

## Evans, Rebecca

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**From:** Tim Nicholson <[REDACTED]>  
**Sent:** 15 February 2024 00:34  
**To:** A66Dualling  
**Subject:** Response to the letter dated 2nd February 2024

Dear Secretary of State,

TR010062: A66 North Pennine Project  
Registration identification number - 20032248

I am writing to comment on the responses given to your letter of 31st January 2024.

Campaign for National Parks have clearly demonstrated that there are legal grounds for you not to make a decision on the DCO prior to National Highways clearly demonstrating that they have addressed the requirement to “seek to further” the statutory purposes of the North Pennines National Landscape (AONB) and the Lake District National Park.

National Highways have ignored the concerns of the Lake District National Park that this project will increase vehicular traffic into the National Park rather than seeking to develop and encourage visitors to arrive by public transport. National Highways don't seem to think that they need to address these concerns, however I think that you do when making a decision. What alternatives to road expansion were considered in the early development stages of this project? I recall the “need” for dualling was a “given” presumably so that it wouldn't be scrutinised to rush this project through under “Project Speed”, but shouldn't this be scrutinised in the light of other Government targets?

Have road and junction improvements, traffic management and reduction measures been given due consideration? This project seeks to encourage yet more traffic on this route and increasing capacity clearly won't work to reduce vehicle numbers in the Lake District National Park (LDNP). Richard Leaf (LDNP Chief Executive) has said they already can't cope with the current number of cars that come into the park. This project is clearly not a sustainable solution to visitor management in the National Park. Why has this concern not been given due consideration?

There is also the issue of the proposed dualling serving to speed up the traffic between the M6 and A1 and cause increased backing up issues at both ends. National Highways have only sought to address this by improving the roundabouts at both ends, not actually managing traffic flows along the route and towards these roundabouts. It's clear to the lay person that this approach will fail, especially as volumes of traffic using the road are forecast to increase towards 2060.

Why aren't there plans to reduce volumes, take heavy goods off the road and onto more sustainable transport such as rail? This project doesn't seem to fit with Government targets to reduce CO2e emissions, particulates, Nitrate pollution of vulnerable moorland habitats, light pollution etc in the construction and operational stage. How can this be? Surely you need to see projects that link Government policies, not ignore them. At what point will Government infrastructure projects take the lead to reduce national/global CO2e emissions? Not acting now will only make meeting targets harder and harder as each month/year passes.

It is disingenuous for National Highways to state that their tidying up of MOD signage and the scruffy appearance of the verges meets the requirement to conserve and enhance the natural beauty of the area of outstanding natural beauty. How can a road project that will increase traffic flows through the AONB seriously claim to achieve these requirements? I think it shows a lack of understanding of the impact that traffic noise and light pollution have on this AONB. Taking this seriously would mean planning to reduce traffic volumes and noise/light from traffic towards 2060.

Furthermore I write in full support of The Woodland Trust's demands that a full Arboricultural Impact Assessment (AIA) must be done prior to the DCO decision. How can you make an assessment of the true impact on the trees both within the DCO boundary and beyond the DCO boundary without this AIA being completed? This approach has been taken with Historic England, where their demands for archaeological survey has required thousands of trenches to be dug along the route prior to the next deadline, working in atrocious ground conditions all through this winter, and yet you haven't yet insisted on a non-invasive AIA. It's incredulous that National Highways seek to ignore the very reasonable demands of the UK's largest charity for trees and woodland, but will wreak destruction with excavators to meet the demands of Historic England.

I also note that the Office for Road and Rail are currently investigating the performance of National Highways. With so much public money at stake in this project you should wait to see the outcome of this report prior to making a decision on this DCO. Are National Highways delivering projects which meet all the Government targets or just working in a road building silo?

Yours sincerely,

Tim Nicholson

Partner RK&GF Nicholson  
Director Cactus Tree Guards LTD