

**THE NATIONAL GRID ELECTRICITY PLC (COTSWOLDS VISUAL IMPACT PROVISION PROJECT)  
COMPULSORY PURCHASE ORDER 2025**

**THE ELECTRICITY ACT 1989 AND THE ACQUISITION OF LAND ACT 1981**

**STATEMENT OF CASE OF THE ACQUIRING AUTHORITY**

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*In this statement CD[X] is a reference to a document contained in the Core Bundle.*

## 1. INTRODUCTION

- 1.1 This is the Statement of Case of National Grid Electricity Transmission Plc ("**NGET**") prepared in connection with the National Grid Electricity Transmission Plc (Cotswolds Visual Impact Provision Project) Compulsory Purchase Order 2025 ("**the Order**") (**CD C1**) which was made by NGET on 8 April 2025 and submitted to the Secretary of State for Energy, Security and Net Zero ("**Secretary of State**") for confirmation on 29 May 2025.
- 1.2 If confirmed by the Secretary of State, the Order will authorise NGET to purchase compulsorily the land and new rights in land required in order to install approximately 7 kilometres of 400kV underground cables, construct two new cable sealing end compounds ("**CSECs**") and permanent access roads, connect the new underground cables to the remaining existing overhead lines, dismantle and permanently remove 7 kilometres of existing Overhead electricity line ("**OHL**") including the net removal of 16 pylons. The Order Rights will also enable NGET to expand an existing NGET substation in Melksham, Wiltshire to allow for the siting of a new shunt reactor and thereby facilitate delivery of the scheme (together the "**Project**").
- 1.3 This Statement is a statement under Rule 7 of the Compulsory Purchase (Inquiries Procedure) Rules 2007 (**CD A7**). NGET reserves the right to alter or expand it as necessary.
- 1.4 In this Statement, the land which is the subject of compulsory purchase powers is referred to as the "**Order Land**". The Order Land is described in paragraph 8 of this Statement and is shown on the maps (**CD C2**) which form part of the Order.
- 1.5 The Order also contains a Schedule of Interests which identifies those persons with an interest in land affected by the Order.
- 1.6 As explained in paragraph 14 and the Objections Summary Table at Appendix 2 of this Statement a total of 7 objections were made to the Order (**CD C5 to C11**). The Secretary of State has therefore directed that a public inquiry should be held to consider and determine whether the Order should be confirmed. The inquiry has been listed to commence on 4 November and is scheduled for 6 days.

## 2. ENABLING POWER

- 2.1 The Order was made pursuant to Section 10 and schedule 3 of the Electricity Act 1989 ("**1989 Act**") (**CD A4.2 and CD A4.4** (extracts)), the Acquisition of Land Act 1981 ("**1981 Act**") (**CD A3** (extracts)), and having regard to all applicable non-statutory guidance relating to the promotion of compulsory purchase orders in England.
- 2.2 By Section 9(2) of the 1989 Act, the holder of a licence authorising him to participate in the transmission of electricity is charged with the duty "*to develop and maintain an efficient, co-ordinated and economical system of electricity transmission*" (**CD A4.1**).
- 2.3 NGET is a holder of an electricity transmission licence ("**Transmission Licence**") granted or treated as granted under Section 6(1)(b) of the 1989 Act which authorises it to participate in the transmission of electricity for the purpose of giving a supply to any premises or enabling a supply to be so given ("**Licensed Activities**"). The Project is a "purpose connected with the carrying on" of the Licensed Activities. NGET owns the high voltage electricity transmission network in England and Wales and operates the transmission system across England and Wales.
- 2.4 Section 10 (**CD A4.2**) and Schedule 3 (**CD A4.4**) of the 1989 Act empower NGET "*to purchase compulsorily any land [including rights in land] required for any purpose connected with the carrying on of the activities which [NGET] is authorised by [its] licence to carry on.*" The activity in question here is the transmission of electricity and the connected purpose is the mitigation of impacts from the use of the overhead line for such

transmission of electricity. Therefore, the powers of compulsory acquisition under the 1989 Act can be used by NGET to assemble the relevant land required for the purpose of the Project.

### 3. DESCRIPTION OF THE PROJECT

#### Location of the Project

- 3.1 The Cotswolds was designated as an Area of Outstanding Natural Beauty ("**AONB**") in 1966 in recognition of its rich, diverse and high-quality landscape. AONBs are designated under the Countryside and Rights of Way Act 2000 ("**CRoW Act 2000**") for the purposes of conserving and enhancing the natural beauty of the relevant area. From 22 November 2023, AONBs have been renamed as National Landscapes (though statutorily still referred to as AONBs). At 790 square miles, the Cotswolds National Landscape is the largest of the 38 National Landscapes in England and Wales, and the second largest protected landscape in England. It is an area of national significance, with the International Union for the Conservation of Nature ("**IUCN**") recognising the Cotswolds National Landscape as a Category V protected landscape – a protected area managed mainly for landscape protection and recreation.<sup>1</sup>
- 3.2 The Cotswolds National Landscape is crossed by five NGET OHLs (4TE, 4YX, XL, ZF and ZFB). Subsection ZF.2 of the 400kV Feckenham-Walham/Feckenham-Minety or 'ZF' OHL was identified within the 2014 Landscape and Visual Impact Provision Technical Report ("**LVIP Technical Report**") commissioned by National Grid as a red category subsection, which denotes subsections which are judged to have overall combined landscape and visual impacts of high importance (**CD D1**). This results from the combination of a high score for landscape impact and a high score for visual impacts on users of trails and cycleways and visual impacts on visitors to publicly accessible sites. The LVIP Technical Report's findings in respect of the landscape and visual impacts of subsection ZF.2 were summarised as follows:

*It has landscape impacts of high importance. The large-scale landscape which has few overt human influences, is of high quality and contains many features that are representative of the special qualities of the National Landscape. Expansive views across sparsely settled farmland and the distinctive skylines of the escarpments give the area a high scenic quality. The pylon line is a prominent feature which alters the rural qualities and tranquil nature of the landscape.*

*In terms of visual impacts, although the scale of impact of ZF.2 varies, pylons are clearly visible from many locations. This subsection is therefore judged to have visual impacts that are of a high level of importance. The nearby town of Winchcombe and some small dispersed settlements have views of the pylon line, but the wide geographical spread of these impacts and the numbers of people affected means that overall the importance of visual impacts on communities is considered to be moderate. Local public rights of way are mainly concentrated around the scarp slopes with fewer footpaths on the high ground. Although in places pylons are very visible, overall the importance of impacts on these receptors is also considered to be moderate. The Cotswolds Way National Trail runs along the top of the scarp and there are also a number of regional trails in the area. High importance impacts are recorded for these recreational receptors. There are also a number of visitor locations within this subsection including Sudeley Castle and other heritage sites, panoramic viewpoints and a number of car parks. The presence of these encourages people to access the area. Visitors over a wide area are affected by views of pylons. High importance visual impacts are recorded for these receptor groups.*

- 3.3 Subsection ZF.2 enters the National Landscape from the west of Winchcombe heading in a southerly direction, rising up to Prescott where it turns southeast across high ground before descending into subsection 3 southeast of Cheltenham. This line runs broadly parallel to the Cotswold Way National Trail for much of its length, with many regional trails also crossing the area. As well as Cotswold Way National Trail, the existing overhead

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<sup>1</sup> The IUCN is an international organisation working in the field of nature conservation and sustainable use of natural resources. It is comprised of over 1,400 governmental and non-governmental members. Category V status is given to protected landscapes and/or seascapes managed mainly for conservation and recreation. All 46 National Landscapes in the UK are Category V protected landscapes.

line can be seen from Belas Knap long barrow, the Winchcombe Trail and other regional trails, and Cleeve Common.

- 3.4 A 2020 study commissioned by National Grid split subsection ZF.2 into three smaller sub-sections (ZF.2(A), (B) and (C)) to allow for appraisal of the landscape and visual impact of the route in more detail (**CD D2**). The conclusion and recommendation was that National Grid should consider undergrounding the central subsection ZF.2(B) as the removal of this part would result in the most significant visual benefits to the widest range of visual receptors. This smaller subsection of OHL is some 7km long and starts immediately south of the B4632 (tower ZF306), in proximity to Postlip/Postlip Mills. From Breakheart Plantation the OHL runs in a south-westerly direction to the east of Cleeve Common Site of Special Scientific Interest (SSSI), past Wontley, Drypool and Wood Farms, and down towards Dowdeswell Wood (tower ZF325). There are a number of disused quarries either side of the OHL. The closest villages are Langley (north), and Charlton Kings to the south-west. The closest town is Winchcombe (north east). The route crosses two Local Authority administrative areas - Tewkesbury Borough Council and Cotswold District Council.

### The Project

- 3.5 The Cotswolds VIP Project constitutes NGET's proposal to underground approximately 7 kilometres of the existing OHL subsection ZF.2(B) which runs from the west of Winchcombe to the south east of Cheltenham, within the Cotswolds National Landscape.
- 3.6 The key components of the Project are the installation of approximately 7 kilometres of 400kV underground cables, the dismantling and permanent removal of 7 kilometres of existing OHL including the net removal of 16 pylons, the construction of two new CSECs which will each require a new terminal pylon in order to connect the new underground cable to the remaining existing OHL, a permanent cable easement with an approximate width of 40 metres and the expansion of an existing NGET substation in Melksham, Wiltshire to allow for the siting of a new shunt reactor. A temporary (one year) OHL diversion will be required at the southern CSEC. A description of the works is at paragraphs 3.7 to 3.11 below.

### Underground Works

- 3.7 The intention of the project is for OHL to be replaced by an underground cable. Removal of the OHL can only take place once the cable is installed and commissioned. Hence, cable installation precedes the dismantling of the OHL. Cable installation would require a construction swathe (also referred to as the cable corridor or working width) of up to 100 metres wide along the 7 kilometres length of the cable route. This width is to accommodate the cable trenches, central haul road (metres wide), storage areas for stripped topsoil and sub soil from the cable trench excavation. It would also include temporary and permanent land drainage requirements. The project has sought to minimise the proposed land take for construction, and in this context the construction swathe represents the maximum width that might reasonably be required, having regard to the need to provide working widths and some flexibility to allow for unfavourable ground conditions. The cables will each be laid in the trenches to a specified spacing and bedded and surrounded by a compacted layer of cement bound sand ("**CBS**"). Protective tiles, featuring lettering warning of the danger of electricity below, will be laid above the CBS to protect the cables from future excavation works. Alternatively, a cable ducting system may also be used which involves laying plastic ducts for the cables and then installing associated materials to stabilise and protect those ducts. The remainder of the trench will then be backfilled with a thermally suitable material, sourced from excavated material wherever possible. The cables are then pulled through the installed ducts. The land-take required is not materially altered if cable ducting is deployed. In some locations cables may be installed using horizontal directional drilling which is a trenchless method in which a hole is drilled along a pre-determined path, subsequent hole enlargement follows the path set by the hole, from the surface with minimum disturbance. Cables are then pulled through the enlarged hole. Again, this results in a similar land-take. These are the main methodologies likely to be deployed and form the basis for identifying the land necessary for this Project.
- 3.8 Following completion of the cable installation, the ground would be returned to its previous use. Affected hedgerows and other field boundaries would be reinstated. Trees felled would not be replanted over the buried

cable, but a tree replacement strategy would be undertaken by planting elsewhere to offset the arboricultural impact of tree loss and to take into account the landscape character, local treescape and biodiversity features of the immediate and adjoining areas.

#### Above Ground Works / Sites

- 3.9 As part of the Project, it will be necessary to connect lengths of cables which are supplied in lengths of approximately 900 metres. These joints are made at locations known as “link boxes”, which NGET typically seeks to locate at field boundaries to make them less obtrusive. This is because at each location a “link pillar” and small compound are installed. The link pillars enable earthing of the cables to be monitored.
- 3.10 The connection between retained OHL and new underground cables also requires the construction of two CSECs at the north and south of the cable route to facilitate the transition from the overhead line to the underground cable. Each CSEC would comprise a fenced compound measuring approximately 80 metres by 40 metres containing cable terminations (cable sealing ends), electrical equipment and support structures enclosed by security fencing. There will be a pylon close to the CSEC that enables OHL to connect to a gantry within the CSEC from which circuits lead to the cable. Applications for planning permission in respect of the construction of the two CSECs have been submitted and are described in further detail at paragraph 5.8 below.
- 3.11 During construction, a temporary construction compound of approximately 75 metres by 75 metres will also be required adjacent to each CSEC site. The function of these compounds will be to provide laydown areas, soil storage, parking, welfare facilities, waste facilities and security facilities. Following the completion of construction, the temporary site installation facilities will be removed.
- 3.12 The design of the CSECs has taken care to reduce their visual impact by retaining as much existing vegetation around them as possible and landscape proposals have been sought to filter and screen views to the CSECs as far as possible. In order to minimise visual impact of the CSECs, the access road to each has been carefully designed to maximise screening and will have a grasscrete surface. The fence colour will also be recessive. New native trees, woodland and scrub planting will also be planted to provide visual enclosure when the CSECs are viewed from surrounding roads and public rights of way and to help filter views.
- 3.13 An expansion to an existing NGET substation on land to the west of Melksham Substation, Melksham, Wiltshire ("**Melksham Substation**") is also needed. This is to allow for the siting of a new 400 kV shunt reactor to control voltage in the transmission system. This is because the Project will result in an increased amount of cable in the ground which will cause system voltages in the South-Central region to rise. Therefore, voltage control is needed which is provided by a shunt reactor. The shunt reactor would be sited in the west of Melksham Substation and connected by cables to the rest of the substation. It will be 13.9 metres in length, 6.15 metres in width and 8.3 metres in height, with the body made of steel and copper windings. Internal roadways would also be constructed and the fence line would be extended around the new substation extension. The site will use an access track to the battery energy storage site located to the southwest of Melksham Substation for temporary construction access which would be diverted around the edge of the new extension. Permanent access will be through the Melksham Substation and its existing access road. An application for planning permission in respect of the Melksham Substation has been submitted and is described in further detail from paragraph 5.11.

## 4. **JUSTIFICATION**

### Preliminary

- 4.1 NGET owns and maintains the high-voltage electricity transmission network in England and Wales. The network carries electricity from the generators to substations where the voltage is lowered ready for distribution to homes and businesses. It is NGET’s statutory duty under Section 9 of the 1989 Act to develop and maintain an efficient, co-ordinated and economical system of electricity distribution in England and Wales.

- 4.2 In accordance with Section 38 and Schedule 9 of the 1989 Act, in formulating the proposals for the installation below ground of an electric line, or the execution of any other works for or in connection with the transmission of electricity, NGET must have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest.
- 4.3 The following sub-paragraphs in this paragraph 4 (Justification) set out the justification for the Project and the legal and policy framework within which the Cotswolds VIP Project exists. In the following sub-paragraphs, it details firstly the benefits of the Project and the details of the assessments carried out in respect of the Cotswolds VIP Project which demonstrate these at paragraph 4.4 (Benefits) onwards. It goes on to address the regulatory position of NGET as an economically regulated utility and NGET's statutory licence. It then considers the role of the Stakeholder Advisory Group and the Stakeholder Reference Groups at paragraph 4.32(Process) onwards. Finally, it explains the community consultations and acceptability testing undertaken by NGET (forming part of NGET's wider consultation exercise relating to the VIP Schemes) at paragraph 4.60(Consultation) onwards.

### Benefits

#### *Introduction*

- 4.4 The Cotswolds VIP Project has the potential to benefit and enhance the natural beauty of a portion of the Cotswolds National Landscape. The Cotswolds landscape has few overt human influences, is of high quality and provides expansive views across sparsely settled farmland and the distinctive skylines of the escarpments which give the area a high scenic quality. However, the pylon line is a prominent feature which is clearly visible from many locations, including a number of publicly accessible sites and public rights of way, and alters the rural qualities and tranquil nature of the landscape. As such, the Cotswolds VIP Project, which will lead to the net removal of 16 pylons and approximately 7 kilometres of OHL spanning the Cotswolds National Landscape east of Cheltenham, would significantly benefit the natural beauty of the Cotswolds Natural Landscape, particularly with regards to its landscape and visual qualities.
- 4.5 In summary, whilst there would be some temporary adverse short-term effects upon landscape character as a result of construction activities, upon operation, only beneficial effects are predicted which will increase over time as a result of landscape mitigation. For example, the Project will result in visual amenity benefits for local communities in nearby villages and settlements, as well as for users of publicly accessible sites including heritage sites (Sudeley Castle and Belas Knap Long Barrow) and Open Access Land (including Cleeve Hill Common and Longbarrow Bank). The Project will also give rise to visual amenity benefits for users of public rights of way, promoted cycleways and footpaths. Users of transport routes will also experience positive impacts from the Project as the removal of the OHL and pylons will enhance the views of those travelling on the local road network. These benefits are further detailed in the following paragraphs.

#### *Initial 2014 Landscape and Visual Impact Assessment*

- 4.6 NGET published a Landscape and Visual Impact Methodology ("**LVIM**") in 2014 with the aim of identifying those sections of existing transmission line in England and Wales that have the most significant impacts on the landscape and visual amenity of National Parks and National Landscapes (**CD D3**).
- 4.7 Using the methodology set out in the LVIM, the LVIP Technical Report judged the existing section of overhead line which comprises the subsection ZF.2 involved in the Cotswolds VIP Project to have combined landscape and visual impacts of high overall importance (**CD D1**). A subsequent 2020 study commissioned by National Grid subdivided subsection ZF.2 into three smaller sections (ZF.2(A), (B) and (C)) to allow for appraisal of the landscape and visual impact of the route in more detail (**CD D2**). The conclusion and recommendation was that NGET should consider undergrounding ZF.2(B) as the removal of this part would result in the most significant landscape and visual benefits. These reports were used by NGET as the basis to inform the subsequent detailed design and development of the Cotswolds VIP Project. The landscape and visual impacts of the Project are summarised in further detail in the following paragraphs.

### ***Landscape and Visual Appraisal 2021***

- 4.8 In winter 2021, Chartered Landscape Architects, Gillespies, undertook a landscape and visual appraisal of the of the CSEC siting zones within the northern and southern CSEC search areas identified by NGET (**CD D4**).
- 4.9 This assessment was informed by Gillespies' findings of desk and site work, consideration of the siting zones' landscape and visual baselines, key visual receptors (including designations, character and views), main potential impacts, likely mitigation requirements and residual impacts or implications. This assessment was used by NGET to inform its options appraisal of the potential CSEC site options which considered other factors in addition to landscape and visual considerations (see paragraph 7.5 onwards).

### ***Landscape and Visual Appraisal 2024***

- 4.10 Following this, the Landscape and Visual Appraisal, 2024 ("**LVA**") prepared by LUC on behalf of NGET considered the landscape and visual effects of the Project as a whole and was submitted as part of the CSEC planning applications (detailed below at paragraph 5.8 onwards) (**CD D5**). The LVA concludes that, overall, the landscape effects of the Project will be beneficial and will occur due to the removal of OHL and associated pylons. The LVA is summarised in further detail below.
- 4.11 Different groups of people will be affected by changes to their views and visual amenity as a result of the Cotswolds VIP Project. The LVA assesses the impact on views and visual amenity with reference to Negligible, Minor, Moderate and Major levels of visual effect. In this context, "Negligible" means that the Project will not result in a noticeable change in views. "Minor" means that the Project will result in a small change in a relatively lower value view, or one with lower susceptibility to change. This level of effect may also occur when a larger scale of effect is of short duration or affects a small part of the visual receptor / affects few people. Whereas "Moderate" means that the Project will result in a noticeable change in the view, likely affecting a visual receptor with a moderate susceptibility to that type of change, or locally valued. This level of effect may also occur when a smaller scale of effect acts on a more widely valued view, or a larger scale of effect acting on a view valued at a more local level. This level of effect may also occur when a large scale of effect occurs over a relatively short period or over a small area. Finally, "Major" means that the Project will result in an obvious change in the view, likely affecting a visual receptor with a high susceptibility to that type of change, and/or affecting a valued view. The effect is likely to be long term and affect a relatively large part of the receptor or affect a large number of people. The nature of the effect are described as either beneficial, adverse or neutral and are determined in relation to the degree the Project fits with the landscape character and the contribution to the landscape that the Project makes.
- 4.12 In relation to effects upon landscape character upon the site and surrounding area, there would be some temporary adverse short-term effects as a result of construction activities. However, upon operation, only beneficial effects upon landscape character are predicted, which will increase over time as a result of the landscape mitigation.
- 4.13 For local communities in nearby villages and settlements, the positive visual impact arising from the Cotswolds VIP Project can be explained as follows:
- a) For the scattered communities to the north and south-east of Postlip and surrounding Whittington the overall effect of the removal of the OHL and pylons on visual amenity for residents once the Project is operational in year 15 ("**Year 15**") is considered to be Minor beneficial.
  - b) For the communities between Breakheart Plantation, West Down (part of Cleeve Common) and Arle Grove, the existing pylons and existing OHL are currently a notable detractor in views. As such, the removal of these is considered to have Moderate to Major beneficial effects on visual amenity for residents in Year 15.
  - c) For the scattered communities south-east of Postlip and between Arle Grove and Dowdeswell Wood, a Minor to Negligible beneficial effect on visual amenity is predicted at Year 15.



- d) For the communities surrounding Upper and Lower Dowdeswell and on the upper slopes of Ravensgate Hill, the Project will have an overall Negligible beneficial effect at Year 15 on visual amenity.

4.14 For users of public rights of way, promoted cycleways and footpaths, the visual amenity benefits arising from the Cotswolds VIP Project can be explained as follows:

- a) Walkers using the Cotswold Way National Trail, which is of national value as one of the most used of the National Trails, currently experience views of the existing OHL and associated pylons as it goes from Winchcombe to Ham Road and Dowdeswell Wood. Between Winchcombe to Cleeve Common, there will be Moderate to Minor improvements to views at Year 0 which will increase to Moderate to Major improvements in Year 15 as a result of the removal of the OHL and pylons. There is also considered to be Moderate beneficial effects at Year 15 along the trail between Cleeve Common to Ham Road. There is considered to be Moderate to Minor adverse effects at Year 15 for users of the trail between Ham Road to Dowdeswell Wood (which is a very short length of the trail) due to the proximity of the CSEC. From Dowdeswell Wood to Ravensgate Hill, there is considered to be Minor beneficial effects at Year 15 for users.
- b) The overall effect of the Project on users of Winchcombe Way (a trail from Winchcombe to Cleeve Hill Golf Course) and Sabrina Way (part of the national bridle route network and extends between Gloucestershire to Derbyshire) is considered to be Moderate to Major beneficial at Year 15.
- c) The overall effect of the Project on users of the Windrush Way (which provides a connection between the Cotswold Way at Winchcombe to the Oxfordshire Way to the south-east), Wardens Way (a 22-kilometre walking connection between Winchcombe and Bourton on the Water), public rights of way west of Winchcombe and AWB31 and the Cheltenham Circular Footpath (ZCK61 and ZCK62) is considered to be Minor beneficial at Year 15.
- d) Users of public rights of way to the south-west of Postlip Mill complex (AWB22 and AWB23) will benefit from long-term improved views due to the removal of pylons on higher ground to the east and south-east. As such, the overall effect of the Project on users is considered to be Moderate to Minor beneficial at Years 0 and 15.
- e) For users of public right of way AWB24 located north and north-east of Postlip Mill complex, the overall effect of the Project on visual amenity is expected to be Negligible neutral.
- f) For users of public right of way AWB63 located to the south-east of Postlip Mill complex and public right of way KWH19 (a link from Ham Road to the Cotswold Way National Trail), the overall effect of the Project at Year 15 is considered to be Moderate to Minor adverse effects on visual amenity.
- g) For users of public rights of way to the east, north and south-west of Lower Dowdeswell and elevated public rights of way north of the A436, the overall effect of the Project on visual amenity is considered to be Minor Neutral.

4.15 For users of publicly accessible sites, the Cotswolds VIP Project will give rise to the following specific visual amenity benefits:

- a) Visitors to Sudeley Castle (located to the south-east of Winchcombe) will experience improvements to views south-west from the castle as a result of the removal of the OHL and pylons. The overall effect of the Project for visitors is considered to be Minor beneficial at Year 15. Visitors to the scheduled monument, Belas Knap Long Barrow, which is adjacent to the Cotswold Way National Trail, will also benefit from the removal of the OHL and pylon and the overall effect of the Project for visitors is considered to be Moderate to Minor beneficial at both Years 0 and 15.

- b) There are many large areas of Open Access Land, notably Cleeve Hill Common which is an SSSI and includes three scheduled monuments and is located to the south of the OHL and Longbarrow Bank. There will be positive benefits for visitors to these areas due to the improvement in views as a result of the removal of pylons. The overall effect of the Project for users of Cleeve Hill Common at Year 0 is considered to be Moderate beneficial which is to increase to Moderate to Major beneficial at Year 15. The overall effect for users of Longbarrow Bank open access land is considered to be Minor beneficial at Years 0 and 15. For visitors to the Kilkenny Nature Reserve and open access land, located on higher ground to the south of the A436, the overall effect of the Project on visual amenity is considered to be Negligible neutral.

4.16 Users of transport routes will also experience positive impacts from the Cotswolds VIP Project. These can be described as follows:

- a) Removal of the OHL and pylons will bring benefits in enhancing the views of those travelling on the local road network. For example, the overall effect of the Project is considered to be Minor beneficial for people travelling on the Langley Road (between Winchcombe and the B4632), Sudeley Hill and Salt Way (from Winchcombe to Sudeley Castle and beyond), Corndean Lane (from south-western Winchcombe to Charlton Abbots), minor roads east of Whittington village and the A40 (which follows the River Chelt). The Project is considered to have a Moderate beneficial effect at Year 15 on people using minor roads north-west of Whittington village.
- b) For travellers on the B4632, the minor road south of Corndean Hall and the A436, the overall effect of the Project on visual amenity is considered to be Negligible Neutral at Year 15. For people travelling on minor roads through and east of Lower and Upper Dowdeswell, the effect is considered to be Minor neutral and for travellers on Ham Road, the overall effect of the Project is considered to be Minor adverse in terms of visual amenity.

In summary, the LVA concludes that the overall effects of the Project would result in substantial improvement to landscape character and visual amenity within the Cotswold National Landscape.

### ***Regulatory Position***

4.17 In December 2023, as a result of the Levelling Up and Regeneration Act 2023, Section 85 of the CRoW Act 2000 was amended to confer a general duty on relevant authorities to seek to further the purpose of AONB designation as follows:

*"In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty"* (section 85 (A1) CRoW Act 2000) (**CD A6.1**).

4.18 Section 85 (2) defines "relevant authorities" for this purpose as:

- a) any Minister of the Crown;
- b) any public body;
- c) any statutory undertaker; and
- d) any person holding public office.

4.19 The amended Section 85 duty requires all public bodies, statutory undertakers (including NGET) and holders of public office to seek to further the AONB purpose when carrying out functions in relation to or affecting land within an AONB. This is set out in the Department for Environment, Food and Rural Affairs' Guidance (**CD A15**). The landscape enhancements which will be achieved by the Project's permanent removal of

approximately 7 kilometres of OHL and the net removal of 16 pylons further the purpose of the Cotswolds National Landscape (an AONB).

- 4.20 NGET is regulated by its economic regulator, the Office for Gas and Electricity Markets ("**Ofgem**"), which carries out price control reviews to set NGET's permitted revenues. These reviews limit the amount of money that can be earned by NGET from charges to use the transmission network. Therefore, NGET is incentivised to be more efficient in managing its infrastructure.
- 4.21 Each price control is set for a particular period, after which a new one replaces it. The current price control period is known as 'RIIO-T2' and runs for five years from 2021 to 2026.
- 4.22 Stakeholder consultation is an important component of the current RIIO-T2 regulatory framework and is an area of particular focus for NGET in the context of the Cotswolds VIP Project. This is addressed later in this Statement.
- 4.23 The RIIO model (Revenue = Incentives + Innovation + Outputs) places a greater focus on incentives to drive the innovation that is necessary to deliver a sustainable energy network, combined with value for money for consumers, now and in the future.
- 4.24 As part of the previous RIIO-T1 framework, which covered the period from 1 April 2013 to 31 March 2021, Ofgem, in its capacity as government regulator for gas and electricity markets in Great Britain, set aside a fund of £500 million (in 2009/2010 prices) for NGET and other national transmission owners to address the visual impact of existing transmission infrastructure. Ofgem set out its expectation for NGET in its final proposals for RIIO-T1, published in December 2012. This was supported by Ofgem's strategy for RIIO-T1 which was published in March 2011 (Strategy for the new transmission price control – RIIO-T1 – Outputs and incentives). This document summarises Ofgem's decision to introduce the allowance in order to encourage transmission owners to reduce their wider environmental footprint and the impact their existing infrastructure has on local landscape, habitat and visual amenity in designated areas. Ofgem's decision and size of the provision was taken in response to feedback from stakeholders and research into consumers' willingness to pay to mitigate the visual impact of existing transmission infrastructure in Britain's designated landscapes undertaken by NGET in June 2012. Following the success of the VIP Schemes, consumer research and extensive feedback from stakeholders, Ofgem has made a further provision of £465 million available for the period 1 April 2021 to 31 March 2026. The size of the provision was based on activity in the RIIO-T1 price control period, feedback from stakeholders and a further study into consumers' willingness to pay to mitigate visual impact undertaken by NGET in 2019.
- 4.25 Ofgem developed this initiative due to increased stakeholder lobbying on the environmental impacts of electricity transmission. For new infrastructure, visual impacts must be taken into account, and each transmission owner must demonstrate that they have considered alternatives including rerouting and/or undergrounding. However, for existing transmission lines, Ofgem proposed an allowance be made available in order to mitigate the visual impacts of such infrastructure.

