

Mr J Heron, [REDACTED]
Mrs D and Mr I Heron, [REDACTED]
Mr J and Mrs M Heron, [REDACTED]
Mr S and Mrs C Heron, [REDACTED]
Mr D and Mrs M Heron, [REDACTED]

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 including proposed public rights of way
 - ii) Accommodation Works
 - iii) Drainage
 - iv) Impact on retained land
- The extent of any negotiations, or attempts by the Applicant to acquire land and rights by agreement
- The availability of more suitable routes to the north of the proposed scheme
- The suitability of proposed locations for drainage ponds on my Client's land
- The suitability of the proposed location of site compounds on my Client's land
- The suitability of the proposed location and arrangements for the Brough Hill Fair replacement site
- 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
- 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.