

BY E-MAIL AND POST

Tracey Williams
Case Manager
The Planning Inspectorate
3/18 Eagle Wing
Temple Quay House
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Bristol
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Your Ref EN030002
Our Ref 69757713.2\bg04\656959.07000

9 March 2016

Dear Madam

Planning Act 2008 (as amended) - Section 88 and the Infrastructure Planning (Examination Procedure) Rules 2010 (as amended) - Rule 6 and Rule 13

Application by Keuper Gas Storage Limited (KGSL) for an Order granting Development Consent for the Keuper Gas Storage Project (Project)

Notice of Intention to attend Preliminary Meeting and Issue Specific Hearing on the Draft Development Consent Order (DCO) and initial comments on Principle Issues

Our Client: Mr and Mrs Wildman of Cross Lanes Farm

We write further to the above matter and in particular your letter dated 22 February 2016.

We are writing to confirm that representatives from our firm will be attending both the Preliminary Meeting and the Issue Specific Hearing on 16 March 2016, together with our Clients, Mr and Mrs Wildman.

At present we do not intend to speak at the Preliminary Meeting, however we reserve the right to speak in the event that there are procedural matters raised on which our Client wishes to make representations.

In relation to the First Issue Specific Hearing on the DCO, we have tried to contact you by telephone in order to discuss the purpose of this as, in our experience, it is unusual for such a hearing to be held at this early stage in the DCO process. Please could you confirm the reason for First Issue Specific Hearing on the DCO and whether it is intended to merely provide the attendees with an overview of the DCO or if it will deal with the draft Order in more detail. We note that there is a further Issue Specific Hearing on the 3 May 2016 on the draft DCO, which we assume will deal with the draft Order in more detail.

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If the First Issue Specific Hearing on the DCO will deal with the draft Order in more detail, then we would reserve the right to speak in the event that there are matters raised on which our Client wishes to make representations.

Finally, we have reviewed the Initial Assessment of Principal Issues contained at Annex A and note that the following matters are not specifically included:

1. In the context of Compulsory Acquisition- (i) the consideration of alternatives; and (ii) clarity on how the Applicant proposes to use the land over which the compulsory acquisition powers are sought.
2. In the context of Economic and Social impacts- issues related to the impact on (i) the economic viability of farm businesses, including our Client's; and (ii) impact upon the wellbeing of farm animals, including cattle arising as a result of the draft DCO.

These matters are of key concern to our Client and have been raised with the KGSL and the Planning Inspectorate both in our previous consultation responses¹ and Relevant Representations². Please therefore confirm that these issues will be addressed by the Examining Authority in its consideration of the draft DCO.

Yours faithfully

Pinsent Masons LLP

This letter is sent electronically and so is unsigned

¹ dated 31 October 2014, 27 November 2014, 27 October 2015 and 25 November 2015

² Submitted to the Planning Inspectorate on