

From: [REDACTED]
To: [A66Dualling](#)
Subject: Re: Query
Date: 16 November 2022 23:51:37
Attachments: [image001.png](#)
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[image003.gif](#)
[image004.png](#)
[image005.png](#)
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[image007.png](#)
[image008.png](#)
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Dear Kate,

Please see below for additional points for the ISH 2 and CAH1.

Site Inspection request.

It seems an anomaly that the residents of Low Broomrigg are not classified as “Affected Party” simply because they do not own the field in which the proposals for the road will be built, when currently it will come very close to their house.

Although a site inspection was carried out at the end of Langrigg lane on 20th September, it does not seem that the team went far enough down to assess the impact on people living in Low Broomrigg.

Mary Clare Martin

Issue Specific Hearing 2. 1st December. In person Environment (especially Appleby-Brough section).

Agenda item

2. EMP

1. The Environmental Statement (ES) does not comply with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (“**the 2017 Regulations**”). Chapter 7 of the ES presents estimates of the greenhouse gas (GHG) emissions for assessment of significance of the scheme against the fourth, fifth and sixth carbon budgets. Only “scheme-only” estimates are given (eg the bottom line of Table 7-23, and the “net CO2” data in Table 7-24).
2. One of the requirements of the 2017 Regulations is that the applicant must provide an environmental statement (“ES”) including the cumulative impacts of the project and other existing and/or approved projects on climate change. The requirement can only be discharged by providing a separate cumulative assessment in the ES.
3. The Institute of Environmental Management & Assessment (IEMA) “Assessing greenhouse gas emissions and evaluating their significance” guidance (February 2022) states that best EIA practice for GHGs uses multiple sources of evidence, and

contextualises GHG assessment against local and regional carbon budgets. The IEMA guidance says comparison against national budgets is of “limited value”. The ES does not follow this guidance, and instead makes a sole assessment of significance against the entire UK economy carbon budget.

4. The very large construction stage emissions of 518,562 tCO₂e [Table 7-21] have been omitted from the cost side of the BCR calculations (3.8 Combined Modelling and Appraisal Report, page 148). These would amount to over £130,000,000 at the 2025 government carbon valuation taking the cost side to at least £880m. The value of cumulative carbon emissions from the scheme has not been used in the benefit side of the BCR calculations, because no cumulative assessment has been done. The existing adjusted BCR of 0.92 is an investment hard to justify. It should be recalculated for the issues above, which would reduce it further.

Agenda item 3.

The current plans are for the new dual carriageway to have a speed limit of 70 mph from Scotch Corner to Penrith, with one exception near Kemplay Bank. Besides having a huge impact on the landscape and environment, what is currently one of the most unspoilt parts of the United Kingdom will become an industrial wasteland, and the landscape ruined forever. The scheme, like other road-building, is justified on the grounds of improved connectivity. But on economic grounds alone, given the importance of tourism to the area, the damage inflicted by the construction works to the landscape (for which few photomontages have been produced), will be counter-productive.

In person, Friday December 2nd.

Compulsory Acquisition 1 Hearing. Agenda item-Crown Lands

I would like to know why a more concerted effort has not been made to purchase or rent the land currently used by the army, north of the current A66, as this seems to have been a key barrier to any serious consideration for the route to go north of the current A66. (Information from meeting with NH, 7/9/2022, at Low Broomrigg). The Prime Minister stated in Parliament in October 2021, in response to a question from Neil Hudson, that Defra, the Ministry of Transport and the Ministry of Defence would work together to consult with local people. There has been no productive result on this.

From: Mary Clare Martin [REDACTED]
Sent: 16 November 2022 23:10
To: A66Dualling <A66Dualling@planninginspectorate.gov.uk>
Subject: Re: Query

Points to raise when speaking at Examination. In person

Dr Mary Clare Martin, [REDACTED]. Unique reference number 20032263

Preliminary Meeting -29th November

1.I would like to raise the issue of accessibility. Why was a location chosen with no train station, when there are other places which have stations, such as Penrith, Appleby or Kirkby Stephen? Moreover, as the examination is being held at the eastern end of the scheme, surely this will disadvantage people living at the western end? Indeed, with such a long route, how will the examiners ensure that all eight sections are represented adequately and understood?

2.Has any thought been given to providing access to the Examination for people who do not drive cars? There are many local people in this category, whether through old age, cost, or disinclination to drive in winter. Why has one of the most inaccessible locations along the route, near a main road that is frequently closed in bad weather, been selected?

