

From: [REDACTED]
To: [A66Dualling](#)
Subject: Response to the Secretary of State's letter of 7th December
Date: 21 December 2023 23:51:42

TRO-10062

Reference number is 20032263.

Response to the Secretary of State's consultation letter dated 7th December.

Dear Secretary of State

Thank you for the letter dated 7th December. I am writing on behalf of my parents, local residents [REDACTED], to express concern about the position taken by National Highways about the North Pennines Area of Special Conservation and in particular the claim that the blanket bog in the North Pennines Moors is not a priority habitat.

1. Is a walkover survey sufficiently accurate to assess the nature of the bog? Who are the biodiversity specialists who carried out this survey in July 2023? Surely the full report should be published so the validity of this survey can be assessed in a transparent manner.
2. National Highways appear to have unilaterally decided that the area is "not a priority habitat under regulation 64(2) of the Conservation of Habitats and Species Regulations 2017 (as amended) , despite the concerns expressed by Natural England and previous consultations.

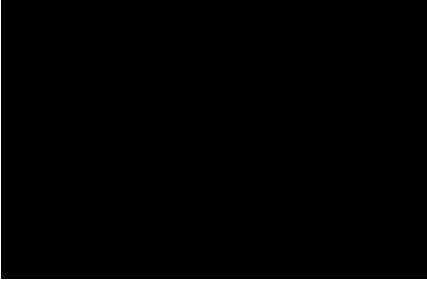
It was never suggested previously in the documentation that it is not an active bog nor actively forming new peat. [Section 3 of the Applicant's HRA Second Supplementary Note – North Pennine Moors SAC/SPA Appendix A, 25 August 2023) and Annex 5 or Annex 6.]

On the issue of IROPI, Annex 6 suggests that the road will have an overall positive human health benefits on road users and walkers, horse riders and cyclists (4.3.23 to 4.3.31). This ignores the negative human health effects of the increase in noise pollution, especially during construction, and decline in air quality (predicted in the Combined Modelling and Appraisal Appendix E Stage 3 Economic Appraisal [APP-241] from 5.7.9), for residents like my parents who are too old to drive, cycle, or to move house, as well as the destruction of the beautiful views over the surrounding countryside which they value so much. Indeed, the potential opportunities for walking will be reduced because a

dual carriageway could not be crossed on foot, as is possible on the current road, to access the AONB for walking. The report prioritises drivers over the needs of local residents, and the experiences of those who choose to drive over people who are old and vulnerable. This contravenes human rights legislation as well as what should be humanitarian concerns for senior long-established members of the community.

In any case it is debatable whether the public are likely to choose to cycle, walk or ride horses near a dual carriageway with a 70 mph speed limit. The proposed new site for Brough Hill Fair will clearly not have a beneficial health effect on the gipsy community, who have repeatedly noted their grave concerns about the health and safety implications of the proposed new site.

Dr Mary Clare Martin
on behalf of Joy and Hewlett Thompson



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