

Post Hearing Submissions on the A66 Northern Trans-Pennine Project

Submitted on Behalf of Mr Moss

14th March 2023

1. Introduction

- 1.1 We are instructed to submit these representations on behalf of Mr Moss of [REDACTED], 'Messrs Moss'.
- 1.2 We have previously submitted on behalf of Mr Moss 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 1st and 2nd 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our Clients) compromise the Application to a degree that the timetable should be revisited, or indeed the application withdrawn.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 Farm Impact Assessment

2.3.1 Mr Moss stand to be heavily impacted by the scheme, and as designed would lose around 38% of his tenancy area.

2.3.2 The 'Agricultural land holding baseline summary'¹ prepared by the Applicant identifies the sensitivity of the holding as '*high*'; but this only relates to access requirements for retained land. We are not aware that the Applicant has carried out any substantive review of the impact where substantial areas of land are being acquired from farm

¹ TR010062

businesses including where the likely outcome is that the holding ceases to be profitable.

2.3.3 We respectfully submit that this impact must be fully considered and accounted for as part of this process.

2.3.4 In addition to weighing up the costs and benefits of the scheme as a whole, the Applicant cannot with any certainty predict the costs of the scheme without understanding how it will affect farm businesses along the route.

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 also suggest that the Applicant must carry out impact assessments on the Farming Businesses which will be heavily impacted by the scheme in order to fully understand the implications and associated costs.



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