

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

Our Ref: TJ/00310-10

10 October 2023

Sent by Email to:  
John.McKenna@energysecurity.gov.uk

Dear Mr McKenna

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

Our Client: Andrew Mark Soanes  
Client's Address: Wallis Grange, Kiplingcoates, Market Weighton, York, YO43 3LX  
Plot Ref.: 22/634, 22/635, 22/663, 22/633, 22/634a, 22/634b, 22/634c, 22/638, 22639,  
22/640, 22/643, 22/665b, 22/668

This letter is submitted 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 plots, 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:

22/636 – Acquisition of Temporary Access Rights  
22/635 – Acquisition of Temporary Access Rights  
22/638 – Acquisition of Temporary Access Rights  
22/639 – Acquisition of Temporary Access Rights  
22/640 – Acquisition of Temporary Access Rights

The intention of the right described above is to utilise an existing private access as a primary haul road for the facilitation of National Grid Electricity Transmission Plc's ("NGET") proposed project. The private access covered by these plots is the sole access to our Client's property, and home, at Wallis Grange, Kiplingcoates. The access serves three residential dwellings, the farmstead at Wallis Grange which includes part of our Client's potato storage facility and approximately 160Ha of agricultural land. We have been informed by NGET's representatives that the intention of the rights described will be

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for our Client's private access to form part of the main linear haul road servicing approximately 12.5km of the project route between the B1248 and A1079. No indication of the level of access, the number of vehicle movements, duration of access, restrictions on our Client's use, etc has been provided due to detailed design not yet having taken place and contractors not being appointed. As an example of the potential level of disturbance; assuming that the primary route of access will be from the A1079 heading north and that NGET intend to lay a temporary stone haul road along the entire route there is likely to be in excess of 4,000 vehicle movements in laying, and later removing, the haul road alone. Had our Client's private access road not been present, NGET would need to construct a temporary haul road in this location. It does not appear fair or reasonable that our Client has to suffer unknown levels of disturbance to their property purely because they have an existing access road in a convenient location.

On reviewing the CPO Statement of Reasons it is clear that avoiding the use of our Client's access is technically possible due to the inclusion of what is referred to as the 'Kiplingcoates Option' in section 3.25 and 3.26. This area of the route is one of only three areas where there is optionality to the proposed construction methods. Section 3.26 of the Statement of Reasons states that "an alternative has been identified to east that would permit an open cut (or shorter trenchless) crossing (in Plots 22/651, 22/665, 22/643, 22/644, 22/642, 22/641, 22/641a, 22/634c, 22/654)". The open cut referred to would require a haul road along its length therefore a haul road, other than our Client's private access, at this location is possible.

For the above reasons our Client wishes to object to the inclusion of rights over plots 22/636, 22/635, 22/638, 22/639 and 22/640 in the CPO.

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

Yours faithfully



Tom Julian BSc (Hons) MRICS FAAV

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