

## **Response to Secretary of State's letter of 5<sup>th</sup> January 2024 inviting responses from Interested Parties.**

Thank you for the opportunity to comment on the submissions made on 21<sup>st</sup> December. I am writing on behalf of my parents, [REDACTED]. The proposals would bring the dual carriageway and a new access road about 50 metres from their house, cause an overwhelming reduction in their quality of life, and impact their health significantly, as well as causing loss of value to their property (and subsequently impacting on their ability to pay for social care). The government's policy is to encourage old people to stay in their homes where possible, yet the scheme is a serious threat to this.

There are a number of recent developments or issues not discussed previously on which we wish to comment.

### **1. Issues round the blanket bog/North Pennines SAC**

We very much welcome the report by Natural England in the December 21st submissions that the bog is still active in forming peat. Even if some of it is degraded, it is surely even more important that the active bog be protected. While National Highways produced an IROPI in the form of Annex 6, many of its claims, for example, that the dual carriageway will benefit human health are frankly laughable where many local residents are concerned.

The justification for the road is couched in terms of those travelling through, and businesses, not local residents. Surely the Secretary of State must be aware that the average age of those living in the area is relatively high, and that as people become older, they are less likely to be able to drive. The government should be making provision for elderly residents to travel by improved public transport. Focus on cars and lorries and excluding public transport simply discriminates against the old, and is a human rights issue.

### **2. Benefit Cost Ratio**

The inflationary cost of building materials means that the projected BCR for the project is even lower than previously (0.9 rather than 0.92). In the recent Lower Thames Crossing examination the examiners considered that a projected inflation rate of 4.10% for 2022 was low, so the 3.5% rate in the Combined Modelling and Appraisal Report for the A66 is clearly inadequate. This adds to the argument that the dual carriageway is not in the public interest. Indeed, given the unacceptable levels of government debt admitted by Jeremy Hunt, it is astonishing that such schemes are being promoted. We request that the Secretary of State inquire from the Applicant how the inflation rate will affect the costs of the scheme and ensure the projections are up to date.

### **3. Levelling up and Regeneration Act 2023 (LURA)\_**

The Secretary of State now has increased duties *to further* the interests of National Parks and AONBs. The dual carriageway is projected to make incursions into many parts of the AONB, and no attempts were made to offer options which did not feature a dual carriageway. This was despite the fact that

the North Pennines AONB Partnership sought such measures: ‘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). Yet such options were not seriously considered, and never offered to local people and might have avoided many injuries and fatalities.

Moreover, the statutory management plans for both the North Pennines AONB and the Lake District National Park require measures that would reduce existing harm to the designated landscapes and would avoid imposing any new harms. Yet the aims of the Transpennine Dualling project specifically mention increasing access to the Lake District National Park. It is essential that the SoS honours his statutory duty in this regard.

### **4. Induced traffic and carbon emissions**

Paragraph 5.3.20 of the Combined Modelling and Appraisal Report includes a list of new residential and employment sites , (c2615m c2618m c2457, c 630) in the core area. Yet the carbon emissions and additional traffic from these parks have not yet been factored into the overall environmental cost, for example from greenhouse gas emissions.

## **5. Brough Hill Fair,**

We welcome the response of Westmorland and Furness Council to the invitation to take responsibility for the new proposed site for Brough Hill Fair. Their response demonstrates how unworkable the current proposals are, and the likelihood of future problems. The issue of moving the site has clearly been a significant one from the beginning of the process, and the Applicant must take responsibility for this.

Finally, we would expect the Secretary of State to delay any decision until after Dr Andrew Boswell's A47 appeal and the cases regarding the A38 in Derby.

Dr Mary Clare Martin

On behalf of the Thompsons



19<sup>th</sup> January 2023