



Sent by email only to: A66Dualling@planninginspectorate.gov.uk

4th July, 2022

Dear Planning Inspectorate

Inadequate consultation on the A66 Northern Trans-Pennine scheme

Our solicitors, Richard Buxtons, have copied you into correspondence on our behalf to National Highways regarding the inadequate and potentially unlawful consultation attempts by National Highways on the A66 Northern Trans-Pennine scheme. We attach the three letters dated 7 April 2022, 13 May 2022, and 20 June 2022. The letter dated 20 June 2022 has not received a substantive reply as National Highways are now treating it as a Freedom of Information Act request.

We understand the Development Consent Order (DCO) application for the scheme has now been submitted to the Planning Inspectorate (PINS) who have until 19 July to make a decision whether to accept the DCO application or not. We also understand that paragraph 88 of the [pre-application guidance](#) allows interested parties to make representation to PINS if they remain unsatisfied after making complaints to the applicant.

We have serious concerns about the adequacy and lawfulness of both the statutory and supplementary consultations undertaken by National Highways on the A66 Northern Trans-Pennine scheme, as outlined in the three attached letters from Richard Buxtons, and our attached response to the statutory consultation (over half our response is related to the shortfalls of the statutory consultation). We are also alarmed at the unusual and secretive approach National Highways has taken with its numerous supplementary consultations that have taken place since the statutory consultation in Autumn 2021.

These supplementary consultations included significant changes to the proposed scheme with considerable environmental impacts in nationally and internationally important landscapes and habitats, yet none of the six supplementary consultations were advertised on the scheme website, nor on the dedicated A66 social media channels operated by National Highways. Therefore, no

links were provided to the consultation websites and documents in public, online places, so most people (other than those in the immediate vicinity and who saw the flier posted through their door) would have been aware that the consultations were taking place let alone had access to the consultation documents and maps.

We monitor and participate in many National Highways' consultations and would like to stress that the secretive and discriminatory approach taken by National Highways with the A66 is extremely unusual. We have never seen this behaviour before by National Highways, or indeed by any other developers, and we are extremely alarmed by it. It has seriously undermined participation in the planning process and hence the democratic accountability.


For example, in contrast to there being no posts on the dedicated [A66 Twitter](#) or [Facebook](#) page about the six supplementary consultations with the A66, during the recent 5-week "local refinement" supplementary consultation for the Lower Thames Crossing (LTC) scheme here were 67 tweets on the dedicated [LTC National Highways Twitter](#) account, and 66 [Facebook](#) posts, all with links to the consultation websites/documents. Similarly, the recent 4-week supplementary consultation on the A358 Taunton to Southfields scheme resulted in 17 tweets on the [National Highways SW Twitter](#) account, and 17 posts on the [National Highways SW Facebook](#) page, with hashtags and links to the consultation websites / documents. This ensured that as many people as possible heard about these consultations and could participate in them. With both the LTC and A358 supplementary consultations, Statements of Community Consultations (SoCCs) were also produced, to ensure the expertise and participation of local authorities was engaged. In contrast, no SoCCs have been produced for the six A66 supplementary consultations.

We also note that National Highways' "Summary of the autumn 2021 statutory consultation", published in March 2022, did not include the concerns that ourselves and others raised about the low standard of the consultation materials and the adequacy of the consultation. We have not seen the Consultation Report submitted as part of the DCO application, so cannot comment on its accuracy.

We trust that you will take these concerns on board when considering the adequacy of the consultation of this scheme. We hope that these new, secretive and wholly unacceptable consultation methods adopted by National Highways will not be endorsed by the Planning Inspectorate, and that this DCO application will not be accepted for examination.

Yours faithfully

Rebecca Lush
Roads and Climate Campaigner
Transport Action Network


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