

Post Hearing Submissions on the A66 Northern Trans-Pennine Project

Submitted on Behalf of Mr Richardson

14th March 2023

1. Introduction

- 1.1 We are instructed to submissions on behalf of Mr Richardson of [REDACTED]
[REDACTED].
- 1.2 We have previously submitted on behalf of Mr Richardson 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our Clients) compromise the Application to a degree that the timetable should be revisited, or indeed the application withdrawn.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 Book of Reference

2.3.1 With regard to the Book of Reference, and specifically plot 09-02-05, this land is shown as having an unknown freehold owner. We confirm that Mr Richardson is the freehold owner of this plot.

2.3.2 Mr Richardson is also the owner of an area of the old A66 (i.e. the route prior to the current road) which is used for storing muck all year round. Comprising part 09-01-07, and part 09-02-03, these areas should also be recorded within the Book of Reference as being within Mr Richardson's ownership.

2.4 Accesses

2.4.1 The question of whether new farm accesses would constitute a PMA with public rights over it, or a public right of way with additional private rights was raised by the Examining Authority.

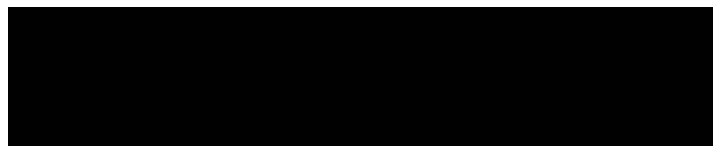
2.4.2 We also ask for clarification on this point; this is however without prejudice to our position that the dual use of routes for farm traffic and public rights of way is unsafe.

2.4.3 We also request from the Applicant confirmation that Mr Richardson will not be responsible for any maintenance or management of the proposed underpass to the south of plot 09-02-06.

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 also provide corrections in respect of the land referencing, and ask for clarification in respect of access routes.



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