



## **A66 Northern Trans-Pennine Project Examination**

**Deadline 6 Submission, 4 April 2023 on behalf of the Brough Hill  
Fair Community Association**

**Responding to the Examination Authority's Question GM 2.1  
relating to:**

**The Draft Statement of Common Ground between National  
Highways and the Gypsy and Traveller Representatives (Revision 3)**

1. In recent weeks we have been working on behalf of the Brough Hill Fair Community Association in regard to their input to the A66 Trans-Pennine Project on behalf of the Gypsy and Traveller community.
2. We have been getting up to speed with the substantial documentation in front of the examination. We have substantial concerns about the 'Statement of Common Ground with the Gypsy and Travellers Representatives' Rev 3, TR010062.
3. In our view and that of our clients, the document provided by National Highways is not so much a Statement of Common Ground as National Highway's summary of the discussions between the parties from National Highway's point of view.
4. While the Statement of Common Ground records substantial consultation with the representatives of the Gypsy and Traveller community, that consultation has been based on National Highway's preferred approach of building the road through the current Fair site and relocating the Fair onto the Bivvy site and the remaining sliver of the Fair site, which is wholly unacceptable to the Gypsy and Traveller community.
5. National Highways has substantially failed to understand and take account of the major cultural importance of the Fair. As a consequence, at a number of points the Statement of Common Ground misunderstands or misrepresents the Brough Hill Fair Community Association's position on behalf of the Gypsy and Traveller community.
6. We have recently begun a dialogue with National Highways with the objective of submitting a jointly agreed Statement of Principal Areas of Disagreement by Deadline 7 (9 May) and a jointly agreed Statement of Common Ground, which accurately reflects the positions of both parties by Deadline 8 (16 May).