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Paul Zyda

Your Ref:

Zyda Law on behalf of
Keuper Gas Storage Limited

Our Ref: EN030002

Date: 13 July 2015

Dear Mr Zyda

Planning Act 2008 (as amended) – Section 51

Proposed Application by Keuper Gas Storage Limited for an Order Granting Development Consent for the Keuper Gas Storage Project

The Planning Inspectorate's comments on the Applicant's pre-application core draft documents

Further to your submission of a second set of draft DCO application documents on 29 May 2015 and following the teleconference of 4 June 2015, please find attached to this letter the Planning Inspectorate's comments on the core draft documents for the Keuper Gas Storage Project.

Annex 1 - General Comments on supporting documents

Annex 2 - Consultation Report, v2, dated May 2015

Annex 3 - Draft DCO, v 9

Explanatory Memorandum, v 2, dated May 2015. Document Ref 2.3.

Statement of Reasons

Annex 4 - Book of Reference, v 2, dated May 2015. Document Ref 4.3.

Annex 5 - HRA Report

Annex 6 - Draft Plans

These comments are without prejudice to any decision made under section 55 of the 2008 Planning Act (as amended) or by the Secretary of State on any submitted application.

It is recognised that that the documents are still in a draft form and therefore incomplete. However, please note that the main issues identified are:

- Draft Book of Reference – The draft book of reference requires attention in order to be of a satisfactory standard for the purposes of examination. Details

are set out in Annex 2 and 4 of this letter.

- Draft Consultation Report – following the changes to the red line boundary in March 2015 and the additional consultation, the evidence of further consultation needs to be provided in the Annexes to the Report, in order to assist the Secretary of State in making a decision under section 55 of the 2008 Planning Act (as amended).
- Draft Habitats Regulations Assessment Report - We note that agreement has been reached jointly with Natural England and the Environment Agency on Habitats Regulations. We have a number of queries regarding the detail of the agreement, set out in Annex 5 and it will be important for all parties to ensure that the reasons for agreement are clear and the necessary technical information is available for any Examining Authority to test should the application be accepted.
- Format of the draft Development Consent Order (DCO) – The DCO does not appear to be in the required Statutory Instrument template. Please contact us as soon as you are able to ensure that you can access the template.

Please do not hesitate to contact me if you have any further queries.

Yours sincerely

Tom Carpen

Tom Carpen
Infrastructure Planning Lead

Annex 1

General Comments on supporting documents

We note and welcome that you have taken on board our comments from the 1st round of draft documents in relation to a number of matters. We hope the following also assists with the preparation of the application documents:

Glossary, Revision 2 (8.5 V2), April 2015

- Please note that the date on the front of the Glossary is May 2015 whilst the date of production of the glossary terms is April 2015. These should be consistent to avoid confusion.
- It might be worth adding two terms:
 - a. Examining Authority (ExA), and
 - b. Statement of Common Ground (SoCG).

Application Form:

- There is a Planning Inspectorate reference number for the project which should be used: EN030002.
- Paragraph 5 (description of the development) must be exactly the same as in DCO – check information in relation to the proposed pipe.

Section 55 Checklist, dated 30 June 2015, has been submitted as Annex 39 to the Consultation Report.

- This is a helpful tool to navigate the body of the CR and the Annexes. We recommend you do a final check of the application against your own checklist prior to submission.

Statement of Engagement (SoE) of s79 EPA 1990, May 2015.

- The draft application documents refer to two Statements of Engagement that serve two different purposes. One has been submitted as Annex 03 of the Consultation Report and one in accordance with Regulation 5(2)(f) of the Applications: Prescribed Forms and Procedures (APFP) Regulations 2009. We recommend that you re-consider the naming to ensure there is no confusion between the documents.

Annex 2

Draft Consultation Report, v2, dated May 2015.

