

To Secretary of State  
IP no – 20032255

Response to further documents filed I apologise that I have not made the deadline for responses. Within previous objections we have hi-lighted that [REDACTED] practices regenerative farming methods and consequently hosts a conference focused on reducing the impact of farming in the agriculture sector. Our annual conference took place over the weekend, and it was hit by heavy flooding. Delegates were impacted when leaving. Animals had to be moved. That this now happens in September is unheard of. The ongoing drive to prioritise large infrastructure, which decimate any chance of delivering on our Carbon budget, makes a mockery of the effort's individuals like us and the people who attended this weekend are making to try and deliver those targets. Why is there an expectation on the individual to change when the Government seems incapable of doing anything other than seeking to wiggle out of its own targets. Since the examination closed, we have had yet more evidence and research from a number of sources identified in my earlier letter (published on the PINS site) about how Government is failing to meet its own targets. Transport is identified as the sector failing on all targets and impacting most on the UK's ability to meet carbon budgets. The reliance placed by Government on future greener energy solutions was undermined by last week's announcement that no bids had been received to build offshore wind farms. This announcement widens the gap further. The reason given - the government was not prepared to guarantee a high enough price for green energy. The failure to prioritise action needed to secure green energy significantly undermines any Carbon emission assessment relating to the A66. The Transport Select Committee (TSC) recently stated that the plan for decarbonisation of the transport sector required a rapid shift to Zero emission vehicles. That shift is reliant on the availability of energy from green sources and it is clear that this will not come online within the timescale government has predicted. The A66 carbon impact assessment should be redone to reflect this development and the fact that EVs will not be using green energy as quickly as predicted. The A66 impact assessment constantly focuses on what will happen the scheme does not happen. The concern is a negative impact on growth. There is no equivalent assessment on what will happen if the scheme goes ahead and the carbon impact of one of the largest infrastructure projects in the country. The evidence was before us this summer. Where in the BCR assessment is the negative impact of an increase in extreme weather events, pollution, impact on crop growth and loss to business caused by climate change. When you are moving cattle due to flash flooding in September you know the impact. When you are having to change your farming practices to adjust to climate impact you know the impact. Why does the business case for the scheme not factor those elements into its assessment? Both the Climate Change Committee and the TSC have emphasised that the Transport sector is causing the UK to lag behind in its Carbon Budget Delivery plan. The A66 is one of the biggest contributors. Rather than being a scheme which meets the CCC/TSC recommendation that only transport solutions which reduce traffic should be considered, the entire business model of the A66 is predicated on facilitating increased traffic. It is a scheme conceived pre-Net Zero. It shows us in real time how the Government devotes its energy to ignoring its own legislation and targets whilst people on the ground scabble around trying to deal with torrential downpours on a Sunday afternoon in September. The Secretary of State should pause and consider how the A66 would provide for a future with less traffic. In its current form it does not. Consent should not be given until there can be confidence the A66 will not build in traffic growth. If that does not happen the conclusion would have to be that the Secretary of State considers the recommendations of the CCC and the TSC as something it can ignore notwithstanding the recent NET ZERO JUDGEMENT which made clear what these must be given Material/Considerable weight. I would like this letter to be provided to the Secretary of State or a deputy minister.

**Benefit Cost Ratio.**

Interested Parties are asked to respond on issues but cannot do so without information. This is particularly evident of the subject of costs. Are the predicted cost now 1.3 billion as indicated by the October 2022 Accounting Officers statement or 1.49 billion as indicated in a 2022 Funding Statement. On which figure was the BCR calculated. If the lower figure, then why? Why does business sensitivity take priority over the need to provide the taxpayer with clear information? NH have held consultation meeting without this information being available to the public. They have accepted there are a number of different schemes by the fact they consulted in different venues and presented different information relevant to the particular scheme. Missing from the information was an assessment of cost and the BCR for each section. Conclusion The Secretary of State needs to conduct an analysis of how the A66 meets the recommendations of the TSC and the CCC which must be given material /considerable weight and identify how the A66 meets those recommendations. The Secretary of State must insist of the release of BCR for each section. The Secretary of State must insist of the BCR being redone before the scheme is consented. The re analysis should not adjust for increased traffic being a positive and should adopt the higher figure. No infrastructure scheme has been delivered on budget. The A66 is already identified as poor value for the taxpayer. The scheme does not meet the requirement of the Planning Act that there must be a compelling case that the scheme is in the public interest to justify the Compulsory Purchase of private land. The A66 Scheme does not meet that test.

## **Safety**

There are regularly articles in the local press and the construction press referring to the A66 as the most dangerous road in Britain. When I lived in Gloucestershire the A417 was similarly referred to. In fact, every local area in the country has a road believed to be the “most dangerous. This is being used to whip up fear and generate local support. It is a fiction first started by the former MP David McClean in his support for an upgrade to the A66, but it persists without any evidence to support it.

Analysis by Euro RapP rates the A66 amongst other strategic roads as typically Low to medium risk and that is its consistent rating over the year. It lists high risk strategies and rural roads. The A66 does not feature. It lists high risk rural roads. The A66 does not feature. It lists roads where investment would produce the most safety benefit. The A66 does not feature.

The risk with generating falsehoods and manipulating peoples genuine fear about safety to justify a business case, is that roads which have much higher safety concerns are not prioritised and a vanity project such as the A66, which produces low travel deduction times, little safety improvement ( the Combined Appraisal Documents confirms there is a small reduction to fatalities but more significant accidents due to increased speed after 1.59 investment) is that investment is not targeted. Local MPs may get to trumpet about the investment they have supported whilst safety improvement that would produce a real reduction in risk are ignored.

Signed – Tim and Emma Nicholson