Response to:

A66 Northern Trans Pennine consultation

Introduction

Transport Action Network (TAN) would like to **OBJECT** to the consultation for the A66 Northern Trans Pennine and to the schemes themselves.

Inadequate and confusing consultation

This consultation is being progressed as a statutory consultation yet is called a 'Preliminary design consultation' in almost all of the documentation titles. This should be the consultation on the final route option that will be taken forward as a Development Consent Order (DCO) application.


A66NTP Preliminary Design Consultation Sept 2021 Brochure
26.9 MB (PDF document)

A66NTP Preliminary Design Consultation Sept 2021 Feedback Form
1.1 MB (PDF document)

A66NTP Preliminary Design Consultation Sept 2021 Banners
3.6 MB (PDF document)

A66NTP Preliminary Design Consultation Sept 2021 Local Traffic Report
19.0 MB (PDF document)

A66NTP Preliminary Design Consultation Sept 2021 Map book - GA Drawings
28.5 MB (PDF document)

A66NTP Preliminary Design Consultation Sept 2021 PEIR Non-Technical Summary
8.2 MB (PDF document)

A66NTP Preliminary Design Consultation Sept 2021 Project Design Report
23.2 MB (PDF document)

A66NTP Preliminary Design Consultation Sept 2021 Section 47 Notice
132.4 KB (PDF document)

A66NTP Preliminary Design Consultation Sept 2021 Section 48 Notice
139.5 KB (PDF document)

A66NTP Preliminary Design Consultation Sept 2021 Statement of Community Consultation
2.0 MB (PDF document)

However, because of the changes made on a number of sections along the route since the preferred route announcement in May 2020, upon which there has been no consultation, and the addition of two new schemes this statutory consultation is premature. There should have been a consultation on the options leading to National Highways revised preferred

routes and that this consultation really should be considered as another options consultation and not a statutory one. This is further reinforced by the paragraph 5.4 in the Statement of Community Consultation which states:

5.4 The consultation will run for six weeks from 24 September until 6 November2021. During the consultation period, in addition to the project generally, we will be consulting on the following particular elements of the project:
• Route alignment and preliminary design, ***including route alignment alternatives*** *considered within specific areas*
• Junction layouts, ***including junction location alternatives*** *considered within specific areas*
• Construction compounds and other land potentially required for construction
• Proposed DCO boundary (the area of land needed to carry out the project)
• Proposals for walking, cycling and horse riding including the diversion of routes
• Environmental assessments and potential environmental impacts
• Environmental mitigation measures and associated land requirements
• Arrangements to mitigate the impact on any communities, farms or businesses [our emphasis]

It is clear from the above that National Highways is meant to be consulting on all the different options contained within the project. However, from the consultation documentation itself it isn't clear that it is inviting comments on these options, as the route selection is presented as a fait accompli. Therefore there is the potential for the public to be misled as to what they can and cannot comment on which could prejudice the outcome of the consultation and another reason why it should be extended or another round of consultation held.

Further confusion is added by different preferred routes being stated in different documents. For example, in the Consultation Brochure on page 58 it states that the preferred route for Appleby to Brough is route 2 (Black - Blue - Black) yet in the PEIR non-technical summary on page 8 it says the Black - Black - Black option is the preferred route.

The number of schemes, let alone the inclusion of multiple options makes this a hugely complex and confusing consultation. The names and colours given to the various options are different to the previous names given to previously consulted on routes, adding extra layers to the confusion.

The Non-Technical Summary (NTS) for the scheme, which should be a simplified version of the PEIR for an ordinary layperson to be able to understand and easily grasp the environmental impacts of a scheme, extends to 89 pages. The NTS is full of highly technical assessments using specialist language. Long and complex tables using technical jargon have been copied over from the PEIR, giving detailed technical information about all fifteen options. There does not appear to have been much attempt made to simplify and condense the environmental impact assessment so that the impacts are obvious and clear to the layperson.

Six weeks is not long enough to consult properly on a single road scheme let alone a complicated project involving eight different sections spread over a very long distance. Combine this with the high volume of extremely confusing information in the consultation documents and most people would struggle to engage in any meaningful way. It is worth pointing out that the forthcoming statutory consultation for the A27 Arundel Bypass will be eight weeks long, further highlighting how inadequate the timing for this consultation is. For such a highly complex project as the A66, effectively eight schemes in one, the

consultation should be at least 12 weeks long, along with much clearer information for the layperson.

The Statement of Community Consultation states at 5.4 that the draft Development Consent Order (DCO) boundaries will be consulted on. We could not see a map clearly outlining the draft DCO boundary in the consultation documents. This would not be possible in any case as National Highways doesn't appear to have finished the route selection process and is still consulting on multiple options as evidenced by this Preliminary Design Consultation. This is a failing of this consultation and demonstrates it has been rushed.

Inclusion of a scheme in the Government's Project Speed initiative should not mean that National Highways should take shortcuts with the statutory consultation process and proper public engagement.

We do not believe this so-called statutory consultation has been adequate, and therefore National Highways should not proceed to DCO application. We believe NH should review feedback on this consultation and then reconsult on their final preferred routes before they consider whether to submit a DCO application to the Planning Inspectorate.

Climate emergency

The extra traffic from the eight schemes would increase carbon emissions by up to 3 million tonnes over the lifetime of the scheme (Table 7-2 in the GHG Emissions Assessment Appendix)

The emissions resulting from the construction of the eight schemes would cause up to 1.4 million extra tonnes of carbon. These extra emissions would occur in the critical fourth carbon budget period when we need to achieve 68% reductions in UK carbon emissions by 2030 under our legally binding commitments under the Paris Agreement (Table 7-1 in the GHG Emissions Assessment Appendix)

In total the scheme would lead to an increase of up to 4.4 million extra tonnes of carbon from extra traffic and the construction process. According to the available data from National Highways, this would make the A66 Northern Trans Pennine the third largest emitting scheme in the RIS2 roads programme.