### ***Special Licence Condition 3.10***

- 4.26 Pursuant to Section 9(2) of the 1989 Act, NGET as the holder of an electricity transmission licence, is charged with the duty "to develop and maintain an efficient, co-ordinated and economical system of electricity transmission". NGET's licence has certain conditions attached to it, with which NGET is obliged to comply as a statutory electricity company, and the salient Special Condition 3.10 is summarised below.
- 4.27 Special Condition 3.10 governs how NGET can submit funding requests to Ofgem for projects that will enhance the landscape by mitigating the impact of pre-existing transmission infrastructure. It also states the minimum information that must be presented to Ofgem and how each funding request will be assessed. Part E of Special Condition 3.10.15 allows NGET to add projects to its licence which have been submitted prior to April 2021 but for which no Ofgem allowance has been provided. The Project was submitted to Ofgem in January 2021. Before making a decision, Part H of Special Condition 3.10.21 provides that Ofgem will publish

on its website the text of the proposed direction, the reasons for it and a period during which representations may be made on the proposed direction (no less than 28 days).

- 4.28 If an application under Special Condition 3.10 is sent to Ofgem and subsequently approved, it is recorded in a table of 'outputs' in NGET's transmission licence: the Enhancing Pre-existing Infrastructure Project allowance (EPI allowance table).
- 4.29 The EPI allowance table contains a summary of what will be delivered by NGET. Categories within this table include:
- a) Project name and designated area;
  - b) Project description (description of works to be carried out);
  - c) Allowance; and
  - d) Year of delivery.
- 4.30 The annual breakdown of the permitted costs will be recovered by NGET across a 45 year life of the regulatory asset value (RAV).
- 4.31 Once the projects have been approved and written into the licence, NGET is obliged to deliver these 'outputs' to completion. Failure to deliver these 'outputs' would be considered a breach of NGET's statutory licence, which could lead to financial penalties. Hence, NGET is required by its licence to deliver schemes of this nature.

## Process

### ***Visual Impact Provision Schemes***

- 4.32 NGET's VIP Schemes make use of the above licence arrangements introduced by Ofgem to reduce the impact of existing electricity transmission lines in English and Welsh National Landscapes and National Parks.
- 4.33 NGET's approach to the selection, funding and delivery of the VIP Schemes is principally governed by its VIP Policy as supported by Ofgem in April 2013 following public and stakeholder consultation (the "**VIP Policy**") (CD D6).
- 4.34 In accordance with Section 7 of the VIP Policy, NGET undertook its most recent detailed review of the Policy in 2021 in conjunction with various stakeholders to ensure its continued fitness for purpose. The review identified the need for only minor updates to the document (which were made and approved by Ofgem).
- 4.35 In line with the VIP Policy, the Stakeholder Advisory Group ("**SAG**") was established in April 2014 to fulfil an integral role in guiding key decision-making on the Visual Impact Provision schemes. Further information on the SAG is at paragraph 4.44 onwards of this Statement.
- 4.36 NGET's overarching objective in the context of the VIP Schemes ("*to achieve the maximum enhancement to the landscape from the available funds whilst ensuring that no significant adverse impacts arise as a result*") continues to be guided by five principles set out in its VIP Policy. Working in line with these principles and with relevant stakeholders, NGET will prioritise proposals for VIP Schemes which:
- a) result in the greatest landscape enhancement benefits (Principle 1);
  - b) result in the greatest opportunities to conserve and enhance natural beauty, wildlife and cultural heritage whilst avoiding unacceptable impacts on the natural and historic environment which cannot be mitigated (Principle 2);

- c) result in the greatest opportunities to encourage public understanding and enjoyment of the protected landscapes including positive socio-economic impacts (Principle 3);
- d) are technically feasible in the context of the wider transmission system (Principle 4); and
- e) are economical and efficient (Principle 5).

- 4.37 Alongside the VIP Policy, NGET also published the LVIM in 2014 which established the basis for determining which of the 571 kilometres of existing transmission lines situated in National Parks and National Landscapes within England and Wales had the most significant adverse impacts on the landscape and visual amenity of those designated landscapes (**CD D3**).
- 4.38 The emphasis of the LVIM was on making a comparative assessment of the impacts of the sections of transmission line within the designated areas to enable a shortlist of candidate schemes to be considered by the SAG as part of its decision-making process.
- 4.39 The LVIP Technical Report, provided to the SAG in October 2014, included a ranking of all sections of transmission line assessed pursuant to the LVIM (**CD D1**). The LVIP Technical Report allowed the SAG to recommend that early technical assessment and feasibility work be undertaken in respect of the top 12 sections of line which were ranked as having the highest level of combined landscape and visual impacts.
- 4.40 Additional assessment and development of the 12 shortlisted options was subsequently undertaken by the SAG, in consultation facilitated by NGET with the relevant local Stakeholder Reference Groups ("**SRGs**"), against the guiding principles set out in the VIP Policy. Further information on the SRGs is at paragraph 4.53 onwards of this Statement.
- 4.41 This process culminated in NGET's decision in September 2015 to proceed with four VIP Schemes: (i) Dorset National Landscape, (ii) New Forest National Park, (iii) Peak District National Park (East) and (iv) the Eryri National Park VIP Project. In March 2019, the SAG recommended that the New Forest National Park project be paused due to concerns surrounding demonstrating imperative reasons of overriding public interest to support the required application for planning permission within the RIIO-T1 timeframe. Due to there being a genuine risk of significant delay and additional legal costs, NGET decided that the New Forest VIP Project should be paused and in July 2019 the North Wessex Downs VIP Project was selected by the SAG to be taken forward. At the November 2019 SAG meeting it was noted that Cotswolds VIP was a shortlisted project for RIIO-T2. In June 2020, it was recommended by the SAG that the Cotswolds VIP Project should be a priority undergrounding project and in March 2022 NGET stated their commitment to proceed with ongoing stakeholder engagement and work towards submitting both the planning and Ofgem funding applications as soon as possible. In NGET's opinion, the chosen VIP Schemes are together capable of delivering the greatest benefit in terms of mitigating the visual impact of NGET's existing overhead lines within the time available.
- 4.42 In the context of the Cotswolds VIP Project specifically, it was concluded that removal of the section of existing OHL should be prioritised as the line currently conflicts with the character of the landscape forming a highly visible intrusive feature which has a widespread influence on the landscape surrounding it. As detailed in the LVIP Technical Report, the large scale landscape has few overt human influences, is of high quality and contains many features that are representative of the special qualities of the National Landscape. Expansive views across sparsely settled farmland and the distinctive skylines of the escarpments give the area a high scenic quality. The pylon line is a prominent feature which alters the rural qualities and tranquil nature of the landscape. Removal of the OHL would enhance the landscape, visual amenity and natural beauty in the area.
- 4.43 The removal of the OHL is actively supported and promoted by a wide range of stakeholders in the area as well as some local people, including some affected property owners. The stakeholders include Gloucestershire County Council, Tewkesbury Borough Council, Cotswold District Council, Cheltenham Borough Council, Cotswolds National Landscape, Cotswold Way National Trail & Access Partnership, Natural England, Historic England, the Environment Agency, as well as the local town and community councils and the elected

members for the affected wards of Gloucestershire County Council, Tewkesbury Borough Council and Cotswold District Council.

### ***Stakeholder Advisory Group***

- 4.44 The SAG, which is chaired by leading environmentalist Professor Chris Baines, comprises senior representatives from 15 organisations that are dedicated to enhancing the landscape and countryside throughout England and Wales (including the Campaign for the Protection of Rural England (CPRE), National Parks England, Natural England, Historic England, National Trust, the Ramblers and the National Landscapes Association). Both Ofgem and NGET are represented at the SAG.
- 4.45 Some of the organisations represented on the SAG were initially responsible for lobbying and convincing Ofgem to make financial provision available for the VIP Schemes and their Scottish counterparts. The groups argued that the impact of existing OHL was detrimental to the special qualities of National Landscapes and National Parks to such an extent that measures should be taken where possible to reduce their landscape and visual impact.
- 4.46 Although Ofgem are represented at the SAG, they do not have voting rights on the decisions taken by the group. Ofgem's primary role is to challenge the SAG, with a focus on protecting consumer interests so that the SAG does not promote VIP Schemes which could be perceived to be uneconomical.
- 4.47 The SAG typically meets approximately twice per year in order to carry out the following principal functions:
- a) helping to identify initial priorities for the VIP Schemes, based on the guiding principles set out in the VIP Policy and the landscape assessment undertaken in 2014;
  - b) considering the technical inputs provided by NGET, and the input of wider stakeholders who are not directly represented on the SAG;
  - c) identifying the specific infrastructure and locations which would most benefit from the VIP Schemes;
  - d) defining the VIP Schemes which should be taken through to the development phase; and
  - e) re-considering and/or re-assessing the priorities and use of the VIP Schemes, as development of the projects progresses.
- 4.48 The SAG ultimately recommended in June 2020 to select the Cotswolds VIP Project from the initial shortlist of 12 potential VIP Schemes.
- 4.49 NGET subsequently sanctioned continued development of the recommended VIP Schemes.
- 4.50 Having been heavily involved throughout the development and evaluation process, the SAG fully supports the need for the Cotswolds VIP Project. Since the Cotswolds VIP Project was prioritised in June 2020, continued support for it has been a standing item on meeting agendas for the SAG. At each meeting, the SAG has unanimously expressed its support for the Project.
- 4.51 At its meeting in March 2024, the SAG was given a detailed update on the Cotswolds VIP Project, including in respect of the relevant planning application and pre-application consultation materials. Following this, in May 2024 the SAG were asked for their views on the Project and the use of powers of compulsory purchase. The SAG agreed that they would support NGET in pursuing this option if it was deemed necessary as a way of securing all the land rights that are needed to deliver the Cotswolds VIP Project.
- 4.52 NGET will continue to engage in respect of the Cotswolds VIP Project with the SAG, the local SRG, the local community and the wider public, and will consult with the SAG on key Project decisions as well as on the most effective ways to engage with local stakeholders.

### ***Stakeholder Reference Groups***

- 4.53 As part of the development and review of the shortlisted VIP Schemes, NGET also established individual SRGs comprised of representatives from organisations within each of the affected National Parks or National Landscapes.
- 4.54 In the context of the Cotswolds VIP Project, the SRG is comprised of representatives from public authorities, national bodies and local organisations including Gloucestershire County Council, Tewkesbury Borough Council, Cotswold District Council, Cheltenham Borough Council, Cotswolds National Landscape, Cotswolds Trails & Access Partnership, Natural England, Historic England, Environment Agency and Gloucestershire Wildlife Trust.
- 4.55 The SRG for the Cotswolds VIP Project was first convened in February 2022. One of the key aims of the initial meeting was to consult with members on early stage plans, ideas and progress to date and establish whether the SRG members favoured the idea of removing the overhead line and whether they would be prepared to support such a project and input into its development.
- 4.56 At the second meeting which took place in March 2023, NGET presented the emerging route for the cables that would replace the existing OHL, the preferred location for the CSECs and the proposed site access. There was general approval for the route. The third SRG meeting took place in September 2023 during which NGET gave more detail on the preferred route and updated the SRG on the continuing community engagement. The SRG were happy to see that the Project was progressing well with good landowner engagement and virtually no opposition at public events as recorded. The third meeting took place in September 2023. At the meeting, NGET gave updates on the surveys that had been undertaken and, in particular, ecological surveys that had revealed the wide variety of bat species – some rare – in the area. These surveys have had a direct impact on the routeing decisions. NGET also updated the SRG on the latest round of consultation events that had taken place over the summer period. Feedback had been overwhelmingly positive with particular interest in the archaeology. Following the visit of the national SAG to the project earlier in the year, there was discussion on drystone walling and the likely shortage of skilled practitioners in the coming years.
- 4.57 The fourth meeting of took place at the end of February 2024. At the meeting NGET presented details of the emerging planning application for the CSECs and answered questions. Discussion points included the likely project impact (if any) on calcareous grassland and ancient woodland and biodiversity net gain.
- 4.58 The SRG for the Cotswolds VIP Project has been consulted in the design and evolution of the Project, thus allowing NGET to continue an open dialogue with local stakeholders, keep them informed about the Project and gather their insight and views into the emerging project. The SRG has been invaluable in providing vital information and advice on NGET's plans for reducing the impact of its electricity lines in the Cotswolds National Landscape and has actively encouraged NGET in its development of the Cotswolds VIP Project at every stage.

### **Consultation**

- 4.59 The following sub-paragraphs in this section explains the community consultations and acceptability testing undertaken by NGET in respect of the Project. Paragraph 9 and Appendix 1 to this Statement of Case address landowner consultation.

### ***Community Consultations***

- 4.60 Consultation and stakeholder input has been integral to the design and development of all of the VIP Schemes, including the Cotswolds VIP Project.
- 4.61 Both NGET and Ofgem have ensured that stakeholders play an ongoing, central role in helping to identify those areas with existing overhead electricity lines which would benefit most from investment to reduce the visual impact.

- 4.62 Under Section 38 and Schedule 9 of the 1989 Act, NGET has a duty to have regard to the desirability of the preservation of amenity, particularly including the effect of NGET's work on communities. NGET's Stakeholder, Community and Amenity Policy sets out a commitment to meet this duty, making the following consultation commitments:

*"We will promote genuine and meaningful stakeholder and community engagement. We will meet and, where appropriate, exceed the statutory requirements for consultation or engagement."*

- 4.63 In the context of the Cotswolds VIP Project, NGET has sought to go above and beyond consultation guidelines and requirements set out for developers, including by engaging with as many stakeholders as possible and tailoring its consultation programme with regard to the community in Winchcombe, a market town to the north of the project, by hosting drop-in events at the museum and annual country show and taking information stalls to halls in the surrounding villages of Charlton Kings and Whittington in order to maximise opportunities for feedback. This approach has been acknowledged and commended by representatives of the Cotswold National Landscape at SRG and SAG meetings.
- 4.64 Prior to finalising its proposals, NGET had careful regard to the feedback it received from local stakeholders and residents during the consultation process. Engagement with both the community and stakeholders in relation to the Cotswolds VIP Project commenced at an early stage, primarily in order to gather detailed information and inform NGET's understanding of the local area, but also with an intention of giving the local community a sense of ownership of the Project itself.
- 4.65 Early engagement involved technical workshops and drop ins with key representatives of organisations including Natural England, Tewkesbury Borough Council, Cheltenham Borough Council, Cotswold District Council, Gloucestershire County Council, Cotswolds National Landscape, the Ramblers, the British Horse Society, the Gloucestershire Local Access Forum and Cotswolds Trails & Access Partnership.
- 4.66 A series of further public information events took place in July 2022 to September 2022 at Cleeve Hill Common, Charlton Kings, Winchcombe Museum and Country Fair, Whittington, and Cleeve Hill Golf Club. These events provided opportunities for members of the public and stakeholders to give feedback. A further series of public information events took place at the same venues in July 2023 to September 2023 at which the feedback from the public was positive.
- 4.67 In addition to these events, NGET has met with other stakeholder and community groups on several occasions. These included presentations to the Cotswolds National Landscape, local MPs (including Laurence Robertson former MP for Tewkesbury, Sir Geoffrey Clifton-Brown MP for the Cotswolds and Alex Chalk former MP for Cheltenham), Gloucestershire County Council, Tewkesbury Borough Council, Cotswold District Council, Cheltenham Borough Council, Winchcombe Town Council, Charlton Kings Parish Council, Cotswolds Trails & Access Partnership, British Horse Society, Winchcombe Walkers are Welcome group, Cotswolds Rangers, Winchcombe Museum, Gloucestershire Wildlife Trust, Butterfly Conservation and National Highways. The Councils expressed their support for the Project while providing valuable input on local issues including the Project's scope and local road safety issues. In July 2024, NGET wrote to the newly elected MPs for Tewkesbury and Cheltenham to brief them on the Project. NGET has briefed Max Wilkinson, current MP for Cheltenham, twice in his previous capacity as a cabinet member of Cheltenham Borough Council. NGET has also briefed representatives of Cleeve Common Trust at a local level by delivering a presentation to trustees in August 2022 and July 2023 and holding regular update meetings to discuss issues including access, commoners and protection of wildlife. There have been expressions of support from all of these groups during the Project development stages and the pre-application consultation.
- 4.68 As well as the numerous events and meetings outlined above where people could feedback to NGET directly or via forms available at the events, a dedicated Project website was established in 2022. The website offers regularly updated information on the project (including all the planning documentation) and a range of feedback options including email, and a consultation phone line.



- 4.69 Further engagement continued throughout development of the Cotswolds VIP Project. This included direct engagement with individuals and groups through a combination of one-to-one meetings (where appropriate), presentations to small groups, letters, email updates and phone conversations. Regular updates were also provided to the local media, published on the Project website and made available at scheduled drop-in events.
- 4.70 As detailed above, drop-in events have been held annually in the local area since 2022, giving individuals the opportunity to receive information on the Cotswolds VIP Project, meet the Project team and provide feedback on the proposals. NGET scheduled these events for weekend and evening hours in order to maximise the highest potential for engagement from local people and communities.
- 4.71 Consultation feedback has demonstrated strong support for NGET's proposals. Local residents and other stakeholders are supportive of the vision of the Cotswolds VIP Project and its potential to enhance the local landscape, and in particular with regard to the improvements to the visual amenity of the area.
- 4.72 Other consultees have highlighted that such a clear visual improvement to the landscape of this part of the Cotswolds National Landscape would also improve the quality of life of local residents and visitors, and thereby promote longer-term economic benefits by way of increased revenue from tourists attracted to a more aesthetically-pleasing destination. For a predominantly rural area with an economy largely sustained by income generated from tourism, the economic benefits associated with the Cotswolds VIP Project are vitally important.
- 4.73 Feedback from property owners in the vicinity of the Cotswolds VIP Project has generally been positive during discussions about the granting of land rights. Comments have been framed in terms of being a benefit to their own property interests and for the area as a whole.

#### ***Acceptability Testing Reports 2018 and 2022***

- 4.74 Stakeholder consultation is an important component of the RIIO-T2 regulatory framework and, as noted in preceding paragraphs, an area of particular focus for NGET in the context of the Cotswolds VIP Project.
- 4.75 Building on NGET's previous research into consumers' willingness to pay to mitigate the visual impact of existing transmission infrastructure in Britain's designated landscapes, Ofgem requested that further analysis be undertaken by NGET to assess if consumers would find it acceptable to pay for the VIP Schemes via increases in their electricity bills.
- 4.76 The analysis comprised a multi-strand programme of research with consumers, including ten discussion groups, nine in-depth interviews with vulnerable consumers and a quantitative survey of 2,002 consumers aged over 16. The output of this analysis, the Visual Impact Project Acceptability Final Report, was published in April 2018 (the "**Acceptability Testing Report 2018**") (CD D7).
- 4.77 The Acceptability Testing Report 2018 concluded that the majority of consumers (66%) supported the VIP Schemes and considered it acceptable for costs associated with these schemes to be borne via increases in their electricity bills.
- 4.78 Consumer support for the VIP Schemes was focused on the perceived enhancements to the country's most beautiful landscapes which could be delivered at an affordable cost. Although consumers recognised that the total cost of the VIP Schemes is substantial, the cost per household is relatively low at £0.60 per year for the next 25 years.
- 4.79 In particular, the Acceptability Testing Report 2018 identified that the undergrounding of power lines is widely seen as an improvement compared to the continued use of existing overhead power lines and pylons. Undergrounding was seen by many consumers as a modernising step forward and a moral action necessary to improve the appearance of Britain's most beautiful landscapes for future generations.
- 4.80 Notwithstanding the above, the Acceptability Testing Report 2018 identified that the level of support for the VIP Schemes was high considering the underlying negativity that consumers often express towards the energy

sector and organisations working within it. Moreover, it was felt that the minority's opposition to the VIP Schemes was often underpinned by hostility to the energy sector as a whole and rejection, in principle, that consumers should bear the cost of the schemes.

- 4.81 This was followed by another programme of consumer research to further test the acceptability of the overall VIP Schemes. A total of 2,000 household consumers across England, Wales and Scotland completed an online survey and sampling quotas were specified based on Office National Statistics Census data to be nationally representative. The survey was complemented by eight 90-minute online focus groups with a total of 58 participants. Groups reflected a mix of age ranges, socio-economic groups and locations. The output of this analysis, the Visual Impact Provision Acceptability Testing – North Wessex Downs Technical Report, was published in July 2022 (the "**Acceptability Testing Report 2022**") (CD D8).
- 4.82 The Acceptability Testing Report 2022 concluded that there was a good level of support for the overall VIP programme. In total, 75% of consumers considered that the overall VIP Schemes and the costs associated (that being £0.27 per year for the average bill-payer from 2023-2047) were "acceptable" or "very acceptable".
- 4.83 Consumer support for the VIP Schemes centred on the perceived improvements to natural areas (45%) and that the impact on bills was reasonable (64%). In addition, respondents were generally found to be willing to pay an amount higher than the expected maximum bill impact for the VIP Schemes to fund undergrounding projects. This is a clear indication that consumers perceive substantial added value from the VIP Schemes over and above the actual bill impact.
- 4.84 This was followed by a further programme of consumer research held between April to July 2024 which examined the acceptability of the Cotswolds VIP Project to household consumers ("**Acceptability Testing 2024**"). Again, a total of 2,000 household consumers across England, Wales and Scotland completed an online survey and 8 online focus groups were held with a total of 55 participants from varying socio-economic and demographic backgrounds. This concluded that there are high levels of consumer support for the Cotswolds VIP Project. In total, 82% of respondents stated that the Project and its bill impact (that being around £0.13 per household per year are "acceptable". Consumer support centred on the visual impact improvement from the Project (59%), the low per consumer cost (44%) and the steps taken to reduce wider impacts (40%) as the major reasons for support. In addition, the Acceptability Testing 2024 research also found that the wider VIP programme had a high level of consumer support, with 78% of respondents supporting the full suite of potential VIP projects. These results are a clear indication that consumers support and perceive material added value from the Cotswolds VIP Project and the wider VIP programme over and above the actual bill impact.

## 5. CONSENTS

### Permitted Development Rights

- 5.1 The majority of the Cotswolds VIP Project is to be constructed pursuant to permitted development rights.
- 5.2 NGET will make use of permitted development rights for:
- a) the excavation of the cable trenches (General Permitted Development Order (GPDO) 2015 Schedule 2, Part 15, Class B(a));
  - b) the installation of the section of underground electric and fibre cable between the two CSECs located at each end of the cable route (General Permitted Development Order (GPDO) 2015 Schedule 2, Part 15, Class B(a)); and
  - c) the installation of temporary construction compounds and construction working areas (including the haul road) that are required to construct the infrastructure listed above (General Permitted Development Order (GPDO) 2015 Schedule 2, Part 4, Class A).
- 5.3 All activities beneath ground which are associated with the trench, including its ultimate fit-out and cable installation, will also be carried out pursuant to permitted development rights.

- 5.4 Permitted development rights are not available in most cases where development is "EIA development" as defined in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Therefore, in respect of those elements of the Cotswolds VIP Project that are to be consented pursuant to permitted development rights, NGET has sought confirmation from the relevant local planning authorities and other statutory bodies through the environmental impact assessment ("**EIA**") screening process that the development is not 'EIA development'.
- 5.5 The Cotswolds VIP Project is situated within the administrative boundaries of Gloucestershire County Council, Cotswold District Council and Tewkesbury Borough Council.
- 5.6 A letter requesting an EIA screening opinion was submitted to Tewkesbury Borough Council and Cotswold District Council on 18 December 2023.
- 5.7 Both Tewkesbury Borough Council and Cotswold District Council have since screened the Cotswolds VIP Project and have confirmed in writing that it is not 'EIA development' (**CD B9** and **CD B10**). Therefore, permitted development rights are available to NGET in these circumstances.

#### Planning Permission

- 5.8 In relation to the construction of CSECs and the provision of access tracks, applications for planning permission were submitted in June 2024 to Tewkesbury Borough Council (Reference 24/00505/FUL) and to Cotswold District Council (Reference 24/01778/FUL) in whose administrative areas the CSECs would lie (together the "**Planning Applications**").
- 5.9 The description of development for which planning permission is sought pursuant to the Planning Applications is as follows:
- "Proposed construction of Cable Sealing End Compound to facilitate the connection between underground cables and existing OHL and associated permanent access roads (and bell-mouth) to the CSECs in addition to temporary bell-mouths created to support the cable construction along classified roads."*
- 5.10 Planning permission for the southern CSEC was granted by the Cotswold District Council on 25 March 2025 (**CD B1**). Planning permission for the northern CSEC was granted by Tewkesbury Borough Council on 24 July 2025 (**CD B2**).
- 5.11 In relation to the expansion to the Melksham Substation to allow for the siting of a new shunt reactor, an application for planning permission was validated on 18 November 2024 to Wiltshire Council (Reference PL/2024/09954) (the "**Melksham Planning Application**").
- 5.12 The description of development for which planning permission is sought pursuant to the Melksham Planning Application is as follows:
- "Expansion of an existing substation to allow for the siting of a new shunt reactor"*.
- 5.13 Planning permission for the Melksham Planning Application was granted by Wiltshire Council on 25 April 2025 (**CD B3**).

#### Consents pursuant to the 1989 Act

- 5.14 Section 37 of the 1989 Act is the main means of obtaining consent for minor works relating to OHLs in England unless they are exempted from such a requirement by meeting certain limitations and restrictions under the Overhead Line (Exemption) (England and Wales) Regulations 2009 ("**2009 Regulations**").
- 5.15 NGET has been granted a Section 37 consent under the 1989 Act for the temporary (one year) overhead line diversions that will be required at the southern CSEC. Consent was granted on 6 November 2024 (**CD B4**).

The Secretary of State has also confirmed in writing that the proposed works are not EIA development under the Electricity Works (Environmental Impact Assessment) (England and Wales) Regulations 2017 (**CD B11**).

- 5.16 Section 37 consent under the 1989 Act is not required for the works associated with the installation of a replacement tower and downloads to connect the existing OHL to the CSECs in accordance with Regulation 3 of the 2009 Regulations.

#### Section 38 Consent pursuant to the Commons Act 2006

- 5.17 NGET has been granted a Section 38 consent under the Commons Act 2006 to carry out works over a narrow strip of land which is part of Cleeve Hill Common, to the west of the existing overhead line. Consent was granted by the Planning Inspectorate on behalf of the Secretary of State for Environment, Food and Rural Affairs on 4 March 2025 (**CD B5**).

#### Highway Orders

- 5.18 The Cotswolds VIP Project will require a small number of highway orders, in the form of temporary Traffic Regulation Orders, along with certain other conventional highways consents, such as authority to carry out works to the highway which may be contained in a Section 278 agreement, which the contractor may from time to time seek to obtain from the relevant highways authority.
- 5.19 These highways orders will be required in respect of the overhead electricity line removal and access works. Given the programme for those works, the orders are not proposed to be sought by NGET until nearer the commencement date.
- 5.20 In any event, the highway orders and other highways consents are standard consents, and there is no reason to believe that the need for such consents represents an impediment to the delivery of the Project.

#### Consent pursuant to the Cleeve Common Bye Laws

- 5.21 The works require the consent of the Conservators of Cleeve Common ("**Conservators**") under the Commons Regulation (Cleeve) Provisional Order Confirmation Act 1890 and its associated byelaws. The Conservators granted consent on 19 November 2024 (**CD B6**).

### **6. SPECIAL CATEGORY LAND AND STATUTORY UNDERTAKERS**

#### Common Land

- 6.1 Sections of the Cotswolds VIP Project will pass through Common Land. This term is defined in the 1981 Act as "*any land subject to be enclosed under the Inclosure Acts 1845 to 1882, and any town or village green*".
- 6.2 Whilst no freehold estate is intended to be acquired in the Common Land, rights in the Common Land are sought for Electricity Infrastructure Construction, Overhead Line Removal and High Voltage Alternating Current (HVAC).
- 6.3 These rights engage Section 28 and Paragraph 6(1)(a) of Schedule 3 to the 1981 Act and accordingly an application for a certificate in relation to Common Land has been made to the Secretary of State for Environment, Food and Rural Affairs on the basis that "*the land, when burdened with that right, will be no less advantageous to those persons in whom it is vested and other persons, if any, entitled to rights of common or other rights, and to the public, than it was before*".
- 6.4 In these circumstances, the Overhead Line Rights are only required for a temporary period for removal of the existing overhead line, affect only a limited part of the total Common Land in the area and ultimately result in the removal of the existing overhead lines and pylons. Electricity Infrastructure Construction Rights are also only required for a temporary period in order to enable the installation of the cables and associated

infrastructure. The High Voltage Alternating Current (HVAC) Rights are required in order to enable their operation and affect only a limited part of the total common land in area.

