

John McKenna  
The Department for Energy Security and Net Zero  
Level 3, Orchard 2,  
1 Victoria Street  
Westminster  
London  
SW1H 0ET

Our Ref: TJ/00395-10

10 October 2023

Dear Mr McKenna

Re: The National Grid Electricity Transmission plc (Scotland to England Green Link 2)  
Compulsory Purchase Order 2023

Our Client: The Executors of John Brian Dixon  
Client's Address: The Beeches, Skerne, Driffield, East Yorkshire, YO25 9HP  
Plot Ref.: 34/952, 34/954, 34/955, 34/954a, 34/956

This letter is submitted in on behalf of our Client in objection to specific rights and plots of land being included within The National Grid Electricity Transmission plc (Scotland to England Green Link 2) Compulsory Purchase Order 2023 ("the CPO").

Below is a list of the plot, of which our Client is the Freehold Owner, and rights proposed to be acquired under the CPO which our Client wishes to lodge an objection to:

34/954 – Acquisition of Electricity Infrastructure Construction Rights and HVDC Rights

Below is an extract of sheet 34 of 46 of the CPO Draft Land Plans, an extract of the most recent Heads of Term plan issued by representatives of National Grid Electricity Transmission plc ("NGET") to our Client and an aerial image showing the same area for comparison.

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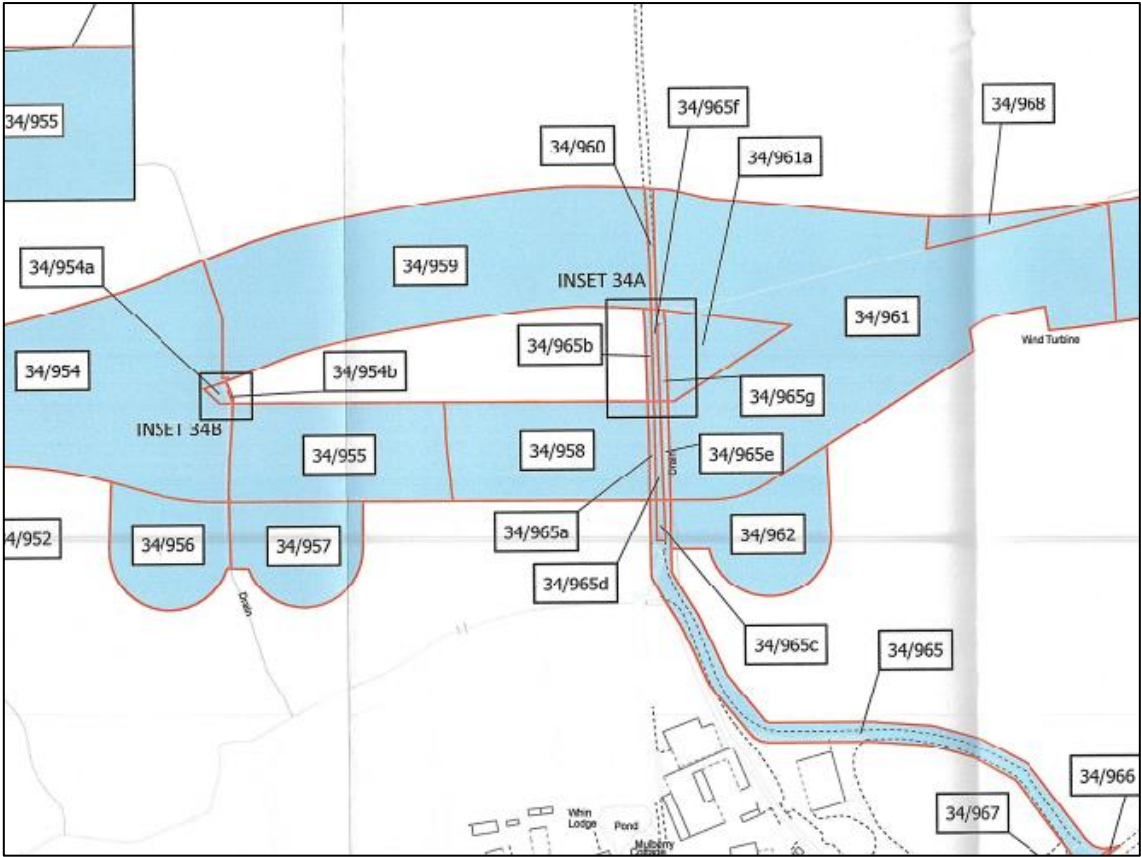


