

The Planning Inspectorate Temple Quay House 2 The Square Temple Quay Bristol BS1 6PN

Our Ref: skjw/crw/240281/13

Your Ref: TR050005

Date: 31 May 2019

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Dear Sir/Madam

Matter: Application by Four Ashes Limited for an order granting development consent

for the West Midlands Interchange ("the Scheme")

Our Client: South Staffordshire Water PLC

We act for South Staffordshire Water PLC ("SSW") in connection with the above application.

Foot Anstey LLP has recently been instructed in connection with this matter. The statutory deadline for submission of representations has passed. Notwithstanding, given the importance of this matter to our client's infrastructure, we would respectfully request that the Inspector accepts this late representation and has due regard to it.

SSW does not object in principle to the Scheme but reserves its position in relation to the specific impact that it will have on its operations. SSW has not been able to assess the scale of impact of the proposed works on SSW's underground and over-ground assets because they have not been provided with information and plans detailed enough to make such assessments.

SSW's primary concerns relate to the protection of major water sources at Somerford and Slade Heath pumping stations. They are concerned that Four Ashes' due diligence has not captured all of SSW's infrastructure within their scheme boundary and this cannot be clarified without detailed plans and information. In addition, further information is required concerning how the change of use and restoration of the quarry at Calf Heath has been considered and its effect on the existing contaminated groundwater plume. Further, the current drafting of the protective provisions of the draft Development Consent Order ("DCO") impose a requirement on SSW to remove redundant apparatus which SSW would normally cap and abandon. To remove such apparatus would impose significant costs on SSW.

SSW therefore objects to the proposal unless and until such time as an approved programme and methodology of works can be agreed.

Yours sincerely

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Associate Suzanne Walford, LARTPI Associate

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Cc – Derry Mockett, BNP Paribas Laura-Beth Hutton – Eversheds Sutherland