

Our ref: HWOU-1-4
Your ref: EN070007
Date: 10 May 2023

National Infrastructure Planning

BY EMAIL

hynetco2pipeline@planninginspectorate.gov.uk

Dear Madam/ Sir

HyNet Carbon Dioxide Pipeline – deadline 2
Response to proposed amendments to the submitted scheme (PS02/PS02a/PS02b)

We write on behalf of our clients:

Stephen Oultram 1199_1096409002_03382_0012
Catherine Oultram 1199_1096409002_03439_0022

1. We note the applicant's proposed changes in respect of the relocation of the slurry tank at New Bridge Farm. It appears that the applicant has not given any genuine consideration to the practicalities of its proposed actions and therefore the impact that these changes will have on the operations at New Bridge Farm.
2. The slurry facility cannot be demolished because of a legal requirement in Wales which mandates that the farm must have the ability to store slurry for a minimum period of 5 months.
3. As a matter of practicality, there is no other suitable site for a slurry store.
4. There does appear to be sufficient space for the pipeline to go round the back of the store without impinging on either the woodland or the current store.
5. We note that, despite assurances from the developer, there does not appear to be any proposal for an alternative location for the construction compound; the current location will deprive the farm of essential facilities (as noted previously).
6. The applicant's proposed changes note that the proposed relocation of the slurry tank hasn't been assessed in the ES. The inference that we draw from that statement, and that a separate consent will be needed, is that the applicant is not going to obtain that consent and it has not considered what impediments there might be to obtaining that consent. It would appear a deficiency in the application to include in it a requirement to relocate a slurry tank but decline to assess the necessary impacts of that element of the works.

Yours sincerely,

Duncan Tilney
Partner
For and on behalf of STEPHENS SCOWN LLP