- 6.5 The rights affect only a limited part of the total Common Land in the area and, following a temporary period of installation, access to the Common Land will be as before and the land will be no less advantageous following the acquisition of the rights. Users of such land are amongst the beneficiaries of the Cotswolds VIP Project, as set out in paragraph 4.15b) of this Statement (Cotswolds VIP Project Landscape & Visual Impact Assessment).
- 6.6 The certificate application was submitted to the Secretary of State for Environment, Food and Rural Affairs via the Planning Inspectorate on 29 May 2025 (**CD B8**). It will be advertised as required by the Secretary of State for Environment, Food and Rural Affairs and there will be a period for representations to be made in respect of the application for the certificate.
- 6.7 In parallel with the above, NGET has continued to seek voluntarily acquire rights over the Common Land. Heads of terms ("**HoTs**") for an option agreement to acquire an easement over the freehold land were entered into between NGET and the owners of the Common Land on 17 January 2025 and HoTs for an option agreement to acquire an easement over the mines and minerals were entered into on 15 April 2025. NGET anticipates that the aforementioned option agreements will be entered into imminently.

#### Forestry Commission Land

- 6.8 The Order also includes land over which the Forestry Commission has an interest, that being a forestry dedication covenant.
- 6.9 In accordance with Section 63 of the 1989 Act and the forestry dedication covenant, the Forestry Commission's authority to acquire such land as is necessary and to use the land other than for forestry purposes was granted on 4 December 2024 (**CD B7**).

#### Local Authorities and Statutory Undertakers

- 6.10 Interests are held by the following local authorities and statutory undertakers in land affected by the Cotswolds VIP Project:
- a) Cheltenham Borough Council;
  - b) Gloucestershire County Council;
  - c) Wiltshire Council;
  - d) Wessex Water Limited;
  - e) Severn Trent Water Limited;
  - f) Openreach Limited;
  - g) Wales & West Utilities Limited;
  - h) Western Power Distribution (West Midlands) PLC;
  - i) Scottish and Southern Energy Power Distribution Limited;
  - j) National Grid Electricity Distribution PLC;
  - k) National Gas Transmission PLC;

- l) National Highways Limited;
- m) Environment Agency; and
- n) Gigaclear Limited.

6.11 NGET's discussions and negotiations with each of these parties are ongoing.

## 7. **ALTERNATIVES**

### No Action

- 7.1 The Cotswolds VIP Project forms part of the VIP Schemes through which works are intended to be carried out by NGET in order to help reduce the landscape and visual impacts of existing electricity transmission lines in National Parks and National Landscapes in England and Wales.
- 7.2 As such, the Project would provide landscape and visual amenity benefits to the public as detailed in paragraph 4.4 onwards (Justification) of this Statement and widely consulted upon by NGET.
- 7.3 If the Project was not to be delivered, then these benefits would not be realised.

### Options Appraisal

- 7.4 Paragraph 4.41 (Justification) of this Statement explains how the Cotswolds VIP Project was shortlisted and selected for promotion.
- 7.5 This paragraph summarises the engineering options that were considered in developing the detailed proposals.
- 7.6 An initial baseline assessment of factors that would affect the development options was undertaken. This included landscape and visual factors, ecology, the historic environment, soils and geology, hydrology and flood risk, tourism and socio-economic factors, traffic and transport constraints, and the presence of existing infrastructure and services.

### ***Northern CSEC options***

- 7.7 The underground cable direct burial option was then taken forward for further investigation. This was based around the following 4 options for the location of the northern CSEC which were identified following an examination of the landscape on site, and the suitability of adapting existing towers to allow the termination of conductors.
  - a) Option N1 - Land north of B4632 and Tower Z306: The site spans across three arable fields immediately north of the B4632, which forms the south west site boundary. The site comprises predominantly arable crop, hedgerows and some hedgerow trees. Landform gently slopes down to Langley Brook; which forms a small part of the northernmost site boundary. An existing suspension pylon falls just outside the west boundary within the westernmost field. Access to this site would be directly from the B4632.
  - b) Option N2 – Land south of B4632 adjacent to ZF306: The site comprises a pastoral field immediately south of the B4632, which forms the northern site boundary. The entrance drive to Postlip Hall forms part of the western boundary of the site. The eastern boundary comprises an unnamed road, which leads to Dry Ground Farm, Postlip Paper Mill and a sewage works adjacent to the River Isbourne. There is an existing pylon within the field. Access to this site would off be from the B4632 via the unnamed road.
  - c) Option N3 – Land south of B4632 and north of ZF307: The site comprises a pastoral field with the Postlip Paper Mill access road (off the B4632) forming the boundary to the west. The site is

immediately north of Postlip Paper Mill. Hedgerow planting runs along the western boundary and hedgerow and hedgerow trees to the south. There is an existing pylon roughly in the centre of the site. The ground gently slopes down to the south towards the River Isbourne. Access to this site would off be from the B4632 via the unnamed road.

- d) Option N4 – Land south of Postlip Mills and south of ZF307, north of ZF308: The Siting Zone spans across two small arable fields, which are largely enclosed by existing woodlands and hedgerows. The driveway to Corndean Farm and Corndean Cottages forms the boundary to the north and east and to the south and west are blocks of woodland and an overgrown hedgerow. The overhead line spans the two fields. The ground has a slight slope from approximately 142m in the southwestern corner down to approximately 126m in the northeastern field. Access to this site would off be from the B4632 via the unnamed road.

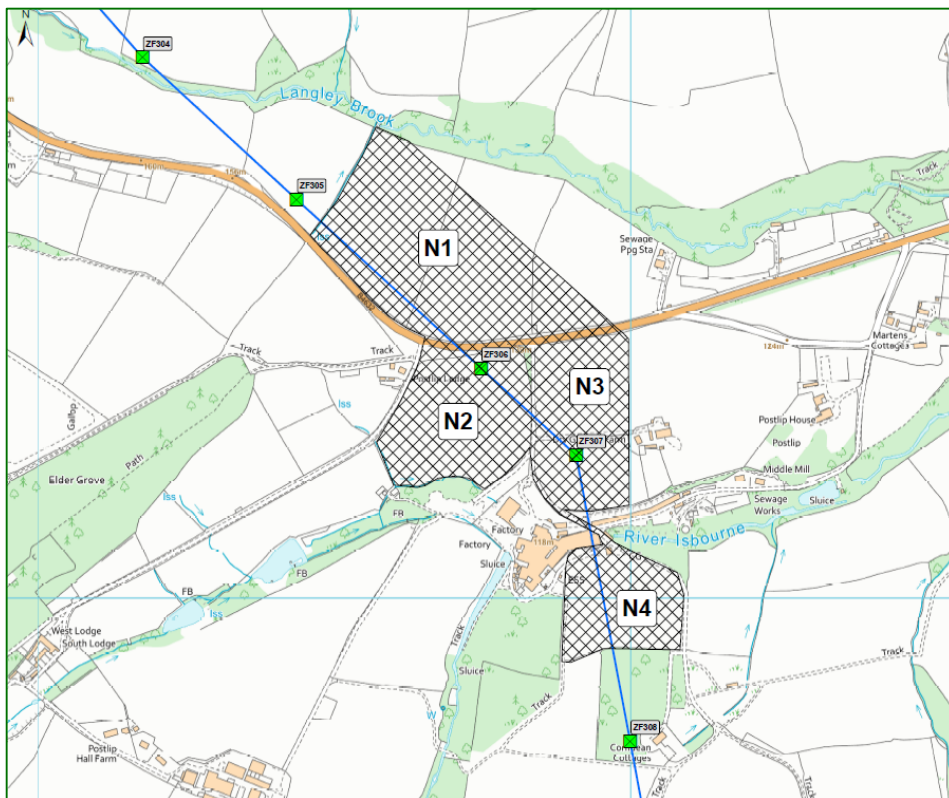


Figure 1: Northern CSEC Siting Options

- 7.8 Each of the options were assessed against the following topics: ecology, landscape and visual amenity, historic environment, water, traffic and transport, socio economics and technical complexity. Having carefully assessed the options against these considerations, NGET proposed that the northern CSEC located at N4 is the clear and compelling design solution.
- 7.9 This decision was the result of an extensive and ongoing assessment of all the above northern CSEC locations undertaken by NGET between 2021 and 2025. In line with the VIP explained at Paragraph 4.36), the preferred location needed to satisfy several criteria, including delivering positive landscape enhancement benefits, avoiding unacceptable impacts, ensuring technical feasibility and maintaining economic and efficient delivery.
- 7.10 Option N4 was selected as the preferred option due to its performance across the above assessment criteria. The location is well screened by the adjacent paper mill, which reduces the visual impact of the CSEC and enhances landscape and visual amenity outcomes compared to alternative locations. From a technical perspective, whilst the location presents a challenge in respect of the final cable terminations of the current

OHL to the CSEC based on the current tower configurations, these can be easily overcome with suitable design considerations due to the adjacent tower being a tension tower. Option N4 also benefits from good access arrangements that are reasonably screened, have limited ecological and woodland impact, and utilise an existing bellmouth off the highway.

- 7.11 Having regard to these factors, NGET determined that Option N4 provides the optimal balance of avoiding unacceptable impacts, ensuring technical feasibility and delivering positive landscape enhancement benefits.
- 7.12 NGET considered the following 6 options for the location of the southern CSEC:

#### ***Southern CSEC Options***

- a) Option S1 – Land south of Ham Road and west of tower ZF325: This site comprises a pastoral field to south of Ham Road. The field is bound by hedgerows and frequent hedgerow trees. S1 is situated on the western slopes of a shallow ridgeline of the High Wold along which the Cotswold Way runs adjacent and parallel to the eastern boundary. Landform slopes away from the northeastern corner down to the southwestern area which is ~237m above ordnance datum ("AOD").
- b) Option S2 - Land underneath existing OHL, south of Ham Road between towers ZF324 and ZF325: This site comprises a pastoral field to south of Ham Road and immediately west of Option S1. The field is bound by hedgerows and frequent hedgerow trees. S2 is situated on the eastern slopes of a shallow ridgeline of the High Wold along which the Cotswold Way runs adjacent and parallel to the western boundary. Landform slopes away from the northern area down to the south eastern area which is ~228m AOD.
- c) Option S3 – Land north of Ham Road between towers ZF323 and ZF324: The site comprises pastoral fields to the north of Ham Road. The fields are divided by a hedgerow boundary with hedgerow trees, which also comprises the majority of the site edges. The Cotswold Way is approximately 115m west running from north to south. The ground slopes away from the northwestern area which is approximately 259m AOD down to the eastern area which is ~232m AOD.
- d) Option S4 – Land south of Ham Road and east of option S2 above: The site comprises of a pastoral field, bound by Ham Road to the north and the access road to Upper Colgate Farm to the west. The field boundaries predominantly consist of mature hedgerow and hedgerow trees. To the east and south the Siting Zone is bound by Dowdeswell Wood (Ancient Woodland). The Cotswold Way National Trail runs adjacent to the southwestern boundary. The ground slopes away from the northern area of the site which is approximately 238m AOD down to the southern area which is ~220m AOD.
- e) Option S5 – Land South of the A40 and east of tower ZF328: This site comprises an area of grassland through which the Cotswold Way passes, bound by the A40 to the north and Lineover Wood (Woodland Trust) Open Access woodland to the south. A picnic bench is located within the grassland near to the Cotswold Way National Trail. To the east is the access road to Lineover Wood visitor car park. The boundaries of the site predominantly consist of mature woodland. Although the site is located in the bottom of the River Chelt valley the localised landform is varied due to the steep banks of the A40 to the north and very steep banks associated with a dismantled railway to the south.
- f) Option S6 – Land to south of the A40 and south of tower ZF328: This site comprises horse paddocks and is bound by Lineover Wood (Woodland Trust) Open Access woodland to the east. The field boundaries consist of a combination of hedgerow, hedgerow trees and post and wire fencing. The



ground is undulating, with steep vegetated embankments of a dismantled railway running within the northern boundary of the site.

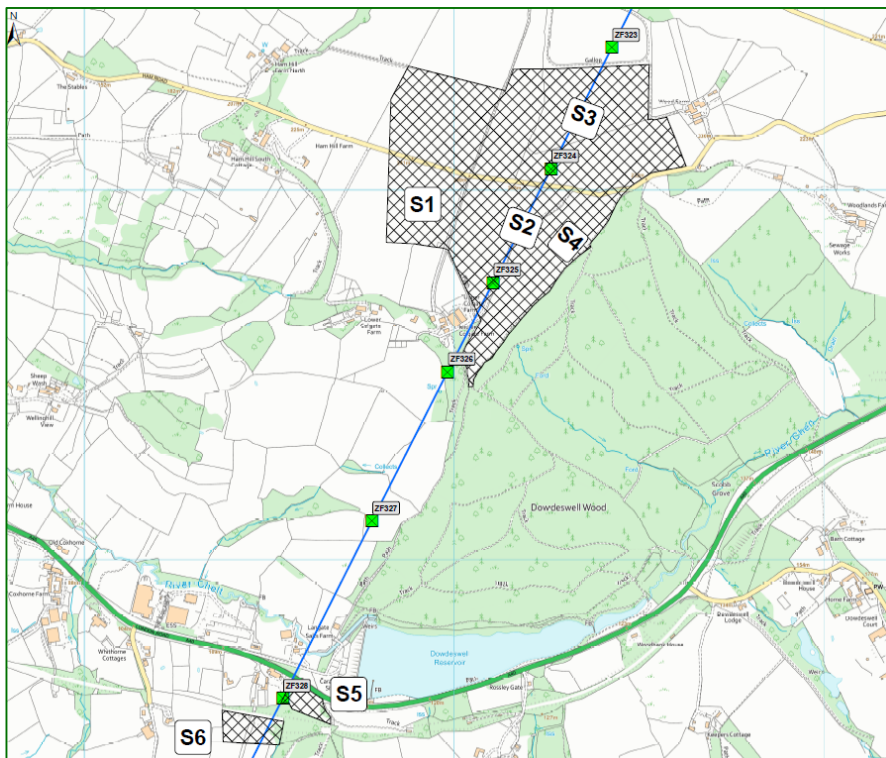


Figure 2: Southern CSEC Siting Options

- 7.13 As with the northern CSEC, NGET carefully assessed the options against the topics listed at paragraph 7.8. NGET concluded that the southern CSEC located at S2 is the selected option. Accordingly, NGET concluded that the option of a direct burial route from N4 CSEC to S2 CSEC is the clear and compelling design solution.
- 7.14 It should be noted that paragraph 10.2.7 of the Statement of Reasons (**CD C3**) erroneously stated that S4 was the preferred option for the southern CSEC. In fact, the preferred option for the southern CSEC has always been and continues to be Option S2. The correct preferred option for the southern CSEC is identified in (i) the planning permission for Option S2 (see paragraph 5.10), (ii) Figure 3 (Cable Routes) at page 42 of the Statement of Reasons which shows the southern CSEC being located at Option S2, (iii) the land included in the Order being at Option S2 (plot 09-015); and this Statement of Case.
- 7.15 The decision to select Option S2 as the preferred option was the result of an extensive and ongoing assessment of all the above southern CSEC locations undertaken by NGET between 2021 and 2025. In line with the VIP Policy (explained at Paragraph 4.36), the preferred location needed to satisfy several criteria, including delivering positive landscape enhancement benefits, avoiding unacceptable impacts, ensuring technical feasibility and maintaining economic and efficient delivery.
- 7.16 As part of its assessment, NGET gave consideration as to whether the southern CSEC could be located south of the A40 (Options S5 and S6). Whilst these locations presented the landscape and visual benefit of resulting in the removal of an additional 3 pylons, they were ultimately rejected due to fundamental technical challenges. These are summarised below.
- Topographical challenges: From the River Chelt valley floor (where S5 and S6 are located), the underground cables would need to ascend approximately 60-80 metres up the escarpment to reach the existing overhead line infrastructure on the High Wold plateau. This steep ascent over a relatively

short distance presents significant engineering difficulties for cable installation and long-term thermal performance.

- b) Crossings: Any cable route from locations south of the A40 would require complex crossings beneath three significant obstacles: (i) the A40 trunk road, (ii) the embankments of a dismantled railway, and (iii) the River Chelt. These crossings would necessitate specialised construction techniques such as horizontal directional drilling, introducing substantial technical risk, cost, and programme implications.
- c) Construction constraints: The confined nature of the sites south of the A40, bounded by the A40 to the north and Lineover Wood to the south/east, severely restricts construction access and working space. The delivery and installation of large electrical equipment would be extremely challenging given the limited access via narrow local roads, creating both health and safety risks during construction and raising concerns about long-term maintenance accessibility.

7.17 Having regard to these constraints, NGET determined that Options S5 and S6 would introduce unacceptable technical complexity and risk to the Project. The engineering challenges would also significantly increase construction costs and programme duration. These significant disadvantages were not outweighed by the landscape and visual benefits of enabling the removal of additional pylons.

7.18 In contrast, the locations north of the A40 avoid these technical constraints whilst still achieving the Project's primary objective of removing the section of visually intrusive overhead line that was judged to result in the most significant visual benefits to the widest range of key visual receptors. NGET concluded that Option S2 provides the optimal balance of avoiding unacceptable impacts, ensuring technical feasibility and maintaining economic and efficient delivery.

### ***Layouts***

7.19 Following this, NGET assessed the 9 options for the layout of the northern CSEC location and OHL termination and the 6 options for the layout of the southern CSEC location and OHL termination.

7.20 On the northern side of the diversion, all the options consider installing a new terminal tower and CSEC on the eastern side of the existing line, between towers ZF307 and ZF308. All options consider the positions of terminal tower and CSEC to be in the same field.

- a) North End A – terminal tower positioned on the northeast portion of the field and the CSEC in the middle.
- b) North End B – terminal tower positioned on the north side of the field and the CSEC on the southern bit of the field.
- c) North End C – terminal tower positioned at a central position and the CSEC on the northeast of the field.
- d) North End D.01 – CSEC positioned on the southeast part of the field and the terminal tower positioned at the east.
- e) North End D.02 – CSEC positioned on the southeast part of the field (slightly further north than D.01) and the terminal tower positioned at the east.
- f) North End D.03 – CSEC positioned on the southeast part of the field and the terminal tower positioned on the northern side.
- g) North End D.04 – CSEC positioned on the southeast part of the field (slightly further north than D.04) and the terminal tower positioned on the northern side.

- h) North End E – CSEC set at the east end of the field and the terminal tower in the centre.
- i) North End F – the CSEC positioned at the northeast of the field and the terminal tower on the north end.

7.21 On the southern side of the diversion, NGET identified the following 6 options for the positioning of the CSEC between existing towers ZF324 and ZF325:

- a) South End A – terminal tower positioned ahead of ZF325 and a standard gantry for the CSEC. This option would require a temporary diversion for the Feckenham – Walham circuit with a temporary tower set west from ZF325. Tower ZF325 to ZF308 would be dismantled.
- b) South End B – similar to A but uses an angle tower and full tension gantry at the CSEC. The temporary diversion requirements are the same.
- c) South End C – reusing the suspension tower ZF325 and siting two separate CSECs at each side of the existing alignment.
- d) South End D – terminal tower positioned ahead (southwest) of ZF325 close to the existing barn and the Cotswold Way. The CSEC is set near to the terminal tower on the opposite side of the access road. Due to sharp angle of the alignment, the terminal tower has an auxiliary crossarm. Temporary diversion is required and construction works in both lands.
- e) South End E – terminal tower positioned ahead of ZF324 close to Ham Road on the existing alignment. The CSEC position is set on the opposite side of the local access road. Due to the sharp bend of the alignment terminal tower has auxiliary crossarm. Temporary diversion of the Feckenham Walham circuit is required to erect the terminal tower.
- f) South End F – the CSEC constructed slightly set off from the original alignment. Replacement of the suspension tower ZF325 would be required.

7.22 NGET selected North End C as the preferred northern CSEC configuration following a detailed assessment of all 9 northern options against the following topics: landscape and visual impact, health and safety management, environmental and land use impact and engineering and construction considerations.

7.23 North End C was ultimately selected due to its performance against the aforementioned assessment criteria. The CSEC is positioned on the north east corner of the field at a lower height coordinate, which reduces visual impact compared to alternatives where the CSEC is positioned in the middle or southern portions of the field. There are also minimal changes in the alignment of the existing OHL route which reduces the likelihood of significant vegetation trimming in nearby woodland and enables cable routes to follow field boundaries whilst entering the CSEC from the same side. In terms of engineering and construction considerations, the configuration of North End C reduces mechanical loads at tower ZF307, reducing the likelihood of requiring tower or foundation strengthening. Both the terminal tower and CSEC can be constructed with both circuits remaining live, which reduces construction risk and reduces land take for temporary diversions. The terminal tower and gantries can be constructed offline in compliance with Health and Safety Executive guidelines, with easier permanent access to the northern CSEC and fewer oversailing conductors on the field compared to other options.

7.24 NGET selected South End F as the preferred southern CSEC configuration following a detailed assessment of all 6 southern options against the topics set out at paragraph 7.22. South End F was selected due to its performance against this criterion. The configuration results in minimal visual impact change around the existing tower ZF325 and requires less change to the original overhead line alignment compared to other options. Crucially, it avoids positioning any new CSEC or terminal tower closer to the Cotswolds National Trail. In addition, this configuration allows the existing suspension tower ZF325 to be reused by connecting with full line tension gantries within the CSEC, avoiding the need for a new larger terminal or angle tower.

- 7.25 As stated above, NGET gave consideration to the other 5 alternative options as part of its assessment, including South End E. Whilst South End E presented the advantage of positioning the CSEC and terminal tower marginally further from the Cotswolds National Trail (although still visible from the route) than some other options, it was ultimately rejected due to the following significant disadvantages:
- a) Land use: The configuration would require construction across two different land parcels due to tower ZF325 and the CSEC being located in different fields. This would create additional complexity in terms of land acquisition, construction logistics, and ongoing maintenance access.
  - b) Engineering and construction: The option would necessitate temporary diversions of the Feckenham-Walham circuit and require auxiliary crossarms due to sharp alignment bends, introducing additional technical complexity and construction risks.
- 7.26 Having regard to these constraints, NGET determined that South End E would introduce unacceptable complications in terms of engineering and construction complexity, land use requirements and health and safety considerations. The marginal improvement in distance from the Cotswolds National Trail was not sufficient to outweigh these disadvantages.
- 7.27 In contrast, South End F avoids these complications whilst achieving the Project's primary objective of minimising visual impact on the Cotswolds National Trail and surrounding National Landscape. NGET concluded that South End F provides the optimal balance of avoiding unacceptable impacts, ensuring technical feasibility, and maintaining efficient delivery whilst operating within a single land parcel.
- 7.28 These configurations now form the basis of the Cotswolds VIP Project, as shown on the Order Maps. The CSECs are required to achieve the transition from an overhead to an underground cable. Both CSECs would require temporary and permanent access roads from the existing highway network which would result in additional construction activities.

### ***Cable Route***

- 7.29 NGET also considered various cable routes for the scheme using a preliminary cable route split between sections and routes and then assessed these against multiple criteria including technical, environmental, ecological, archaeological, visual impact and health and safety considerations. A summary of these routes is set out below.
- a) Section 1 (from northern CSEC to tower ZF312) Route A – shown green on the map at Figure 3 below from the northern CSEC crossing over the Breakheart Plantation.
  - b) Section 2 (from tower ZF312 to tower ZF317) Route A - shown light blue on the map at Figure 3 and moves westerly towards field boundaries and crossing the ZF OHL under span ZF312-ZF313. It then carries south-westerly across Cotswolds Way and the Common Land towards Section 3.
  - c) Section 2 Route B - shown yellow on the map at Figure 3 and moves south parallel to the ZF OHL, which it crosses at span ZF313- ZF314. It then diagonally to the west across a field before carrying south-westerly and across Cotswolds Way and the Common Land towards Section 3.
  - d) Section 2 Route C - shown green on the map at Figure 3 and is similar to Route B to where they cross the ZF OHL but then follows the OHL in parallel before it goes diagonally across the Common Land towards Section 3.
  - e) Section 3 (from tower ZF317 to southern CSEC) Route A - shown orange on the map at Figure 3 and moves diagonally across a field and towards the westerly field boundaries and then carries on due south in-between the Cotswolds Way and Arle Grove. It then passes through a narrow strip of land before it reaches Ham Road and the southern CSEC.

- f) Section 3 Route B - shown purple on the map at Figure 3 and moves south along field boundaries until Arle Grove, where it meets Route A and follows the same alignment to the southern CSEC.
- g) Section 3 Route C - shown light blue on the map at Figure 3 and carries on down in a south, south-easterly direction until existing tower 318. It then continues south parallel to existing towers until existing tower ZF321 before turning nearly east and going across a number of fields in the area. It then turns south again and goes parallel to ZF OHL, around Arle Grove, passes next to Wood Farm and carries on south to the CSEC.
- h) Section 3 Route D - shown green on the map at Figure 3. As with Route C, the route goes around the top of the hill and then continuous south-easterly until it crosses the OHL. It then follows the OHL alignment and carries on south, quite similarly to Route C.

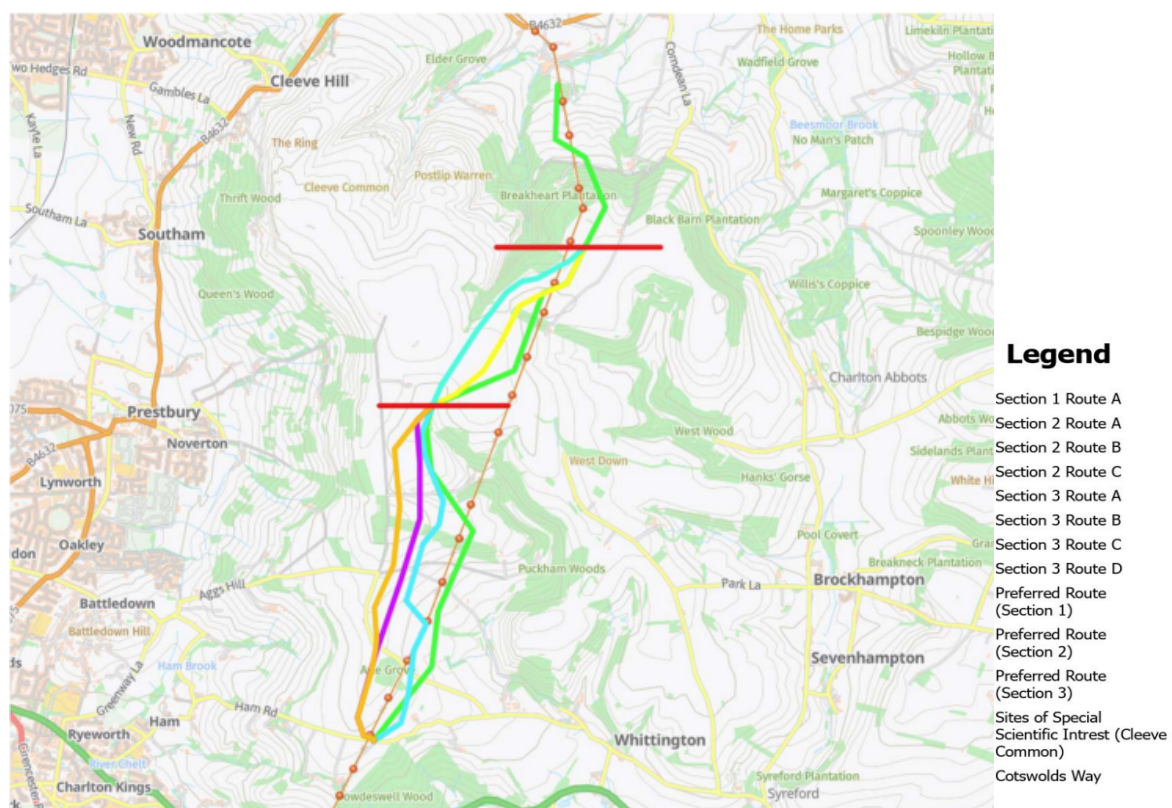


Figure 3: Cable Routes (split between sections shown in red)

- 7.30 Having carefully assessed the options against the above criteria, NGET concluded that the preferred cable route is a combination of the different routes shown in Figure 3, namely Route A for Section 1 and 2 and a combination of Route C for the first part of Section 3 and Route B for the remainder.
- 7.31 Route A was selected as the preferred cable route for Section 1 because it was identified as the only practicable route for this section. This is because alternative options routing the underground cable to the east or west of Breakheart Plantation would require the construction swathe to run through the Cleeve Common SSSI (if located to the west) or in close proximity to the Cotswold Way, Sudeley Castle (a Grade II\* registered park and garden), an ancient woodland and a number of residential properties (if located to the east). In addition, both alternatives would result in a much longer cable route which would increase construction costs and programme duration for the works. It is for these reasons that Route A was identified as the only practical solution for installing the underground cable from the northern CSEC to tower ZF312 and was selected as the preferred route for Section 1 on this basis.