It appears that you have taken on board all comments that we made to the 1st round of draft documents. However, further details are needed to evidence the additional consultation which has been referred to in the Executive Summary, page 17. The relevant paragraph states:

"In April 2015 the Applicant decided to reduce the extent of the proposed DCO red line boundary[...] and conducted *a further limited round of consultation between [DATE] and [DATE] following further diligent inquiries in to those with interests in the land as described in section 44.*" Also, the change is referred to in the following paragraphs but no detailed information is provided in the CR:

- 5.5, page 42,
- 5.41, page 55,
- Further Limited Statutory Consultation: paragraphs 5.141 to 5.148, page 78
- Paragraph 1.10, page 21 says:

*'This reduction does not comprise any land which was not within the previous red line boundary and would not result in any new interests in land being brought within limits of the proposed order or be subject of proposed powers of compulsory acquisition. The location, scale and nature of the development proposed in the application submitted has **not** materially altered from that which was proposed during consultation.'*

- To meet the requirements of the Planning Act we would need to consider the extent to which you comply with all the requirements in Chapter 2 Part 5 of the Act (see section 55(3)(e)) and the Secretary of State must have regard to the Consultation Report, any adequacy of consultation presentation received from a local authority consultee and the extent to which you have had regard to any guidance issued under section 50 of the Act, including the current DCLG Pre-application guidance. Without prejudice to any decision the Secretary of State may make, we advise that you set out more clearly the consultation undertaken, including need information, additional consultation material, list of consultees, a copy of the covering letter sent to the parties, and a summary of any responses received. You should also provide any further justification against the DCLG guidance on how limited consultation was appropriate in this instance as we will need to consider whether any other party has been prejudiced by not being informed or consulted on this change.
- We note that The Marine Management Organisation (MMO) have been consulted: paragraph 5.21, page 46: *'the KGSP does include provision for the development of a new brine discharge in Runcorn adjacent to the Mersey Estuary utilising and existing environmental permit granted...the Environment Agency. KGSP considered it to be prudent to treat the MMO as a prescribed consultee.'*

Paragraphs 5.149 and 5.150, page 79 include details of the consultation with the Ambulance Trust but there is no evidence provided.

Page numbering/printing:

Please note that although there are no issues with page numbering of the electronic document, pages 115 to 156 are mixed up when the CR is printed. For example: page 151 follows page 130. It might be caused by the insertion of the Tables into the body of the text so this is just to make the applicant aware of it.

Appendices/Annexes (received on 2 July.)

- Annexes **07** (Statement of Community Consultation (SOCC) Compliance Table) and **23** (Comments received from PINS on the SoCC) contain the same document, provided by PINS on. Delete one of them and rename the remaining Annex so it is clear that the Table represents comments provided by PINS as s51 advice.
- Annexes **05** (Cheshire West and Chester Borough Council (CWCBC) Confirmation Correspondence) and **50(1)** (RE KGPS SoCC for formal consultation) are the same email, dated 25 September 2014, from CWCBC on SoCC.
- Annexes **06** (Halton Borough Council (HBC) confirmation correspondence) and **50** (Response to SoCC from HBC) are the same letter, dated 17 September 2014, from HBC to Mr Stevenson, Northwich Sites, as above.
- Annex **11** (Section 44 list) lists more potential s44 persons than are included in the Book of Reference (BoR). There are different types of potential affected persons (IEL tenant, property owner, farm owner affected by seismic etc) but it is difficult to cross refer this information to the details included in the BoR.
- As Annexes **22** and **44** have been deleted please ensure that all Annexes are renumbered prior to final submission of the application to avoid any confusion in both paper and electronic copies of the CR. Also, we would suggest that cross referencing between the main body of the Consultation Report and the Annexes is reviewed. At present Table of Annexes (page 14 of CR) shows no Annex **22** but Annex **44** (Mitigation Measures for Construction and Operation) is listed (page 15 of CR).
- Annex **30** (KGSP Media Coverage) – two dates appear to be typos: 1st October 2015 and 3rd October 2015. They clearly refer to 2014.
- Annex **38** (Section 48 Public Notice) shows a copy of the notice; however, we advise applicants to provide copies of the newspapers in which the notices have been published. The Applicant's s55 checklist states that the notice has been published in six local newspapers and in The Guardian.
- Annex **39** (Section 55 Checklist) must be clearly named if forming a part of Consultation Report, or submitted as a separated document.
- There are no Annexes providing evidence in relation to the further consultation, carried out following the change of red line boundary in April 2015. You will need to provide supporting evidence to show how the changes have been communicated

to the consultees, and how the responses, if any, were taken into account by the applicant. Without this, the application may not meet the requirements of section 55(3)(e) and 55(4) of the Act.

