From:

Sent:

To: Cc:

Subject:

11 October 2023 20:12

FW: [EXTERNAL] The National Grid Electricity Transmission plc (Scotland to England Green Link 2) Compulsory Purchase Order 2023 - T E Richardson & Co Limited, Low Farm, Gransmoor, Driffield YO25 8HZ [CMCK-UK.FID91098707]

Of Counsel

T +44 20 7367 3546



CMS Cameron McKenna Nabarro Olswang LLP | Cannon Place, 78 Cannon Street | London EC4N 6AF | United Kingdom

cms.law cms-lawnow.com

From: (Energy Security)

Sent: Wednesday, October 11, 2023 6:33 PM

To:

Subject: [EXTERNAL] FW: The National Grid Electricity Transmission plc (Scotland to England Green Link 2) Compulsory Purchase Order 2023 - T E Richardson & Co Limited, Low Farm, Gransmoor, Driffield YO25 8HZ

Here is OBJ11,

Thanks.



Head of Network Planning team
Energy Infrastructure Planning Delivery Team
Energy Development
Tel: 07920 150 513

3-8 Whitehall Place

From: Sent: Tuesday, October 10, 2023 6:17 PM

(Energy Security) <

Subject: The National Grid Electricity Transmission plc (Scotland to England Green Link 2) Compulsory Purchase Order 2023 - T E Richardson & Co Limited, Low Farm, Gransmoor, Driffield YO25 8HZ

Dear ,

Re: T E Richardson & Co Limited, Low Farm, Gransmoor, Driffield YO25 8HZ

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

Land Interest Nos (as per Statement of Reasons Dated 5th September 2023) 40/1115, 40/1117, 40/1127, 40/1118, 40/1116, 39/1110, 40/1129, 40/1128, 40/1123, 40/1122, 39/1111a, 40/1117a, 40/1122a, 40/1122b, 40/1122c, 40/1123a, 40/1123b, 40/1114a

We are instructed as Agents on behalf of T E Richardson & Co Ltd. We have been in discussions with the Applicant's Agents, Fisher German ('FG') regarding the terms of a voluntary agreement in connection with the proposed SEGL2 Project. Our client remains committed to continuing to take forward these negotiations, however due to the speed of progress with the same as well as site specific issues our client wishes to raise **Objections** to the above CPO application as follows:

1. Voluntary Negotiations

1.1 Our client's land holding comprises an equipped farm including agricultural arable land as well as permanent pasture, including 'ridge and furrow' grassland. It is premature to grant a CPO because the negotiations for a voluntary agreement with our client are ongoing and queries regarding a) the extent of land affected and b) the nature of the rights which NG are seeking on a permanent basis over the same are still to be addressed by the Applicant.

2. Incorrect Statement of Reasons & Site Specific Issues

- 2.1 Page 31 of the Statement of Reasons dated 5th September 2023 relating to haul road access over the ridge and furrow field is incorrect. As yet, no agreement in principle has been reached as to access.
- 2.2 The proposal is to lay the cable by Horizontal Directional Drilling (HDD) underneath the ridge and furrow field and our client is content that this is the best approach in order to preserve this feature. However, the Applicant is proposing a haul road crossing the ridge and furrow field to which our client has objected due to the damage that this will cause. It seems counterintuitive on the one hand to lay the cable by HDD to protect the ridge and furrow and on the other to lay a haul road across the same.
- 2.3 At a meeting with FG in January 2023 our client proposed an alternative haul road route ('the alternative route') from Kelk Lane which would avoid the ridge and furrow field. We were advised by FG in March 2023 that this was not possible due to the "socio economic impact" on the local community.
- 2.4 Our client's concerns regarding damage to and reinstatement of the ridge and furrow therefore remain and since April 2023 we have been waiting for further information from the Applicant with regard to how a haul road could be constructed without damaging the ridge and furrow.
- 2.5 In July 2023 our client's proposal for the alternative route was reintroduced by FG which was encouraging and we were advised that the Applicant's Engineers were concerned as to how the ridge and furrow could be reinstated. We suggested it would therefore be helpful to meet again with the Applicant and FG to progress matters. However to date a meeting has not taken place.
- 2.6 We were advised early October 2023 that the alternative route was not being progressed. We therefore still await information from the Applicant as to how damage to the ridge and furrow can be mitigated and the feature reinstated.

We trust that the Applicant can review our client's Objections and provide an adequate response in order that our negotiations for a voluntary agreement can continue, as appropriate.

Yours sincerely,

BSc (Hons) MRICS FA	AAV	
Partner		
The Exchange, 20 Exchange Street, Drif	ffield, YO25 6LD	
Office hours: Mon – Fri 9.00am to 5.30	pm Saturdays by	
appointment only		
T. 01377 253151 M. 07739 322650	F. 01377 241041	
	www.dee-atkinson-harrison.co.uk	- 1 - 1

DISCLAIMER

This email and any attachment is sent from Dee Atkinson & Harrison and is for authorised use by the intended recipient(s) only. It may contain proprietary material, confidential information and/or be subject to legal privilege. It should not be copied, disclosed to, retained or used by, any other party. If you are not the intended recipient then please promptly delete this e-mail and any attachment and all copies and inform the sender either via email or phone 01377 241919. We also make every effort to keep our network virus free. However, you do need to scan this e-mail and any attachments to it for viruses as we can take no responsibility for any computer virus which might be transferred by way of this email. Thank you.