- 7.32 Route A was selected as the preferred cable route for Section 2 due to its performance across the above assessment criteria. The route generally follows the field boundaries more closely than the other options, which reduces the impact on the land and minimises the land take by avoiding a more central alignment through fields. It is also expected to involve less tree clearance (if any). Whilst all Section 2 cable routes must cross under the OHL and cross through Cleeve Common, Route A is the shortest route of all three options which also make it the most preferable from an engineering and cost perspective.
- 7.33 Route C was selected as the preferred cable route for the first part of Section 3 because it follows field boundaries more closely, which minimises disruption to land use and reduces the need for land acquisition across multiple field parcels. It also avoids tree clearance where the route crosses the road leading to Drypool Farm and maintains appropriate separation distances from residential properties. Route B was selected as the preferred cable route for the remainder of Section 3 because it utilises an existing clearing between trees near existing tower ZF319, thereby minimising the impact on ancient woodland. Route B also provides a more direct route to the southern CSEC, reducing overall cable route length and associated construction costs. In contrast, the remainder of Route C was discounted because it would bring the cable route very close to Wood Farm (within 95 metres) and would require the route to run parallel to the existing overhead line for an extended length, creating additional health and safety considerations due to proximity to live conductors and induced voltage risks.
- 7.34 NGET also considered the options for the siting of a shunt reactor unit (which as detailed in paragraph 2.4.5 above is required to control voltage in the transmission system), based around a shortlist of 6 options at 3 different existing NGET substations:
- a) Melksham Option – This option would require an extension of the substation site to the west (part of the neighbouring golf course) and then an extension to the main and reserve bus bars to create a new shunt reactor bay in the newly extended part of the site. The underground cables are nearby and working space is available in the land identified.
  - b) Minety Option 1 – This option would involve an area of land to the south-east of the Minety substation, which is traditionally used as a laydown area for works at the site, being used to accommodate a shunt reactor bay.
  - c) Minety Option 2 – This would involve the creation of a new shunt reactor bay to the north-east of the substation site and would require an extension to the north of the existing site fence. The option may involve a section of cable through woodland (part of which would need to be cleared) to connect between the new bay and the substation bus bars. This option was identified as requiring a connection to a mesh corner of the substation site.
  - d) Bramley Option 1 – An option within the existing fence line of the Bramley substation was identified. This would involve the extension of the main and reserve bus bars using a gas insulated solution to keep the footprint compact enough to remain within the existing fence line.
  - e) Bramley Option 2 – An extension to the west of Bramley substation was also considered. This would involve extending the site fence line out over part of the adjacent ancient woodland that encircles the site. Then extending the main and reserve bus bars to create a new shunt reactor bay in the newly extended part of the site.
  - f) Bramley Option 3 - An extension to the east of Bramley substation was also considered. This would involve extending the site fence line out over part of the adjacent ancient woodland that encircles the site. Then extending the main and reserve bus bars to create a new shunt reactor bay in the newly extended part of the site.
- 7.35 NGET assessed the above options against the following criteria: technical issues, cost, environmental, health and safety management and plans for future development. Following its assessment, NGET concluded that Melksham was the preferred option.

### Removal of Existing Electricity Lines and Pylons

- 7.36 There are limited alternatives available in terms of the removal of the existing overhead line.
- 7.37 The Order provides for a very limited but necessary degree of flexibility in terms of access routeing, scaffold positions and associated temporary dismantling infrastructure. However, the precise micro-siting will be carried out to minimise the impact on land interests, the environment, the local transport network and in order to accord with NGET's statutory duty to be economic, efficient and co-ordinated.

## **8. LAND AND NEW RIGHTS REQUIRED**

- 8.1 The Order Land is shown on the maps that accompany the Order. It comprises all of the land required for the delivery of the Project, including the proposed cable route, pylons to be removed and retained, the northern and southern CSECs, temporary construction compounds and accesses.

### Land Referencing

- 8.2 Land referencing for the Cotswolds VIP Project commenced in 2021 with desktop studies undertaken to establish Land Registry title information together with known information about landowners and occupiers in the area. Desktop studies were also undertaken to identify any special category land in the area. Sources of information included local authority websites, Commons Register, Natural England, English Heritage, Highways England, Crown Estate and the National Trust. Desktop referencing was completed in March 2024. Landowner questionnaires were issued in November 2021 to facilitate survey access.
- 8.3 This was followed by detailed land referencing which commenced in 2023. This included a refresh of the Land Registry data, a review of registered land titles and the issuing and follow-up of detailed questionnaires to all known persons with interests in land. This also included the erection of notices in respect of unregistered land (accompanied by a plan showing the extent of the unregistered land) and investigations into that land. Such notices requested that any party with an interest in the unregistered land come forward and make claim to their interest. Land interest questionnaires were then sent to claimants to confirm their interest. Site walkovers were also conducted to identify any information not obtained from desktop research or contact site referencing, for example any information that has recently changed or change in land use.
- 8.4 In light of this comprehensive and thorough approach, NGET has met the test of diligent inquiry in establishing the persons interested in the land. This then enables such landowners as have been identified to be notified of the proposed compulsory purchase order.
- 8.5 In April 2024, land interest questionnaires were issued along with a plan to landowners, occupiers and other interested parties asking for information about the nature of their ownership, occupation, if there are tenancies and/or any other party with an interest in their land such as rights of way. Recipients of land interest questionnaires were also asked to identify whether the boundary of their interest is correctly identified on the plan. This fed into the detailed land referencing for the purpose of producing the Order maps and schedule to the Order.

### Permanent Land Acquisition

- 8.6 The sites coloured pink on the Order maps are those where permanent land acquisition is sought. However, NGET's approach is only to acquire the interests that it requires over the various plots within the Order. Therefore, should NGET only require new rights over this land or any part of it rather than its permanent acquisition, it will seek to create these rather than acquiring a freehold estate.
- 8.7 For the Cotswolds VIP Project the areas subject to permanent land acquisition are the above ground sites south of Postlip Mills, Winchcombe and south of Ham Road, Cheltenham, both for the construction and operation of the northern and southern CSECs respectively and land to the west of Melksham Substation for the expansion of the substation to allow for the siting of a new shunt reactor. Landowners and their agents are currently engaged in positive negotiations over the HoTs.



## Acquisition of New Rights

- 8.8 The new rights to be purchased compulsorily over the land under this Order are described in Table 1 of the Order Schedule in accordance with the following definitions:

**"Arcing Horn"** means the projecting conductor used to protect transmission infrastructure from damage during power surges on towers ZF302, ZF303, ZF304, ZF305, ZF306, ZF307, ZF325, ZF326, ZF327, ZF328, ZF329 and ZF330;

**"electricity infrastructure"** means the underground cables (including wires, earth wires, fibre optic cables, distributed temperature sensor fibre cabling and other communication cables, pipes, coatings and ducts), connections, cable draw pits, cable joints, cable marker posts, cable terminals, earth bonding and tape, drains, culverts, fibre optic pits, inspection boxes, trenches, marking bands, protective boards or tiles, jointing pits, link boxes, manholes, monitoring equipment, apparatus, conductors, supports, plant, equipment, pillars, warning tape, sheaths for transmitting and/or distributing electricity at such voltage as NGET or other licenced operators may from time to time require for the purposes of its or their operations together with other underground or overground equipment and apparatus associated with or ancillary to such underground cables;

**"electric lines"** means the electric lines and conductors (including wires, earth wires, fibre optic cables and other communication cables, pipes, coatings and ducts and connections) for transmitting and/or distributing electricity at such voltage as NGET or other licenced operators may from time to time require for the purposes of its or their operations together with the tower(s) (if any) for supporting the same and any ancillary equipment and apparatus associated with or ancillary to such electric lines and conductors.

Rights	Description of Rights
Access Rights	<p>All rights necessary to access the Order Land and adjoining land with or without vehicles, plant, machinery, apparatus, equipment, materials and personnel for the purposes of constructing, installing, commissioning, inspecting, surveying, maintaining, repairing, altering, renewing, replacing and removing or decommissioning the electricity infrastructure, including:</p> <ul style="list-style-type: none"><li>a) to carry out de-watering and drainage works and installing, altering or reinstating land drainage systems;</li><li>b) discharge water into existing drains and watercourses;</li><li>c) to carry out works to facilitate such access including to construct, lay down, use and remove access roads including any necessary bridging, culverting or diversion of water courses and drains, modifying road verges and junctions and installing, using, altering, diverting, and removing services and utilities;</li><li>d) the right to fence, erect scaffolding, hoardings or signage or otherwise secure the requisite compound;</li><li>e) to access the Order Land and adjoining land to use horizontal directional drilling, where appropriate, for the installation of the cables;</li><li>f) to fell, trim or lop trees, shrubs, hedges and bushes and to clear and remove any and all vegetation which may damage, obstruct or interfere with the exercise of these Access Rights;</li><li>g) to make good any damage caused in connection with the exercise of these Access Rights; and</li></ul>



	<p>h) to carry out any activities ancillary or incidental thereto,</p> <p>and rights to prevent and remove any works or use of the land which may interfere with or obstruct such access or the exercise of these Access Rights.</p>
<b>Electricity Infrastructure Construction Rights</b>	<p>All rights necessary for the purposes of or incidental to the construction, installation and commissioning of the electricity infrastructure, including to:</p> <ul style="list-style-type: none"> <li>a) excavate, construct and install the electricity infrastructure in, on, under or over the land, including using trenchless techniques such as horizontal directional drilling and ducting;</li> <li>b) test and commission the electricity infrastructure installed in, on, under or over the land and to remedy initial faults and defects in it at any time prior to the date on which it is energised and ready for commercial operation;</li> <li>c) energise and commercially operate the electricity infrastructure for a period of no more than four months following initial commercial operation;</li> <li>d) enter the land and carry out surveys and investigations, including aerial surveys (including the right to fly an unmanned aircraft over the land and to enter and retrieve and recover any such unmanned aircraft from the land);</li> <li>e) carry out archaeological works and environmental and/or ecological mitigation and/or works with or without vehicles plant and equipment;</li> <li>f) carry out works required or permitted by a planning permission and/or consent or licences;</li> <li>g) erect and remove fencing, scaffolding, hoardings or signage or otherwise secure the compound;</li> <li>h) store and stockpile and where necessary use, manage and process plant, machinery, apparatus, and materials (including excavated material) and/or equipment;</li> <li>i) access the land and adjoining land with or without vehicles, personnel and plant, machinery, apparatus, equipment and materials for such purposes;</li> <li>j) construct, lay down, use and remove access roads and work areas including any bellmouths, necessary bridging, culverting or diversion of water courses and drains, carrying out security operations, carrying out earth works, modifying road verges and junctions and installing, using, altering, diverting, and removing services and utilities;</li> <li>k) carry out de-watering and drainage works and install, alter, reinstate or remove land drainage systems;</li> <li>l) discharge water into existing drains and watercourses;</li> <li>m) protect and prevent damage to or interference with the electricity infrastructure and the construction of the same;</li> <li>n) fell, trim or lop trees, shrubs, hedges, bushes and vegetation and to remove or alter any and all walls, fences or any other structures or erections on the land which may damage, obstruct or interfere with the exercise of these Electricity</li> </ul>

	<p>Infrastructure Construction Rights with or without vehicles plant and equipment;</p> <ul style="list-style-type: none"> <li>o) all necessary rights of support for the electricity infrastructure;</li> <li>p) erect, create, use and remove welfare facilities including portable toilets, portable cabins and offices and electricity generators;</li> <li>q) install, use and remove artificial lighting;</li> <li>r) install and remove protection measures for third party structures / assets, including scaffolding;</li> <li>s) install, use, alter, divert and remove services and utilities;</li> <li>t) make good any damage caused in connection with the exercise of these Electricity Infrastructure Construction Rights;</li> <li>u) reinstate the land and to monitor reinstatement works; and</li> <li>v) carry out any activities ancillary or incidental thereto,</li> </ul> <p>and rights to prevent and remove any works or use of the land which may interfere with or obstruct such access or the exercise of these Electricity Infrastructure Construction Rights.</p>
<b>Construction Compound Rights</b>	<p>All rights necessary for the purposes of or incidental to the establishment, use and removal of works compounds associated with the construction and commissioning of the electricity infrastructure and/or the construction, commissioning and decommissioning of the electric lines, including rights to:</p> <ul style="list-style-type: none"> <li>a) erect, create, use and remove a works compound which may include portable cabins and offices, noise enclosure, substation and welfare facilities including portable toilets and electricity generators;</li> <li>b) store, stockpile and where necessary use, manage and process plant, machinery, apparatus, materials (including excavated material) and/or equipment;</li> <li>c) remove topsoil, adjust the height of the land, lay terram and/or stone surface (or similar surface) on the compound and to store the soil;</li> <li>d) access the land and adjoining land with or without vehicles, personnel and plant, machinery, apparatus, equipment, personnel and materials for such purposes;</li> <li>e) carry out works to facilitate such access including to construct, lay down, use and remove access roads including any bell mouths, temporary roads, necessary bridging, culverting or diversion of watercourses and drains, erecting fencing or gates carrying out security operations, carrying out earth works, removing buildings or structures or apparatus, modifying road verges and junctions;</li> </ul>

	<ul style="list-style-type: none"> <li>f) erect, create, use and remove temporary towers and any associated apparatus (including earth wires) for the purpose of diverting electric lines to enable the dismantling of the existing pylons;</li> <li>g) fence, erect hoardings, scaffolding or signage or otherwise secure the compound;</li> <li>h) carry out de-watering and drainage works and install, alter, reinstate or remove land drainage systems;</li> <li>i) discharge water into existing drains and watercourses;</li> <li>j) monitor, including assets and equipment;</li> <li>k) carry out environmental surveys and works for the purpose of protecting wildlife and habitats during construction;</li> <li>l) support and protect the compound;</li> <li>m) install, use and remove artificial lighting;</li> <li>n) park cars;</li> <li>o) protect and prevent damage to or interference with the operation and maintenance of any works constructed pursuant to these Construction Compound Rights;</li> <li>p) fell, trim or lop trees, shrubs, hedges, bushes and vegetation and to remove any and all walls, fences or other structures which may damage, obstruct or interfere with the exercise of these Construction Compound Rights with or without vehicles plant and equipment;</li> <li>q) install, use, alter, divert and remove services and utilities;</li> <li>r) reinstate the land and make good any damage caused in connection with the exercise of these Construction Compound Rights; and</li> <li>s) carry out any activities ancillary or incidental thereto,</li> </ul> <p>and rights to prevent and remove any works or use of the land which may interfere with or obstruct such access or the exercise of these Construction Compound Rights.</p>
<b>High Voltage Alternating Current (HVAC) Rights</b>	<p>All rights necessary for the purposes of or incidental to the retention, commissioning, operation, protection, inspection, maintenance, surveying, repair, alteration, renewal, replacement, removal and decommissioning of the electricity infrastructure, including to:</p> <ul style="list-style-type: none"> <li>a) access the land and adjoining land with or without vehicles, personnel and plant, machinery, apparatus, equipment and materials for such purposes;</li> <li>b) carry out works to facilitate such access, including to construct, lay down, use and remove access roads including any temporary roads, bridging, culverting or diversion of watercourses and drains, removing and erecting fencing/gates, carrying out security operations, carrying out earth works, altering the level of land, removing buildings or structures or apparatus, modifying road verges</li> </ul>

	<p>and junctions and installing, using, altering, diverting, protecting and removing services and utilities;</p> <ul style="list-style-type: none"> <li>c) use horizontal directional drilling and ducting, where appropriate, for the installation of the electricity infrastructure;</li> <li>d) carry out de-watering and drainage works and install, alter, reinstate or remove land drainage systems;</li> <li>e) discharge water into existing drains and watercourses;</li> <li>f) install and remove protection measures for third party structures/assets, including scaffolding;</li> <li>g) divert and remove services and utilities;</li> <li>h) all necessary rights of support for the electricity infrastructure;</li> <li>i) enter the land and carry out surveys and investigations, including aerial surveys (including the right to fly an unmanned aircraft over the land and to enter and retrieve and recover any such unmanned aircraft from the land);</li> <li>j) protect and prevent damage to or interference with the operation and maintenance of the electricity infrastructure;</li> <li>k) fell, trim or lop trees, shrubs, hedges, bushes and vegetation and to remove or alter any and all walls, fences or any other structures or erections on the land which may damage, obstruct or interfere with the electricity infrastructure with or without vehicles plant and equipment;</li> <li>l) with or without vehicles plant and equipment to carry out mitigation planting and monitoring;</li> <li>m) fence, erect hoardings, scaffolding or signage or otherwise secure the requisite compound;</li> <li>n) prevent changes to the use, or level of the surface of, the land;</li> <li>o) make good any damage caused in connection with the exercise of these HVAC Rights; and</li> <li>p) carry out any activities ancillary or incidental thereto.</li> </ul> <p>and rights to prevent and remove any works, obstacles or use of the land which may interfere with or obstruct such access or the exercise of these HVAC Rights.</p> <p>The HVAC Rights may be acquired over such part of the Order Land plots described in Table 1 of Schedule 1 to the Order as may be necessary PROVIDED THAT the 'rights corridor' within which the HVAC Rights shall be acquired shall not exceed 40 metres in width.</p> <p>AND PROVIDED FURTHER THAT the width restrictions above shall not apply to the acquisition of the access rights described at paragraph a) and c) above, which rights may be acquired over such part of the Order Land plots described in Table 1 of Schedule 1 to the Order as may be necessary.</p>
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<b>Overhead Line Rights</b>	<p>All rights necessary for the purposes of or incidental to the construction, retention, commissioning, operation, protection, maintenance, surveying, repair, renewal, replacement, removal and decommissioning of the electric lines, including to:</p> <ul style="list-style-type: none"> <li>a) take all necessary rights of support for the electric lines;</li> <li>b) install and remove protection measures for third party structures/assets, including scaffolding;</li> <li>c) test and commission the electric lines and to remedy initial faults and defects in them at any time prior to the date on which it is energised and ready for operation;</li> <li>d) enter the land and carry out surveys and investigations, including aerial surveys (including the right to fly an unmanned aircraft over the land and to enter and retrieve and recover any such unmanned aircraft from the land);</li> <li>e) carry out archaeological works, environmental and/or ecological mitigation and/or works (including mitigation planting) and associated monitoring and maintenance;</li> <li>f) carry out works required or permitted by a planning permission and/or consent or licences;</li> <li>g) erect and remove fencing, scaffolding, hoardings, or signage or otherwise secure the requisite compound;</li> <li>h) store and stockpile and where necessary use, manage and process plant, machinery, apparatus, and materials (including excavated material) and/or equipment;</li> <li>i) access the land and adjoining land with or without vehicles, personnel, plant, machinery, apparatus, equipment and materials for such purposes;</li> <li>j) facilitate a footpath diversion;</li> <li>k) construct, lay down, use and remove access roads including any bellmouths, temporary roads, necessary temporary bridging, culverting or diversion of water courses and drains;</li> <li>l) carry out de-watering and drainage works and install, alter, reinstate or remove land drainage systems;</li> <li>m) discharge water into existing drains and watercourses;</li> <li>n) protect and prevent damage to or interference with the operation and maintenance of the electric lines and construction of the same;</li> <li>o) fell, trim or lop trees, shrubs, hedges, bushes and vegetation and to remove and alter any and all walls, fences or any other structures which may damage, obstruct or interfere with these Overhead Line Rights with or without vehicles plant and equipment;</li> <li>p) erect, create, use and remove welfare facilities including portable toilets, portable cabins and offices and electricity generators;</li> </ul>
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	<p>q) install, use and remove artificial lighting;</p> <p>r) install, use, alter, divert and remove services and utilities;</p> <p>s) prevent changes to the use, or level of the surface of, the land;</p> <p>t) rights necessary for the purposes of or incidental to the installation, alteration, retention, commissioning, operation, protection, maintenance, surveying, repair, renewal, replacement, removal and decommissioning of the Arcing Horns;</p> <p>u) carry out incidental works to allow safe access to the electric lines such as vegetation clearance and bird nest removal;</p> <p>v) apply a temporary electricity earthing system to electric lines;</p> <p>w) replace permanent colour plates on electric lines;</p> <p>x) make good any damage caused in connection with the exercise of these Overhead Line Rights; and</p> <p>y) carry out any activities ancillary or incidental thereto,</p> <p>and rights to prevent and remove any works or use of the land which may damage, interfere with or obstruct such access or the exercise of these Overhead Line Rights.</p>
<b>Overhead Line Removal Rights</b>	<p>All rights necessary for the purposes of or incidental to the dismantling, removal and decommissioning of the electric lines, including to:</p> <p>a) install and remove protection measures for third party structures/assets, including scaffolding;</p> <p>b) enter the land and carry out surveys and investigations, including aerial surveys (including the right to fly an unmanned aircraft over the land and to enter and retrieve and recover any such unmanned aircraft from the land);</p> <p>c) carry out archaeological works, environmental and/or ecological mitigation and/or works (including mitigation planting) and associated monitoring and maintenance;</p> <p>d) carry out works required or permitted by a planning permission and/or consent or licences;</p> <p>e) erect and remove fencing, scaffolding, hoardings or signage or otherwise secure the requisite compound;</p> <p>f) store and stockpile and where necessary use, manage and process plant, machinery, apparatus, and materials (including excavated material) and/or equipment;</p> <p>g) access the land and adjoining land with or without vehicles, personnel, plant, machinery, apparatus, equipment and materials for such purposes;</p> <p>h) carry out works to facilitate such access, including to construct, lay down, use and remove access roads including any bellmouths, temporary roads,</p>

	<p>necessary bridging, culverting or diversion of water courses and drains, removing and erecting fencing/gates, carrying out security operations, carrying out earth works, altering the level of land, removing buildings or structures or apparatus, modifying road verges and junctions and installing, using, altering, diverting, protecting and removing services and utilities;</p> <p>i) carry out de-watering and drainage works and install, alter, reinstate or remove land drainage systems;</p> <p>j) discharge water into existing drains and watercourses;</p> <p>k) fell, trim or lop trees, shrubs, hedges, bushes and vegetation and to remove and alter any and all walls, fences or any other structures which may damage, obstruct or interfere with these Overhead Line Removal Rights;</p> <p>l) bring onto the land, position and swing the jib of a crane loaded or unloaded through the airspace above the land for the purposes of removing machinery and equipment;</p> <p>m) erect, create, use and remove welfare facilities including portable toilets, portable cabins and offices and electricity generators;</p> <p>n) install, use and remove artificial lighting;</p> <p>o) install, use, alter, divert and remove services and utilities;</p> <p>p) prevent changes to the use, or level of the surface of, the land;</p> <p>q) reinstate the land and monitor the reinstatement works;</p> <p>r) make good any damage caused in connection with the exercise of these Overhead Line Removal Rights; and</p> <p>s) carry out any activities ancillary or incidental thereto,</p> <p>and rights to prevent and remove any works or use of the land which may interfere with or obstruct such access or the exercise of these Overhead Line Removal Rights.</p>
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- 8.9 The land over which the new rights are to be purchased compulsorily is shown coloured blue on the Order maps. The schedule to the Order indicates in respect of each plot, which rights are sought.
- 8.10 The above new rights are for the benefit of the undertaking of NGET for the transmission of electricity including without limitation such land and hereditaments forming part of that undertaking as are accommodated by the rights set out in the Order.

#### Mining Code

- 8.11 Ownership of the mines and mineral rights are excluded from the Order.
- 8.12 However, Parts II and III of Schedule 2 to the 1981 Act, which concern the 'Mining Code', are expressly incorporated within the Order, first in order to safeguard and protect all apparatus and other equipment which will be constructed and/or installed by NGET and its contractors for the purposes of the Cotswolds VIP Project and second to preserve the rights of the owner of the sterilised mines or minerals to claim compensation.

## 9. ACQUISITION BY AGREEMENT

### NGET's Acquisition Strategy

- 9.1 NGET's preference will always be to secure land rights on a voluntary basis. This will be through negotiation with individual landowners to obtain option agreements for the grant of an easement for the trench, cables and/or new overhead line, a lease for temporary construction land, and for the acquisition of land necessary to site the CSECs and expand Melksham Substation to site a new shunt reactor. To help to facilitate this, National Grid's Guidance on Land Rights for New Electricity Transmission Assets (England and Wales) ("**GLR**") has been used (**CD D9**).
- 9.2 The GLR was developed by National Grid in 2010 in order to provide a consistent methodology for acquiring land rights for National Grid's infrastructure projects, both for Development Consent Orders and Town & Country Planning Act/Compulsory Purchase Order schemes. The GLR has been implemented on all National Grid projects requiring land and rights acquisition, and remains under continuous review to ensure that it is still fit for commercial purpose, and meets the expectations of third-party landowners and occupiers. National Grid was one of the first utility companies to formally adopt and promote this approach and it accords with the Guidance on Compulsory Purchase (**CD A14**) and Crichel Down Rules.
- 9.3 A system of payments for rights for the Cotswolds VIP Project was adopted using the principles of both the GLR and CPO Guidance to ensure consistency and fairness in submitting reasonable offers for land and rights across the Project area.
- 9.4 Initially, HoTs were issued and negotiated on the basis that NGET would be granted the option to exercise rights and create easements or transfer land as appropriate. Upon agreement of these principal terms, these are then translated into legal agreements.
- 9.5 Negotiations with landowners and occupiers to secure voluntary option contracts for easements for the trenches within the Cotswolds VIP Project have been ongoing since May 2024. Negotiations with landowners to secure voluntary option contracts for the CSECs sites and associated land and rights have also been ongoing since May 2024. Negotiations with the landowner to secure voluntary option contracts for the expansion of Melksham Substation and associated land and rights have been ongoing since April 2024. Please see the Schedule of Landowner Engagement at Appendix 1 for further detail.
- 9.6 NGET currently benefits from easements/wayleaves in relation to the existing overhead line. Where appropriate, NGET will be utilising these existing rights to carry out the works. However, in some cases the relevant rights require amending or replacing to ensure the rights are sufficient for powers of removal that are expected to be exercised. In such instances, NGET are seeking agreements to vary existing agreements.
- 9.7 Whilst NGET seeks to avoid the use of compulsory purchase powers by negotiating by private treaty, in order to ensure the timely delivery of the Cotswolds VIP Project, it is now necessary to seek compulsory purchase powers. Negotiations to obtain, by agreement, the remainder of the necessary land and rights will continue in parallel with the compulsory purchase process.
- 9.8 Given that the Cotswolds VIP Project comprises in part the removal of existing overhead electricity lines, the Project will inevitably cross existing assets held by statutory undertakers, including transport and highway authorities, in respect of which asset protection and crossing agreements may be required. Further detail is provided at paragraph 6.10 of this Statement.

### Progress

- 9.9 As indicated above, NGET has been seeking to secure all necessary land and rights required to deliver the Cotswold VIP Project. To date HoTs have been issued to all known landowners and negotiations progress positively. No landowners have refused to negotiate so far. As explained above, Appendix 1 comprises a schedule of the key stages of engagement with landowners and occupiers to date.



- 9.10 NGET will continue to seek to voluntarily acquire rights over plots where there are known landowners and will continue to negotiate HoTs with all landowners that are yet to agree HoTs. NGET will do this in parallel with the promotion of the Order, as the Order is its last resort to ensure that it has acquired all the rights that it requires to deliver the Project in accordance with the project programme. Notwithstanding NGET's ongoing commitment to voluntary negotiations with known landowners, NGET must have certainty in respect of the rights that it requires in order to ensure the comprehensive delivery of the Project.
- 9.11 In the event that voluntary agreements cannot be concluded, parties subject to compulsory acquisition will be entitled to compensation under the Compulsory Purchase Compensation Code ("**Compensation Code**").

## 10. FUNDING AND DELIVERY

### Timetable for delivery

- 10.1 NGET has a preferred bidder as main contractor further to its competitive tender in May 2025 and expect the contract to be awarded by April 2026 when preliminary surveys and works will commence, subject to securing necessary planning consents. The main construction works will commence in June 2026.
- 10.2 Subject to securing all necessary approvals and consents, NGET currently estimates that on-site works forming part of the Cotswolds VIP Project will commence in June 2026 and will take approximately two years to complete.
- 10.3 NGET's intention is for the underground connection to be operational and the existing pylons and overhead lines to be removed by 2029.

### Funding

- 10.4 As noted above, the Cotswolds VIP Project forms part of the NGET's wider visual impact provision programme.
- 10.5 The RIIO-T2 framework covers the period from 1 April 2021 to 31 March 2026. NGET submitted its funding application to Ofgem on 16 May 2025.
- 10.6 In order to be eligible for the £465 million provision, visual impact provision schemes must be approved by Ofgem and written into NGET's transmission licence by 31 March 2026. Once written into the licence, they will become a licence condition with which NGET must comply.
- 10.7 Accordingly, funding would be available by the time that the Order enabled the exercise of compulsory acquisition powers. Furthermore, NGET have significant financial standing with a net asset figure on the balance sheet of the 2023/24 Accounts being £5,157 million which ensures that sufficient funding could be made available immediately to cope with any acquisition arising from a blight notice.

