Submission ID: 13101

Written Representation Registering as an Interested Party -Dr Mary Clare Martin. Unique reference number 20032263.

My concerns and objections about the proposed A66 dualling scheme from Scotch Corner to Penrith, and in particular (but not exclusively), the Appleby-Brough stretch are as follows:

- 1) Impact on individuals, properties and communities
- 2). Cost to the taxpayer
- 3) Failure to consult adequately, to implement local preferences, and to consult key stakeholders.
- 4) Weak rationale, poor value for money, economic benefits low, improved safety not guaranteed.
- 5) Impact on landscape and environment, air quality, increased noise and light pollution, carbon emissions, inappropriate use of resources in a climate emergency.
- 6) Potential infringement of the Equality Act 2010 and the Human Rights Act.
- 1. Impact on individuals and properties, affecting livelihoods and quality of life, in many places along the route, (such as Kirkby Thore and Dyke Nook). My parents live in a house, in the location of the proposed new Langrigg Junction. It is in a field, which is currently unspoilt farmland, and a site where curlews and peewits nest, yet no awareness has been shown of the impact on biodiversity of destroying this. It is proposed that this field be filled with a new dual carriageway, a new junction (Langrigg), an access road, sink ponds and an additional road directly north-west of the house Appleby-Brough, sec 5 of 8, S06 DCO Cover Sheets.pdf (planninginspectorate.gov.uk).

The conditions in which my parents would live during construction and afterwards would be intolerable. The boundary fence on the side of the road works is only about 15 feet from the house. The hours of work in the Environment Management Plan are very long, and there is no guarantee that there will not be work at night.(In this context, the requests by National Highways to seek "self-approval― for changes to the EMP are horrifying, since the public would have no control over the activities of contractors.)

The value of the house would be badly affected. Low Broomrigg is in a lane which is not suitable for lorries. Therefore a large junction at the current road end is inappropriate design. Access to the dual carriageway or even the local access road will be worse than at present, as it will only be westbound.

A much less destructive plan would for the dual carriageway to go north of the current A66. This would remove the need for complicated new junctions and unsightly overpasses, which need to be built because the new dual carriageway will go south. The arguments against this are a) it is an Area of Outstanding Natural Beauty and b) the land is used by the Ministry of Defence. Yet the AONB is scrubland which has been used for firing by the army for decades. Moreover, NH have made a case for going into the AONB at Warcop (as described in ISH1) which is applicable elsewhere.

2.Cost of route design to taxpayer:

The whole scheme is estimated as about £1.5bn. Running south of current A66, the scheme involves additional junctions, slip and access roads (and safety risks), and sink ponds. The route south is justified because the north is an AONB, but the minutes (PINS sec 51, 17 March 2022) admit the initial AONB boundary was arbitrary. The Appleby-Brough and Temple Sowerby sections account for 50% of the costs of the route. The BCR is unacceptably low (0.92). APP-237 Table 7-9. This was justified in the Responses to Relevant Representations by arguing that there were qualitative benefits to the new dual carriageway. In the Langrigg context, it is hard to see how destruction of the landscape and greater proximity to cars and lorries is a qualitative benefit. The scheme is estimated to have increased traffic of 30%, while research shows that new roads― induce traffic.

3) Poor quality of consultation and information:

Local people on the Appleby-Brough section were never presented with the route north as an option, nor offered the alternative of upgrading the existing road, as recommended by the Friends of the Lake District. In the summer of 2020, they were offered a "preferred route―, in which the new dual carriageway was positioned directly south of the existing road (preferred route announcement, 2020). The preference of local people for the route to go north was very strong. Warcop and Musgrave parish councils conducted a survey in December 2020 in which 94% of those surveyed who responded were in favour of the northern route. A petition on change.org currently has 974 signatures.

