

Michael Drew

15/12/2022

Your ref: TR010062
Representation 20032254

To the Planning Inspectorate, with respect to the A66 dualling project, proposed route Cross Lanes to Rokeby Junction.

Summary

I live in [REDACTED] with my family, including three small children [REDACTED]. I am writing to register my opposition to the proposed Black junction at Rokeby for the above listed stretch. I fully support the Blue Route (the eastern Rokeby junction), which Highways developed in conjunction with local community groups, and which best represents those communities' needs.

National Highways traffic reports have demonstrated a significant traffic imbalance relating to the acceptance of the Black route, specifically owing to the location of the junction at Rokeby. The longer distance between this junction and the previous one at Cross Lanes will naturally encourage drivers to use Cross Lanes for accessing Barnard Castle and beyond, rather than use the C165 as previously.

Highways recognised the issues this would cause the local area and developed an eastern option, the Blue route. This option was supported by local stakeholders and authorities – including the affected landowner – and scored well on the sifting process in comparison to the Black route.

Unfortunately, despite an alternative eastern junction being developed, Historic England's original brief heritage statement stated that the Blue route would cause "substantial harm" to St Mary' Rokeby and surrounding park and gardens. Because of the decision, Highways did not believe the DCO would pass examination, and put forward the Black route.

Highways new traffic figures are significantly different from their original report. I am concerned that the new figures are not transparent and do not clearly explain why they have been revised so far, and so conveniently, downwards. I am also concerned that they admit that the imbalance of traffic flow still exists and if their numbers are wrong (or change, as they already have) Barnard Castle and its environs will suffer the resulting harm as a direct result of the choice of junction.

I believe that increased traffic along unsuitable roads will lead to increased air pollution, increased journey times, traffic congestion, safety risks, and most important, damage to the dozens of culturally significant locations on the listed buildings register along the affected route. I believe that these effects in fact cause the Black route to potentially do substantial harm to residents, the local environment, and our cultural heritage.

As such, I wish to state clearly my opposition to the Black route and support for the alternative Blue route with the eastern junction at Rokeby.

Statement

I originally produced my objection for the public consultation phase. At that time, I was working on the original traffic report, which predicted over 1500 additional vehicles passing down Moorhouse Lane and The Sills all directly relating to the imbalance of traffic created by the Black Junction.

Since that point, Highways have revealed new numbers which significantly downplay the effects of this traffic imbalance – whilst still accepting that the traffic imbalance exists. I stand by my original concerns and so recreate them below.

The drop in numbers is dramatic and comes despite no significant change in the location of the Rokeby junction which would explain this. It appears that despite additional vehicles coming off at Cross Lanes every local road in and around Barnard Castle will see a decrease in overall traffic. Highways stated reason is that the newly dualled A66 will be a preferable drive to going through town.

Why was this not a factor in the original numbers? Surely if this was such a massive factor, it would have been reflected in the original traffic report? Likewise, where is the traffic going once it comes off? Highways originally seemed to believe that the traffic using Moorhouse Lane, was traffic aiming for Barnard Castle no longer using the C165. To get to any part of Barnard Castle, these vehicles would have to go up Bridgegate and the Bank. Yet they do not. We are told to expect 500+ more cars per day down The Sills, but to lose 400 cars a day from the County Bridge.

It seems unlikely this traffic is headed for the Bowes Road, as the A66 would surely be more desirable and there will be a newly designed junction at Bowes. It is not reflected in the reduced traffic continuing past the Bridge. It is not reflected in the traffic movement in town. Given that the increase on Moorhouse Lane has always near-paralleled the decrease on the C165, that traffic must be traffic heading for town or onwards. If it was heading up the A67 away from The Bank, then the equivalent traffic coming down Moorhouse Lane would have to use The Bank to get to the same place. Why are those 500 vehicles not represented in the traffic use in town?

The numbers may well be correct, in which case, the town would benefit from the Black Route. However, they are significantly different. If the reality is, in fact, more like the original numbers, there will be greatly increased effects on the town, owing to this imbalance of traffic along unsuitable roads. My concerns with the numbers (and my reason for continuing my objection) are two-fold.

