

## **Post Hearing Submissions on the A66 Northern Trans-Pennine Project**

### **Submitted on Behalf of Mr Manners**

**14<sup>th</sup> March 2023**

#### **1. Introduction**

- 1.1 We are instructed to submissions on behalf of [REDACTED]  
[REDACTED].
- 1.2 We have previously submitted on behalf of Mr Manners written submissions for deadlines 1,2 and 3. We do not propose to repeat those representations, but would stress that the issues raised remain unresolved.

#### **2. Post Hearing Submissions**

- 2.1 Further to the Compulsory Acquisition 2 (CAH2), and Issue Specific Hearing 3 (ISH3) held on the 1<sup>st</sup> and 2<sup>nd</sup> March 2023, please find below a post hearing submission on points raised and/or queries arising from the hearings.
- 2.2 General Commentary
- 2.2.1 We have raised through this process substantial concerns as to the lack of detail provided by the Applicant and/or certainty on their part as to the intended design, acquisition areas, future land management, and also the lack of any meaningful attempt to negotiate terms with Landowners & Occupiers.

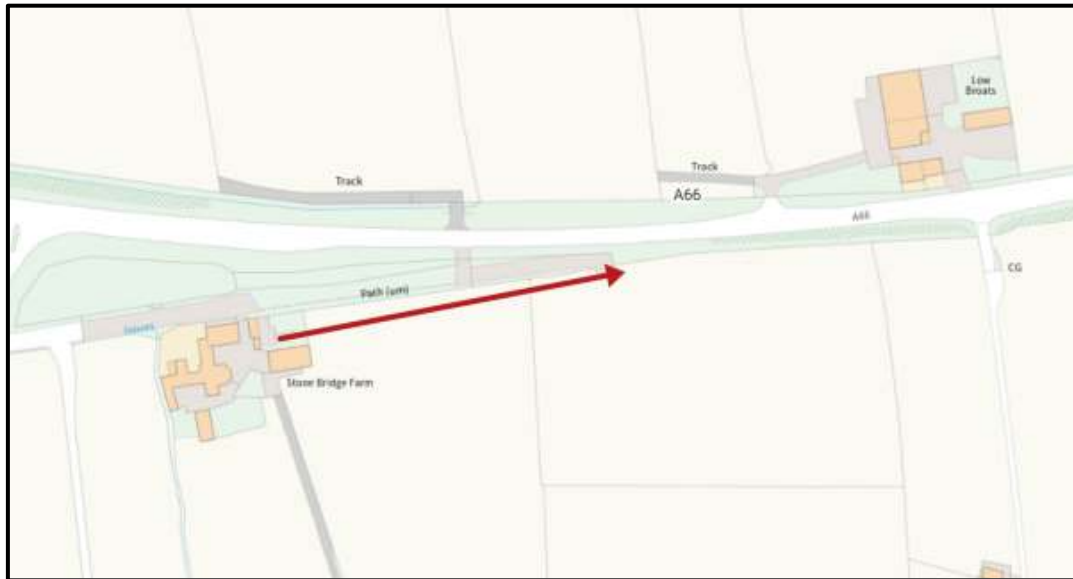
2.2.2 We note that similar concerns have been raised not only by other Agents but also organisations such as the NFU, Statutory Bodies, and Local Authorities.

2.2.3 The ExA's frustration at the Applicant's lack of progress in reaching agreement with Statutory Bodies was also noted during the hearings, and this must also in part be explained by the paucity of information provided by the Applicant.

2.2.4 We would respectfully ask the ExA to consider at what point these repeated failures on the part of the Applicant (to the continuing detriment of our Clients) compromise the Application to a degree that the timetable should be revisited, or indeed the application withdrawn.

### 2.3 Request for Visualisation

2.3.1 Further to the discussions in regard to photomontages or other visualisations, given the size of the proposed structure and impact on Mr Manners and his business, we would ask the Applicant to provide an image showing the proposed bridge to the east of Stone Bridge Farm when viewed from Mr Manners' property as per the plan below:



