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• We refer to our written representations at REP1-217 and the Applicant's submission document at REP3-046, Appendix

A - Transport General Update Note (the "Transport Update").

• We note that the Transport Update simply reflects ongoing discussions between the Applicant, Leicestershire County Council, Warwickshire County Council and National Highways. It does not address our clients' concerns outlined in our written representations regarding the adequacy of the background data and the proposed highways mitigation.

• However, the Transport Update notes that further documentation will be submitted by Deadline 4 in respect of the modelling data and mitigation package.

• We therefore are unable to provide any further detailed commentary on the impacts of the HNRFI on highways at this stage, but reserve the right to do so once further information is submitted by the Applicant on or after Deadline 4.

• We also note that no further justification has been provided for the temporary acquisition of land within Plot 122. The comments and concerns raised in our written representations and during Compulsory Acquisition Hearing 2 therefore remain.