Firstly, the numbers have changed. There is no reason to think they will not change again in the future. If they increase, or if Highways are wrong, then the town will suffer. We in town are reliant on numbers which have proven subject to massive change. The only route which ensures future proofing is the Blue route. The other has a problem in-built at the design stage. If the numbers change the wrong way, it will be impossible to rectify or mitigate them.

Secondly, the only constant between these two sets of dramatically different numbers is the repeated belief (completely accepted by residents) that the extra distance for Eastbound traffic will lead to a disproportionate number of drivers coming off early from the A66 and using Moorhouse Lane. Given that this is the only thing the same in both traffic reports, it must be treated seriously. Given that - and given the effects that flow from the imbalanced traffic numbers created - the Blue route is the only sensible option to address this.

It appears Highways' objection is principally in response to Historic England's belief that the Blue route would cause "substantial harm" to St Mary's Church and the park and gardens of

the Mortham estate.¹ Highways are thus required to use Historic England's chosen route owing to the NPS:

5.133 Where the proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm, or alternatively that all of the following apply:

- the nature of the heritage asset prevents all reasonable uses of the site; and
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- the harm or loss is outweighed by the benefit of bringing the site back into use.

However, I believe that the Black Route fails far more to adequately satisfy the National Planning Policy Framework in terms of its impact on the surrounding land and people. Highways England have provided little to no evidentiary support for their proposition that the Black Route is the better option for the local area around Barnard Castle, beyond Historic England's comparison of the specific sites of the proposed junction location.

I have several principal objections to the proposed western Rokeby junction, which all stem from the same starting point: the route.

According to Highways England's own modelling, the choice of the Black Route will drive more traffic down the B6277 (Moorhouse Lane), down Church Bank and The Sills, across the County Bridge, down Bridgegate and up The Bank. This route is wholly inappropriate for heavy traffic flow. The entire length to the County Bridge is marked by rapid, sharp bends, hidden exits, and a steep hill with both sharp bends and hidden exits. It is impossible to have a clear view of the bottom of Church Bank when entering it at the top.

Once down The Sills, there is a three-way light (currently weighted against the B6277 owing to its relative lack of importance versus the A67 which it joins), which controls access to the single lane County Bridge. The turn onto the Bridge is near right-angle, to the right, with a cluster of listed buildings on the near side. The Bridge itself is Grade I listed, owing to its age and significance, and is single lane and has a (poorly enforced) weight limit. Although The Sills is technically two-lane, it is often heavily parked along the pavement side (there is only pavement on one side). This reduces traffic flow, slowing vehicles and making passing difficult.

Bridgegate is two-lane, but at the far end from the Bridge, there is a near right-angle turn left, which begins the climb up the precipitous Bank. This is always parked on both sides. Frequently traffic on one or other side is stopped to allow vehicles to pass in the opposite direction. This is especially risky for ascending traffic, as it forces hill starts or extreme low speeds, which risk stalls. Added to this, parked or parking vehicles often block both sides of the road whilst manoeuvring. At the top is a quasi-roundabout created by the Grade I listed Market Cross. Although functionally a roundabout, the rules are altered by the priority of traffic ascending The Bank on the A67. This can lead to stopped traffic coming off Market Place and Newgate if the weight of ascending traffic prevents movement.

All of this combines to create a congestion trap. This can be seen most clearly when an issue on the A66 makes the town a *de facto* bypass. Traffic backs up in all directions, dropping movement to a crawl. This affects everyone who lives in town. We only have the one main road through town. School runs, deliveries, shopping trips, daily commutes, all of these have only the one route. The only escape from this road is the even less appropriate residential street system, which is often single lane and heavily parked. Further, these roads are

confusing and often end in culs-de-sac, which will cause further issues for non-resident use. [NPPF 104]

Several problems arise from the reliance on this route to take extra traffic from the A66.

1. Accidents

Irrespective of which set of numbers is correct, traffic will increase along The Sills. The lack of adequate pavement along the B6277 leads to my first serious concern. The pavement along this section of the route is single-person wide for most of its duration. At intervals, lampposts block the pavement, forcing you to enter the road. If you meet people coming toward you the most common result is someone entering the road. We have a baby, she uses a pushchair, not a grotesquely large one, but which nonetheless fills the pavement at many points. Either we must enter the road, or the people coming towards us do. This problem further extends to dog-walkers, people with small children, those with large bags, people of larger size than the average, those in wheelchairs or using walking frames, or anyone else not walking on their own.