## 11. HUMAN RIGHTS

- 11.1 The European Convention rights potentially applicable to the making of the Order are Articles 6 and 8 and Article 1 of the First Protocol (as contained in Schedule 1 to the Human Rights Act 1998).
- 11.2 Relevant parts of Article 1 of the First Protocol of the Convention provide:
- "Every natural or legal person is entitled to peaceful enjoyment of his possessions" and "no one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law".*
- 11.3 Relevant parts of Article 8 of the Convention provide:
- "1. Everyone has the right to respect for his private and family life, his home and his correspondence.*

*2. There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of... the economic well-being of the country ...”*

- 11.4 The Order has been made pursuant to Section 10 and Schedule 3 of the 1989 Act which authorises NGET to acquire land and new rights compulsorily subject to following the procedures laid down in the 1981 Act.
- 11.5 NGET is taking a proportionate approach to compulsory acquisition. Rather than acquiring the freehold title to all land comprised within the Order limits, NGET is seeking to acquire a combination of freehold title (including for the two CSECs), and permanent rights (such as the right to install and operate the buried cable, and the right to remove the existing overhead line).
- 11.6 NGET is seeking to acquire only those parcels of land and/or new rights which are absolutely necessary to facilitate delivery of the Cotswolds VIP Project.
- 11.7 NGET considers that there is a compelling case in the public interest that the new rights and land referred to in the Order be acquired in order to achieve the purposes described in this Statement.
- 11.8 If the Secretary of State agrees with NGET that there is a compelling case in the public interest, he or she may confirm the Order.
- 11.9 If the Order is confirmed, compensation may be claimed by persons whose interests in land have been acquired or whose possession of land has been disturbed proportionate to any losses that they incur as a result of the acquisition.
- 11.10 In the circumstances, if the Order is confirmed, it is considered that the compulsory acquisition of the land and new rights referred to in the Order will not conflict with Article 1 of the First Protocol or Article 8 of the European Convention as any interference with the rights will be in accordance with the law, justified and proportionate.
- 11.11 Relevant parts of Article 6 provide that:

*“1. In the determination of his civil rights and obligations ... everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law.”*
- 11.12 So far as the Order is concerned, any owner, lessee or occupier of land included in the Order will be notified and may have the opportunity to make representations to the Secretary of State and to be heard at a public inquiry before a decision is made as to whether or not the Order should be confirmed, and would in any event have legal rights under the 1981 Act to challenge any order made on the relevant statutory grounds.
- 11.13 NGET is satisfied that there are no planning or financial impediments to the implementation of the Cotswolds VIP Project and that the Cotswolds VIP Project is therefore likely to proceed if the Order is confirmed.
- 11.14 For the reasons set out above, there is considered to be a compelling case in the public interest to proceed with the Order to facilitate the removal of the existing subsection ZF.2(B) of overhead line and pylons.

## **12. EQUALITY ACT**

- 12.1 Section 149 of the Equality Act 2010 (**CD A9.1**) requires due regard to be given to the need to:
  - a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
  - b) advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it; and

- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

- 12.2 The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- 12.3 Although NGET is not directly subject to the public sector equality duty under Section 149 of the Equality Act 2010 ("**PSED**"), information is provided in relation to the Project's interaction with it to assist the Secretary of State with their discharge of that duty.
- 12.4 In the event that NGET is required to confirm the CPO itself, the PSED will be applied as though NGET were subject to it.
- 12.5 The Project has been designed to run in proximity to the existing ZF 400kV overhead line, avoiding residential areas. As such the Project will keep the disruption to those living along the route to a minimum; this will not cause differential impacts to those individuals or groups of individuals who share a relevant protected characteristic.
- 12.6 NGET is undertaking negotiations with landowners impacted by the Order and has made particular efforts to avoid the need to use compulsory purchase powers by negotiating by private treaty.
- 12.7 NGET has carried out community engagement. NGET circulated its first community mailing explaining the Project in July 2022. NGET will continue to engage with the community as the Project progresses, to keep people up to date on its work. Nothing arose from the engagement to date that caused NGET to become concerned that the Project would have a disproportionate effect on any individuals or groups of individuals with protected characteristics. Regular engagement has also been taking place with key stakeholders since February 2022. Engagement with landowners affected first took place in September 2021.
- 12.8 In light of the above, NGET considers that the Order is appropriate in the context of the public sector equality duty set out in Section 149 of the Equality Act 2010.

### 13. **STATEMENT JUSTIFYING EXTENT OF SCHEME TO BE DISREGARDED FOR THE PURPOSES OF ASSESSING COMPENSATION IN THE 'NO SCHEME WORLD'**

- 13.1 Section 6A of the Land Compensation Act 1961 ("**LCA 1961**") (**CD A1.2**) provides that "*the no scheme principle is to be applied when assessing the value of land in order to work out how much compensation should be paid by the acquiring authority for the compulsory acquisition of land.*"
- 13.2 There is a requirement to state the extent of the scheme to be disregarded for the purposes of assessing compensation and applying the no scheme principle set out in Section 6A of the LCA 1961. This is known as the "No Scheme World".
- 13.3 In most cases the 'scheme' means the scheme of development underlying the acquisition and provided for by the Order unless it is shown that the underlying scheme is larger than, but incorporating the scheme provided by the Order.
- 13.4 In the case of the Cotswolds VIP Project, the 'scheme' is the Cotswolds VIP Project which is the proposed development scheme enabled by the Order.

### 14. **OBJECTIONS TO THE ORDER**

- 14.1 A total of 7 objections were made to the Order.
- 14.2 The table at Appendix 2 of this Statement details those objections, summarises their grounds of objection, sets out NGET's response, and the current status of the objections.

- 14.3 The objection received from Mr Tom Howard Nicholas and Mr Jack Thomas Frank Nicholas (represented by Carter Jonas) has now been withdrawn.

## 15. CONCLUSION

- 15.1 Section 10 (**CD A4.2**) and Schedule 3 (**CD A4.4**) of the 1989 Act empower NGET "to purchase compulsorily any land (including rights in land) required for any purpose connected with the carrying on of the activities which (NGET) is authorised by (its) licence to carry on." The rights to be acquired pursuant to the Order are also required for the purposes connected with the carrying on of the activities which NGET is authorised to carry out by the Transmission Licence.
- 15.2 The public benefits of the Project substantially outweigh the private rights affected. The delivery of the Project is in the public interest.
- 15.3 NGET is creating new rights compulsorily as opposed to permanently acquiring land where possible. NGET's approach to the creation of rights follows a proportionate approach in the use of NGET's powers of compulsory acquisition.
- 15.4 NGET's approach is to only acquire the interests that it requires over the various plots within the Order. Not all plots require the same rights, and so NGET will compulsorily acquire different classes of rights over different plots. This also follows a proportionate approach to the use of NGET's powers of compulsory acquisition.
- 15.5 There is a compelling case in the public interest for the exercise of the powers of compulsory acquisition included within the Order.
- 15.6 There are no impediments to the implementation of the Order.
- 15.7 The Secretary of State should confirm the Order.

## 16. FURTHER INFORMATION

### Compensation

- 16.1 Provision is made by statute with regard to compensation for the compulsory acquisition of land and the depreciation in value of properties. More information is given in the series of guides published by the Department for Housing, Communities and Local Government entitled "Compulsory Purchase and Compensation" listed below:
- a) Guide 1 – Compulsory Purchase Procedure (**CD D10**).
  - b) Guide 2 – Compensation to Business Owners and Occupiers (**CD D11**).
  - c) Guide 3 – Compensation to Agricultural Owners and Occupiers (**CD D12**).
  - d) Guide 4 – Compensation for Residential Owners and Occupiers (**CD D13**).
- 16.2 These guides are available to download for free online at:  
<https://www.gov.uk/government/collections/compulsory-purchase-system-guidance>
- 16.3 A copy of this Statement of Case, the documents referenced therein, the Order and maps are available for inspection at [Cotswolds visual impact provision: document library | National Grid](#).



## CORE DOCUMENTS LIST

A	LEGISLATION, GOVERNMENT AND OTHER CENTRAL GUIDANCE
<b>Legislation</b>	
1.	Land Compensation Act 1961
1.1.	Part 1
1.2.	Section 6A
2.	Compulsory Purchase Act 1965
2.1.	Section 7
2.2.	Section 10
3.	Acquisition of Land Act 1981
3.1.	Schedule 3
4.	Electricity Act 1989
4.1.	Section 9
4.2.	Section 10
4.3.	Section 38
4.4.	Schedule 3
4.5.	Schedule 9
5.	Human Rights Act 1998
5.1.	Section 6
6.	Countryside and Rights of Way Act 2000
6.1.	Section 85
7.	Compulsory Purchase (Inquiries Procedure) Rules 2007
8.	Overhead Line (Exemption) (England and Wales) Regulations 2009
8.1.	Regulation 3(1)(E)
8.2.	Regulation 4
8.3.	Regulation 5
9.	Equality Act 2010

9.1.	Section 149
10.	Town and Country Planning (General Permitted Development) (England) Order 2015
10.1.	Schedule 2, Part 15, Class B
10.2.	Schedule 2, Part 4, Class A
11.	The Conservation of Habitats and Species Regulations 2017
12.	Town and Country Planning (Environmental Impact Assessment) Regulations 2017
13.	Electricity Works (Environmental Impact Assessment) (England and Wales) Regulations 2017
<b>Government Guidance</b>	
14.	The Department for Levelling Up, Housing and Communities Guidance on Compulsory Purchase process (January 2025)
15.	The Department for Environment, Food and Rural Affairs Guidance for Relevant Authorities on Seeking to Further the Purposes of Protected Landscapes (December 2024)

<b>B</b>	<b>PLANNING PERMISSIONS AND CONSENTS</b>
1.	Cotswold District Council Planning Permission Reference: 24/01778/FUL Decision Notice (25 March 2025)
2.	Tewkesbury Borough Council Planning Permission Reference: 24/00505/FUL Decision Notice (24 July 2025)
3.	Wiltshire Council Planning Permission Reference: PL/2024/09954 Decision Notice (25 April 2025)
4.	Section 37 Consent (6 November 2024)
5.	Section 38 Consent (4 March 2025)
6.	Cleeve Common Byelaws Consent (19 November 2024)
7.	Forestry Commission Consent (4 December 2024)
8.	Application to the Secretary of State for Environment, Food and Rural Affairs pursuant to paragraph 6(1)(a) of Schedule 3 to the 1981 Act
9.	Cotswold District Council Screening Option Reference: 23/03995/SCR (19 January 2024)
10.	Tewkesbury Borough Council Screening Opinion Reference: 24/00001/SCR (5 April 2024)
11.	Secretary of State Section 37 Screening Decision Reference: 1989u (7 November 2024)
12.	Notice to Mr Jonathan Morton Stanley regarding southern CSEC planning application

12.1	Cover letter to Mr Jonathan Morton Stanley enclosing Notice 1 in respect of southern CSEC planning application (12 June 2024)
12.2	Notice 1 in respect of southern CSEC planning application (12 June 2024)
12.3	Extract of southern CSEC planning application form regarding notice to owners of the relevant land (12 June 2024)
13	Outline Construction Environmental Management Plan submitted with CSEC Planning Applications (June 2024)

<b>C</b>	<b>COMPULSORY PURCHASE ORDER AND RELATED DOCUMENTS</b>
1.	Order
2.	Sealed CPO Maps
2.1	Sealed CPO Land Maps
2.2	Sealed CPO Crown Land Maps
2.3	Sealed CPO Special Category Land Maps
3.	Statement of Reasons
4.	Statement of Case
5.	Email of Objection - Councillor Paul Hodgkinson
6.	Letter of Objection - National Gas Transmission
7.	Letter of Objection - Mr Jonathan Morton Stanley and Corinium Construction Limited, represented by Charles Russell Speechlys
8.	Letter of Objection - Dunkerton Properties Projects Limited and Dowdeswell Conservation Limited represented by Charles Russell Speechlys
9.	Letter of Objection - R H Barnes and Sons represented by Knight Frank
10.	Letter of Objection - Mr Ivan Drake and Mrs Ann Drake
11.	Email of Objection – Mr Tom Howard Nicholas and Mr Jack Thomas Frank Nicholas represented by Carter Jonas

<b>D</b>	<b>MISCELLANEOUS</b>
1.	Landscape and Visual Impact Provision Technical Report (October 2014)
2.	VIP Cotswolds AONB ZF.2 – High Level Appraisal (April 2020)



3.	Landscape and Visual Impact Methodology
4.	VIP Cotswolds CSEC Siting Study (December 2021)
5.	Cotswolds VIP Project Landscape and Visual Appraisal (May 2024)
5.1	Cotswolds VIP Project Landscape and Visual Appraisal (May 2024) Part 1
5.2	Cotswolds VIP Project Landscape and Visual Appraisal (May 2024) Part 2
5.3	Cotswolds VIP Project Landscape and Visual Appraisal (May 2024) Part 3
5.4	Cotswolds VIP Project Landscape and Visual Appraisal (May 2024) Part 4
5.5	Cotswolds VIP Project Landscape and Visual Appraisal (May 2024) Part 5
5.6	Cotswolds VIP Project Landscape and Visual Appraisal (May 2024) Part 6
5.7	Cotswolds VIP Project Landscape and Visual Appraisal (May 2024) Part 7
6.	National Grid: Visual Impact Provision: 'How we intend to reduce the visual impact of existing electricity transmission lines in National Parks and Areas of Outstanding Natural Beauty' (Updated March 2021)
7.	Visual Impact Project Acceptability (April 2018)
8.	Visual Impact Provision Acceptability Testing – North Wessex Downs: Technical Report (July 2022)
9.	Guidance on Land Rights for New Electricity Transmission Assets (England and Wales)
10.	Department for Housing, Communities and Local Government Compulsory Purchase and Compensation - Guide 1 - Compulsory Purchase Procedure
11.	Department for Housing, Communities and Local Government Compulsory Purchase and Compensation – Guide 2 - Compensation to Business Owners and Occupiers
12.	Department for Housing, Communities and Local Government Compulsory Purchase and Compensation - Guide 3 - Compensation to Agricultural Owners and Occupiers
13.	Department for Housing, Communities and Local Government Compulsory Purchase and Compensation – Guide 4 - Compensation for Residential Owners and Occupiers
14.	Cotswold Landscape Character Assessment Extract – Landscape Character Area 2D Cooper's Hill to Winchcombe

## GLOSSARY

Term	Definition
"1981 Act"	The Acquisition of Land Act 1981
"1989 Act"	The Electricity Act 1989
"AOD"	Above ordnance datum
"Acceptability Report 2018"	Testing The Visual Impact Project Acceptability Final Report published in April 2018 included at CD D6
"Acceptability Report 2022"	Testing The Visual Impact Provision Acceptability Testing – North Wessex Downs Technical Report published in July 2022 included at CD D7
"Acceptability Report 2024"	Testing Programme of consumer research held between April to July 2024 examining the acceptability of the Project to household consumers
"AONB"	Area of Outstanding Natural Beauty
"CBS"	Cement bound sand
"CMP"	Construction Environmental Management Plan
"Conservators"	Conservators of Cleeve Common
"CRoW Act 2000"	The Countryside and Rights of Way Act 2000
"CSEC"	Cable sealing end compound
"Compensation Code"	Compulsory Purchase Compensation Code
"CPO Guidance"	Department for Housing, Communities and Local Government's <i>Guidance on Compulsory Purchase process</i> (January y 2025)
"DM"	Dalcour Maclaren (NGET's LA)
"EIA"	Environmental impact assessment
"GLR"	National Grid's Guidance on Land Rights for New Electricity Transmission Assets (England and Wales)
"HoTs"	Heads of terms
"IUCN"	International Union for the Conservation of Nature
"LA"	Appointed Land Agent
"LCA 1961"	The Land Compensation Act 1961
"Licensed Activities"	The transmission of electricity by NGET for the purpose of giving a supply to any premises or enabling a supply to be so given authorised by the Transmission Licence

<b>Term</b>	<b>Definition</b>
"LIQ"	Land Interest Questionnaire
"LOQ"	Landowner Questionnaire
"LVA"	Landscape and Visual Appraisal prepared by LUC on behalf of NGET in 2024 included at CD D5
"LVIM"	Landscape and Visual Impact Methodology published in 2014 included at CD D3
"LVIP Technical Report"	Landscape and Visual Impact Provision Technical Report published in 2014 included at CD D1
"Melksham Planning Application"	Application for planning permission for the expansion to the Melksham Substation
"Melksham Substation"	Melksham Substation, Melksham, Wiltshire
"NGET"	National Grid Electricity Transmission Plc
"OCEMP"	Outline Construction Environmental Management Plan
"Ofgem"	Office for Gas and Electricity Markets
"OHL"	Overhead electricity line
"Order"	National Grid Electricity Transmission (Cotswolds Visual Impact Provision Project) Compulsory Purchase Order 2025
"Order Land"	the land included in the Order
"Planning Applications"	Applications for planning permission for the construction of the CSECs and provision of access tracks
"Project"	Cotswolds Visual Impact Provision Project
"PSED"	The public sector equality duty under Section 149 of the Equality Act 2010
"SAG"	Stakeholder Advisory Group
"Secretary of State"	Secretary of State for Energy, Security and Net Zero
"SMP"	Soil Management Plan
"SRGs"	Stakeholder Reference Groups
"Tel con"	Telephone conversation
"Transmission Licence"	Electricity transmission licence
"VIP Policy"	NGET's policy document governing its approach to the selection, funding and delivery of the VIP Schemes included at CD D5

## APPENDIX 1: SCHEDULE OF LANDOWNER ENGAGEMENT

National Grid Electricity Transmission ("NGET"), Dalcour Maclaren ("DM"), HoTs ("HoTs"), Appointed Land Agent ("LA"), Telephone Conversation ("tel con"), Land Interest Questionnaire ("LIQ"), Landowner Questionnaire ("LOQ").

This Appendix includes limited personal data in to demonstrate negotiations with affected parties and to answer the objections raised. Publication is necessary to comply with NGET's legal obligations and with government guidance, as explained in our Supplemental CPO Privacy Notice. A copy of the Privacy Notice can be accessed at [Cotswolds visual impact provision: document library | National Grid](#),

Interest Name	CPO Plots	Summary Engagement
Eileen Mary Ann Rutledge (ER)	01-001, 01-003, 01-005	<p>29-10-2021 : DM to ER with initial proposal for the project and requirement for survey access.</p> <p>05-11-2021 : LIQ to ER.</p> <p>01-12-2021 : DM to ER with confirmation of walk over surveys.</p> <p>06-02-2024 : Tel con DM to ER to try and arrange non-intrusive access.</p> <p>18-04-2024 : LIQs to ER.</p> <p>22-04-2024 : DM to ER with update on the project.</p> <p>02-05-2022 : ER return of LIQ.</p> <p>10-05-2024 : LIQ from DM to ER.</p> <p>23-05-2024 : Follow up by DM for LIQ.</p> <p>13-06-2024 : Further follow up by DM re LIQ.</p> <p>10-10-2024 : DM to ER invitation to contact NGET to replace the existing wayleave with an easement.</p> <p>18-10-2024 : Tel con ER to DM. Confirming landowner info in response to LIQ.</p> <p>16-04-2025 : NGET to ER with letter and notice of making of the Order (notice date 14-04-2025)</p> <p>08-08-2025 : Follow-up letter from DM to ER regarding existing rights and providing update on project timeframes.</p>
Thomas Woodcock (TW)	01-002, 01-004	<p>20-03-2024 : LA to DM confirming appointment.</p> <p>22-04-2024 : LIQ to TW.</p> <p>25-04-2024 : TW return of LIQ.</p> <p>10-10-2024 : DM to TW Invitation to contact NGET to replace the existing wayleave with an easement.</p> <p>16-04-2025 : NGET to TW with letter and notice of making of the Order (notice date 14-04-2025)</p> <p>08-08-2025 : Follow-up letter from DM to TW regarding existing rights and providing update on project timeframes.</p>
Bryan Harvey & Jacqueline Harvey (BH)	01-006, 01-007	<p>29-10-2021 : DM to BH with initial proposal for the project and requirement for survey access.</p> <p>05-11-2021 : LIQs to BH.</p>

		<p>01-12-2021 : DM to BH with confirmation of walk over surveys.</p> <p>06-12-2021 : Tel con DM/BH confirming agreement to survey access.</p> <p>06-02-2024 : Tel con DM to BH to arrange successful non-intrusive access.</p> <p>22-04 -2024 : Update by DM to BH on project.</p> <p>22-04-2024 : LIQs to BH.</p> <p>27-04-2024 : LIQ response to DM.</p> <p>10-10-2024 : DM to BH Invitation to contact NGET to replace the existing wayleave with an easement.</p> <p>16-04-2025 : NGET to BH with letter and notice of making of the Order (notice date 14-04-2025)</p> <p>08-08-2025 : Follow-up letter from DM to BH regarding existing rights and providing update on project timeframes.</p>
David Courtenay Massey (DCM)	01-008, 01-009	<p>29-10-2021 : DM to DM with initial proposal for the project and requirement for survey access.</p> <p>05-11-2021 : LIQ returned to DM.</p> <p>01-12-2021 : DM confirmation of walk over surveys.</p> <p>13-09-2022 : 2nd LIQ sent by DCM.</p> <p>22-04-2024 : LIQs returned to DM.</p> <p>10-05-2024 : LIQ from DM to DCM.</p> <p>23-05-2024 : Follow up by DM for LIQ.</p> <p>13-06-2024 : Further follow up by DM re LIQ.</p> <p>10-10-2024 : DM to DCM Invitation to contact NGET to replace the existing wayleave with an easement.</p> <p>14-04-2025 : NGET to DCM with letter and notice of making of the Order.</p> <p>08-08-2025 : Follow-up letter from DM to DCM regarding existing rights and providing update on project timeframes.</p>
Claire Colegrave, Anne Patricia Keatley & Philip Charles Keatley (CC),(AC)	01-009, 01-010, 01-011	<p>29-10-2021 : DM to CC with initial proposal for the project and requirement for survey access.</p> <p>05-11-2021 : LIQ to CC.</p> <p>12-11-2021 : Return of LIQs by CC.</p> <p>01-12-2021 : DM to CC confirming walkover surveys required.</p> <p>01-12-2021 : Access granted by CC for non-intrusive surveys.</p> <p>22-04-2024 : LIQ from DM to CC.</p> <p>10-05-2024 : Follow up by DM for LIQ.</p> <p>23-05-2024 : Follow up by DM for LIQ.</p> <p>13-06-2024 : Follow up by DM for LIQ.</p> <p>10-10-2024 : DM to CC/AC Invitation to contact NGET to replace the existing wayleave with an easement.</p> <p>16-04-2025 : NGET to CC/AC with letter and notice of making of the Order (notice date 14-04-2025)</p> <p>08-08-2025 : Follow-up letter from DM to CC/AC regarding existing rights and providing update on project timeframes.</p>

Gloucestershire County Council (GCC)	01-012, 01-013, 01-014, 01-015, 01-016, 01-018, 01-020, 01-021, 01-024a, 02-031, 02-038, 02-040, 05-003, 05-004, 07-002, 07-003, 07-004, 07-005, 07-006, 07-014, 07-018, 07-019, 07-023, 08-002, 08-003, 08-007, 08-008, 09-008, 09-009, 09-011, 10-009, 10-017	29-10-2021 : DM issued initial proposal for the project and requirement for survey access. 01-12-2021 : DM issued reminder letter. 03-12-2021 : GCC email response to letter requesting plans for survey access requirement. 06-12-2021 : DM response with plans attached confirmation all parcels are on the B4362. 06-12-2021 : GCC email to highways with request/plans. 06-12-2021 : Highways response. 07-12-2021 : Further highways response. 22-04-2024 : DM issued project update letter and LIQ. 01-05-2024 : LIQ responses from GCC. 23-05-2024 : DM issued letter and LIQ. 13-06-2024 : DM issued LIQ reminder letter. 19-07-2024 : DM issued LIQ reminder letter. 02-08-2024 : DM issued LIQ reminder letter. 09-08-2024 : Tel con from GGC, confirming receipt of LIQ confirming each are public rights of way. 04-12-2024 : Email from GGC to DM, highway response confirming Highways/pubic rights of way. 16-01-2025 : LIQ responses to all other LIQs. 22-04-2025 : Notice of making.
Lucien John Harvey (LH)	01-016, 01-021, 01-024b, 01-027, 01-029, 01-031, 02-001, 02-002	29-10-2021 : DM to LH with initial proposal for the project and requirement for survey access. 05-11-2021 : LIQ to LH 01-12-2021 : DM to LH with confirmation of walk over surveys. 08-02-2022 : Returned LIQ from LH to DM. 09-2-2022 : Invoice submitted by LA for completing LIQs. 09-3-2022 : Payment to LH for non-intrusive survey. 25-4-2022 : Interim payment to LH for LA fees (from 9-2-2022). 18-12-2023 : LA to DM confirming payment for walk over access. 03-05-2024 : Tel con between Camargue and LH on the project and tower removal near to his land. 10-05-2024 : LIQ from DM to LH. 23-05-2024 : Follow up by DM for LIQs. 13-06-2024 : Further follow up by DM re LIQs. 26-06-2024 : Tel con LH to DM re LIQs. 21-07-2024 to 19-09-2024 : DM to LA and vice versa suggesting site meeting. 21-07-2024 : DR to LA requesting meeting. 22-07-2024 : Tel con LH to DM, would like a site meeting and engage with LA. 23-09-2024 : DM to LA site meeting arranged for 24-09-2024. 24-09-2024 : SM site meeting with LA/LH to discuss Deed of Variation.

