

Submission ID: 13686

I hope that the Examining Authority will be able to accept my submission despite it being late. I was unwell on Monday 23rd Jan which was the day I had set aside to write my deadline 3 response and was therefore unable to get it finished by 24th January.

A66 Northern Trans-Pennine Project

Planning Inspectorate Reference:
Ref TR010062

Comments on Deadline 2 Submissions

Friends of the Lake District

Unique Reference Number 20032016



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Response to National Highways' response to Friends of the Lake District Written Reps in document REP2-017 "Deadline 2 Submission - 7.8 Applicant's Response to Written Representations made by other Interested Parties at Deadline 1 - Rev 1"

REP1-067

REP1-068

REP1-069

REP1-070

Climate Change

1. The response submitted by Andrew Boswell at Deadline 3 demonstrates that the "detailed and robust" assessment of the likely significant and cumulative effects of the A66 on climate is nothing of the sort and in fact fails to follow the guidance in the DRMB.
2. We would like to draw the ExA's attention to the 2021 Progress Report from the Committee on Climate Change which states that "This sector [transport] is now significantly off-track from the cost-effective path of the committee's fifth carbon budget assessment".
3. In 2020, Transport for Quality of Life published 'The carbon impact of the national road programme', its assessment of RIS 2. The report shows the roads programme will add 20 million tonnes of CO2 to the strategic road network in the 12 years up to 2032, whereas those emissions need to be cut by 167 million tonnes in order to meet the climate targets. It is only too clear that the RIS programme does not only not align with the declared policy of decarbonisation, but works actively against it.
4. The idea that the substantial quantity of additional carbon that will be emitted by the construction and operation of the A66 upgrade is not "significant" at a time when CO2 emissions must swiftly decline to meet the Government's net zero targets is frankly risible. The applicants are using a technicality to pretend that their scheme will have no impact on the UK reaching net zero when in fact it will be part of a significant increase in emissions in combination with the other road schemes put forward in RIS2.

5. On a local basis, the A66 alone will compromise Cumbria/Westmorland and Lonsdale Unitary Authority's ability to reach its Net Zero commitment by 2037 as set out when it declared a Climate Emergency. The local impact of the A66 on Cumbria's emissions **is** significant as we set out in our Written Representation and this should therefore be taken into account by the Examining Authority in its decision-making process.
6. The claim by the applicant that there is no regional or local carbon Government baseline is an excuse on the basis that Cumbria County Council has had a Cumbrian baseline produced. This may not be a Government baseline, but the figures are available and valid and they demonstrate that the upgrade of the A66 will have a significant effect on Cumbria/Westmorland and Lonsdale's carbon emissions and will mean that a 4% cut in carbon will have to be found elsewhere within the county to offset the increase from the construction and operation of the A66 if the County is to meet its Zero Carbon target. This is a significant quantifiable local impact and should be treated as such.

Case for the Project/BCR

7. We disagree with the Applicant on their response to our Representation that the A66 upgrade is essential for levelling up and economic growth. There is plenty of evidence to show that it won't increase economic prosperity or help levelling up. The Key finding of the Standing Advisory Committee on Trunk Road Assessment (SACTRA) in the seminal report 'Transport and the Economy', published in 1999, found (after an exhaustive review) a "*strong theoretical expectation*" that transport investment could boost economic growth, but that direct evidence was "*weak and contested*". The report concluded that, in a developed economy such as that which exists in the UK, there is no automatic connection between transport investment and economic growth. Despite the age of the study, its findings have not substantially been refuted. The Transport for Quality of Life study which we submitted as an appendix to our Written Representation (REP1-069) demonstrates this is the case.

- i. *Of 25 road schemes justified on the basis that they would benefit the local economy, only five had any evidence of any economic effects. Even for these five,*

the economic effects may have arisen from changes incidental to the road scheme, or involved development in an inappropriate location, or involved changes that were as likely to suck money out of the local area as to bring it in.

- ii. Where a road scheme was justified on the basis that it would support regeneration of an area with a struggling economy, it was common for economic development following completion of the road scheme to be slower than expected, or not to materialise at all, or to be of a type which offered little benefit to the area concerned.*
- iii. Where a road scheme was justified on the basis that it was needed to cater for current and future traffic in a 'pressure cooker' area with a buoyant economy, it was common for the scheme to be followed by much development in car-dependent locations, causing rapid traffic growth and congestion on both the road scheme and the pre-existing road network.*
- iv. Some road schemes were justified on the basis that by reducing journey times, they would increase the number of jobs that were accessible to local people, or increase the potential workforce able to access major employment sites, or create thousands of new jobs. There was no evidence of measurable economic benefit from these schemes (Transport for Quality of Life 2017).*

8. We are aware that the Applicant has not reappraised the scheme in line with the updated TAG v 1.20 appraisal standards. It should also be appraising the scheme in light of the new National Road Traffic Projections which were published by Department for Transport on 12th December. The National Road Traffic Projections have revised traffic growth forecasts downwards in line with the decarbonisation necessary to meet Net Zero and also because of lower economic and population growth. It is imperative that the Applicant reruns the modelling and appraisal of the scheme. The BCR is already very low and poor value, and it is highly likely that the reappraisals will bring the figure down even further.
9. The Benefit Cost Ratio needs to be re-evaluated during the Examination period rather than waiting until it after it has closed. A Full Business Case just being used to persuade

Ministers rather than being examined in public is very much against the spirit of the NSIP DCO process. Taxpayers should not be funding a scheme that will provide negative returns for taxpayer investment, that will increase carbon emissions at a time that they should be reduced and that damages a protected landscape and biodiversity

Lack of Photomontages

10. We fundamentally disagree with the Applicant's comments on our representation about lack of photomontages. We find it worrying that a Nationally Significant Infrastructure Project of this length and magnitude only warrants 14 photomontages along its entire length, that there are no montages of the proposed viaducts at Troutbeck, Cringle Beck and Moor Beck.

World Heritage Site Assessment

11. We disagree with the Applicants when they say that the UNESCO English Lakes World Heritage Site has been scoped out of the DCO on the basis of distance from the A66. This is disingenuous on the basis that the impact will be "off site" e.g. extra vehicles making day trip journeys into the Lake District using the A66 east of Penrith.
12. We support the Lake District National Park Authority's stance that a Heritage Impact Assessment needs to be carried out.

Lack of Engagement

13. Friends of the Lake District received a response from National Highways to our Freedom of Information request for copies of emails inviting Friends of the Lake District to environmental focus group meetings at Scotch Corner. Going through the documents, it is very obvious that emails that National Highways sent to us were not received by us as there are a number of "bounceback" email messages. The email address that they were sending the correspondence to has been redacted, but on the basis that Kate Willshaw, Friends of the Lake District's Policy Officer had been to previous focus group meetings in Darlington and had been in correspondence with Highways England staff in 2018, they already had the correct email address to contact us with and obviously failed to use it.

14. As the scheme's proposer, it should have been National Highways' responsibility to chase up the bounceback emails and ensure that they had the correct email address, or to contact Friends of the Lake District to obtain the correct email address. We are therefore correct in our assertion that we weren't included in the focus groups because National Highways were not contacting us via a valid email address. They should have made the effort to involve us as a stakeholder that had previously been enthusiastically engaged in the consultation process. We would request that National Highways make it clear in their next response that they did not contact us about the focus groups because of an error at their end. Their insistence that we failed to attend meetings is incorrect and needs to be rectified.