Fig. 1 – Sheet 34 of 46 – CPO Draft Land Plans

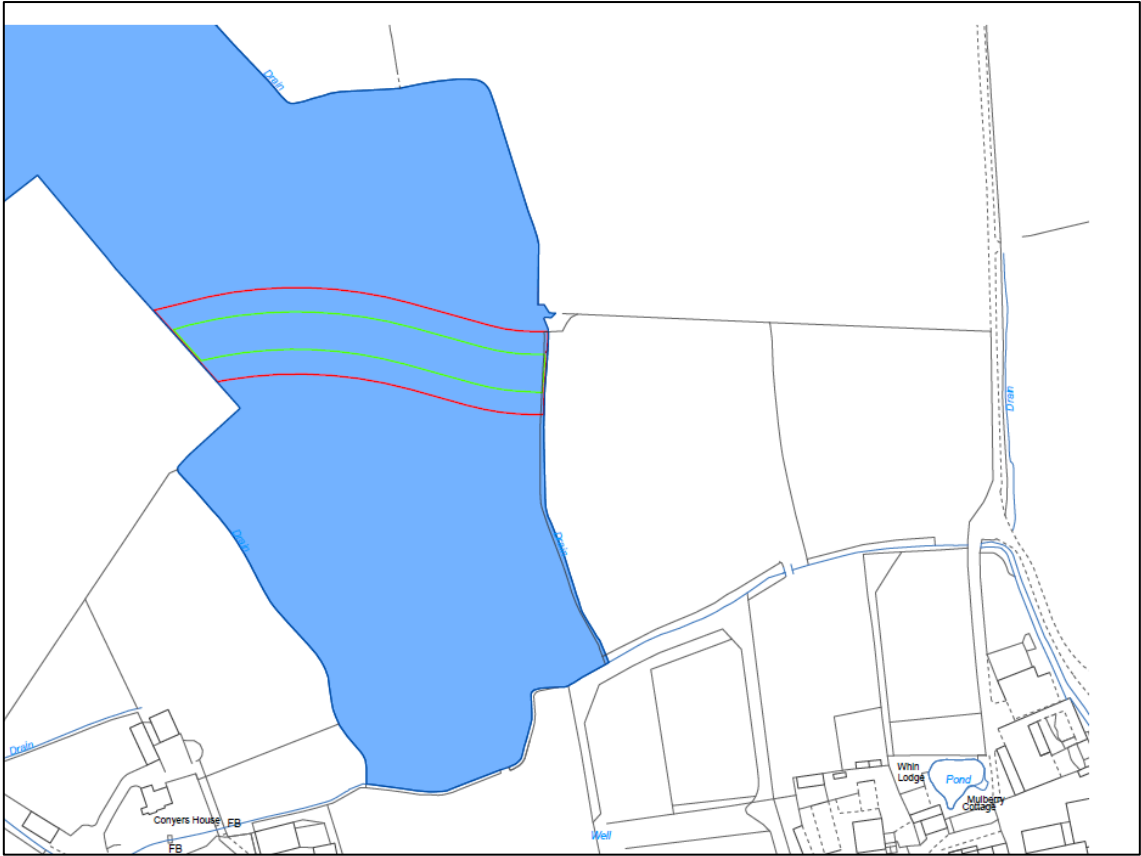


Fig. 2 – Heads of Terms Plan



Fig. 3 – Aerial imagery

The proposed cable route identified by the option area shown edged red in Figure 2 is the result of between 12 and 18 months negotiation with NGET's representatives to avoid a solar park currently being developed on our Client's land and also to align the route to the south side of the new agricultural buildings which can be seen on the Figure 3 above.

The solar park lease which our client entered into is relevant to the objection for two reasons. Firstly, plot 34/968, owned by Andrew John Dixon, forms part of the solar park area which is currently being developed. The inclusion of this plot would jeopardise the solar park which is currently under construction. Secondly, the solar park lease grants a right of access "free from obstruction" along the access road which incorporates plots 34/960, 34/965, 34/965a, 34/965b, 34/965c, 34/965d, 34/965e, 34/965f and 34/965g. Should the CPO be granted and rights exercised our Client will be left in a position where they are in breach of the lease and may be liable for any losses suffered by the solar park tenant due to breach of contract. We understand that the current leaseholder, BayWa r.e. UK Limited, will also be submitting an objection to the CPO.

The new agricultural buildings visible in Figure 3 above are the first phase of relocating our Client's farmyard to a new location due to the existing farmyard, on the edge of the village, being redeveloped for purposes other than agriculture. Negotiations with NGET and their representatives has resulted in the original 'northern route', mainly represented by plot 34/959, being discounted due to the sterilisation of a significant area of land which is proposed to be used for further agricultural buildings or concrete yards. The 'southern route' which is shown in Figure 2 and mainly represented by plot 34/958 is that which is currently being negotiated upon and will avoid this potential issue. Whilst we understand that NGET have included the 'northern route' in the CPO due to this being the route which currently has planning consent, even though the intention, subject to agreement on terms, is to

progress with the 'southern route', our Client wishes to object to the inclusion in the CPO those parts of plots 34/954, 34/959 and 34/961 which form the 'northern route'.

For the above reasons our Client wishes to object to the inclusion of rights over plot 34/954 in the CPO.

I trust that you will fully consider the above objection as part of the CPO examination process.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Tom Julian', written in a cursive style.

Tom Julian BSc (Hons) MRICS FAAV

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