		<p>11-10-2024 : DM to LA with draft HoTs following site meeting.</p> <p>16-04-2025 : NGET to LH with letter and notice of making of the Order (notice date 14-04-2025)</p> <p>02-06-2025 : DM to LA with draft HoTs , (this is a follow up to email 11-10-2024 to LA).</p> <p>18-07-2025 : LA, DM meeting to discuss HoTs, action points agreed by DM &amp; LA.</p>
Richard Maurice Albutt, Valerie Albutt, Edward William Albutt (RA),(DA)	<p>01-017, 01-018, 01-019, 01-020, 01-022, 01-023, 01-028, 01-030, 01-032, 02-016, 02-020, 02-021, 02-022, 02-024, 02-025, 02-026, 02-028, 02-029, 02-030, 02-031, 02-038, 01-016, 01-017, 01-018, 01-019, 01-020, 01-022, 01-023, 01-028, 01-030, 01-032, 02-016, 02-020, 02-021, 02-022, 02-024, 02-025, 02-026, 02-028, 02-029, 02-030, 02-031, 02-038</p>	<p>29-10-2021 : DM to RA with initial proposal for the project and requirement for survey access.</p> <p>06-12-2021 : LIQs were returned on behalf of RA.</p> <p>01-12-2021 : Follow up by DM for LIQs.</p> <p>10-12-2021 : Access was granted for non-intrusive surveys by RA.</p> <p>08-03-2022 : Payment to RA for non-intrusive surveys.</p> <p>18-05-2023 to 01-06-2023 : DM to LA and vice versa re licence access for surveys.</p> <p>04-07-2023 to 25-09-2023 : LA to DM and vice versa re further survey works.</p> <p>18-10-2023 to 31-10-2023 : LA to DM re survey access and copy of signed licence.</p> <p>26-02-2024 to 07-03-2024 : LA to DM re damage claim and LA's fees.</p> <p>22-04-2024 : Further request for LIQs to RA by DM.</p> <p>10-05-2024 : Follow up to LIQS to RA by DM.</p> <p>16-05-2024 : DA to DM confirming LA now formally appointed.</p> <p>17-05-2024 : DM to DA confirming the above email.</p> <p>23-05-2024 : DA to DM and vice versa with LA's timesheet.</p> <p>23-05-2024 : Follow up to LIQS to RA by DM.</p> <p>31-05-2024 DM to LA &amp; DA re fees.</p> <p>13-06-2024 : Follow up to LIQS to RA by DM.</p> <p>18-06-2024 to 18-07-2024 : DA to DM and vice versa with further agreed licence for survey works.</p> <p>05-07-2024 : DM to LA with HoTs (HoTs) for cable easement.</p> <p>09-07-2024 to 10-07-2024 : LA to DM and vice versa arranging site meeting.</p> <p>29-07-2024 : Site Meeting conducted with LA/DM</p> <p>29-07-2024 to 30-07-2024 : DA to DM and vice versa on clarification on where HoTs sent.</p> <p>05-08-2024 to 12-08-2024 : LA to DM and vice versa with comments on HoTs.</p> <p>09-08-2024 : DM to LA with HoTs for access and compound.</p> <p>16-08-2024 to 25-09-2024 : DM to LA re survey access and vice versa, returned licence and confirmation of start dates for access for surveys.</p> <p>24-09-2024 : LA to DM with completed survey access licence.</p> <p>28-10-2024 : DM to RA with project update and request for LIQs.</p> <p>07-11-2024 to 28-11-20-24 : DM to LA and vice versa re LA's fees.</p> <p>28-11-2024 : LA to DM with invoice for fees.</p> <p>05-12-2024 to 19-12-2024 : DM to LA and vice versa with detailed comments on HoTs.</p>

		<p>20-02-2025 to 02-04-2025 : LA to DM and vice versa re damage to gates/fencing post survey works.</p> <p>28-02-2025 : DM to LA with comments on comparables.</p> <p>11-03-2025 to 12-03-2025 : DM to LA and vice versa re concerns on damage after survey works.</p> <p>08-04-2025 to 11-04-2025 : DM to LA and vice versa with further detailed comments on HoTs.</p> <p>16-04-2025 : NGET to RA with letter and notice of making of the Order (notice date 14-04-2025).</p> <p>30-04-2025 to 15-05-2024 : DM to LA and vice versa agreement on HoTs.</p> <p>22-05-2025 : LA to DM re client claim and fees.</p> <p>28-05-2025 : HoTs agreed and circulated to NGET's solicitors.</p> <p>29-05-2025 : JR to DM extending licence for access surveys.</p> <p>22-05-2025 to 09-07-2025 : DM to LA confirming processing client claim.</p> <p>20-05-2025 to 09-07-2025 : DM to LA confirming details of claim and payment.</p> <p>29-05-2025 : DM to RA with copy of licence extension for further survey works.</p>
Hollingsworth & Vose Company Limited (H&V)	01-023, 01-024a, 01-025a, 01-025b, 01-026, 01-028, 01-030, 01-033, 02-003, 02-004, 02-005, 02-006, 02-007, 02-008, 02-009, 02-010, 02-011, 02-013, 02-014, 02-015, 02-023	<p>29-10-2021 :DM H&amp;V with initial proposal for the project.</p> <p>05-11-2021 LIQ to H&amp;V.</p> <p>01-12-2021 : DM to H&amp;V with confirmation of walk over surveys.</p> <p>09-02-2022 : Access granted for non-intrusive surveys.</p> <p>10-02-2023 : Licence on file for H&amp;V (survey access)</p> <p>22-04-2024 : LIQ from DM to H&amp;V</p> <p>5-05-2024 : LIQ response from H&amp;V</p> <p>10-05-2024 : Follow up by DM for LIQ to H&amp;V</p> <p>11-06-2024 : Email from DM to LA regarding HoTs and providing route map.</p> <p>13-06-2024 : Further follow up by DM re LIQ</p> <p>18-06-2024 : DM email to LA regarding intrusive survey licence</p> <p>05-07-2024 : DM issued HoTs to AT/LA for Easement.</p> <p>08-08-2024 : DM issued HoTs for NSEC purchase to LA.</p> <p>16-01-2025 : In person meeting between DM/LA to discuss HoTs.</p> <p>16-04-2025 : DM to H&amp;V with letter and notice of making of the Order (notice date 14-04-2025)</p> <p>18-07-2025 : LA/DM meeting to discuss HoTs, action points agreed by DM &amp; LA.</p>
Linda Mary Dare & The Executor of the Estate of the Late Christopher Frederick Dare (LD),(ECD)	02-017, 02-018, 02-019	<p>29-10-2021 :DM to ECD with initial proposal for the project and request for survey access.</p> <p>05-11-2021 LIQs issued to ECD.</p> <p>26-11-2021 : Tel con LD/DM with confirmation that ECD has passed away, LD is the point of contact and that survey access is agreed.</p> <p>22-04-2024 : LIQ from DM to ECD.</p> <p>10-05-2024 : Follow up by DM for LIQs.</p> <p>23-05-2024 : Follow up by DM for LIQs.</p>



		<p>13-06-2024 : Further follow up by DM re LIQs.</p> <p>21-06-2024 : LD to project with request for further information on project</p> <p>21-06-2024 : DM to LD inviting a discussion/meeting so that DR can provide info on project to LO.</p> <p>21-06-2024 : LD to DM with response and querying LIQs and tel con DM clarifying LIQs request.</p> <p>09-10-2024 : DM to LD with further follow up on LIQs.</p> <p>16-04-2025 : NGET to LD with letter and notice of making of the Order.</p>
<p>Damian Charles Hurley &amp; Elizabeth Jane Hurley (EH),</p> <p><i>Personal Assistant (PA)</i></p>	<p>02-027, 02-036, 02-037, 02-040</p>	<p>04-03-2024 : DM with request for meeting with EH to discuss project following change of ownerhsip.</p> <p>05-03-2024 to 19-06-2023 : DM to EH and vice versa to arrange site meeting following email of 04-03-2025 by DM to EH.</p> <p>22-04-2024 : LIQs to EH.</p> <p>09-05-2024 : Returned LIQs to DM by EH.</p> <p>10-05-2024 : Follow up by DM for LIQs to EH.</p> <p>13-06-2024 : Follow up by DM for LIQs to EH.</p> <p>18-06-2024 : Further LIQs response to DM by EH.</p> <p>03-07-2024 : NGET/DM/EH/PA site Meeting</p> <p>05-07-2024 : DM to PA with HoTs for cable easement and plans.</p> <p>30-07-2024 : DM to PA follow up to HoTs.</p> <p>16-08-2024 to 06-09-2024 : DM to PA with update on results of survey work and further survey access requests.</p> <p>10-09-2024 : DM to PA with plans for HoTs.</p> <p>25-09-2024 : DM to PA follow for request for survey access.</p> <p>26-09-2024 : DM to EH with follow up re LIQs.</p> <p>16-10-2024 : DM to PA further follow for request for survey access.</p> <p>24-10-2024 : EH to DM re proposed access clarification request.</p> <p>24-10-2024 : PA to DM request for clarification on working area.</p> <p>28-10-2024 : DM to EH with project update and timeline</p> <p>14-11-2024 to 22-11-2024 : PA to DM and vice versa re clarification of access.</p> <p>29-11-2024 : DM to PA providing clarification on access rights and HoTs.</p> <p>05-12-2024 : DM to PA with follow up to email 29-11-2024.</p> <p>07-01-2025 : DM to PA with follow to email 05-12-2024 and request for survey access.</p> <p>16-02-2025 : Emily to DM with completed access survey licence.</p> <p>17-02-2025 : DM to PA confirming receipt of licence.</p> <p>28-02-2025 : DM to PA follow up on HoTs.</p> <p>16-04-2025 : NGET to EH with confirmation of making of the Order.</p> <p>07-05-2025 : DM to PA Follow up on HoTs.</p> <p>15-05-2025 : Tel con PA/DM and follow up to EH with update and suggestion that EH appoint LA.</p>

		<p>03-06-2025 : DM to EH follow up on HoTs.</p> <p>04-06-2025 : LA to DM acknowledging email 03-06-2025 to EH.</p> <p>17-06-2025 :DM to PA with further follow up, discussion on appointing a LA.</p> <p>07-2025 : EH confirmation of appointment of LA.</p> <p>08-07-2025 : Site meeting LA/DM to discuss aspects of the project.</p> <p>14-07-2025 : LA to DM confirming points of discussion at meeting and suggestions to move matter forward.</p> <p>29-07-2025 to 31-07-2025 : DM to LA and vice versa with comments on email 14-07-2025 confirming pegging out of proposed easement strip.</p>
Michele Huguet Marie Hillgarth & Tristan Patrick Alan Hillgarth (MH)	02-031, 02-032, 02-033, 02-034, 02-038, 02-041, 02-042, 02-044	<p>29-10-2021 :DM to MH with initial proposal for the project and requirement for survey access.</p> <p>07-03-2022 : Payment to MH for non-intrusive survey access.</p> <p>06-02-2024 : Tel con DM to MH and non-intrusive access was arranged.</p> <p>22-04-2024 : Update on project and request for LIQs from MH.</p> <p>10-05-2024 : Follow up request for LIQs from MH.</p> <p>23-05-2024 : Further follow up request for LIQs from MH.</p> <p>13-06-2024 : Further follow up request for LIQs from MH.</p> <p>25-06-2024 : Return of LIQs from MH.</p> <p>18-10-2024 : Message left by DM to TH for MH.</p> <p>16-04-2025 : NGET to MH with letter and notice of making of the Order.</p>
Ann Wendy Drake & Ivan Laurence Drake (ID) (Objection 6)	02-035, 02-039, 02-040, 02-043, 03-001, 03-002, 03-010	<p>29-10-2021 : DM to ID confirming project and requesting survey access.</p> <p>10-11-2021 : Return of competed LIQ by ID.</p> <p>07-3-2022 : Payment to ID for non-intrusive surveys</p> <p>21-03-2022 : Tel con with ID/DM provided further background to the project.</p> <p>02-05-23 : DM tel con to ID regarding survey access.</p> <p>03-05-23 to 25-05-2023 : Requests for survey access and return of agreed access licence.</p> <p>13-06-2023 : DM to ID and vice versa further survey access requests.</p> <p>09-09-2023 to 19-09-2023 : ID to DM re issues post survey work.</p> <p>01-11-2023 : DM to ID re LA appointment.</p> <p>06-11-2023 : LA to DM requesting plans.</p> <p>06-11-2023 : DM to LA confirming will attend meeting with plans.</p> <p>30-11-2023 to 05-12-2023 : ID to DM and vice versa re land plans ahead of meeting 07-12-2023.</p> <p>07-12-2023 : Meeting LA &amp; ID to confirm if KF would represent ID, subsequently LA confirmed that they would not act for ID (11-011-2023).</p> <p>15-12-2023 : Minutes of meeting circulated by LA.</p> <p>19-12-2023 : ID to DM requesting information on the project.</p> <p>20-12-2023 to 03-01-2024 : DM to LA and vice versa requesting plans.</p>

		<p>02-01-2024 : DM to ID update on detailed survey requirements by project.</p> <p>10-01-2024 : ID to DM confirming that need to appoint a new LA.</p> <p>01-02-2024 : LA to DM confirming appointment by ID.</p> <p>05-02-2024 : LA to DM also confirming appointment.</p> <p>18-04-2024 : DM to ID and vice versa confirming survey work.</p> <p>22-04-2024 : LIQs to ID.</p> <p>08-05-2024 &amp; 24-05-2024 : LIQ responses by ID</p> <p>15-05-2024 : ID to DM chasing invoice payment.</p> <p>20-05-2024 : LA confirmed that now dealing with matters for ID, requesting HoTs and update on survey access.</p> <p>22-05-2024 : DM to LA updating timeline for issuing HoTs.</p> <p>24-06-2024 : DR to LA/AT re restrictive covenant in favour of Forestry Commission and request that AT discusses with ID.</p> <p>24-06-2024 : LA confirmed meeting ID on 02-07-2024.</p> <p>04-07-2024 : LA to DR to confirm results of meeting with requested actions by DM .</p> <p>05-07-2024 : DM to LA with HoTs and Land Plans.</p> <p>08-07-2024 : DR to LA answering requests from AT email 08-07-2024.</p> <p>11-07-2024 : LA to DR with request on clarification on relevant matters for project.</p> <p>16-07-2024 : DR to LA clarifying matters raised by LA in email 11-07-2024.</p> <p>17-07-2024 : DR to LA providing data for project.</p> <p>22-07-2024 : LA to DR confirming data has been reviewed and request for clarification on HoTs, and DR to LA in response to clarification.</p> <p>22-07-2024 : LA to DM requesting draft deed of easement from NGET.</p> <p>05-08-2024 : LA to DR further queries raised re surveys.</p> <p>09-08-2024 : ID to DM with claim form for survey works and acknowledgement by DM.</p> <p>21-08-2024 to 22-08-2024 &amp; 26-11-2024 : LA to DM and vice versa requesting standard NGET easement.</p> <p>05-09-2024 : Teams call with LAs/ DM to clarify matters.</p> <p>05-09-2024 : Meeting 5th Sept with ID, LAs, EH, DM discussion on the project and impacts to his land holding.</p> <p>05-09-2024 : DM provided notes of meeting.</p> <p>19-09-2024 : DM to LA confirming Forestry Commission have provided process to remove part of Woodland from covenant.</p> <p>20-09-2024 : NGET to DM/LA requesting covenant removal process now to move forward.</p> <p>20-09-2024 : LA to DM/NGET and DM to LA re woodland covenant.</p> <p>14-10-2024 : LA to DM request for proposed route of cable and DM response</p> <p>14-10-2024 to 16-10-2024 : DM to ID re payments of claim.</p> <p>28-10-2024 : LIQs requests to ID.</p>
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Jonathan Martin James Simms (JS)	03-003, 03-004, 03-005, 03-006, 03-007, 03-008, 03-009, 03-011, 03-012, 03-013, 03-014, 03-015	<p>29-10-2021 : DM to JS with initial proposal for the project and requirement for survey access.</p> <p>05-11-2021 : LIQs by DM to JS.</p> <p>01-12-2021 : Follow up by DM re LIQs.</p> <p>28 -02-2022 : Return of LIQs to DM by JS.</p> <p>25-04-2022 : Payment to JS for non-intrusive surveys</p> <p>23-05-2023 : DM to JS confirming tel con and access arrangements via licence.</p> <p>24-07-2023 to : DM to JS with request for site meeting and confirmation of appointment of JA.</p> <p>31-07-2023 : LA to DM confirming that site meeting will be arranged, meeting arranged 09-08-2023 on site.</p> <p>21-08-2023 : DM to LA confirming points of discussion on site, including access.</p> <p>15-09-2023 : DM to LA confirming archaeology access requirements.</p> <p>19-09-2023 : JS to DM/LA confirming access for the 28-09-2023.</p> <p>20-10-2023 : DM to LA with request for further survey access.</p> <p>25-10-2023 : JS to DM/LA confirming survey access.</p> <p>26-10-2023 : DM to LA/JS confirming indicative locations for soil survey.</p> <p>27-10-2023 : JA to DM and vice versa updated on project.</p> <p>06-02-2024 : Tel con DM to JS to try and arrange non-intrusive access.</p> <p>22-04-2024 : LIQ by DM to JS</p> <p>10-05-2024 : Follow by DM to LIQ</p> <p>23-05-2024 : Follow by DM to LIQ</p> <p>13-06-2024 : Follow by DM to LIQ</p> <p>05-07-2024 : DM to LA with draft HoTs (HoTs).</p> <p>16-08-2024 : DM to LA confirming request for further survey access</p> <p>23-08-2024 : Teams meeting DM &amp; LA</p> <p>28-08-2024 : LA to DM with returned comments on HoTs.</p> <p>25-09-2024 : follow up by DM to JS for LIQs.</p>

		<p>10-09-2024 : DM to LA providing plans to show compound area, licence agreement.</p> <p>25-09-2024 : DM to LA follow up for returned access licence.</p> <p>02-10-2024 : Teams meeting DM &amp; LA</p> <p>21-10-2024 : DM to LA follow up on fencing requirements and survey access.</p> <p>28-10-2024 to 07-11-2024 : Further follow up DM to LA re licence agreement.</p> <p>30-10-2024 to 07-11-2024 : DM to LA with update survey timeline request that progress made on survey licence for access.</p> <p>11-11-2024 to 18-11-2024 : LA to DM and vice versa with requirements for fencing and payments for licence fees.</p> <p>14-11-2024 : DM to LA confirming payment figure for fence.</p> <p>22-11-2024, 26-11-2024 &amp; 02-12-2024 : DM to LA follow up for signed licences.</p> <p>03-12-2024 : LA to DM with returned access licences.</p> <p>09-12-2024 : DM to LA with word version of HOTS.</p> <p>22-01-2025 DM to LA follow up response for HoTs.</p> <p>11-02-2025 &amp; 28-02-2025 : DM to LA with further follow up on response for HoTs.</p> <p>05-03-2025 : DM to LA with draft easement plans.</p> <p>06-03-2025 : DM to LA with updated draft HoTs.</p> <p>08-04-2025 : DM to LA request a meeting to discuss HoTs.</p> <p>16-04-2025 : NGET to JS with letter and notice of making of the Order (notice date 14-04-2025)</p> <p>30-04-2025 : DM to LA with further comments on HoTs.</p> <p>13-05-2025 : DM to LA with follow up for responses on updated HoTs.</p> <p>16-05-2025 : Teams call LA &amp; DM</p> <p>04-06-2025, 17-06-2025 &amp; 24-06-2025 : DM to LA further follow ups on HoTs.</p> <p>26-06-2025 : Tel con DM &amp; LA.</p> <p>27-06-2025 : DM to LA confirming discussion on 26-06-2025 and request for land value comparables.</p> <p>08-07-2025 : JA to DM with comments on HoTs and providing land value comparables.</p> <p>29-07-2025 : DM to LA response on comparables, kiosk design and further updated HoTs.</p>
Charlton Abbotts Limited Liability Partnership, Edwin Maxime Bailey & Tristan Ward Bailey (EB),(LA)	03-016, 03-017, 03-018, 03-019, 03-020, 03-021, 03-022, 04-001, 04-002, 04-003, 04-004, 04-005, 04-006, 04-007, 04-008, 04-009, 05-001, 05-004, 06-	<p>29-10-2021 : First engagement with initial proposal DM for the project and request for walk over survey access.</p> <p>15-11-2021 : File note to confirm access granted for walk-over surveys.</p> <p>02-12-2021 : LIQs were returned by the landowner.</p> <p>07-03-2022 : Payment for non-intrusive survey.</p> <p>13-05-2023 to 12-12-2023 : DM to EB and vice versa re survey access.</p> <p>22-04-2024 : DM to Charlton Abbotts LLP with update on project and further request for LIQs completion.</p> <p>28-04-2024 : LIQs returned from EB.</p> <p>09-05-2024 : Confirmation of tel con DM/EB re LIQs and notification of site notice on unregistered land.</p> <p>05-07-2024 : DM to EB with HoTs for easement.</p>

	0010, 5-002, 05-003,	<p>09-07-2024 to 23-07-2024 : EB to DM and vice versa re confirmation and discussion of access required for the project.</p> <p>16-08-2024 to 20-10-2024 : DM to EB and vice versa further survey access.</p> <p>30-08-2024 : EB to DM return of signed licence.</p> <p>19-11-2024 to 04-12-2024 : DM to EB and vice versa with follow up and discussion on HoTs.</p> <p>04-12-2024 : DM/EB meeting to discuss HoTs.</p> <p>04-12-2024 : Signed copy of HOTS on file.</p> <p>17-12-2024 to 19-12-2024 : DM to EB and vice versa re further survey access.</p> <p>21-01-2025 : EB to DLA Piper with signed HOTS and request that legal matters now progress.</p> <p>19-02-2025 : Copy of signed HoTs from EB circulated to NGET .</p> <p>07-04-2025 to 08-04-2025 : EB to DM and vice versa re advance payment which is due on completion of legal agreement.</p> <p>08-04-2025 : EM to DM with (copy) of follow up to EB's solicitors on legal agreement.</p> <p>16-04-2025 : NGET advised landowner with letter and notice of making of the Order (notice date 14-04-2025).</p> <p>18-04-2025 to 22-04-2025 : EB to DM and vice versa with clarification on land plans from the Order.</p> <p>29-07-2025 &amp; 30-07-2025 : DM to EB and vice versa re National Gas interactions on EB's land holding.</p>
Cleeve Common Trust & Peter Neil Robson & Philip Alan Mark Robson (CCT),(PR)	04-010, 06-002	<p>17-12-2021 : PR to DM requesting assistance with return of LOQ documents.</p> <p>17-12-2021 : DM response to PR's request for assistance.</p> <p>23-12-2021 : DM follow-up email with resolution to LOQ issued raised with online form.</p> <p>20-01-2022 : DM follow-up email.</p> <p>25-01-2022 : PR confirmation of submission of LOQ form.</p> <p>08-02-2023 : Email from DM to PR requesting initial telephone conversation and site meeting.</p> <p>17-02-2023 : Telcon between DM and PR. Arrangements for site meeting with NGET representatives and CCT.</p> <p>24-02-2023 : DM/PR/CCTNGET site meeting on Cleeve Common.</p> <p>21-03-2023 : DM issues letter to CCT to provide project update and ecology survey outlook.</p> <p>24-04-2023 : DM confirmation of receipt to PR.</p> <p>25-04-2023 : PR email to DM with copy of 1957 Conveyance and confirmation names parties were conservators.</p> <p>14-04-2023 : DM email to PR and CCT requesting copy of 1957 Conveyance and clarification re : 3 named parties.</p> <p>18-04-2023 : CCT confirm consent for survey access.</p> <p>03-05-2023 : 15-09-2023 : Various emails between DM and CCT regarding survey access</p> <p>15-08-2024 : CCT email to DM offering survey access through CCT land.</p> <p>16-09-2024 : CCT advises they are seeking to appoint LA.</p> <p>24-10-2024 : HRC Law confirm LA is instructed.</p> <p>28-10-2024 : DM issues copy of HoTs to LA.</p> <p>06-11-2024 : LIQ and cover letter by DM to CCT</p>

		<p>03-12-2024 : DM chase for LIQ response</p> <p>11-12-2024 : CCT email to confirm LIQ mirrors PR (Freehold owner of Common) and therefore does not need to return his.</p> <p>22-04-2025 : DM issue Cover letter and Notice of Making.</p> <p>28-10-2024 : 19-03-2025 : Various emails and tel cons to negotiate HoTs with LA.</p> <p>19-03-2025 : DM email to LA to confirm we have accepted HoTs changes.</p> <p>15-04-2025 : LA provides signed HoTs on behalf of CCT to DM.</p> <p>13 -05-2025 : DM email to LA to confirm contact details for CCT appointed Legals.</p> <p>21-05-2025 : LA confirms CCTlegal representatives.</p>
Sara Paterson (SP)	04-011, 06-004, 06-006, 06-008, 06-010, 06-011, 06-012, 06-013, 06-014, 06-017, 06-018, 06-019, 06-021	<p>17-5-2022 : Telcon (message) from SP to DM request call back re survey access.</p> <p>17-05-2022 : DM to SP confirming subsequent tel con in reply to message above.</p> <p>19-04-2023 : SP to DM requesting call back about the project.</p> <p>24-04-2023 : SP to DM confirming tel con with DM and requesting confirmation of crop loss being paid to their tenant farmer.</p> <p>21-05-2023 : SP to DM confirming will be appointing LA, requesting their fees are re-imbursed.</p> <p>18-09-2023 : DM to SP confirming forthcoming non-intrusive survey works.</p> <p>21-09-2023 : SP to DM and vice versa with agreement on non-intrusive survey access.</p> <p>06-12-2023 : DM to LA confirming meeting (07-12-2023) to discuss with SP project proposals.</p> <p>07-12-2023 DM/SP site meeting</p> <p>19-04-2024 : LA to DM and vice versa confirming survey access arrangements.</p> <p>22-04-2024 : LIQs to SP.</p> <p>24-04-2024 to 28-04-2204 : LIQs follow up by DM .</p> <p>07-05-2024 : Tel con DM and SP's daughter re LIQs.</p> <p>05-07-2024 : DM to LA issuing draft HoTs.</p> <p>16-08-2024 : DM to LA confirming that further survey works required post the non-intrusive surveys.</p> <p>27-08-2024 : LA to DM confirming Dry Pool Farm now tenanted.</p> <p>28-08-2024 : LA to DM providing update.</p> <p>06-11-2024 : LA to DM providing draft invoice for SP engagement.</p> <p>6-11-2024 : Letter to SP from DM with update on scheme.</p> <p>6-11-2024 : LIQs response from SP to DM .</p> <p>12-12-2024 : LA to DM and vice versa confirming fee account can be submitted, request by LA for resending of HoTs.</p> <p>2-12-2024 : LIQs follow up by DM .</p> <p>09-12-2024 : SP tel con clarifying ownership, in respect of LIQs sent.</p> <p>16-04-2025 : NGET to SP with letter and notice of making of the Order (notice date 14-04-2025).</p>



		<p>12-05-2025 : LA to DM requesting land plans.</p> <p>12-05-2025 : DM to LA providing land plans.</p> <p>16-05-2025 : DM to LA follow up re HoTs.</p> <p>29-05-2025 : JR to LA extending licence for non-intrusive survey works.</p> <p>14-07-2025 : Tel con DM &amp; LA chasing up progress on HoTs, agreed action is with LA to respond on HoTs.</p> <p>23-07-2025 : RS to LA re-issuing HoTs.</p> <p>30-07-2025 : Teams call with DM/LA to discuss HoTs.</p>
Angela Mary Gregory & James Glahome Gregory (JG)	06-003, 06-005, 06-007, 06-009	<p>07-02-2024 : Tel con DM to JG arranging ecology access survey.</p> <p>22-04-2024 : LIQs from DM to JG.</p> <p>10-05-2024 : Follow up by DM for LIQs.</p> <p>20-05-2024 : LIQs returned by JG.</p> <p>23-05-2024 : Follow up by DM for LIQ.</p> <p>29-10-2024 : DR to JG with outline of the project and requesting meeting to discuss in more detail, plan to undertake works utilising existing Deed.</p> <p>16-04-2025 : DM to JG with letter and notice of making of the Order (notice date 14-04-2025)</p>
Brenda Anne Robinson & Edward Richard Morris Robinson (ER)	06-013, 06-014, 06-015, 06-016, 07-019, 07-021, 07-023, 07-024, 07-025, 07-026, 08-001, 08-002, 08-003, 09-002, 09-003	<p>29-10-2021 : DM to ER with initial proposal for the project and requirement for survey access.</p> <p>30-10-2021 : LIQs returned by ER to DM</p> <p>03-04-2023 : Tel con ER to DM confirming meeting 12-04-2023.</p> <p>24-05-2023 to 30-06-2023 : DM to LA and vice versa re survey access licences.</p> <p>30-05-2023 : Tel con ER to DM confirming his son has FBT over ER landholding.</p> <p>13-06-2023 to 04-07-2023 : DM to LA and vice versa survey access by way of licence.</p> <p>04-07-2023 : DM to LA confirming dates for surveys.</p> <p>29-09-2023 to 13-11-2023 : DM to LA and vice versa further survey access by way of licence and payment.</p> <p>29-01-2024 : DM to LA re professional fees.</p> <p>22-04-2024 : LIQs to ER.</p> <p>10-05-2024 : Follow up by DM for LIQs to ER.</p> <p>13-06-2024 : Returned LIQs to DM by ER.</p> <p>16-08-2024 : DM to LA confirming results of surveys with confirmation of further surveys required.</p> <p>29-08-2024 : DM to LA with follow up on survey access.</p> <p>01-10-2024 : LA to DM, with LIQs for ER Robinson, request for a site meeting ahead of survey access, concerns in relation to existing drainage.</p> <p>04-06-2024 : DM issued draft HoTs (HoTs) for lease to LA.</p> <p>05-06-2024 : LA confirmed receipt of HoTs.</p> <p>10-06-2024 &amp; 11-06-2024 : DM to LA and vice versa suggesting meeting to discuss HoTs (all landowners).</p> <p>20-06-2024 : Meeting DM/LA.</p>

		<p>05-07-2024 : DM issued draft HoTs (HoTs) for cable easement to LA.</p> <p>02-08-2024 to 26-11-2024 : DM to LA and vice versa re format of HoTs.</p> <p>13-08-2024 TO 18-09-2024 : LA to DM and vice versa re LIQs.</p> <p>16-08-2024 to 21-10-2024 to : DM to LA and vice versa re further licence and agreement to meet.</p> <p>16-10-2024 : Site meeting arranged for 22-10-2024.</p> <p>22-10-2024 : Meeting ER, LA, NGET on site re survey access and lease HoTs</p> <p>23-10-2024 : DM to LA with follow after site meeting, enclosing 2no licences and raising other matters discussed at site meeting.</p> <p>05-12-2024 : DM to LA follow up on HoTs.</p> <p>18-12-2024 to 01-05-2025 : DM to LA and vice versa discussion on HoTs with suggestion of meeting to discuss.</p> <p>16-04-2025 : NGET to ER with letter and notice of making of the Order (notice date 14-04-2025)</p> <p>08-07-2025 : to 15-07-2025 : DM to LA and vice versa further discussion on HoTs and meeting arranged for 18-07-2025.</p> <p>18-07-2025 : LA/DM meeting to discuss HoTs, action points agreed by DM &amp; LA.</p>
<p>Shelburne Farming LLP (SF)</p> <p><i>John Price Landowner (JP)</i></p>	<p>06-020, 06-023, 06-024, 06-025, 06-026, 06-027, 06-029, 07-009</p>	<p>29-10-2021 : LIQ by DM to SF</p> <p>22-11-2021 : DM issue LIQ reminder letter to SF</p> <p>06-01-2022 : JP responds to LIQ confirming ownership providing contact details and agreeing to non-intrusive survey access.</p> <p>28-02-2022 : DM issue payment for non-intrusive survey access.</p> <p>08-03-2022 : DM issue licence payment for survey access.</p> <p>02-08-2023 : DM tel con to JP.</p> <p>18-09-2023 : DM tel con to JP to discuss survey access.</p> <p>19-09-2023 : DM tel con with JP.</p> <p>19-09-2023 : DM email to JP regarding survey access and advising on public consultation dates.</p> <p>15-11-2023 : DM issue licence payment to JP for non-intrusive survey access.</p> <p>06-10-2024 : DM tel con with JP.</p> <p>05-07-2024 : DM issues HoTs to JP.</p> <p>30/07/2024 : DM tel con to JP to discuss project and HoTs and asks for availability for site meeting.</p> <p>07/08/2025 : DM emails chase for HoTs.</p> <p>02-04-2024 : DM issue LIQ to JP.</p> <p>24-05-2024 : DM issue LIQ reminder letter.</p> <p>13-06-2024 : DM issue LIQ reminder letter.</p> <p>28-02-2025 : DM email to JP asking to progress HoTs and offering meeting.</p> <p>30-04-2025 : DM tel con with JP to discuss HoTs and reissues HoTs via email, site meeting offered.</p>

