

**Mr S and Mrs P Brogden**



### **Outline of Principle Submissions**

On behalf of my Clients, I intend to raise through written representations and replies, and if appropriate oral representations at a Hearing and Compulsory Acquisition Hearing concerns relating to the following points:

- The adequacy of information provided by the Applicant, including but not limited to information relating to:
  - i) The extent and location of land and rights required
  - ii) Accommodation Works
  - iii) Drainage
  - iv) Protection measures in relation to an existing spring water supply
  - v) Impact on retained land
  
- The extent of any negotiations, or attempts by the Applicant to acquire land and rights by agreement
- The design arrangement with regards to access to my clients land
- The availability of more suitable routes to the north of the proposed scheme; and more efficient designs in regard to the land-take required
- The suitability of proposed locations for drainage ponds on my Client's land
- The need for and location of bunds and other landscaping proposed to at the expense of productive agricultural land
- Ecological impact, the adequacy of mitigation measures, and also the suitability of the Applicant's current proposed locations for mitigation measures
- Justification for the permeant acquisition of land or rights over land, and temporary land occupation; and the extent of those needs
- Demonstration of the availability of necessary funding

We have not had sight of Position Statements prepared by the Applicant or any subsequent reply from the Planning Inspectorate, and reserve the right to raise further points relating to these if necessary.