There is increased risk of traffic accident from this route. The Bank requires careful driving to avoid slippage or stalling. The frequent, sharp turns require careful driving. The narrow turn onto the Bridge requires precision to avoid damaging listed buildings (and damage happens to the Bridge). The sharp, blind slope down Church Bank requires considerable brake control, which is not always anticipated by drivers. The tree-lined road it enters blocks visibility for several turns, making the sudden appearance of cars common. [NPPF 111]

As well, there few safe pedestrian crossing points. Even with lights, The Sills is hard to cross at the County Bridge owing to a lack of visibility of oncoming traffic. There is no other crossing point. The Bank only has two traffic islands. One at the bottom, which lacks visibility onto Bridgegate, and one at the top, which lacks all visibility downhill owing to parked cars, and all visibility round the Market Cross. Taken together, the road is difficult to drive and cross; increasing the traffic will increase the frequency of accident. [NPPF 112c]

2. Air pollution

It is known that congestion leads to increased air pollution. The forms this takes are various, including NO₂, particulate matter and carbon monoxide, and can lead to a wide raft of problems, such as lung cancer, heart disease, asthma, COPD, and even eczema and diabetes. Even small increases in particulate matter can have significant effects on mortality.

A *British Medical Journal* article - newly published when I first wrote to the Public Consultation - featured original research on long term survival and changes in exposure to fine particulate matter (all quotes or references in this paragraph come from this article)². The article made the bold statement that “At a population level, reducing ambient fine particulate matter air pollution improves mean survival.” Reducing exposure to PM_{2.5} was strongly associated with reductions in cardiometabolic deaths, whereas increased exposure was associated with respiratory deaths. The study adds to the overwhelming evidence that long term exposure to PM_{2.5} is associated with mortality – “even in countries such as Canada where PM_{2.5} levels are considered low by global comparisons.” The WHO recently introduced new guidelines, halving the recommended annual PM_{2.5} limit. However, as the article ends, “evidence of any threshold below which exposure to PM_{2.5} is safe is lacking.”

This was recently supported by the Health and Air Pollution in New Zealand (Hapinz) study. This discovered 2000 premature deaths from NO₂ and 1300 from particulate matter.³ Samuel Cai, a lecturer in environmental epidemiology at the University of Leicester, told the *BMJ*, that although these numbers seem low,

The report says that 3300 deaths would represent about 11% of total deaths in New Zealand in 2016. That is remarkable because it means that roughly one in 10 deaths can be linked directly to air pollution.⁴

His belief was that policy was the best tool for mitigating and addressing any potential rise in air pollution. Here the air quality will be protected by the choice of the Blue Route. Policy can help shape the future of the town and the health of its residents.

The worst contributor to particulate matter is brake and tyre wear. These are both heavily associated with congested driving, as the stop-start conditions stress the vehicle more. Add to this the extra work of the two hills at each end of the route and you have a drive guaranteed to add to the PM concentration of the air.

About a quarter of the town's population is over 60; about 20% is under 18. These two groups will be disproportionately affected by any increase of air pollution. Children suffer particularly as exhaust fumes tend to sink, increasing the concentration at their height. Compounding this is the developing state of their lungs, which makes them susceptible to the damaging effects of toxic chemicals. Reducing air pollution reduces the risk factors for long-term conditions, and their severity when they are present. An increase in pollution will lead to an increase in mortality, especially amongst the elderly. This will mean avoidable deaths. The associated increased risk of long-term conditions amongst the young will increase the cost of public health expenditure across the length their lives.

The Blue Route helps mitigate the risk of congestion, thus reducing the increase in pollution and reducing deaths – whilst also increasing quality of life for all residents. As an NHS Senior Library Assistant, I find it hard to conceive of a situation in which the definition of public benefit does not include public health – and find it equally hard to conceive of a situation in which a minor building should be judged more valuable than the lives and health of thousands of people.