Such huge increases in carbon emissions are completely unacceptable whilst we are in a climate emergency, and take us further away from reaching our already very difficult to achieve 68% cut by 2030 required under the Paris Agreement. It is not acceptable for National Highways to conclude that these large increases in carbon (that would not occur if these eight projects were not being built) are "insignificant" and should be dismissed. It is also not acceptable, fair or rational to compare these increases to the entire carbon output of the UK, across all sectors. No project (road or otherwise) would be able to, on its own, undermine the Government's attempts to meet its legal commitments to reduce carbon emissions. This is a meaningless comparison.

A more meaningful comparison would be to compare the carbon increases resulting from these eight projects to the local and regional carbon budgets for transport for this area, as required under the EIA Regulations.

Ecological and landscape impact

All of the options presented have a huge environmental impact, and this is one of the most destructive schemes in the RIS2 programme, damaging internationally, nationally, regionally and locally important habitats and species, and nationally important landscapes.

Direct impacts

The eight schemes would directly impact on:

- River Eden and Tributaries Special Area of Conservation (SAC)
- River Eden and Tributaries Site of Special Scientific Interest (SSSI)
- North Pennines Area of Outstanding Natural Beauty (AONB)

There are strong presumptions against building in AONBs, SSSIs, and SACs in the National Planning Policy Framework (NPPF) and the National Policy Statement for National Networks (NNNPS) unless there are “exceptional circumstances” or it is in the “public interest”. We do not believe these conditions have been met and the impacts are unjustified. The eight schemes would industrialise beautiful and protected landscapes, permanently changing their characteristics with a high speed dual carriageway driven through them.

The eight schemes would also impact on the habitats of internationally and nationally important species such as red squirrels, otters, bats, water voles, polecat, brown hare, hedgehog and roe deer.

The eight schemes would also impact on a large number of internationally important bird species including lapwing, curlew, oystercatcher, snipe, redshank, pinkfooted goose, whooper swan, woodcock, redwing, fieldfare, black redstart, kingfisher, golden plover, and barn owl.

The eight schemes would also directly impact on ancient woodland at Chapel Wood, and many veteran trees and hedgerows supporting a diversity of species.

Indirect impacts

Significant indirect impacts include:

- Pennine Moors Special Area of Conservation (SAC)
- Pennine Moors Special Protection Area (SPA)

The proposed route options pass close to the Pennine Moors SAC and SPA which have the highest level of habitat protection. The indirect impacts will be significant to these internationally important habitats and the species they support.

The scheme would also indirectly impact on another 22 ancient woodlands and three SSSIs within 200m of the Affected Road Network.

Lack of important information in the PEIR

Despite the enormous amount of content in the PEIR much of it states that field studies and surveys have not been undertaken and that further work will be undertaken for the Environmental Statement (ES) in the DCO application. This is unacceptable, and it is not possible to respond adequately to the incomplete information presented in the PEIR.

Noise and air pollution

The eight schemes would significantly increase noise and air pollution in protected landscapes and habitats. This will have a significant adverse impact on species and the tranquility of valuable protected landscapes. Table 12-14 of the Noise Chapter of the PEIR shows that almost double the amount of people would be significantly adversely impacted by increased noise than would benefit.

Table 12-14: Summary of route wide significant effects

Scheme	Residential Significant Effects		Non-Residential Significant Effects	
	Adverse	Beneficial	Adverse	Beneficial
Route wide	979	530	37	79

The air pollution resulting from the eight schemes would significantly impact on very rare and protected habitats and species. This is completely unacceptable as our wildlife is under threat and the importance of this threat is well known and understood.

Heritage

The eight schemes would impact on heritage assets including Brough Castle, Eden Valley Railway and Rokeby Park a Grade II* Registered Park & Garden.

Severance

The eight schemes would all increase severance for people walking and cycling, sending them on long detours or complicated and awkward crossings

Alternative options

National Highways have not adequately assessed non-roadbuilding alternatives that would reduce traffic on the existing roads, and meet our national and international legal requirements to reduce our carbon emissions. National Highways have only examined road building options that increase and speed up traffic - increasing carbon emissions and other harmful impacts. Rather than focusing on options that would only serve to drive more HGV traffic through the Lake District National Park, the North Pennines AONB, and the Yorkshire Dales National Park, National Highways and the Department for Transport should be examining options that would reduce traffic, especially HGV traffic.

One option that would be significantly cheaper (and would have other benefits such as reducing carbon, noise, congestion and air pollution) is to invest in **rail freight** alternatives such as on the north trans Pennine rail route, and the railway line between Newcastle and Carlisle. Also increased capacity for rail freight on the East Coast and West Coast main lines would also help with freight movements to Scotland. Both of these routes have constraints on them that ultimately need investment to resolve. The +£1 billion earmarked for these road schemes would be better invested on cheaper and more sustainable rail capacity improvements.

To improve safety on the A66 in the short term, National Highways should be examining **reducing speed limits**, which would have other benefits such as reduced noise, air pollution and carbon emissions.

6 November 2021

Chris Todd
Director
Transport Action Network

Transport Action Network provides free support to people and groups pressing for more sustainable transport in their area and opposing cuts to bus services, damaging road schemes and large unsustainable developments

254 Upper Shoreham Road, Shoreham-by-Sea, West Sussex, BN43 6BF

Not-for-profit company limited by guarantee, registered in England and Wales: 12100114