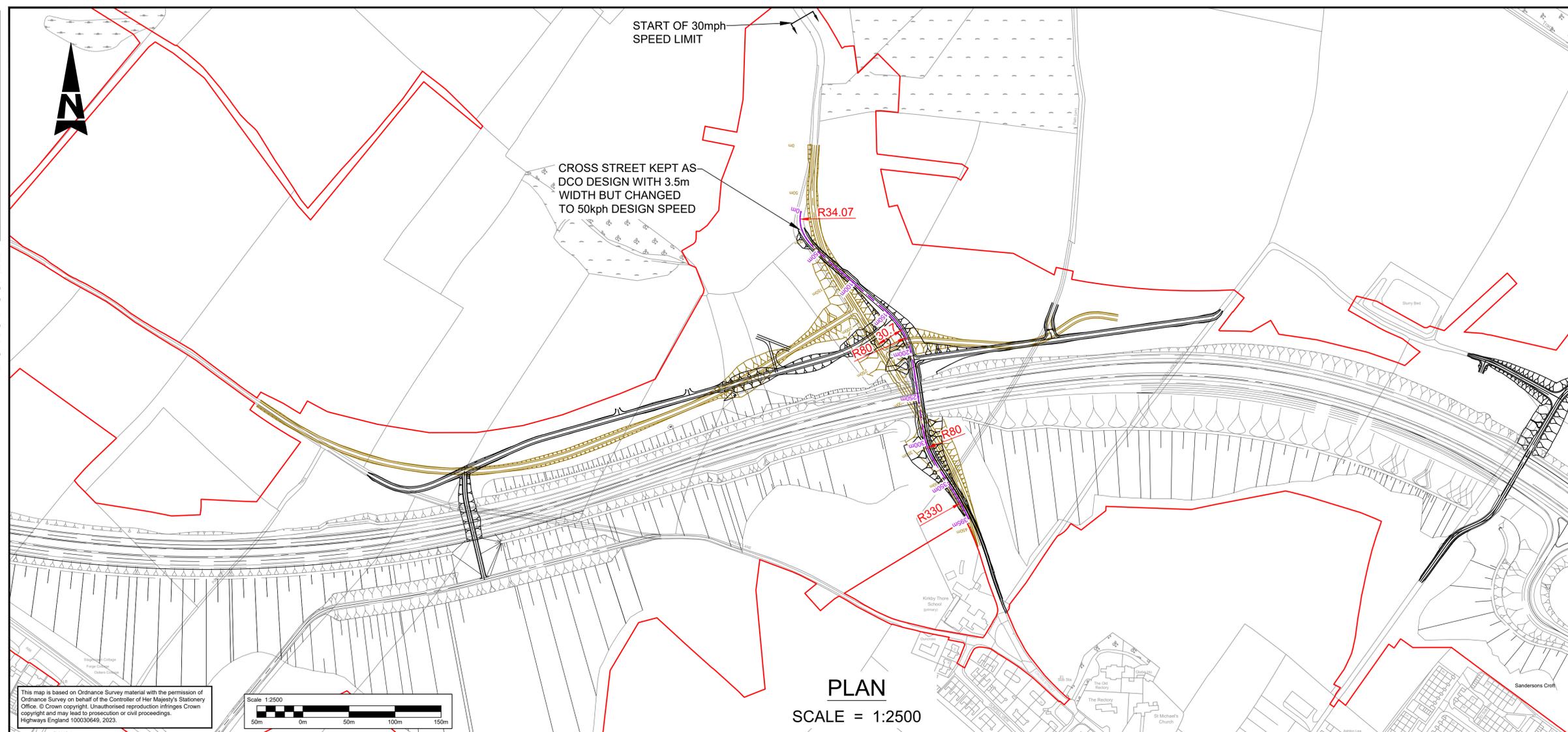
DCO Project Manager  
National Highways

DO NOT SCALE

Millimetres

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**NOTE**

- ALIGNMENT SKETCH PREPARED TO ALLOW ASSESSMENT OF DESIGN CHANGE.