**Points to be made at Issue Specific hearing 1. Alternative Route Options.
30th November . In person**

**Agenda Item 2, Scheme 06, Appleby-Brough
Alternative routes**

- Proposals a) the dual carriageway to go north of the current A66 (a range of possible routes have been suggested) OR**
b) Upgrade the existing A66
c) Move the existing plans within the Limits of Deviation (40 metres)

1. Are PINS aware of the devastating effect the proposed new Langrigg Junction and associated roads will have on the local residents? Plans for making a single into a dual carriageway have changed from extending the existing road (Spring 2020) to filling an entire field with roads and sink ponds. Two 90-year olds, my parents, live at Low Broomrigg, CA16 6PT, and the proposed route could be 20 metres away from their family home. National Highways have known that the house is permanently inhabited, yet persisted with these damaging proposals, which have become worse.

An additional spur, linking the access road with Langrigg Lane, even closer to their house than the proposed new dual carriageway and new access road to Flitholme, was added to the documents after the consultation was finished (July 2022). As a result, there was no opportunity for other local people to comment.

2. The destruction of beautiful landscape as well as the impact on individuals is not justified by the alleged benefits of the scheme. The cost of the Appleby-Brough proposals is huge: with the Temple Sowerby-Appleby section, it will be 50% of the total cost of the £1.6bn project,

The benefit-cost ratio of the whole scheme is below one (0.92) according to the Combined Appraisal and Modelling report, nor does the DCO estimate the new road will be any safer, though this is the rationale which has been given to local people.

3. Because the route has been designed to go south of the existing A66, this involves building many complicated new junctions and slip roads. These (and the accompanying expense) could be avoided if the new road went north, leaving the existing road for access for local people, and avoiding the damage to the environment and cost to humans.

4. National Highways have consistently ignored the expressed preferences of local people for the dual carriageway to go north of the current road, despite the ongoing campaigns of local representative bodies, a petition with over 900 signatures, and numerous representations in the press and media. No comprehensive survey of a potential northern route has been conducted by NH, so there is no hard data to compare costs, feasibility etc.

5. The clearly expressed views of the gypsy community to retain their site at Brough Hill Fair and for the dual carriageway to go north of the current A66 have not been listened to, and they have been offered an inferior site.

6. National Highways have apparently not even considered the proposals of the Friends of the Lake District in 2019 that the need for the dual carriageway could be avoided by more safety measures, such as speed limits, cameras, upgrades to existing junctions, while exploring alternatives such as putting freight on railways. Nor was this important organisation invited to offer their expertise throughout the consultation. In an era of grave concern about climate change, surely publicly funded bodies should be more responsible about the environment and more responsive to the very real concerns about the degradation and industrialisation of this currently very beautiful scenery, in an area which is heavily dependent on tourism.

7. We have been informed by NH that the Limits of Deviation for the section round the Langrigg Junction/Low Broomrigg, have been set at 40 metres, which would allow for the spur, the access road to Flitholme and dual carriageway all to be moved 40 metres from

Low Broomrigg. While this would be preferable to the current face value plans, the complexity of explaining this to others, based on pencil marks on maps, makes building a critical mass of support extremely difficult. Others, such as representatives of Warcop Parish Council, have considered that the Langrigg Junction is unnecessary, which would make it possible for the access road to be built closer to the dual carriageway.

From: A66Dualling <A66Dualling@planninginspectorate.gov.uk>

Sent: 16 November 2022 17:59

To: Mary Clare Martin [REDACTED]

Cc: A66Dualling <A66Dualling@planninginspectorate.gov.uk>

Subject: [EXTERNAL] RE: Query

This message originated from outside the University. Treat links and attachments with caution.

Hi Mary Clare,

Thank you for clarifying I will add you to the attendance sheet.

Kind regards,
Katy



Katy O'Loan | Case Officer- National Infrastructure
The Planning Inspectorate
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From: Mary Clare Martin [REDACTED] >

Sent: 16 November 2022 17:54

To: A66Dualling <A66Dualling@planninginspectorate.gov.uk>

Subject: Query

Dear Katy,

Yes I plan to attend on 30 Nov, 29 Nov, 1st Dec and 2nd Dec and speak at all of them.

Mary Clare

[REDACTED]

From: A66Dualling <A66Dualling@planninginspectorate.gov.uk>

Sent: Wednesday, November 16, 2022 1:57:29 PM