My elderly parents were therefore shocked when they received a visit from HE in March 2021, arranged a week beforehand by telephone. At the end of the meeting they handed my parents some maps without proper explanation. It took some time for them to realise that these designs would completely encircle their house with roads. This was apparently because people at a nearby village, Flitholme, had asked for more access. (This is now available in the form of a new underpass.)

The Route Development Report (DCO documents, 5.6.40 and 5.6.41 claim that a virtual engagement event was held in November 2020 about proposals for junctions at Sandford and Langrigg. This was not available to my parents, and the Chair of Warcop and Musgrave Parish Councils were shocked when they were told of these developments in Spring 2021. For example, they first confuse the survey described above with the petition. 5.6.48 talks about the May 2020 route being "refined―. In fact there was a huge change in the plans between 2020 and 2021 which left no opportunity for affected residents to plan ahead.

Throughout the summer of 2020 our family engaged with NH and also wrote to the MP, Neil Hudson, who supports the northern route. There were some minor adjustments which resulted in the Blue option, definitely preferable to the Black option. It was disappointing that NH did not attend a public meeting on July 23rd,2021 attended by about 70 people and the MP.

Additional supplementary consultations were held from January -March 2022:-targeting specific residents when compounds (for example) are a general issue. In February 2022 an informal discussion about the value of the Langrigg Junction was held at the consultation at Warcop Parish Hall, based on the initiative of the Chair of Warcop Parish Council. (It should be noted that our family were not invited to this consultation: we only knew about it because we were informed by Warcop Parish Council. This is an example of how secretive, targeted local consultations excluded people to whom they could be relevant.) At the next consultation (on Brough Hill Fair), I was informed there was a schedule of commitment to look at the Langrigg Junction, yet there was no further communication until late July.

National Highways also appear to have wasted taxpayers' money. Warcop Parish Hall was booked for individual consultations with landowners on April 6th but the caretaker had to call them to find out why they had not turned up. They were later charged for the wasted space. I tried to book an appointment in advance but this was only given over the phone at the last minute and the date was confusing. A visit was made to my parents' house on April 7th 2022 but it was of limited value as I could not attend.

It was only after the DCO documents were published in June/July 2022 that we learnt that an additional spur had been added immediately north of the house. My parents would not have known had their children discovered it.

A meeting was held with my parents and myself at their house with National Highways on 7th September (originally scheduled for 28th July.) This was at their request (not ours, as stated in the hearing), to revisit the points made in my complaint about lack of consultation, which were not fully addressed.

In that meeting we were told that our request that their stage of the road works was done last would be considered. Yet, the EMP states that the scheduled time for the works to start on the Appleby-Brough section is July 2024.

There also seemed to be some misunderstanding in the Issue Specific Hearing 1 when it was stated that the Langrigg Junction needed to be large so lorries can turn. The two farms marked in yellow on the map are small, and large lorries rarely, if ever, go into the lane, which is unsuitable

for this purpose.

Limits of Deviation have been set at 40 metres away from the house. There are three places where the roads could be moved further away. The first is to move the spur further away, the second is to bring the access road 40 m further away closer to the dual carriageway, and the third is to remove the Langrigg Junction. We were asked to mention this in our representations. However, as the inspector said at the Examination, there is no guarantee that these limits will be observed and/ placed as far away from the house as possible.

We were told in the Examination that NH were planning to redesign the Langrigg Junction in the new plans to be submitted in January, and the Inspector told NH to redesign the Junction. We look forward to seeing improved designs.

4. Poor justification for the scheme: The dual carriageway has been marketed to local people on the grounds of improved safety as well as improved journey times. Yet the DCO documents do not support the claim that it would enhance safety. It is very poor value for money (BCR 0.92). Nor do other sources support the frequent claim that it is the most dangerous road in Britain, or that dual carriageways will improve safety. An analysis of data from the website crashmap up to 2019 indicates that there were more accidents on the dual carriageway sections on the road that on the single carriageway.

Indeed, if the road is so dangerous, why are there not speed cameras along the route, properly monitored? When speed cameras were fitted along