

Response to Secretary of State's invitation to Interested Parties of 8th November in relation to a range of issues:

Reference number: 20032263. Dr Mary Clare Martin, on behalf of Joy and Hewlett Thompson, [REDACTED] who live near the current A66.

Dear Secretary of State,

Thank you for the opportunity to comment further on the outstanding issues relating to the proposed dualling of the A66. In your letter of 8th November, responses were requested from any Interested Parties on the following topics:

1. North Pennines Area of Special Conservation and blanket bog

The Applicant concludes there are no suitable mitigation options (27th October, Annex 5: 2.6) and rejects a reduced speed limit for some or all of the way on the grounds that this would make the Project less attractive to drivers and reduce safety. Not only were alternatives to the dual carriageway not considered, the justification for the road (reducing journey time by a small amount) and the apparent assumption that the behaviour of drivers should be prioritized over the preservation of protected and irreplaceable habitats, raises serious issues about priorities and commitment to observing UK law and international agreements.

2. According to Article 53/54 of the draft DCO, the SoS is to approve the second iteration of the EMP but not the third. This leaves members of the public in a very vulnerable position, in relation to changes in the conditions under which the dual carriageway is constructed. For anyone living near the road during construction, measures to protect the public such as designated hours of work are essential. The proposal that the

Arboriculture Assessment will not be carried out until the second iteration of the EMP raises serious issues about its effectiveness.

3. (Item 7). I understand that the invitation to participate in the consultation did not reach many IPs, who were then invited to catch up on large numbers of documents in a very limited time. This is unacceptable in excluding people from fully participating in the consultation process.

4. (Item 8) Government response to the Climate Change Committee (example being paragraph 4.3 below)

4.3. That being said, this Government is determined to get the consent of the public to ensure net zero is achieved. As the Prime Minister set out in his speech on 20 September, we will take a pragmatic, proportional and realistic approach to net zero. That means not taking forward CCC recommendations on policies that force families to make costly and burdensome changes to their lifestyles. For example, we are anti-aviation emissions, not flying, and want to deliver sustainable flying for everyone to enjoy holidays, visit friends and family overseas and to travel for business.

This represents a depressingly limited approach to the issue of persuading the public to change behaviours, in which the government should be taking the lead. Moreover, in a time of climate crisis, it is even more imperative to protect the landscape which is still beautiful and relatively unspoilt within the UK, and to ensure that it is not destroyed by unsightly road works, excessive noise, and induced traffic.

In addition, there are now new legal responsibilities to protect the landscape.

The Levelling and Regeneration Act has changed the statutory duty on all public bodies from 'have regard to National Park/AONB purposes' to 'further' those purposes. This applies to any action that may impact on designated landscapes, which includes increases in traffic/ harming special qualities views tranquillity. How would the dual carriageway, which will clearly impact on the North Pennines AONB, increase noise,

impact on the appearance of the landscape and decrease air quality further the purposes of the AONB?

In REP8-019, it was stated that furthering the purpose of the AONB would be achieved by alternative measures that avoid road building and reduce traffic, as was implied by the North Pennines AONB Partnership: “It will therefore be necessary for the developer to evidence the compelling reasons for the enhanced capacity against alternative measures, such as improved safety of junctions, reducing speed limits etc. We expect the developer to have fully explored and scoped out those alternative measures that would be less damaging, before pressing ahead with dualling – it should not be a fait accompli” (REP8-019). Despite this recommendation, these measures were dismissed at an early stage.

It is clear that there have been significant gaps in the information available to the Examining Authority and the Secretary of State. These gaps should be fully addressed and the information also made available to the public for consultation before the A66 dual carriageway can be approved.

It is deeply concerning that issues of such importance to the environment and the public at a time of climate crisis have not been fully considered, from the failure to consider alternatives at an early stage, to the lack of information on such important issues at this very late stage.

Dr Mary Clare Martin