Holly Mitchell & The Executor of the Estate of the Late Jacki Thomas Laughlin Mitchell (HM)	06-022, 07-010	<p>03-01-2021 : HM tel con to DM advised mother is deceased and changes required to land ownership.</p> <p>15-02-2022 : DM hand-delivered letter.</p> <p>21-02-2022 : HM return tel con following door knock to confirm survey access arrangements.</p> <p>21-03-2022 : Return of LOQ.</p> <p>30-08-2023 : DM email to HM, thanking for tel con and proving plan to assist in identifying water supply pipe.</p> <p>31-08-2023 : HM response with marked up plan.</p> <p>18-04-2024 : DM issue LIQ.</p> <p>24-05-2024 : LIQ reminder letter.</p> <p>13-06-2024 : LIQ reminder letter.</p> <p>14-06-2024 : HM tel con, confirming receipt of reminder letter. Further LIQ issued. Discussion re : spring water supply in proximity to RLB. LIQ re-issued.</p> <p>22-04-2025 : Notice of making</p> <p>23-04-2025 : HM email to DESNZ seeking clarification on project extent and impact on land.</p> <p>29-04-2025 : DM email to HM response regarding project impact and confirming no access to woodland unless there is a requirement for survey access. Provision of plot plan.</p> <p>29-04-2025 : HM response, thanking for explanation.</p>
John Henry Barnes & Rosemary Susan Barnes (JB) (Objection 5)	06-028, 06-030, 07-001, 07-002, 07-003, 07-004, 07-005, 07-006, 07-007, 07-008, 07-011, 07-012, 07-013, 07-014, 07-015, 07-016, 07-017, 07-018, 07-019, 07-022, 08-023, 08-002, 08-003, 08-004, 08-005	<p>29-10-2021 : DM to JB confirming background to project &amp; survey access.</p> <p>05-11-2021 : LIQs to JB.</p> <p>21-12-2021 : JB to NGET, questioning LIQ and querying survey access.</p> <p>19-01-2022 : DM to JB clarifying queries, re survey access.</p> <p>20-02-2023 : JB to DM raising queries re aspects of the project.</p> <p>02-03-2022 : DM to JB confirming further survey access.</p> <p>16-03-2023 : JB to DM thanking DM for information re the project.</p> <p>20-03-2023 : Teams call JB/DM</p> <p>19-04-2023 : JB to DM raising questions in respect of project.</p> <p>19-04-2023 : DM to LA in response to questions raised by LA in relation to project.</p> <p>30-06-2023 : LA to Dm confirming instructions from LA.</p> <p>10-07-2023 : DM to LA providing update on project and indicative proposal plan, survey access and copy of licence.</p> <p>12-07-2023 : LA to DM confirming receipt of above info.</p> <p>03-11-2023 LA to DM to discuss site meeting.</p> <p>03-11-2023 : LA to DM with proposed dates.</p> <p>16-11-2023 : DM to LA confirming proposed site meeting dates, arranged for 7th December 2023.</p> <p>07-12-2023 : Site meeting arranged with DM/LA/JB</p> <p>06-02-2024 : LA to DM with request for updated red line boundary.</p>

		<p>26-02-2024 : DM to LA confirming NGET web site for red line boundary plans, with request from LA to DM for pdf red line plans.</p> <p>26-02-2024 : DM to LA confirming red line still subject to final change, once finalised copy plans will be provided.</p> <p>29-02-2024 : LA to DR confirming LA attended public event with concern of proximity of haul road to proximity of haul road to holiday barns. Request for teams call to consider alternatives.</p> <p>6-03-2024 : DM to LA noting concerns and requesting dates for meeting.</p> <p>12-03-2024 &amp; 13-03-2024 : Emails LA to DM and vice versa confirming dates to meet.</p> <p>15-03-2024 : DM to LA with suggestion to meet to discuss HoTs.</p> <p>21-03-2024 : LA to DM and vice versa re surveyor fees.</p> <p>27-03-2024 : LA to LA expressing concerns of project to business.</p> <p>28-03-2024 : LA to DR with copy of LA email from 27-03-2024.</p> <p>12-03-2024 : DM to LA confirming LA's concern have been noted and suggesting a tel con to discuss.</p> <p>15-04-2024 : DM with update from meeting with JB &amp; L on 15-04-2024.</p> <p>18-04-2024 : DM to LA and vice versa with update on survey access request.</p> <p>22-04-2024 : project update to JB and LIQ request.</p> <p>10-05-2024 : DM to LA and vice versa with project update and confirmation of boundary plans.</p> <p>10-05-2024 : LIQs to LA.</p> <p>28-05-2024 : LA to VIP questions why further LIQ sent, with further emails LA to DM and vice versa with request for clarification.</p> <p>10-05-2024 : LIQ to LA.</p> <p>23-05-2024 : Follow up LIQ to LA (from previous month)</p> <p>13-06-2024 : Follow up LIQ to LA.</p> <p>18-06-2024 : DM to LA confirming results of non-intrusive surveys, with request for intrusive surveys.</p> <p>20-06-2024 &amp; 25-06-2024 : LA to DM reviewing/commenting on licence for access.</p> <p>26-06-2024 : DM to LA and vice versa confirming points from above email.</p> <p>02-07-2024 : Further email DM to LA with proposed payments for surveys.</p> <p>02-07-2024 : LA to DM discussing access timings.</p> <p>5-07-2024 : DM to LA issue of HoTs for easement and plans.</p> <p>08-07-2024 : LA to DM confirming receipt of HoTs, with request for A1 plans.</p> <p>09-07-2024 to 10-07-2024 : DM to LA and vice versa confirming records of condition have been completed and will be forwarded/acknowledged &amp; return of signed copy licences for access.</p> <p>16-07-2024 : DM to LA issue of HoTs for proposed access lease and plans.</p> <p>19-07-2024 : project update and LIQ follow up.</p> <p>29-07-2024 to 30-07-2024 : LA to DM and vice versa re progress on harvesting/contractor's access.</p> <p>16-07-2024 : LA to DM confirming receipt of HoTs for access lease, with request for A1 plans.</p>
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		<p>02-10-2024 : DM teams meeting LA.</p> <p>03-10-2024 to 8-10-2024 : LA to DM confirming dates/access to complete archaeology work and compound payments.</p> <p>8-10-2024 : DM to LA confirming proposed use of compound associated with survey access and subsequent issuing of compound licence.</p> <p>08-10-2024 : LA to DM with time sheet for LA.</p> <p>11-10-2024 : LA to DM and vice versa raising/discussing concerns to damage to track at Drypool Farm.</p> <p>11-10-2024 : DM to LA confirming completion of archaeology works.</p> <p>11-10-2024 : LA to DM confirming issues of reinstatement post survey works.</p> <p>06-11-2024 : LA to DM with invoices.</p> <p>10-12-2024 : DM to LA confirming approval of fees, with request for updated invoices.</p> <p>10-12-2024 : DM to LA providing licence for LA clients to sign return ahead of NGET approval process.</p> <p>11-12-2024 : DM to LA confirming payment of fees progressing and chasing response on HoTs.</p> <p>06-12-2024 : DM to LA confirming information for meeting 7th December.</p> <p>09-01-2025 : LA to DM request for walk over with LA.</p> <p>16-01-2025 : DM to LA confirming proposed date for walk over meeting with a request that HoTs are reviewed.</p> <p>20-01-2025 : Meeting confirmed for 3rd Feb 2025 ahead of survey works.</p> <p>12-02-2025 : DM to LA requesting claim for JB signed and returned for processing.</p> <p>28-02-2025 : DM to LA clarifying reasons for current route , suggestion screening options to reduce visual impact, requesting meeting with LA.</p> <p>03-03-2025 : LA confirming he will speak to LA, DM response that request to reviews HoTs.</p> <p>14-03-2025 to 30-04-2025 : LA to DM suggesting meeting with LA. DM responding to confirm dates.</p> <p>10-04-2025 : DM to LA confirming payments made.</p> <p>16-04-2025 : DM to LA with letter and notice of making of the Order (notice date 14-04-2025)</p> <p>01-05-2025 : DM to LA confirming CPO has now been submitted.</p> <p>01-05-2025 : LA to DM and vice versa suggesting further dates to meet.</p> <p>06-05-2025 : Meeting with LA confirmed for 7th May.</p> <p>12-05-2025 : LA to DM with request for Land plans, DM responded with copy of land plans.</p> <p>16-04-2025 : DM to LA with letter and notice of making of the Order (notice date 14-04-2025).</p> <p>16-05-2025 : DM to LA confirming that NGET wish to work with LA to mitigate business disturbance inviting LA to respond.</p> <p>29-05-2025 : Objection submitted by LA on behalf of JB.</p> <p>29-05-2025 : DM to LA with extension to non-intrusive survey licence.</p> <p>03-06-2025 : DM to LA with further email requesting engagement on HoTs.</p> <p>16-06-2025 : Tel con DM to LA and follow up email chasing for response on HoTs.</p>
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<p>Beryl Baxter &amp; Derek Baxter (DB)</p> <p><i>Rob Baxter – Son (RB)</i></p>	<p>07-025, 07-026, 09-002, 09-003, 09-004, 09-005</p>	<p>29-10-2021 : DM to DB with initial proposal for the project and requirement for survey access.</p> <p>05-11-2021 LIQs to DB.</p> <p>01-12-2021 : DM to DB with confirmation of walk over surveys.</p> <p>28-04-2022 : File note to confirm that DM has visited twice and posted X2 letters and sent letter with tracked delivery.</p> <p>25-05-2022 : File note by DM confirming DM called. DM explained that a number of attempts to contact DB (RB is son). RB confirmed he could be point of contact moving forward.</p> <p>29-05-2022 : DM to RB confirming access requests/requirements.</p> <p>13-06-2025 : DM to RB with follow re access request.</p> <p>23-09-2022 : DM to RB requesting returned LIQs.</p> <p>05-12-2022 : DM to RB requesting meeting or tel con to discuss the project.</p> <p>11-01-2023 : DM to RB confirming further surveys and requesting RB contact DM.</p> <p>11-01-2023 : Tel con from RB to DM. Verbal agreement on non-intrusive surveys.</p> <p>03-04-2023 : DM tel con to RB to arrange a meeting.</p> <p>21-04-2023 : Site meeting with DB/NGET</p> <p>06-11-2023 : Confirmation of appointment of LA by DB.</p> <p>16-11-2023 : DM to LA confirming project background and next steps/timings for project.</p> <p>16-11-2023 : DM to LA providing consultation plan and background to discussions to date.</p> <p>28-02-2024 : DM to LA confirming DB attended consultation event, inviting LA to contact DM.</p> <p>04-03-2024 : DM to LA providing update on project.</p> <p>22-04-2024 : LIQs from DM to DB</p> <p>21-05-2024 : LA to DM confirming meeting would be sensible.</p> <p>10-05-2024 : Follow up LIQs from DM to DB.</p> <p>23-05-2024 : Further follow up LIQs from DM to DB.</p> <p>13-06-2024 : Further follow up LIQs from DM to DB.</p> <p>25-06-2024 &amp; 30-08-2024 : LIQs responses from DB.</p> <p>25-08-2024 : LA to DM re licence agreement for access.</p> <p>29-08-2024 : DM to LA and vice versa confirming arrangements for access.</p> <p>31-08-2024 : LA to DM sending survey licence.</p> <p>11-10-2024 : DM to LA issuing HoTs (HoTs) for easement.</p>

		<p>20-01-2025 : DM to DB to confirm dates for access.</p> <p>20-01-2025 : DB to DM confirming receipt of email and DB will contact DM direct.</p> <p>21-01-2025 : Tel con message DB to DM requesting tel con re access.</p> <p>11-02-2025 : DM tel con to DB confirming and agreeing access 12 &amp;13 Feb 2025.</p> <p>16-04-2025 : NGET to DB with letter and notice of making of the Order (notice date 14-04-2025)</p> <p>21-05-2025 : DM to LA confirming tel with DB providing update on project &amp; requesting response on HoTs, enclosing HoTs once again.</p> <p>21-05-2025 : LA to DM confirming meeting with the family planned and will respond on HoTs and request for compound size.</p> <p>23-05-2025 : DM to LA providing red line boundary and fencing requirements.</p> <p>05-06-2025 : LA to DM with comments on HoTs.</p>
The Executor of the Estate of the Late David John Pritchett (EDP)	07-025, 07-026, 09-002, 09-003, 09-004, 09-005, 09-006, 09-007, 09-010	<p>29-10-2021 : DM to EDP with initial proposal for the project and requirement for survey access.</p> <p>05-11-2021 : LIQs to EDP.</p> <p>01-12-2021 : DM to EDP with confirmation of walk over surveys.</p> <p>07-12-2021 : LA confirmed that DPE had passed away.</p> <p>29-03-2022 : Return of LIQ by LA on behalf of EDP.</p> <p>12-05-2022 : DM to LA with request if EDP will sell land required for project.</p> <p>08-06-2022 : DM to LA confirming offer for the land on behalf of NGET.</p> <p>24-08-2023 to 27-09-2023 : DM to LA and vice versa re survey access.</p> <p>23-10-2023 : DM to LA with plan showing soil survey locations.</p> <p>30-10-2023 : DM to LA and vice versa agreeing survey licence with draft licence enclosed.</p> <p>31-10-2023 : LA to DM with licence amendments.</p> <p>31-10-2023 : DM to LA with revised licences.</p> <p>09-11-2023 : LA to DM and vice versa with signed licence and confirmation from DM it is walkover.</p> <p>20-02-2024 : LA to DM confirming land owned by EDP now sold and details of new owner.</p> <p>22-04 -2024 : Update by DM to EDP on project with LIQ request.</p> <p>10-04-2024 : LIQ follow up by DM .</p> <p>23-05-2024 : LIQ further follow up by DM .</p> <p>13-06-2024 : LIQ further follow up by DM .</p> <p>16-04-2025 : NGET to EDP with letter and notice of making of the Order (notice date 14-04-2025)</p>
Jennifer Ann Stringer (JS)	08-006, 08-007	<p>20-06-2022 : DM letter to JS introducing the project and request for meeting.</p> <p>11-07-2022 : LIQ by DM to JS</p> <p>14-07-2022 : DM tel con with JS regarding project and confirmed LA.</p> <p>12-08-2022 : Email LA to DM confirming his instruction. LA completed LIQ and issued to DM.</p> <p>12-08-2022 : Email DM to LA confirming receipt of LIQ and offering meeting.</p>



		<p>12-08-2022 : LA confirmed acceptance of non-intrusive survey access on behalf of JS.</p> <p>26-08-2022 : DM email to LA to provide cable route corridor and details of proposal.</p> <p>26-08-2022 : LA return LOQ on behalf of JS.</p> <p>18-07-2023 : DM email to LA to provide scheme route options and location of compound.</p> <p>10-08-2023 : DM chases LA on route plan and suggests site meeting.</p> <p>15-08-2023 : Site meeting with DM and LA to discuss project proposal.</p> <p>06-07-2023 : JS grants access for non-intrusive surveys.</p> <p>15-09-2023 : DM email to LA requesting survey access.</p> <p>19-09-2023 : JS tel con to DM following receipt of DM letter, confirmed happy for survey access. DM confirmed HoTs will be issued and suggests land meeting once issued.</p> <p>21-09-2023 : 16-10-2023 : Multiple correspondence regarding survey access .</p> <p>26-02-2024 : DM email to LA providing project update letter and notifying him of dates for public consultation events.</p> <p>22-03-2024 : LIQ issued by DM.</p> <p>24-05-2024 : DM issue LIQ reminder.</p> <p>04-06-2024 : DM issue HoTs to LA.</p> <p>13-06-2024 : DM issue LIQ reminder.</p> <p>07-07-2024 : LA provides comments on HoTs requesting more details and negotiating lease value.</p> <p>16-08-2024 : DM issues intrusive survey licence to LA and JS.</p> <p>29-08-2024 : DM email to LA clarifying approach to ground investigation surveys and responding to comments on HoTs.</p> <p>30-08-2024 : LA provides comparable evidence of licence agreements for HoTs negotiations.</p> <p>27-09-2024 : DM has Teams call with LA to discuss HoTs.</p> <p>23-10-2024 : DM email to LA negotiating lease value in HoTs.</p> <p>31-10-2024 : DM chase email to LA to provide comment on land values for HoTs.</p> <p>31-10-2024 : LA email to DM negotiating HoTs.</p> <p>04-12-2024 : 15-05-2025 : Significant correspondence was had with regards to HoTs negotiations and lease rate agreed upon.</p> <p>11-04-2025 : Teams meeting with DM and LA to discuss HoTs.</p> <p>01-05-2025 : 22-07-2025 : DM chases LA for signed HoTs while LA advising he is seeking solicitors' comment.</p> <p>16-04-2025 : DM issue project update letter and Notice of Making.</p> <p>22-07-2025 : LA advises that he wishes to increase agreed lease fee.</p> <p>24-07-2025 : DM issue letter regarding Ecology survey access.</p> <p>12-08-2025 : DM emails LA to negotiate HoTs.</p>
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John Robert Davis (JD)	09-004, 09-005, 09-006, 09-007, 09-008, 09-009, 09-010, 09-011	<p>29-10-2021 : LIQ by DM to JD.</p> <p>01-12-2021 : LIQ reminder by DM to JD.</p> <p>01-12-2021 : LIQ returned by JTW to DM, agreeing to non-intrusive survey access.</p> <p>30-05-2023 : Letter to JD regarding upcoming intrusive surveys.</p> <p>15-11-2023 : Payment issued to JD for intrusive survey works.</p> <p>22-04-2024 : LIQ by DM to JD</p> <p>24-05-2024 : LIQ reminder by DM to JD.</p> <p>13-06-2024 : LIQ reminder by DM to JD.</p> <p>28-06-2024 : LIQ response by JD to DM.</p> <p>11-10-2024 : DM issues HoTs via post to JD.</p> <p>29-10-2024 : LA confirms instruction by JD.</p> <p>09-12-2024 : DM reissued HoTs to LA on receipt of instruction confirmation.</p> <p>18-12-2024 to 16-01-2025 : LA to DM requesting a meeting on site, arranged for 16th January 2025</p> <p>16-01-2025 : Meeting between DM/LA to discuss client HoTs.</p> <p>22-04-2025 : Project update letter and Notice of Making issued to JD by DM.</p> <p>08-07-2025 : LA tel con to DM and follow up email. DM to LA to confirm positive progress on HoTs, suggestion for a further meeting. Draft option agreement provided to LA.</p> <p>17-07-2025 : LA, DM meeting to discuss HoTs, actions agreed and follow up required.</p>
Christine Caroline Ten Wolde-Marshall & Johannes Albertus Ten Wolde (JTW)	09-008, 09-009, 09-011, 09-017	<p>05-11-2021 : LIQ to JTW by DM.</p> <p>05-11-2021 : Survey access and Cotswolds VIP letter issued by DM to JTW.</p> <p>01-12-2021 : LIQ returned by JTW to DM, agreeing to non-intrusive survey access.</p> <p>07-03-2022 : Payment for non-intrusive survey access issued to JTW.</p> <p>06-09-2022 : LA email to confirm instruction as LA for JTW.</p> <p>06-09-2022 : DM email to LA confirming receipt of instruction email and invites LA to a Teams call to discuss the project.</p> <p>06-09-2022 : LA email to DR advising his clients attended Charlton Kings consultation event and were supportive of project but concerned with the impact on their property.</p> <p>09-09-2022 : DM phone tel con to LA providing more detail on project.</p> <p>14-11-2023 : DM tel con to LA regarding access for non-intrusive surveys.</p> <p>19-03-2024 : Site meeting with DM, JTW and LA to discuss project impact on land.</p> <p>18-04-2024 : DM issue LIQ to JTW.</p> <p>24-04-2024 : LA email to DM regarding erected notices on road by client's property.</p> <p>24-04-2024 : DM provides response and explanation regarding unregistered land site noticing.</p> <p>20-05-2024 : LIQ response from JTW.</p> <p>11-10-2024 : DM issued HoTs to LA.</p>

		<p>13-10-2024 : LA email to DM advising he away and will review on his return-to-work 21st October.</p> <p>10-12-2024 : Following no response from LA DM chases LA for response on HoTs.</p> <p>13-12-2025 : LA emails DM stating his client do not wish to enter into an option agreement until project is “further down the line.”</p> <p>13-12-2024 : DM email to LA suggesting a site meeting.</p> <p>22-04-2025 : DM issue Cover letter and Notice of Making to JTW.</p> <p>06-05-2025 : DM email to LA outlining project update and confirming planning permissions approved. DM chases LA for response on HoTs.</p> <p>12-08-2025 : DM email to LA to ask if landowners are in a position to negotiate HoTs.</p>
Jonathan Morton Stanley & Corinium Construction Limited (JS) (Objection 3)	09-008, 09-009, 09-011, 09-021, 07-014, 07-018, 07-020, 07-027, 09-001, 09-008, 09-009, 09-011, 09-012, 09-013, 09-014, 09-015, 09-016, 09-018, 09-019, 09-020, 09-022, 09-024, 10-001	<p>29-10-2021 : Letter DM to JS with initial proposal for the project and requirement for survey access.</p> <p>05-11-2021 : LIQs to JS.</p> <p>01-12-2021 : Tel con DM/JS with reference to the project.</p> <p>01-12-2021 : DM to JS confirming requirement for walk over access.</p> <p>10-12-2021 : JS return of completed LIQs.</p> <p>28-02-2022 : Payment of non-intrusive survey to JS .</p> <p>16-11-2023 : LA to DM confirming appointed by JS.</p> <p>11-12-2023 to 18-12-2023 : LA to DM and vice versa re survey access.</p> <p>31-01-2024 : LA to DM and vice versa re further survey access.</p> <p>20-02-2024 : LA to DM confirming land now sold to JS.</p> <p>15-03-2024 : LA to DM and vice versa confirming appointment of LA by JS and request for a meeting, subsequently confirmed for 20-03-2024.</p> <p>26-02-2024 : DM to LA with project update</p> <p>20-03-2024 : Meeting between DM/LA in DM Bristol Office.</p> <p>17-04-2024 : LIQs to JS from DM</p> <p>18-04-2024 : DM to LA with further survey requests and background to survey works.</p> <p>22-04-2024 : Update letter for the project from DM to JS.</p> <p>25-04-2024 : DM to JS confirming receipt of project update.</p> <p>10-05-2024 : Follow up letter re LIQs request to JS from DM</p> <p>15-05-2024 : JS to DM with title information.</p> <p>23-05-2024 : Further follow up letter re LIQs request to JS from DM .</p> <p>28-05-2024 : LA to DM re return of LIQs.</p> <p>13-06-2024 : Further follow up letter re LIQ request to JS from DM .</p> <p>18-06-2024 : DM to LA confirming request for ecology surveys, and LA to DM confirming consent for these to be carried 25-07-2024.</p> <p>18-06-2024 : JS to DM re clear up works following survey access.</p>

		<p>19-06-2024 : DM to LA providing information on planning application, DM confirmed he had been contacted direct by JS.</p> <p>20-06-2024 : LA to DM confirming receipt of information.</p> <p>02-07-2024 to 10-07-2024 : LA to DM and vice versa re further survey access/issuing of licence/provision of records of condition.</p> <p>05-07-2024 : DM to LA providing HoTs (HoTs) for cable easement and purchase of SEC.</p> <p>15-07-2024 : LA to DM return of signed licence.</p> <p>02-08-2024 to 23-08-2024 : LA to DM and vice versa with further survey requests.</p> <p>29-08-2024 04-09-2024 : LA to DM with claim for trail pit disturbance and subsequent discussion.</p> <p>29-08-2024 : Tel con JS/DM requesting further land referencing queries go to LA.</p> <p>29-08-2024 : LA to DM request for update re organic status and Sustainable Farming Incentive obligations.</p> <p>29-08-2024 : LA to DM confirming losses re impacts of trail pits.</p> <p>29-08-2024 : DM to LA confirming payment for trail pits.</p> <p>03-09-2024 : LA to DM request for meeting re survey access and other matters.</p> <p>04-09-2024 : DM to LA confirming that will respond on JS claim.</p> <p>09-09-2024 : Meeting LA/DR to discuss project.</p> <p>12-09-2024 to 25-09-2024 : DM to LA and vice versa with further survey access requests.</p> <p>13-09-2204 : DM to LA offering payments to JS re licences for access.</p> <p>13-09-2204 : LA to DM confirming payments and raising querying in relation to trees on his land holding when temporary diversion.</p> <p>16-09-2024 : DM to LA confirming arrangements for survey access/temporary diversion to mitigate effects on JS land holdings.</p> <p>17-09-2024 to 11-12-2024 : DM to LA and vice versa in relation LA fees, final outcome is approval of fees.</p> <p>11-12-2024 : DM to LA requesting progress on HoTs and feedback from LA.</p> <p>22-11-2024 : DM to LA re claim for damage re survey access.</p> <p>26-11-2024 : Site meeting with JS/DM to discuss damage.</p> <p>25-11-2025 to 10-12-2024 : LA to DM re approval of professional fees.</p> <p>03-03-2025 : Follow up with LA on HoTs.</p> <p>03-03-2025 : LA to DM confirming that he will review the HoTs.</p> <p>16-04-2025 : NGET to JS with letter and notice of making of the Order (notice date 14-04-2025)</p> <p>30-04-205 to 01-05-2025 : DM to LA further follow up on HoTs, confirming LA handing over to LA/suggestion for a meeting.</p> <p>01-05-2025 : LA to DM confirming the handover.</p> <p>12-05-2025 : LA to DM querying location of Land Plans.</p> <p>12-05-2025 : DM to LA with Land Plans.</p>
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Dunkerton Properties projects Limited, Dowdeswell Conservation Limited & Dowdeswell Park (Estates) LLP (DP) (Objection 4)	10-003, 10-004, 10-013, 10-017	<p>10-07-2021 : LIQ by DM to DP</p> <p>22-11-2021 : Survey access and Cotswolds VIP letter issued by DM to DP</p> <p>13-01-2022 : Site meeting held with DM and LA discussing impact of project.</p> <p>25-04-2022 to 21-07-2022 : DM and NGET chase Dunkerton properties for an update following site meeting.</p> <p>19-05-2022 : LOQ issued by DM.</p> <p>17-01-2023 : DP provide letter granting foot access for surveys.</p> <p>02-05-2023 : Following tel con attempts DM emails LA regarding survey access.</p> <p>15-09-2023 : DM emails LA to chase for survey access response.</p> <p>17-05-2023 : LA emails DM with copy of signed licence agreement for survey access.</p> <p>17-04-2024 : DM issue project update letter and LIQ to DP</p> <p>24-05-2024 : DM issue chase email for LIQ to DP.</p> <p>13-06-2024 : DM issue chase email for LIQ to DP.</p> <p>09-10-2024 : DM issue chase email for LIQ to DP.</p> <p>10-10-2024 : DM issue HoTs to DP and DC.</p> <p>16-10-2024 : LA emails DM confirming receipt of HoTs.</p> <p>16-10-2024 : LA emails DM requesting more detail on HoTs and further discussion or meeting.</p> <p>16-10-2024 : DM emails B regarding HoTs and offering a meeting to discuss.</p> <p>18-10-2024 : DM hosts Microsoft Teams with LA to discuss HoTs.</p> <p>22-04-2025 : DM issue Cover letter and Notice of Making to DP.</p> <p>06-05-2025 : DM chases on HoTs and offers another meeting to discuss details.</p> <p>07-05-2025 : LA requests HoTs to be resent.</p>