**KEY**

- DCO ALIGNMENT
- REALIGNMENT DESIGN

**SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION**

In addition to the hazards/risks normally associated with the types of work detailed on this drawing, note the following significant residual risks (Reference shall also be made to the design hazard log).

Construction	N/A
Maintenance / Cleaning	N/A
Use	N/A
Decommissioning / Demolition	N/A

Status	Revision	Drawn	Checked	Reviewed	Authorised	Issue Date
Description						
First Issue						
S2	P01	Drawn KH	Checked JG	Reviewed AS	Authorised AS	Issue Date 30/11/22
Description						
Updated following AA Comments						
S2	P02	Drawn KH	Checked JG	Reviewed AS	Authorised AS	Issue Date 24/02/23
Description						
S0	P03.2	Drawn ---	Checked ---	Reviewed ---	Authorised ---	Issue Date ---

Project Stage: Design Fix  
Project Name: PCF 5-DF1  
State: Preliminary

Drawing Suitability: WORK IN PROGRES  
Status: S0

Designer: **ATKINS**  
Member of the SNC-Lavalin Group  
Chadwick House, Birchwood Park, Warrington, WA3 6AE  
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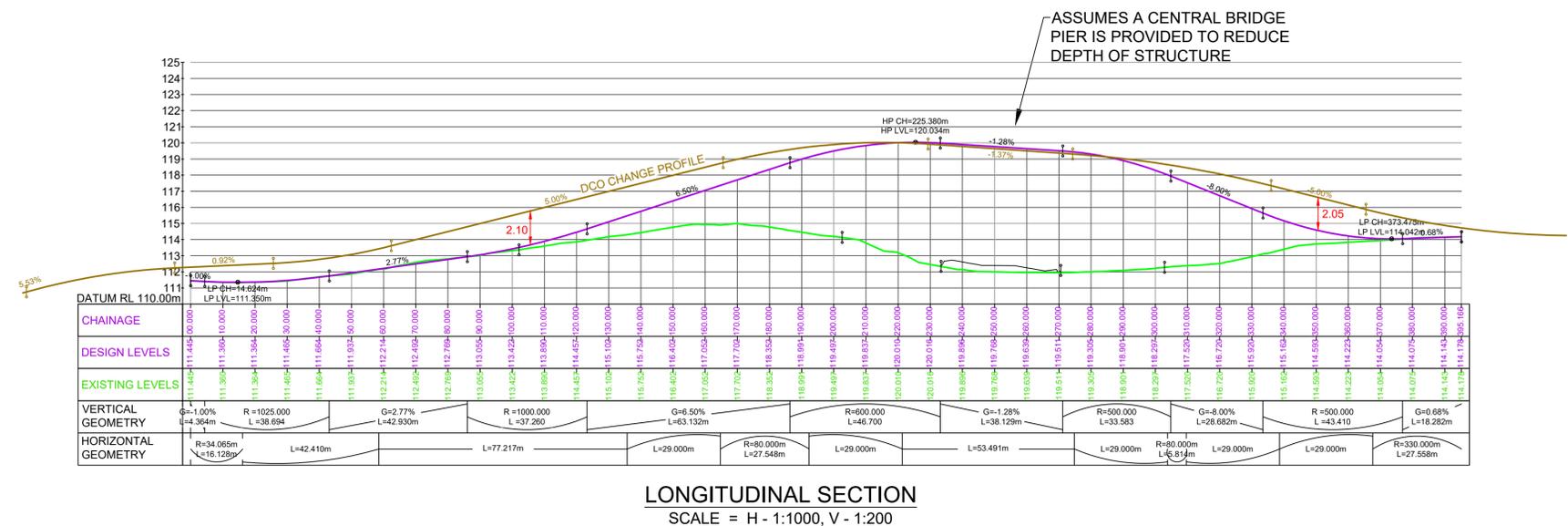
Client: **national highways**

