

Our Ref: PT/DIC001/0005  
Your Ref: TR0110016

The Planning Inspectorate  
Major Applications and Plans  
Temple Quay House  
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By email to: [A63castlestreet@pins.gsi.gov.uk](mailto:A63castlestreet@pins.gsi.gov.uk)

5 August 2019

Dear Sir/Madam

**A63 (Castle Street Improvement, Hull) – TR010016**  
**Deadline 5: Response by EPIC (No.2) Limited (“EPIC”)**  
**IP URN: 20018241**

We are writing in relation to Deadline 5, including a response to the Examining Authority’s written questions and requests for information (ExQ2).

**Statement of Common Ground and agreed Heads of Terms**

EPIC has agreed with Highways England a Statement of Common Ground and Heads of Terms for a settlement agreement. The settlement agreement will provide for the voluntary acquisition of EPIC’s land interests and other interests required by Highways England in lieu of the exercise of powers of compulsory purchase. It will also secure mitigation for adverse impacts of the proposals and provide protection for the ongoing operation of Kingston Retail Park.

The detailed drafting of the settlement agreement is in process and once concluded, EPIC will be able to withdraw its objection. However, if it is not concluded by Deadline 7 (10 September 2019), EPIC will make submissions in relation to the draft DCO, including if necessary, supplementary drafting to the protective provisions drafted by Richard Harwood QC on behalf of EPIC, as proposed as part of the submissions for Deadline 3.

**Responses to Examining Authority’s written questions and requests for information (ExQ2)**

*Q2.8.4 – Temporary Traffic Management and Q2.8.8 – Traffic management during construction*

EPIC share Hull City Council’s concerns regarding the need for measures to mitigate the traffic impacts of the scheme during the construction period. Due to the length of the construction periods in question, Kingston Retail Park will be subject to these effects for several years.

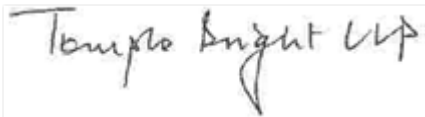
Highways England have agreed to carry out a study of the impact on the construction works on the Daltry Roundabout junction and subsequent route/junctions to Kingston Retail Park, this study is ongoing and due to report in Mid-August.

Should the study indicate the need for mitigation measures, we would expect the draft DCO and other related documents to set out a firm commitment for Highways England to delivery of the mitigation measures and define their exact form, type, duration and location.

## **Next Steps**

EPIC hopes that the settlement agreement will be agreed and concluded in August, which will enable EPIC to withdraw its objection.

Yours faithfully

A handwritten signature in black ink that reads "Temple Bright LLP". The signature is written in a cursive, slightly slanted style.

## **Temple Bright LLP**

London office

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