

Outline of Principal 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 including public rights of way
 - ii) Accommodation Works
 - iii) Drainage
 - iv) Impact on retained land
 - v) Protection of existing service connections
 - vi) How access to retained property will be achieved
 - vii) How the design will mitigate additional risks in respect of security and anti-social behaviour

- The extent of any negotiations, or attempts by the Applicant to acquire land and rights by agreement

- The availability of more suitable routes for the proposed scheme; and more efficient designs in regard to the land-take required

- The requirement for and suitability of location for proposed ponds

- The suitability of the proposed location for soil storage

- Ecological impact, the adequacy of mitigation measures, and also the suitability of the Applicant's current proposed locations for mitigation measures

- Justification for the permanent acquisition of land or rights over land, and temporary land occupation; and the extent of those needs including in relation to public rights of way

- Safety concerns over the dual use of access tracks

- 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.