

Unique Reference: 20031900

A66 19th January 2024 deadline comments

I have serious concern that the Benefit Cost Ratio of this project is so bad. It cannot and should not be considered as being in the public interest and good to proceed with a project that has such a poor BCR.

The rate of inflation used for assessments, 3.5%, is ridiculously outdated and unrealistic. The costing of the project is outdated and should be reviewed and updated prior to any decision being made.

It is not good enough, when Government are proposing spending such large amounts of public money on projects like the A66, for adequate costings not to be compulsory prior to decision making. To simply push ahead with such outdated costing would be irresponsible and is akin to writing a blank cheque.

It is very apparent that the cost would rise considerably more and the BCR would drop further, as the cost of everything has and is rising so much.

Examiners in the Lower Thames Crossing Development Consent Order Examination questioned National Highways about the figures that had been used for the LTC economic assessments, and when told (as an example) the inflation rate used for the year 2022 in the assessment was 4.10% (which is higher than the A66 3.5%), the Examiner commented that this seemed to be very much underestimated and wildly out of touch.

I would respectfully ask that Natural England are asked to assess and comment on the Levelling Up and Regeneration Act 2023 in regard to AONB protections, that includes the need to seek to further the purpose of the AONB.

There was discussion on these AONB protections in the Lower Thames Crossing DCO Examination. In this hearing it was clarified that National Highways have an active duty, not a passive duty to seek to further the purpose of the AONB.

I do not believe that this has been done, nor that Natural England have commented on this matter, and as a statutory government adviser on such matters, I feel it essential that they are asked to comment on this for the A66.

Finally, I would also like to call upon you to delay any decision on the A66 until after the rulings on Dr Andrew Boswell's A47 legal challenge appeal, and the A38 Derby legal challenge as the outcomes of both are also relevant to the A66 project.

Laura Blake