

From: [REDACTED]
To: [A66Duallying](#)
Subject: Response to letter from Secretary of State dated 15th September 2023
Date: 21 September 2023 22:32:39
Attachments: [REDACTED]

Dear Sir/Madam

Response to the letter from the Secretary of State dated 15th September 2023

Representation by IP 20032016

I made a number of representations raising concerns about the greenhouse emissions, the poor benefit cost ratio of the scheme and the impacts on the Lake District National Park/English Lake District World Heritage Site of the proposed road during the A66 Examination including REP1-067. I have further representations to make regarding these issues due to information submitted by National Highways and Government policy changes on climate change.

Greenhouse gas and nitrogen emissions

I am writing to draw to your attention to announcement by the Prime Minister on 20th September 2023 regarding postponing the ban on sales of ICE (internal combustion engine) vehicles by 5 years to 2035. This extends the proportion of fossil fuel vehicles in the national fleet for the period up to 2035, and also to 2050 and beyond from those vehicles bought close to the 2035 deadline. This 5 year delay to the planned ban will mean that the emissions appraisals for operation of the A66 will need to be recalculated to take into account additional numbers of new ICE vehicles on the road.

As this policy announcement will lead to a variation to the parameters for calculating carbon and other emissions from vehicles, it is imperative that National Highways undertakes a complete reappraisal of carbon emissions in Chapter 14 considering the extra greenhouse gas emissions caused by the rollback of the deadline. I request that the Secretary of State must require the applicant to reappraise both the greenhouse gas emissions calculations and those for nitrogen deposition onto the peat bogs in the North Pennine Moors Special Area of Conservation in light of the extra ICE vehicles that will be using the road over a longer period due to the push back from 2030 to 2035.

Natural England already have raised that the future predictions of impacts to the SAC from the applicant may be overly optimistic *"especially given the lack of current incentives for consumers to switch to electric vehicles"*. The policy change worsens the bias of the predictions which now need to include the new policy when recalculated.

Benefit Cost Ratio

The Benefit Cost Ratio (BCR) for the scheme found in the Combined Modelling and Appraisal Appendix will need to be recalculated to take the additional greenhouse gas emissions due to the five year extension for ICE vehicles into account. The figures in the air pollution and environment section will also need to be reappraised to take the additional pollution and damage from ICE vehicles into account. This will push the already Poor Vfm BCR (as defined by the Government's [Value for Money Indicator](#)) further below 1 making this scheme even worse value for money.

Tourism and the Lake District National Park

I request that the Secretary of State is made aware of concerns about the impact of the development on the English Lakes World Heritage Site. I note in the Applicant's response dated 7 September 2023 to Mr Dyer under the heading Tourism that National Highways continue to try and downplay the impact that the proposal will have on the Lake District National Park/World Heritage Site by only referring to Cumbria Tourism, Eden Tourism Network and the LEP's support for the project without acknowledging the Lake District National Park Authority's concerns around tourism. I would refer the Secretary of State back to the submission made by the Lake District National Park Authority who manage the English Lake District World Heritage Site (**Ref REP1-028**) which states:

"Whilst not within the Lake District National Park boundary, the impacts of this development will be felt within the national park and aspects of this proposal are contrary to the strategies and action in the statutory Management Plan"....

"The Key transformative actions [of the management plan] are all focused on promoting sustainable transport and reducing car dependency, including active travel, rail and bus improvements, integrated ticketing and traffic management.

We have clearly set out that we will reduce carbon emissions and transport within, and to, the Lake District as currently transport contributes to almost one half of our carbon budget. Carbon emitted from visitors travelling to the Lake District will clearly be increased through the A66 development, undermining our progress towards net zero.

Excessive traffic at peak times in the Lake District is already damaging the environment and the visitor experience. The modelling around the A66 shows that it will generate additional traffic. A significant proportion of that traffic will be destined for the Lake District, further increasing pressure on already overstretched infrastructure. We believe the figure quoted in the response to our representation of 350 cars per day to be underestimated **and we ask that this be factually verified**, as such a nominal increase would appear to contradict the figures that claim the project will lead to economic growth in the tourism sector.

Our desire is to encourage more overnight stays to benefit the economy and reduce carbon. We fear faster journey times from northeast England to the Lake District may only further the attractiveness of daytrips which, whilst we understand may be desirable for aspects of economic performance, are not as beneficial as overnight stay spends.

We trust the above highlights some of the issues that the Lake District National Park Authority would like you to consider in terms of the aims of the management plan and best practice within a World Heritage Site”

This clearly lays out concerns around the impact of increased vehicle numbers and day trips making it harder for the Lake District National Park Authority to manage the already difficult traffic issues within the national park. These concerns have not been adequately addressed by the applicant and support of the project by the three organisations mentioned does not negate the concerns of the National Park Authority which has to balance income from visitors with looking after a national park which is already under significant pressure from overtourism (e.g. this [article in the Telegraph](#) 19/09/2023) .

Consultation period

Seven days is not enough time for consultees to deal with this volume of information and puts undue pressure on individuals and NGOs wishing to take part in this decision-making process.

Yours faithfully,

Dr Kate Willshaw

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