Beyond utilitarian philosophical arguments, the Guidance to the NPPF states that changes to emissions levels because of a development are a relevant consideration in planning.⁵ Highways cannot demonstrate any evidence to show the impact on local air pollution. Conveniently, their new figures excuse them from producing a local air quality study, as there is no longer predicted to be a 1000+ increase on the road (as there was before). They have not supplied figures which demonstrate negligible impacts on local health from the increased traffic flow. Again, irrespective of the numbers you choose to believe, they predict an increase in traffic. More vehicles must surely cause more pollution.

3. Cultural Heritage

I am a history scholar by education; an antiquarian bookseller by training; and currently work in a library. I understand and respect Historic England's position. They play a vital part in speaking for buildings, which would otherwise stay silent. As they very rightly point out, air pollution is known to have a damaging effect on heritage buildings. I do not question their concern about St Mary's, Rokeby. I do though question their lack of wider vision and concern for the local context of their choice. I would also question their impartiality, given their focus on the heritage impact on only one location. Why have they not considered the heritage impacts of their selected route on the areas affected by the new junction?

Our house is a Grade II listed building whose front door is only a metre from the A67 side.⁶ Our local at the bottom of the Bank is a grade II listed building.⁷ Friends and family live in Grade II listed houses on the Bank.^{8 9 10} Our children shop in a Grade II listed toyshop.¹¹ We worship in a Grade I listed St Mary's at the top of the Bank, though ours is more used than Rokeby.¹² The top and bottom of the Bank are marked by Grade I listed structures – the County Bridge and the Market Cross, both too often damaged by heavy goods vehicles of the

kind Historic England's choice could see increase over the Bridge.^{13 14} Also on the Bank is Blagraves, a Grade I listed restaurant.¹⁵ The Grade I listed Castle, which gives the town its name, overlooks the road which would bear the brunt of increased traffic entering town.¹⁶ These are only a few of the Grade II or higher listed structures which line the Bank and onwards through town (it would be likely quicker to list the buildings along the road which are not listed in some form).¹⁷ Where is Historic England to preserve and protect our homes and businesses and church?

If the heritage impact of the Blue Route on the sites Historic England chose to survey is such that it must be rejected, what of the effect of the Black Route on the dozens of sites which will be affected by the potential traffic increase through Startforth and Barnard Castle? How can a proper determination of "substantial harm" be made if Historic England have not provided all the necessary evidence to make such a statement? [NPPF 200-201]

Air pollution is also responsible for the poisoning of the land and wildlife. We live in a rural area and there are farms around town. It is known that pollution can move from its location through the action of weather. If air pollution is increased in town, this will carry over to the local landscape through wind and rain – including the Tees. This is especially clean through our stretch, with a resurgence in diverse local river life. It is not only humans and the built landscape which suffers. The countryside does as well. [NPPF 104 (d)]

Finally, the combination of air pollution and congestion affects tourism and house prices. People do not enjoy visiting towns clogged with traffic or wreathed in exhaust fumes. This will affect local businesses and suppress the local economy. The pollution (noise and air), the congestion, and the drop in economic value will all affect house prices, further hurting people. These may seem minor in comparison to human life and the heritage cost, but they add to the depression of quality of life which will potentially flow from Historic England's chosen route.

Final point

There is one final minor point I would like to raise concerning the comparison of the two routes. According to NPPF section 169:

169. Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:

- (a) take account of advice from the lead local flood authority;
- (b) have appropriate proposed minimum operational standards;
- (c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
- (d) where possible, provide multifunctional benefits.

Yet according to Highways England:

5.8.83 From a drainage perspective, the alternative eastern junction is considered better, as whilst it would introduce an additional pond and outfall, it has the significant benefit of not introducing a trapped cutting as present in the baseline western junction design. The alternative junction manages to maintain falls such that water can escape the underpass in the event of any drainage blockages on the local road.¹⁸

And

5.8.86 For road drainage, the eastern alternative junction is considered to be better than the western baseline junction during the construction phase due to the works being undertaken further away from Tutta Beck and the resultant reduction in risk of negatively impacting water quality. The operational impact on climate change is considered better for the eastern alternative junction due to the ability for the junction drainage to flow freely, therefore avoiding the risk of the underpass flooding which is present in the baseline junction.¹⁹

Historic England's chosen route may be supported by one section of the NPPF [heritage] but is at odds with this one (if not more).