Annex 3

Draft Development Consent Order, Explanatory Memorandum and Statement of Reasons

Unless it is a DCO or statutory reference, sections and paragraph numbers relate to Advice Note 13: Drafting Development Consent Orders ([Advice Note 13](#)).

Draft Development Consent Order (DCO)

General

Given the spelling error (PRINCIPLE POWERS) and general formatting it appears that the draft DCO is not yet in the SI template. Please can you confirm whether you have requested access to the Statutory Instrument (SI) Template yet. If not please contact us for the details. For example – eg *PART 3 STREET WORKS* is normally *PART 3 Streets. Temporary prohibition or restriction of use of streets* is unknown. Cross references will need to be checked; for example Article 18 should cross refer to Schedule 7; Requirement 7 should refer to the Landscape Scheme approved under Requirement 7 (1); Schedule 9 Protective Provisions, Part 3 (protective provisions for the benefit of the Canal and River Trust) should refer to the correct articles and the explanatory note should refer to the correct article requiring certification of plans. Schedules should be numbered according to the order in which they are mentioned in the DCO (see paragraph 8.2). Here, requirements are mentioned in Article 3 but are contained in Schedule 10.

Remove dates for “made” and “coming into force” in draft DCO.

Articles

1. Article 2 (definition of “undertaker”), Articles 6 and 7 don’t work together and don’t follow normal practice. The purpose of Article 6 is to give the benefit of the DCO to a specific named undertaker subject to the consent provisions under Article 7. Here, Article 6 (which gives the benefit to the undertaker and its successors in title) does not therefore limit the benefit to Keuper Gas Storage Ltd.
2. Definition of “maintenance” – what is meant by *“not so as to vary from the description of the authorised development”*?
3. Article 3 – development consent:
 - Why does Article 3(a) include *“including the carrying out of operations for the purpose of altering underground gas storage facilities”*. This is unnecessary as the authorised development should give a comprehensive description of the development for which development consent will be granted, including any development (i.e operations) which will alter underground gas storage facilities. See earlier s51 advice. It isn’t made clear that the project is an NSIP because it involves creation of underground gas storage facilities (meeting thresholds in s17(2)(4) of the PA 2008) and associated alteration of existing underground gas storage facilities (albeit such alterations would not in themselves constitute an NSIP).
 - Does Article 3(b) have the intended effect? A DCO can specify the purposes for which a building is authorised to be used and if no purpose is so specified, the

consent is taken to authorise the use of the building for the purpose for which it is designed (s157). Here, the DCO authorises use of "*the authorised development for underground storage of gas*". Not all buildings comprised within the authorised development are to be used for the underground storage of gas, for example the gas processing plant and office, control and maintenance building. Would it be better to describe the power as providing consent to use the authorised development for the purpose for which it is designed including use of the cavities to be created for the underground storage of gas?

4. Article 4 – maintenance:

- Is Article 4(2) necessary given that Article 2 defines maintain and the permitted activities?

5. Article 7 – consent to transfer:

- It is not appropriate to add "*including any of the numbered works*" because the purpose of the power is to authorise a transfer of the benefit of provisions.
- What is the justification for Article 7(4)(a) and (b)? In what circumstances would a statutory undertaker (as defined by s127 of the Planning Act 2008) be likely to be a transferee or lessee? Why in relation to this particular project would the Secretary of State not wish to consent to a transfer in the circumstances described in paragraphs (b) (i) to (v)?

6. Article 10 – is the street authority content with consent being deemed in the absence of a decision after 56 days?

7. Article 11 - what is the justification for introducing a defence to proceedings for damages in the circumstances of this particular NSIP? It is not clear why the provision is necessary to "*address matters ancillary to the formation of the site accesses*" or for "*consistency with the general powers*".

8. Article 16 – it is considered that further justification is required for this power and the article will need careful examination. Regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010 requires that "*when deciding an application for development consent which affects or is likely to affect a scheduled monument or its setting, the [Secretary of State] must have regard to the desirability of preserving the scheduled monument or its setting.*"

9. Article 28 – statutory undertaker is defined by reference to s127(8) and the article would not therefore authorise removal or repositioning of electronic communications apparatus (which is defined in s138).