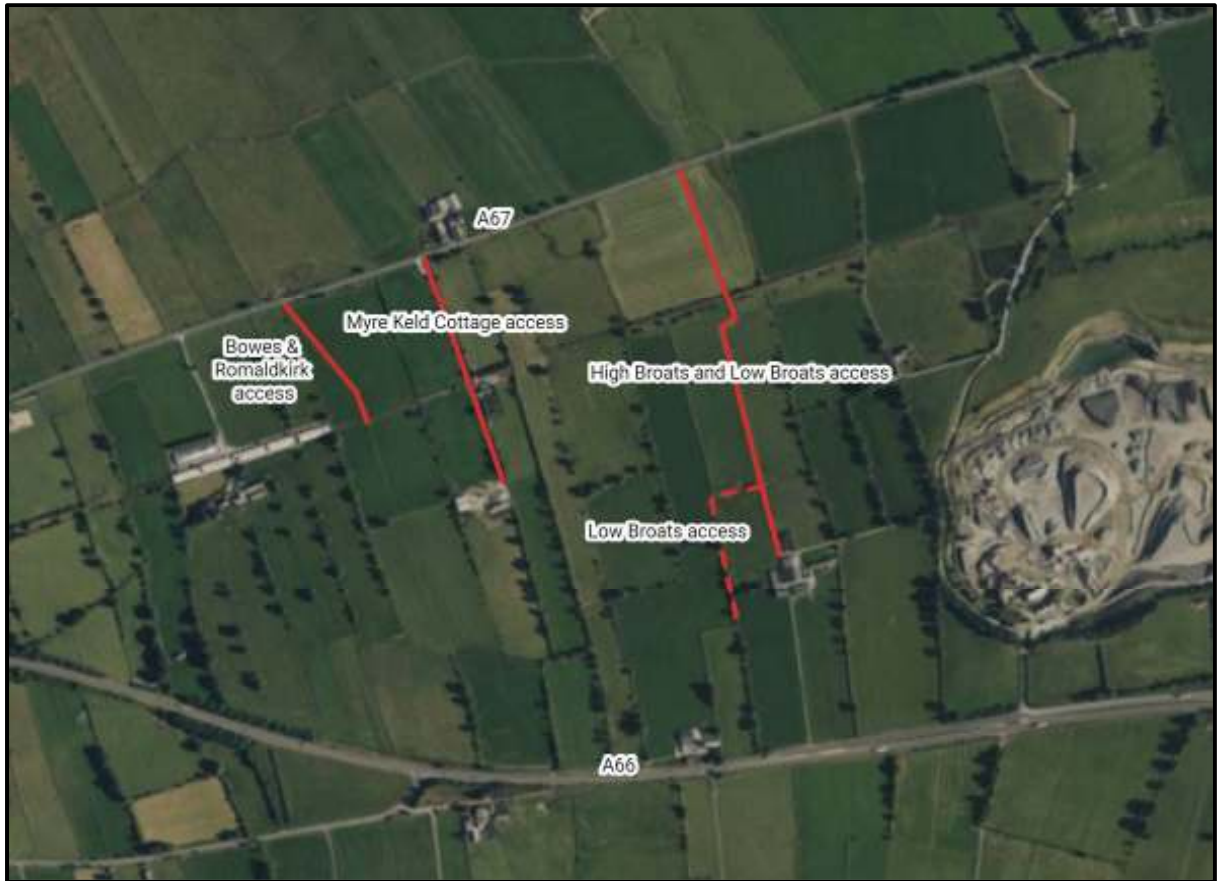
2.3.2 This will assist all parties in understanding the impact on Mr Manners, and also the holiday business conducted at Stonebridge Farm.

#### 2.4 Reasonable Need for Bridge to the East of Stonebridge Farm

2.4.1 Further to our previous representations to the effect that the bridge over the A66 is extraneous we include below a plan showing in red the accesses that the relevant properties enjoy to the north to the A67 which already exist and (even if upgraded to a degree) can provide safe and efficient access to the properties without the need for the bridge therefore at minimal cost to the public purse<sup>1</sup>.

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<sup>1</sup> A4 copy attached as Appendix 1



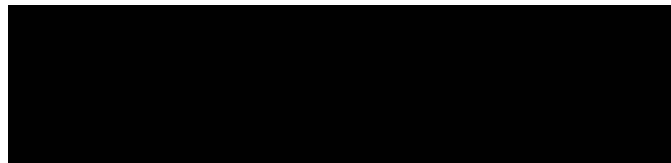
## 2.5 Book of Reference

2.5.1 Following the hearing we have identified a number of errors in respect of the Book of Reference.

2.5.2 The following plots should be identified as falling within the freehold ownership of Mr Manners, but are currently attributed to other parties:  
07-03-05, 07-03-44, 07-03-13, 07-03-04 and 07-03-06.

### **3. Conclusion**

- 3.1 In conclusion, following CAH2 and ISH3 the lack of detail provided by the Applicant remains of concern, and is clearly impacting the scheme on a wide basis. There also remains a lack of substantive efforts to negotiate on the part of the Applicant.
- 3.2 We identify errors in respect of the Book of Reference requiring correction; and
- 3.3 We also respectfully suggest that the proposed bridge over the A66 to the east of Stonebridge Farm is unnecessary.



14<sup>th</sup> March 2023

# Appendix 1

## Existing Accesses to the A67 for Properties north of Stonebridge Farm