According to 163:

If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied.

Another area with lower flooding risk is available, why has that not been selected as the preferred route? No demonstration has been made that the Black Route has "wider sustainability benefits to the community" nor that the development "will be safe for its lifetime taking account of the vulnerability of its users" – indeed, 5.8.86 makes clear that it is the Blue Route's drainage which achieves this aim and matches climate mitigation policy.²⁰

The Black Route has one specific benefit that everyone can agree on – it will likely reduce additional traffic around St Mary's, Rokeby. I leave the question of the gardens, though Historic England seem at odds with the owners, managers and farmers of the estate. There is no other point which offers any form of benefit from the adoption of their choice. The Black Route is more dangerous, more polluting, increases journey times, is not climate compliant, affects more historic assets, and does not meet the needs of the local communities affected.

The Blue Route was designed in conjunction with the local communities – in line with Highways England's stated goal of "tailored" solutions. We ask that the significant public benefit associated with the Blue Route be taken seriously, and it be recognised that, whatever the possible harm to a heritage site might be, harm to the lives of thousands of people must take precedence.

With grateful thanks for your attention,

Michael Drew MA (Cantab) MA, on behalf of Mrs Laura Drew MA (Cantab) and Nathaniel (7), Corinne (5), and Cleo (2)

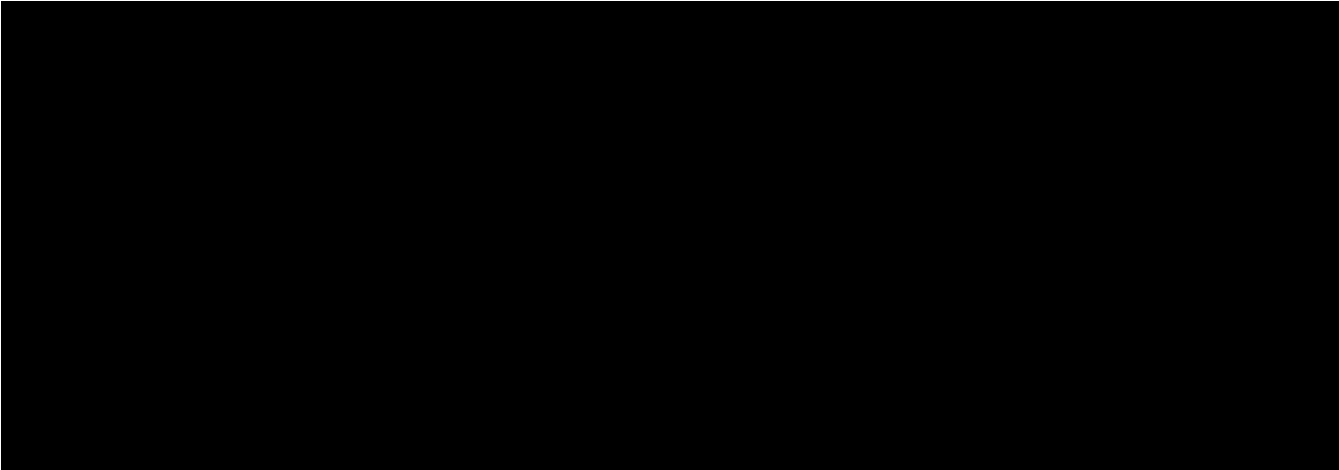
¹ Historic England. "A66 Rokeby Junction Options – Historic England comments post site visit" 23/06/21, p.2

² Chen H., Kaufman JS, Olaniyan T, et al. BMJ 2021;375:n2368, pp.186-7

³ Hussain Z. How cars take lives in more ways than just crashes BMJ 2022; 379 :o2385 doi:10.1136/bmj.o2385

⁴ Ibid.

⁵



¹⁸ Highways England. Northern Trans-Pennine project. Route Development report. Volume 1, p.99

¹⁹ Ibid.

²⁰ Highways England, Op. cit., p.100