

The Planning Inspectorate
3/25 Hawk Wing
Temple Quay House
2 The Square
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BS1 6PN

Our Ref : GIP/KB/324055/0001
Date : 29 March 2021

Via email LittleCrowSolarPark@planninginspectorate.gov.uk

Dear Sirs

Little Crow Solar Park
Reference: 20027039

We continue to act for Richard Fenwick Johnson, Katie Teresa Holmes, Fennswood Motors Ltd, ManDown Support Ltd and Infocus ID Ltd.

Our clients have received, but we initially did not receive, a copy of the amended Rule 6 Letter of 23 March 2021. The amended Rule 6 Letter refers to an earlier document which is said to be dated 22 April 2021. We assume that that is a reference to 22 March 2021.

Our clients intend to be represented at both the Preliminary Meeting on the morning of 20 April 2021 and (if it goes ahead) at the ISH1 to be held on the afternoon of 20 April 2021 and on 21 April 2021.

We cannot at the present time state which individual will attend these hearings because that depends upon matters contained in this letter.

If the ISH1 fixed for the afternoon of Tuesday 20 April 2021 is not postponed prior to the Preliminary Meeting on 20 April 2021, the preliminary meeting will be attended by counsel with either [REDACTED] or [REDACTED] of ourselves sitting behind. If the IHS1 arranged for 20 April 2021 is postponed prior to the preliminary meeting our [REDACTED] will attend the preliminary meeting.

You state (top of page 3 of the Rule 6 Letter) that you are seeking requests to be heard at the Preliminary Meeting identifying the matters on the agenda that you wish to discuss. We wish to be heard at the Preliminary Meeting.

At that Preliminary Meeting, we wish to propose three new procedural deadlines A1, A2 and A3 to take place after the Preliminary Meeting and before ISH1. We also wish to discuss the date of item 3 (ISH1)



We propose the following revised timetable:-

Item	Matters	Due Dates
2A	<p>Procedural Deadline A1 Deadline for receipt by the ExA of:</p> <ul style="list-style-type: none"> • Applicant's list of documents on which reliance will be placed at ISH1 • any further Applicant's documents relating to ISH1 not previously filed 	Not later than 23:59 on 23 April 2021
2B	<p>Procedural Deadline A2 Deadline for receipt by the ExA of:</p> <ul style="list-style-type: none"> • Written Representations by IPs relating to ISH1 • Any requests by IPs for further information from Applicant 	Not later than 23:59 on 30 April 2021
2C	<p>Procedural Deadline A Deadline for receipt by the ExA of:</p> <ul style="list-style-type: none"> • Written Representations by Applicant relating to ISH1 • Answers by Applicant to requests for further information made by IPs 	Not later than 23:59 on 7 May 2021

At the Preliminary Meeting we will propose that ISH1 takes place no earlier than 12 May 2021.

Although our clients will wish to participate at later stages of the Examination, the only comments we wish to make regarding the later stages of the Examination procedure is that the number of proposed procedural steps and the possibly thematic approach to be adopted means that private sector IPs wishing to make short points on a number of issues appear to have to participate in a disproportionate number of procedural steps. This compares unfavourably with the traditional public enquiry process where all of the submissions of most private sector parties (other than campaign groups) making representations were generally taken at the same time.

Yours faithfully

SILLS & BETTERIDGE LLP
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