10. Article 34 – ideally plan numbers and dates should be provided for absolute clarity.

Authorised development - Schedule 1

1. Conventionally, Part 1 of the Schedule 1 contains the authorised development (and separates those elements of the development which are associated development from the principal development) and Part 2 of the Schedule 1 comprises any ancillary works not comprising development. Here, associated development is identified as forming Part 2 of the Schedule 2. As they are all the same dimension, it isn't necessary to list individual caverns (this wasn't the approach taken in the

Preesall Saltfield Underground Gas Storage's draft DCO) which could be referred to collectively in the description of the authorised development.

2. Use "comprising" rather than "as follows".
3. To what do the references H501, N502 etc refer? Are these references necessary?
4. The convention is Work No not *Numbered Work No ...*
5. Work No 3 - Combining two underground pipelines in one work description (Work No 3) is uncertain. Does the works plan clearly identify Work No 3 as comprising more than one pipeline? Also, it is not usual to use initial capitals unless words are proper nouns - eg *Holford Gas Storage Project Temporary Solution Mining Compound*. Why does Solution Mining Compound have initial capitals and is then followed by SMC3 but SMC3 isn't thereafter used as an abbreviation?
6. Work No 4 – *Solution Mining Compound* - as above. Why does Solution Mining Compound have initial capitals and is then followed by SMC3 which has already been referenced in Work No 3? Why does Distributed Control System have initial capitals? Similar points apply to other works (such as Work Nos 13 and 14 that use upper case initials).
7. Work Nos 2A to 2U - the description of the gated wellhead compound areas is not precise. What is meant by "permanent and temporary equipment"?
8. Work Nos 5A and 5B – is the network in total up to 30km?
9. Work No 5D – is the absence of parameters (diameter and length) intentional?
10. There is duplication of Work No 6.
11. Why are Work Nos 9 to 11 in a separate schedule? "Authorised development" in Art 2 describes associated development as falling within Schedule 1. See above comments on general practice for describing authorised development.
12. Work No 16 - Do the works plans clearly show all the laydown areas and car parking as a single work?
13. Work No 19 – again, does the works plan clearly identify Work No 19 as comprising 3 pipelines?
14. Work No 25 – does this include a connection from the existing pylon?
15. Work No 28 – what is meant by "optional"? This is uncertain.
16. Part 2 of the Schedule 2 associated development - see above, this should be Part 2 of the Schedule 1. What is meant by "installed...as part of the installation of 600 metres of ...pipeline..."? Does the DCO also seek to authorise construction of the pipeline?

Requirements – Schedule 10

1. Requirement 3 – Construction Environmental Management Plan (CEMP) in chapters of the ES?
2. Requirement 9 – does this requirement duplicate what is secured in the s106 agreement or what is secured in the traffic management plan under requirement 3(4) so is it necessary?
3. Requirement 10 – see previous s51 advice about the need to justify the flexibility to increase the permitted heavy goods vehicle movements.
4. Requirement 12 – the DCO does not authorise the extinguishment of any public right of way (using the powers under s136) and this requirement cannot achieve that end.
5. Requirement 13 – see previous s51 advice. The definition of “commence” excludes “*temporary means of enclosure*” so this could be erected without details being approved under this requirement.
6. Requirement 31 – see previous s51 advice about the acceptability of the tailpiece “*unless otherwise agreed in writing*”. Paragraphs (2) and (3) duplicate the requirement to implement “*in full*”.
7. Requirement 20 – the requirements do not in general provide the flexibility for the LPA to vary any details in writing so this requirement isn’t necessary.

Protective Provisions – Schedule 9

1. Protective Provisions (Canal & River Trust) – these provisions will need careful examination together with Article 18. For example, Part 3 purports to authorise the construction of works. Are these authorised by the DCO and have they been assessed? Internal references to articles should be checked, e.g. the statutory undertaker article doesn’t confer powers under sections 271 and 272 of the Town and Country Planning Act 1990.
2. Protective Provisions (Part 4) – this part isn’t titled. How does it relate to (and is it consistent with) Part 1 which is also for the protection of electricity undertakers and gas transporters?

Explanatory Memorandum (EM)

Para 2.3 – development consent required in accordance with s31.

Para 2.4 – associated development detailed at Part 2 of the Schedule 1.

Para 2.4 – the storage cavities (first bullet point) aren’t associated development.

Para 2.5 – all development for which development consent is sought?

