Winckworth Sherwood

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For the attention of David Warman

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11 July 2018

Our Ref: JEW/33916/00001/PFI

Dear Sirs

Transport and Works Act 1992
Proposed Rother Valley Railway (Bodiam to Robertsbridge Junction) Order ("the Order")

Winckworth Sherwood LLP is instructed by Rother Valley Railway Limited ("RVR") in relation to the promotion of the application for the Order.

The Department for Transport has sent us a copy of your objection (dated 31 May 2018) to the proposed Order, submitted on behalf of the Hoad family and the Executors and Trustees of the Noel de Quincey estate.

RVR is considering the detail of your objection and will be responding fully in due course. Whilst RVR appreciates your clients' strength of feeling about the Order scheme, it remains keen to engage with them to investigate how it might be able to allay their concerns about the effects of its proposals. RVR also remains committed to seeking to acquire the land necessary for the railway by agreement, rather than by the exercise of compulsory powers (which it regards as a last resort).

In order to respond fully to your grounds of objection as early as possible, it would be helpful to have sight of the reports and other information to which you refer in the objection (which will have to be shared with RVR in due course under the Inquiries Rules if you wish to rely on them in the Inquiry):

- in paras 52 to 67 you refer to a technical review of the highway impacts undertaken by WSP. Please kindly let us have a full copy of that review as we would wish to see the basis on which they have made their comments.

- in paras 75 to 80, you refer to a review of flooding impacts by WSP and indicate that they have reached a number of conclusions. Please kindly let us have a full copy of that review as we would wish to see the basis on which they have made their comments.

- in paras 91 to 93, you indicate that Volterra was commissioned to review the economic case for the order and that they identified a number of relevant points. You also refer to Volterra having made a number of points about benchmarking other railways and other

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aspects of the economic impacts of the Order scheme. Can kindly provide a full copy of Volterra's review.

In the section of your objection entitled "Errors and Omissions in the Book of Reference" you refer to omissions from the Book of Reference of the names of owners of land of which you are aware. You also refer to having knowledge of other third parties whose rights would be overridden by the proposed Order. We do not accept that there has been any non-compliance with the Applications Rules. However, as you are apparently aware of persons with an interest in the land to be acquired or used for the scheme who are unknown to RVR, we would respectfully request you to let us have your belated response to RVR's request for Land Interest Information so that we can initiate contact with these persons.

As your objection was filed on the final day of the consultation period and has only recently been forwarded to us formally by the Department for Transport, we would appreciate your early response (with the relevant reports) to facilitate our timely reply.

Yours faithfully

Winckworth Sherwood LLP

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