Project Title: A66 Northern Trans-Pennine

Drawing Title: **CROSS STREET REALIGNMENT**

Drawing Number: HE615324  
Project: BBA  
Originator: HSR  
Volume: HSR  
Location: 004\_UN5\_SCHEM · SK · CH · 000002  
Type: SK  
Role: CH  
Number: 000002

Original Size: A1  
Scale: AS SHOWN  
Project Ref. No.: HE615324  
Sheet: 1 of 1  
Rev: P03.2



[REDACTED]  
Planning Inspectorate

By email only

9<sup>th</sup> March 2026

Dear Sir/Madam,

**Proposal: A66 Northern Trans-Pennine Development Consent Order for Non-Material Change Application**

**Sport England Reference: PA/26/NW/CUC/72861**

We refer to the consultation from National Highways relating to the above Development Consent Order.

**Sport England – planning policy**

Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field land remains undeveloped, or
- land allocated for use as a playing field

unless, in the judgement of Sport England the development as a whole meets with one or more of five specific exceptions.

[Playing fields policy | Sport England](#)

**Background**

Sport England has commented once previously on this non-material change application by letter dated 5th February 2026, where we advised that we were unable to make any detailed comments due to being unable to interpret the impact on the playing field from the plans and information provided.

SportPark, 3 Oakwood Drive  
Loughborough,  
Leicestershire, LE11 3QF

Registered address: Loughborough, SportPark, 3 Oakwood Drive, Loughborough, Leicestershire LE11 3QF



We have since met with representatives from National Highways via Teams on 4th March, and have subsequently received an email and attached plan on 6th March 2026 (see attached) which helps provide further clarification on the proposed relationship with the playing field at Kirkby Thore Primary School. This includes the following image overlay :



### **Assessment against Sport England's Playing Fields Policy and NPPF**

In 2022, Sport England provided comments on this proposal and our records indicate that we signed a Statement of Common Ground that covered the following sites that included playing field:

- Kirkby Thore Primary School.
- Wetheriggs Country Park, Penrith
- MOD Playing Field at Warcop
- Ullswater Community College, Penrith

We note and concur with National Highways that in respect of this non-material change application, the only relevant impact on playing field to consider is the relationship with the playing field at Kirkby Thore Primary School. We understand that the other proposed changes do not impact on the other playing field sites mentioned above or any other playing field land.

From the additional plan now provided to Sport England (Cross Street and Priest lane Realignment Revision P03) including the information provided by email dated 6<sup>th</sup> March 2026, we can confirm that we are satisfied that the playing field at the primary school will not be adversely affected, and therefore we have no objection to raise to the proposed change. This is on the basis that the alignment of the highway and the associated works do not impact on the school playing field.

## **Sport England's position**

Given the above, Sport England does not wish to object to this proposed non-material change application.

Yours sincerely,

[REDACTED]

Principal Planning Manager, North Team

[REDACTED]

[\[REDACTED\]@sportengland.org](mailto:[REDACTED]@sportengland.org)

[REDACTED]

## **Annex**

### **The Five Exceptions to Sport England's Playing Fields Policy**

#### **Exception 1**

A robust and up-to-date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.

#### **Exception 2**

The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.

#### **Exception 3**

The proposed development affects only land incapable of forming part of a playing pitch and does not:

- reduce the size of any playing pitch;
- result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);
- reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;
- result in the loss of other sporting provision or ancillary facilities on the site; or
- prejudice the use of any remaining areas of playing field on the site.

#### **Exception 4**

The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:

- of equivalent or better quality, and
- of equivalent or greater quantity, and
- in a suitable location, and
- subject to equivalent or better accessibility and management arrangements.

#### **Exception 5**

The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

**The full 'Playing Fields Policy and Guidance Document' is available to view at: [www.sportengland.org/playingfieldspolicy](http://www.sportengland.org/playingfieldspolicy)**