Para 2.6 – Statement of Reasons also sets out justification for compulsory acquisition?

Art 2 – “associated development” is not an alternative concept to “ancillary works”. There are not any ancillary works.

Statement of Reasons (SoR)

It is noted that the document is still in draft and will require checking, e.g. the tables which provide reasons for temporary use should be consistent with the schedule of land / purposes for temporary possession in the DCO. Editing may also be required. For example, a lot of detail is provided to make the case that there are no policy/project alternatives but not that there are no alternatives to compulsory acquisition.

The uncertainty about definition of the NSIP (see comments on DCO and authorised development) is reflected in some of the explanations in the SoR. Paragraph 4.9 explains that KGSL seeks CA powers for land "*to facilitate*" the NSIP. Paragraph 5.4 refers to CA in order to facilitate the NSIP. Paragraph 5.5 explains that the Order land is required for 9 underground gas storage cavities. Isn't CA required for the development (s122(2)(a)) - one of the primary reasons for CA is stated as being "*the creation and use of an additional 9 gas storage cavities*"? Paragraph 6.75 refers to "*the creation and use of an additional 9 gas storage cavities*". Which of the 19 works listed in the authorised development to create the UGC require compulsory acquisition of land or rights to enable construction? Are the other 10 cavities (for which CA isn't required) already constructed?

Paragraph 5.20 explains that diligent enquiries have not identified any rights that are likely to be extinguished. Part 3 of the BoR lists rights that are to be extinguished. The "conservative approach" described in paragraph 5.21 isn't really fully explained.

Annex 4

Book of Reference (BoR)

The Planning Inspectorate has not been able to check every plot identified in the BoR; however, the comments below on a sample of the plots (which are identified on Land Plan sheet 7 of 7, numbered 13-03-01/HOL/24/617) are likely to be relevant to the rest of the BoR.

- There does not appear to be any plot boundaries on the land plan. For example, it is not possible to identify the extent of plot 4.3. The absence of horizontal dividing lines in the BoR also means that it is not clear that persons listed in this plot are Category 1 and/or 2 persons in relation to each plot 4.1 to 4.5. It is also not clear in Part 3 to which part of the land the identified interest to be extinguished etc relates. For example, does the shooting, hunting etc right described as being in respect of title number CH442179 subsist over plots 4.1 to 4.3?
- Schedule 8 of the DCO (which identifies land of which temporary possession may be taken) makes reference to plot numbers, e.g. plot 4, but no single plot 4 is defined on the land plan. Is "4" in Schedule 8 intended to mean plots 4.1 to 4.5? If these are just subdivisions of a large plot 4 then a boundary should be identified in the land plan and a total plot area (adding together the plot areas of each subdivision) should be provided in the BoR. This is uncertain and the approach doesn't follow DCLG guidance which requires boundaries to be clearly delineated and each plot separately numbered to correspond to the BoR.
- It is customary for the article authorising the acquisition of new rights to identify (by reference to a schedule listing the relevant plots) any land over which only new rights may be acquired. This distinction isn't made in the Keuper DCO.
- The BoR plot descriptions do not need to provide explanatory text nor DCO cross references; for example in Part 1, the description of plot 4.5 includes "*pursuant to article 26 for the purposes in Schedule 7 [sic]*". What's more, it's not clear (in relation to plot 4.5) which of the rights described are new rights to be acquired compulsorily. Are some of the "*rights*" in land identified in fact works (eg landscaping and habitat improvement works)? Also, as Article 26 and Schedule 8 have the effect of authorising temporary possession, removal of buildings and construction of works in relation to specific plots why does the explanatory heading alongside plot 4.5's description refer to "*land to be used temporarily...*"?

Given this uncertainty (and read in conjunction with the Land Plans) the Book of Reference is not of a satisfactory standard.

