

Rt Hon Chris Huhne
Secretary of State
Department for Energy and Climate Change
3 Whitehall Place
London
SW1A 2AW

Our Ref: GRE001200053

The Treasury Solicitor
One Kemble Street
London
WC2B 4TS

16 August 2011

By Hand and email to correspondence@decc.gsi.gov.uk
thetreasurysolicitor@tsol.gsi.gov.uk

Dear Secretary of State

Urgent Proposed Judicial Review

We act for Greenpeace Ltd. (Greenpeace) and this is a letter written and served in accordance with the judicial review pre action protocol.

Proposed Defendant

1. Secretary of State for Energy & Climate Change

Proposed Claimant

2. Greenpeace Ltd, Canonbury Villas, London, N1 2PN ("Greenpeace")

The details of the matter being challenged

3. The decision challenged is the Nuclear National Policy Statement designated, under the Planning Act 2008, on 19th July 2011.

The issue & Grounds

4. The details of the challenge are those set out in the attached draft Claimant's statement of Fact and Grounds.

The details of the action that the Defendant is expected to take

5. The action that the Secretary of State is requested to take is to quash the Nuclear National Policy Statement, if necessary by submitting to a court of competent jurisdiction.

The details of the legal advisers dealing with the claim

6. Kate Harrison, Harrison Grant Solicitors, 175-185 Gray's Inn Road, London, WC1X 8UE
Tel: 020 7812 0639. Fax: 020 7812 0654.

The details of any interested parties

7. Not known

The details of information sought

8. None

The details of any documents that are considered relevant and necessary

9. Please see the attached draft Claimant's statement of Fact and Grounds

The address for reply and service of court documents

10. Kate Harrison, Harrison Grant Solicitors, 175-185 Gray's Inn Road, London, WC1X 8UE

Proposed reply date

11. The legislation provides for a time limit for any challenge of 6 weeks. Therefore any claim must be filed by 29th August 2011. As 29th August is a bank holiday, any claim must be filed by 26th August 2011.
12. The pre-action protocol provides, in relation to a pre-action protocol letter and the time for a reply, that:

"The precise time will depend upon the circumstances of the individual case. However, although a shorter or longer time may be appropriate in a particular case, 14 days is a reasonable time to allow in most circumstances".

13. Greenpeace has acted as fast as possible in this matter: it has been difficult because the time for challenge has fallen in the vacation. For this reason, and because the time limit is so tight, we request that you reply to this letter by Monday 22nd August 2011.
14. We look forward to hearing from you, together with the names of anyone you consider is an interested party, by 22nd August 2011.

Yours sincerely

A handwritten signature in cursive script that reads "Harrison Grant".

Harrison Grant