Annex 5

Draft Habitats Regulation Assessment

Comments on the KGSP draft HRA report are below:

- Page 14 of the HRA report states '*A joint response from Natural England and the Environment Agency confirms they are satisfied with the assessment presented in this report and agree with the conclusion of no 'likely significant effect'.* The Planning Inspectorate encourages that this response is provided as evidence as part of the application documents along with an understanding of key factors upon which this agreement relies (for example embedded mitigation or DCO requirements). It would also be of benefit to understand the extent to which the list of projects considered in the in-combination has been agreed and whether NE and EA's agreement of no LSE extends to in-combination effects as well.
- At page 4 of the HRA report, the applicant describes that, in terms of the brine discharge consent '*Use of this permit for the Project has been agreed with the Environment Agency, as set out in the meeting record in [Annex A] of this report. The Project will operate within the consented limits of the discharge permit'.* The version of the document received in draft by PINS does not appear to contain the meeting record referred to. The applicant will need to demonstrate to the satisfaction of the ExA / SoS that there are appropriate legal safeguards in place to ensure the discharge remains within the limits of the permit if the operational control of the discharge lies with INEOS Enterprises and not KGSL as the applicant for the DCO (as PINS currently understands is the position). This is particularly important given that reliance is being placed on the permit for the conclusions of draft HRA report.
- The in-combination assessment in section 4.4 does not seem to provide any technical assessment of the effects on relevant European sites against each of the effects identified in section 4.1 of the report, other than concluding for all except 1 scheme that potential effects are screened out due to the nature of and / or proximity to the scheme. For example, there is no consideration of the potential in-combination effects between the proposed development and those in-combination schemes which may generate additional NOx (e.g. from high levels of road traffic). It would also be of benefit to understand whether the list of projects considered in the in-combination has been agreed and whether NE and EA's agreement of no LSE (as per the above) extends to consideration of in-combination effects as well.
- Reference is made on page 49 to Figure 4.2, although this does not appear to have been included in the draft document. It may be helpful if this figure was extended to identify all of the in-combination schemes identified in section 4.4

Annex 6

Draft Plans

Please find below the Planning Inspectorate's general observations in relation to the draft plans submitted.

- The plans provided appear to comply with Regulation 5(3) of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (APFP). That is, they are no larger than A0 size, drawn to an identified scale (not smaller than 1:2500 (Key Plans excepted)) and, in the case of plans, shall show the direction of North.
- The plans provided appear to comply with Regulation 5(4) of the APFP, where a plan comprises three or more separate sheets a key plan must be provided showing the relationship between the different sheets.

Land Plans

- The Planning Inspectorate commends the use of colour shading on these plans and the ease of reading this provides.
- The boundaries between plots should be clearly delineated and each plot separately numbered to correspond with the Book of Reference. An example of this can be found for plot 2.3 on plan 617, where this plot is dissected by other plots and continues with the same plot number in what appears to be a separate self-contained area.
- The use of one number to denote individual plots appears to be inconsistent, for example plots 2.3 and 2.5 have at least two plots that are separate bearing the same plot number.
- Further guidance on what plans which must accompany an application seeking authorisation of compulsory acquisition is given in Annexe C of the 'Planning Act 2008: procedures for the compulsory acquisition of land' document

[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/236454/Planning_Act_2008 -
Guidance related to procedures for the compulsory acquisition of land.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/236454/Planning_Act_2008_-_Guidance_related_to_procedures_for_the_compulsory_acquisition_of_land.pdf)

Relation to Works

In the draft DCO, works 5B, 5C & 5D do not state that these works are underground, but on the land plans concerned with some of the plots relating to these works, the land is for rights only (blue shading, rather than for (freehold) CA (pink shading). This is evident at the 'corridors' in which the services to well heads will run. Examples of this can be found on plots 1.4, 2.4, 3.4 etc

Similarly work No 6 for 'access road network' appears that it will, in part, be over land which the applicant has rights but has not compulsorily acquired the freehold.

Works Plans

- We suggest the use of colour and/or shading to better depict the works.
- We suggest fewer Works per plan to aid clarity.
- Greater detail is needed as currently the Works are blocked together in areas. This approach doesn't sufficiently show each work. The approach used in the general arrangement plans (231 – 233) is more useful.
- Work No 5 doesn't appear to be on works or general arrangement plans.
- Work No 8 – why is this work not contained within the individual works for each cavity (Works 1A – 1U).

Advice may be given about applying for an order granting development consent or making representations about an application (or a proposed application). This communication does not however constitute legal advice upon which you can rely and you should obtain your own legal advice and professional advice as required.

A record of the advice which is provided will be recorded on the Planning Inspectorate website together with the name of the person or organisation who asked for the advice. The privacy of any other personal information will be protected in accordance with our Information Charter which you should view before sending information to the Planning Inspectorate.