		<p>07-05-2025 : DM reissues HoTs to LA at his request and provides detail on project timescales.</p> <p>27-06-2025 : DM emails LA noting receipt of objection and expresses wish to continue HoTs discussions.</p> <p>25-07-2025 : DM emails LA to ask for a site meeting to discuss objection and HoTs.</p> <p>05-08 –2025 : DM/NGET meet on site with DP to discuss project and objection.</p>
Georgina Katherine Fuller, Joanna Louise Hamilton Salmon, Robert Paul Tagg & Simon Lawrence Hamilton Ward (SW)	10-005	<p>22-04-2022 : LIQ by DM to SW</p> <p>11-05-2022 : DM tel con with SW to discuss project. Reissued LOQ and land plans.</p> <p>12-05-2022 : SW confirmed receipt of correspondence from 2022. DM confirmed SW's postal address and details of scheme.</p> <p>30-05-2022 : DM email to SW to chase return of LIQ.</p> <p>09-06-2022 : SW email to DM asking to speak in due course.</p> <p>09-06-2022 : DM suggests Teams call on 11th June 2022.</p> <p>10-06-2022 : DM confirmed tel con arrangement with SW for Tuesday 14th June.</p> <p>11-07-2022 : DM site meeting with SW.</p> <p>21-07-2022 : DM to SW thanking SW for his time on site and confirming if survey access is now agreed.</p> <p>10-08-2022 : Following tel con SW confirmed to DM that NGET may access for non-intrusive survey work.</p> <p>24-08-2023 : DM tel con to SW and follow email to provide latest project consultation plan.</p> <p>22-03-2024 : DM issued LIQ to SW.</p> <p>23-04-2024 : DM received tel con from SW.</p> <p>18-06-2024 : DM email to SW regarding survey access on River Cheltenham.</p> <p>25-06-2024 : DM email to chase SW on survey access.</p> <p>07-07-2024 : HoTs issued to SW via post.</p> <p>22-04-2025 : DM issued project update letter and Notice of Making.</p> <p>13-05-2025 : DM email to SW to prompt response on HoTs.</p> <p>16-06-2025 : SW email to DM requesting new copy of HoTs.</p> <p>24-07-2025 : DM issues new copy of HoTs and advising that a meeting would be useful.</p>
Environment Agency (EA)	10-006	<p>29-10-2021 : DM intro letter and survey access request.</p> <p>01-12-2021 : DM LOQ letter.</p> <p>02-04-2024 : LIQ response from EA.</p> <p>22-04-2024 : DM letter to EA with project update and LIQ.</p> <p>03-05-2024 : EA response from Estate Surveyor Central confirming no known interest in land, not relating to this plot.</p> <p>03-05-2024 : EA response regarding main river and permissive powers, request to follow permitting rules for main river.</p> <p>17-04-2025 : Notice of making issued.</p>

Dorothy Mary Bloxham & Kenneth George Bloxham & David Craig Spencer Bloxham & Margaret Caroline Bloxham (KB)	10-008, 10-011, 10-013, 10-014, 10-017	<p>29-10-2021 : DM to KB with initial proposal for the project and requirement for survey access.</p> <p>01-12-2021 : DM to KB with confirmation of walk over surveys and reminder to return LIQs.</p> <p>22-04-2024 : Further LIQs to KB</p> <p>22-04-2024 : DM issue LIQ via site visits from DM, no response from door knock.</p> <p>13-06-2024 : Further follow on LIQs by DM.</p> <p>18-09-2024 : Further LIQs request from KB.</p> <p>14-10-2024 : DM attempts site visit with no response at property, LIQ posted in property.</p> <p>04-11-2024 : Letter issued regarding fibre licence proposal over property.</p> <p>22-11-2024 : DM issues LIQ and project update letter via recorded delivery.</p> <p>12-12-2024 : Posting of notice of entry on landowner interest.</p> <p>16-04-2025 : NGET to KB with letter and notice of making of the Order (notice date 14-04-2025)</p>
Golam Azam & K B S Properties Limited (KBS)	10-010, 10-012, 10-015, 10-016, 10-017	<p>29-10-2021 : DM to KBS with initial proposal for the project and requirement for survey access.</p> <p>01-12-2021 : DM to KBS with confirmation of walk over surveys and reminder to return LIQs.</p> <p>22-04-2024 : Further LIQs to KBS.</p> <p>10-05-2024 : Further follow up by DM re LIQs.</p> <p>23-05-2024 : Further follow up LIQs request from KBS.</p> <p>13-06-2024 : Further follow up LIQs request from KBS.</p> <p>28-10-2024 : Update from DM on project and further request for LIQs.</p> <p>10-10-2024 : DM to KBS Invitation to contact NGET to replace the existing wayleave with an easement.</p> <p>16-04-2025 : NGET to KBS with letter and notice of making of the Order (notice date 14-04-2025)</p> <p>08-08-2025 : Follow-up letter from DM to KBS regarding existing rights and providing update on project timeframes.</p>
John Charles Gater & Lilie Bridget Gater (JG)	10-017, 10-018, 10-019, 10-020, 10-021, 10-023, 10-024	<p>29-10-2021 : DM to JG with initial proposal for the project and requirement for survey access.</p> <p>02-11-2021 : Return of LIQs by JG.</p> <p>03-12-2021 : Tel con JG to clarify LIQ responses.</p> <p>01-12-2021 : DM to JG with confirmation of walk over surveys.</p> <p>22-04-2024 : LIQs to JG.</p>

		<p>10-05-2024 : LIQ follow up from DM to JG.  23-05-2024 : Follow up by DM for LIQ.  31-05-2024 : Tel con JG to DM to clarify responses to LIQs.  13-06-2024 : Further follow up by DM re LIQs.  21-07-2024 : LIQs to JG.  23-07-2024 : Project update for JG.  25-09-2024 : Further LIQs request from DM to JG.  10-10-2024 : DM to JG invitation to contact NGET to replace the existing wayleave with an easement.  16-04-2025 : NGET to JG with letter and notice of making of the Order (notice date 14-04-2025)  29-05-2025 : DM issuing licences to JG for ecology non-intrusive surveys.  20-06-2025 : DM tel con to JG re survey access.  25-06-2025 DM tel con to JG to re-arrange survey access.  08-08-2025 : Follow-up letter from DM to JG regarding existing rights and providing update on project timeframes.</p>
Fourgate (Cheltenham) Limited (FG)	10-022	<p>29-10-2021 : DM to FG with initial proposal for the project and requirement for survey access.  01-12-2021 : DM to FG with confirmation of walk over surveys.  22-04-2024 : LIQs to FG.  10-05-2024 : LIQ follow up from DM to FG.  23-05-2024 : LIQ further follow up from DM to FG.  13-06-2024 : LIQ further follow up from DM to FG.  10-10-2024 : DM to FG with invitation to contact NGET to replace the existing wayleave with an easement.  16-04-2025 : DM to FG with letter and notice of making of the Order (notice date 14-04-2025)  08-08-2025 : Follow-up letter from DM to FG regarding existing rights and providing update on project timeframes.</p>
Megan Jane Davis (MD)	10-025, 10-026, 10-027	<p>07-02-2024 : Tel con DM to MD confirming non-intrusive access is agreed.  22-04-2024 : LIQs to MD.  10-05-2024 : LIQ from DM to MD.  13-05-2024 : Telcon MD to DM requesting further LIQs.  13-05-2024 : Project update from DM to MD and request for LIQs.  23-05-2024 : Follow up by DM for LIQs.  13-06-2024 : Further follow up by DM re LIQs.  06-08-2024 : Tel con MD clarifying ownership in response to LIQs.  10-10-2024 : DM to MD with invitation to contact NGET to replace the existing wayleave with an easement.  18-11-2024 : LA to DM confirming appointment by MD with questions around project and access to existing Pylons.  16-04-2025 : NGET to DM with letter and notice of making of the Order (notice date 14-04-2025)</p>



		08-08-2025 : Follow-up letter from MD to DM regarding existing rights and providing update on project timeframes.
Jack Thomas Frank Nicholas & Tom Howard Nicholas (JN,TN)	11-001, 11-002, 11-003, 11-004, 11-005	<p>18-01-2024 : DM introductory letter with plan and survey access request.</p> <p>27-02-2024 : Meeting arrangements finalised.</p> <p>08-03-2024 : Meeting note from LA confirming survey licence has been signed and issued in the post. DM response.</p> <p>15-03-2024 : DM confirmation to NGET project Manager that signed licence has been received.</p> <p>17-06-2024 : DM email to LA with plans attached and breakdown of land required. Request for proposed acquisition value and supporting calculations.</p> <p>July 2024 : Return of LIQs and DM internal processing of key information for SoId and detailed land referencing.</p> <p>16-07-2024 : Follow-up email from DM to LA requesting response to email dated 17-06-2024.</p> <p>18-07-2024 : Email from LA to DM confirming receipt and providing initial figure for discussion.</p> <p>18-07-2024 : DM email to LA requesting breakdown of workings.</p> <p>18-07-2024 : LA email to DM with breakdown of workings.</p> <p>19-07-2024 : DM email to LA requesting tel con next week to review calculations, along with breakdown of own figures.</p> <p>02-08-2024 : Email from LA to DM with further information.</p> <p>02-09-2024 : In person meeting held in Bristol.</p> <p>05-11-2024 : DM email to LA confirming Melksham Planning Application submission.</p> <p>05-11-2024 : Acknowledgement from LA re planning and request for update from DM.</p> <p>05-11-2024 : DM email to LA confirming commitment to reach voluntary agreement. DM made revised offer.</p> <p>20-11-2025 : DM email to JN/TN/LA with proposed survey dates.</p> <p>23-11-2025 : Email from JN to DM confirming access for surveys.</p> <p>13-12-2025 : DM email to LA requesting response to email of 05-11-2024</p> <p>14-02-2025 : DM email to LA requesting response to email of 05-11-2024.</p> <p>07-03-2025 : DM email to LA requesting response to email of 05-11-2024.</p> <p>10-03-2025 : DM email to LA re : planning representation and request for all parties meeting to discuss.</p> <p>24-03-2025 : Meeting between DM/LA/TN/JN to discuss voluntary deal.</p> <p>04-04-2025 : Email from LA to DM with breakdown of proposed acquisition figures.</p> <p>08-04-2025 : DM to LA. Terms for deal were discussed verbally with LA to report to client.</p> <p>11-04-2025 : LA email to DM requesting discussed terms are issued in writing and request for marking out of site.</p> <p>13-04-2025 : DM email to LA with updated HoTs (v3).</p> <p>14-04-2025 : LA email to DM with comments on HoTs.</p> <p>29-04-2025 : DM email to LA with comments on HoTs and fresh version (v4).</p> <p>06-05-2025 : DM email to LA with proposed tel con time to discuss HoTs.</p> <p>07-05-2025 : Tel con between DM and LA on HoTs and follow-up email.</p>

		<p>08-05-2025 : DM email to LA with latest version of HoTs (v5).</p> <p>16-05-2025 : Signed HoTs returned by LA.</p> <p>21-05-2025 : DM email to LA confirming receipt and highlighting further project discussions about extent of use of access for construction traffic.</p> <p>21-05-2025 : DM email to JN/TN in LA absence, raising issue around use of access for construction traffic.</p> <p>22-05-2025 : JN email response to DM confirming receipt and raising disappointment.</p> <p>22-05-2025 : DM response to JN email suggesting meeting when LA returns from annual leave.</p> <p>09-06-2025 : LA email to DM requesting update.</p> <p>12-06-2025 : DM email to LA acknowledging objection raised by LA on behalf of JN/TN and suggesting options to progress voluntary agreement for use of access for all construction traffic.</p> <p>20-06-2025 : LA email to DM with meeting times and dates. Proposed solution offered and raising of professional fee balance.</p> <p>24-06-2025 : DM email to LA confirming response will be issued following project meeting.</p> <p>03-07-2025 : LA email to DM requesting update.</p> <p>09-07-2025 : DM email with revised HoTs (v6) for LA consideration.</p> <p>09-07-2025 : LA email to DM confirming receipt of HoTs and confirming he will discuss with his client.</p> <p>09-07-2025 : DM email to LA re : fees.</p> <p>11-07-2025 : LA email to DM with queries on terms.</p> <p>14-07-2025 : DM email to LA requesting tel con.</p> <p>16-07-2025 : DM email to LA with revised wording proposal for HoTs.</p> <p>22-07-2025 : LA email to DM on HoTs wording and fees.</p> <p>22-07-2025 : DM tel con to LA no answer.</p> <p>23-07-2025 : DM tel con to LA and discussion around HoTs.</p> <p>24-07-2025 : DM email to LA with revised HoTs (v7).</p> <p>29-07-2025 : LA email to DM with signed HoTs.</p> <p>05-08-2025 : DR voicemail to LA re : removal of objection following receipt of signed terms. LA email to DESNZ confirming removal of CPO objection.</p>
National Gas Transmission (NGT) (Objection 2)	05-001	<p>22-04-2024 : LIQs to NGT</p> <p>29-04-2024 : LA confirm appointed by NGT with request for plan to show entire route of project.</p> <p>03-05-2024 : Further request from LA to DM as follow up to 29-04-2024.</p> <p>07-05-2024 : Further request from LA to DM as follow up to 03-05-2024.</p> <p>07-04-2024 : DM to LA with red line boundary plan for entire extent of project.</p> <p>10-05-2024 : LIQs from DM to NGT</p> <p>23-05-2024 : Follow up by DM for LIQs.</p>

		<p>13-06-2024 : Further follow up by DM re LIQ</p> <p>09-07-2024 : LA to DM requesting timelines to submit planning application(s).</p> <p>16-07-2024 : DM to LA confirming which applications submitted and return of LIQs.</p> <p>17-07-2024 : DM to LA requesting meeting.</p> <p>15-10-2024 : NGT to DM confirming that Asset Protection Agreement (APA) will be required.</p> <p>12-12-2024 : NGT chasing response from email 15-10-2024.</p> <p>16-12-2024 : DM to NGT confirming update on project timelines, and that no intention for construction over NGT asset.</p> <p>07-02-2025 : DM to NGT clarifying internal actions between NGET &amp; NGT and that contractor will engage with NGT to ensure crossings are suitably managed.</p> <p>14-02-2025 : NGT to DM confirming requirements in order to protect NGT asset.</p> <p>19-03-2025 : NGT to DM requesting solicitors' details so that Asset Protect Agreement (APA) can be facilitated.</p> <p>16-04-2025 : NGET to NGT with letter and notice of making of the Order (notice date 14-04-2025)</p> <p>14-05-2025 : NGT to DM request that CPO is delayed so that NGT can understand design.</p> <p>14-05-2025 : DM to NGT confirming that will discuss with NGET.</p> <p>21-05-2025 : Objection received from NGT.</p> <p>28-05-2025 : DM to NGT requesting Teams call to discuss objection.</p> <p>03-06-2025 : Follow up DM to NGT for meeting.</p> <p>03-06-2025 : NGT to DM confirming that Asset Protection Agreement (APA) required.</p> <p>03-06-2025 : DM to NGT requesting standard APA to review.</p> <p>04-06-2025 : NGT confirmed that APA can only be shared between solicitors, but ahead of this undertaking on fees required.</p> <p>04-06-2025 : DM to project including NGT requesting explanation in respect of rights that NGT have and its apparatus.</p> <p>05-06-2025 : NGT to NGET confirming background to why APA required.</p> <p>06-06-2025 : NGT to NGET with further request for undertaking on fees.</p> <p>06-06-2025 : NGET to NGT with request from teams call to discuss engineering detail explained.</p> <p>10-06-2025 : NGET to NGT confirming that undertaking on APA to be provided when clear that project presents a risk to NGT asset.</p> <p>12-06-2025 : DM voicemail to NGT with request to meet to discuss practical matters.</p> <p>13-06-2025 : DM to NGT confirming NGT's requirements following tel con.</p> <p>13-06-2025 : NGT to DM confirming name of company to complete loading calcs on road with follow up 01-07-2025.</p> <p>30-06-2025 : DM to NGT requesting copy of NGT deed of easement.</p> <p>02-07-2025 : NGT to DM with copy of NGET easement.</p>
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		24-07-2025 : DM to NGT confirming project undertaking assessment of possible loadings and integrity of access road and will advise further.
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## APPENDIX 2: OBJECTIONS SUMMARY TABLE

	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
1.	<b>Councillor Paul Hodgkinson</b>	N/A	N/A	<p>Forwarded an email from constituent (Mr Jonathan Stanley of Corinium Construction (Objection 3 below)) in support of his view that the southern CSEC should be re-designed. The current design to leave 2 pylons on the brow of the Cotswold escarpment and adding two sealing end gantries where the cables go underground will add to, not reduce, the visual impact to the area. The following two alternative designs are suggested.</p> <ol style="list-style-type: none"> <li>1. Sealing end gantries are moved two pylons further to the south to below the skyline, where they would be less visible and could be blended into the surrounding landscape more easily. This would improve views from on top of the escarpment, from the valley below along the line of the A40 into and out of Cheltenham. It would also ensure the multitude of footpaths that cross over the hill are cleared of any overhead power lines. (Alternative Design)</li> <li>2. Remove the remaining 3 pylons above the A40 and install the sealing end gantries just to the south of the A40. This would ultimately improve the view of all users of the A40 (in excess of 7000 people each day), clients of Dunkerton's Cider, as well as ramblers on the Cotswolds Way (Optimum Design).</li> </ol>	<ul style="list-style-type: none"> <li>• The suggested Alternative Design would result in the removal of an additional 2 pylons which would have landscape and visual benefits. However, this part of the landscape (Cooper's Hill to Winchcombe Landscape Character Area, as described in the Cotswolds National Landscape Character Assessment 2002 (see <b>CD D14</b>)) is highly sensitive to siting a new CSEC. This is predominantly because of the steep valley slopes of the escarpment which would require more earthworks (cut and fill) and a longer permanent access road from the north or south. This would result in greater direct impacts on the landscape character of the escarpment, including direct impacts on vegetation and topography of the steep valley slopes, and affecting views.</li> <li>• Whilst the suggested Optimum Design (referenced at paragraph 7 as Options S5 and S6) would result in the net removal of an additional 3 pylons with associated landscape and visual benefits, Option S5 presents landscape and visual disadvantages that materially reduce the benefits of</li> </ul>

	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
					<p>additional pylon removal. Option S5 is heavily constrained in terms of space for landscape and visual mitigation measures. The Cotswold Way National Trail also runs directly through Option S5, meaning people walking along this nationally important recreational route and other highly sensitive visual receptors in the local community would be likely to experience significant residual visual effects from the CSEC infrastructure. Whilst Option S6 was the preferred location from a landscape and visual perspective,</p> <ul style="list-style-type: none"> <li>• this option and Option S5 were ultimately rejected due to technical challenges. These challenges included the following. <ul style="list-style-type: none"> <li>○ Topographical constraints: cables would need to ascend approximately 60 – 80 metres up the escarpment over a relatively short distance, presenting significant engineering difficulties for cable installation and long-term thermal performance.</li> <li>○ Complex crossings: any cable route would require crossings beneath the A40 trunk road, the embankments of a dismantled railway, and the</li> </ul> </li> </ul>

	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
					<p>River Chelt, necessitating specialised construction techniques with substantial technical risk, cost, and programme implications.</p> <ul style="list-style-type: none"> <li>○ Construction constraints: the confined nature of sites south of the A40 severely restricts construction access and working space, making delivery and installation of large electrical equipment extremely challenging and creating health and safety risks.</li> <li>• These engineering challenges would significantly increase construction costs and programme duration. These disadvantages were not outweighed by the landscape and visual benefits of enabling the removal of additional pylons.</li> <li>• In contrast, the selected location (Option S2) avoids these technical constraints whilst still delivering substantial landscape and visual improvements through the removal of net 16 pylons and approximately 7km of OHL through the Cotswolds National Landscape.</li> </ul>

	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
2.	National Gas Transmission ("NGT")	04-008 05-001	Access Rights	<ul style="list-style-type: none"> <li>Holding objection to the Order which will cross NGT's high pressure gas pipeline (Feeder 14 Wormington to Dowdeswell). The pipeline could be affected by AC and/or DC interference.</li> <li>The pipeline has a land easement in operation. No development, construction or landscaping is permitted within the easement without formal written approval from NGT.</li> <li>There are specific criteria that must be adhered to for developing electrical infrastructure near NGT's gas pipelines to avoid unacceptable levels of interference.</li> <li>Utility crossings over NGT's gas pipelines are restricted and will require documentation detailing the construction and separation distances before a 'Deed of Consent' can be issued. Due to the nature of CPO projects, NGT require an Asset Protection Agreement ("APA") with NGET prior to proceeding with these discussions.</li> <li>Technical requirements must be met including construction methods, supervision by NGT representatives, and adherence to NGT's specifications and British Standards policy. Pipeline access must be maintained during and after construction.</li> </ul>	<ul style="list-style-type: none"> <li>NGET confirms that no electrical infrastructure will be developed over or within the easement of NGT's Feeder 14 pipeline. The cable route has been specifically designed to avoid the pipeline alignment to prevent any AC/DC interference issues.</li> <li>NGET acknowledges that a crossing of the pipeline will be required for construction access purposes. This crossing will be designed and constructed using temporary protective slabs in accordance with British Standards, including the standards cited by NGT (BS EN 13509:2003, BS EN 12954:2001, and BS 7361 Part 1) and in accordance with T/SP/SSW22.</li> <li>All construction activities will be subject to a detailed Construction Environmental Management Plan ("CEMP") which will incorporate NGT's requirements for fencing, protective measures, health and safety requirements and monitoring. NGET confirms that pipeline access will be maintained during and after construction, and no permanent structures will be erected within the easement strip.</li> <li>Furthermore, NGET is undertaking an assessment of the pipeline crossing location.</li> </ul>



	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
				<ul style="list-style-type: none"> <li>Where existing roads cannot be used, construction traffic should only cross the pipeline at locations agreed with a NGT engineer.</li> <li>All crossing points will be fenced on both sides with a post and wire fence and with the fence returned along the easement for a distance of 6 metres.</li> <li>The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. No protective measures including the installation of concrete slab protection shall be installed over or near to the NGT pipeline without the prior permission of NGT. NGT will need to agree the material, the dimensions and method of installation of the proposed protective measure. The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to NGT.</li> <li>A Deed of Indemnity is required for any crossing of the easement.</li> </ul>	<p>The results of this will inform the detailed design of any protective measures required and ensure compliance with all NGT requirements for clearance distances and construction methodology. If reinforcements are required following this assessment, these will be implemented accordingly.</p> <ul style="list-style-type: none"> <li>NGET remain committed to reaching voluntary agreement and as such, NGET's agents will continue to be in regular contact to ensure that outstanding matters can be resolved as soon as possible.</li> </ul>

3.	<b>Mr Jonathan Morton Stanley and Corinium Construction Limited, represented by Charles Russell Speechlys</b>	07-014, 07-027, 09-001, 09-008, 09-011	Electricity Infrastructure Construction Rights	<p><u>Lack of clarity as to preferred option</u></p> <ul style="list-style-type: none"> <li>• NGET does not fully justify the reasoning for selecting one option above another. For example, in relation to the southern CSEC, it does not provide a detailed explanation of how this decision was reached or why other options did not meet the same criteria. The assessment considered factors such as ecology, landscape and visual amenity, historic environment, water, traffic and transport, socio-economics, and technical complexity. Despite this thorough evaluation, the document lacks specific reasoning or comparative analysis that would clarify why the direct burial route was deemed superior or why other options were insufficient. This omission leaves our clients without a clear understanding of the rationale behind the selection process, which is crucial for transparency and informed decision-making.</li> <li>• It is unclear how it is proposed that the proposed route would end at S4 CSEC. If that were the case it would end in land not owned by Mr Jonathan Stanley or Corinium Construction Limited and would be positioned between the land owned by Mr Jonathan Stanley and Corinium Construction Limited and Dowdeswell Wood. However, it appears to remain the case (drawing 21006866_PLN_INFO_27.2 refers) that the CSEC is still set to be situated on their land. Clarification of this is requested.</li> </ul>	<p><u>Lack of clarity as to preferred option</u></p> <ul style="list-style-type: none"> <li>• NGET undertook an extensive and ongoing assessment of the relevant options between 2021 and 2025. This is set out in detail at paragraphs 7.4 to 7.35 above. In respect of the southern CSEC, As detailed at paragraphs 7.15 to 7.18 above, NGET considered whether this could be located south of the A40 (Options S5 and S6). Whilst these locations presented the landscape and visual benefit of resulting in the removal of an additional 3 pylons, they were ultimately rejected due to fundamental technical challenges relating to topography, crossings, and construction constraints. These are detailed at paragraph 7.16 above.</li> <li>• As mentioned above, Option S5 also presents landscape and visual disadvantages that materially reduce the benefits of additional pylon removal. Option S5 is heavily constrained in terms of space for landscape and visual mitigation measures, and the Cotswold Way National Trail runs directly through it. Whilst Option S6 was the preferred location from a landscape and visual perspective, this was ultimately rejected due to the aforementioned technical challenges relating to topography, crossings, and construction constraints</li> <li>• In light of the above considerations, the fundamental technical challenges of these options were not outweighed by the</li> </ul>
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		07-027, 09-001, 09-008, 09-011, 09-020,	High Voltage Alternating Current (HVAC) Rights	<p><u>The proposed solution does not address the Project's aim</u></p> <ul style="list-style-type: none"> <li>The proposed solution does not adequately address the Project's aim to maximise landscape enhancement benefits. The Southern Options S5 and S6 offer a more compelling design solution than Southern Option S4, as they are located in areas that would provide greater visual benefits and align better with the Project's objectives. These options are situated in locations that are less intrusive and would result in more significant visual improvements to the landscape, thereby supporting the Project's overarching goal of achieving maximum enhancement to the landscape.</li> <li>The proposal to conclude the Project at Southern Option S5 or S6 would significantly support the Project's aim of enhancing the landscape and visual amenity. The removal of existing overhead lines and pylons in these areas would not only improve the scenic quality for motorists on the A40 (see the reference to road users in paragraph 3.3.2 of the Statement of Reasons) but also enhance the experience for users of the Cotswold Way and visitors to Dowdeswell Wood and Reservoir, a popular local attraction. By selecting Southern Option S5 or S6, the Project would maximise landscape enhancement benefits, aligning with the Project's objectives to conserve and enhance the natural beauty of the Cotswolds National Landscape. These options would also encourage public understanding and enjoyment of the protected landscapes, offering positive</li> </ul>	<p>landscape and visual benefits of enabling the removal of additional pylons.</p> <ul style="list-style-type: none"> <li>As explained at paragraph 7.14 above, paragraph 10.2.7 of the Statement of Reasons (<b>CD C3</b>) incorrectly stated that S4 was the preferred option for the southern CSEC. This was a typographical error. The preferred option for the southern CSEC is (and has always been) Option S2, as per (i) the planning permission which was obtained for Option S2, (ii) Figure 3 (Cable Routes) at page 42 of the Statement of Reasons which shows the southern CSEC being located at Option S2, and (iii) the land included in the Order being at Option S2 (plot 09-015). The proposed route therefore ends at the S2 CSEC location, not S4 (see further at paragraph 7.14).</li> </ul> <p><u>The proposed solution does not address the Project's aim</u></p> <ul style="list-style-type: none"> <li>Whilst NGET recognises that Options S5 and S6 would result in the removal of additional pylons, these options present significant and fundamental technical challenges that would prevent them from delivering optimal landscape enhancement benefits overall.</li> <li>Option S5 is heavily constrained in terms of space for landscape and visual mitigation measures. The Cotswold Way National</li> </ul>
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		09-008, 09-009, 09-013, 09-014, 09-018, 09-019, 09-020, 09-021, 09-022, 09-024, 10-001	Overhead Line Rights	<p>socioeconomic impacts by attracting more visitors to the area.</p> <ul style="list-style-type: none"> <li>• The current proposals fail to adequately meet NGET's obligations under Section 38 of the Electricity Act 1989 and Section 85 of the Countryside Rights of Way Act 2000. Ending the Project at S5 or S6 would meet those obligations.</li> <li>• Utilising option S5 or S6 would do more than the current proposal to deliver the following principles: <ul style="list-style-type: none"> <li>○ result in the greatest landscape enhancement benefits;</li> <li>○ result in the greatest opportunities to conserve and enhance natural beauty, wildlife and cultural heritage whilst avoiding unacceptable impacts on the natural and historic environment which cannot be mitigated;</li> <li>○ result in the greatest opportunities to encourage public understanding and enjoyment of protected landscapes including positive socioeconomic impacts;</li> <li>○ be technically feasible in the context of the wider transmission system; and</li> <li>○ be economical and efficient.</li> </ul> </li> <li>• Even if ending the Project at S2/S3 were the most sensible end-points for the Project (which is denied), although various locations for the CSEC are identified at paragraph 10.2.9 of the Statement of Reasons, the reasoning for selecting “South End F” is entirely</li> </ul>	<p>Trail also runs directly through Option S5, meaning people walking along this nationally important route would be likely to experience additional residual visual effects from new CSEC infrastructure.</p> <ul style="list-style-type: none"> <li>• Furthermore, as explained above and detailed at paragraph 7.16, Options S5 and S6 were discounted due to fundamental technical challenges they presented.</li> <li>• The selected solution for the southern CSEC (Option S2) meets NGET's obligations under Section 38 of the 1989 Act and Section 85 of CROW Act 2000 by delivering significant landscape enhancement (net removal of 16 pylons and undergrounding of approximately 7km of OHL) whilst maintaining technical feasibility and economic efficiency. This represents an appropriate balance between these factors and achieves the Project's aims.</li> <li>• The selection of South End F as the preferred option for the positioning of the southern CSEC was also the result of an extensive assessment undertaken by NGET. As explained at paragraphs 7.24 to 7.27, NGET assessed all 6 southern CSEC configuration options against multiple criteria including landscape and visual impact, health and safety management, environmental and land use impact, and engineering and construction considerations. South End F was selected</li> </ul>
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	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
		09-008	Overhead Line Removal Rights	<p>opaque and cannot possibly be considered to satisfy the public interest test (amongst others). Insufficient consideration has been given to utilising South End E.</p> <ul style="list-style-type: none"> <li>The chosen cable routes are also unclear. Further detail is required to properly consider what is being proposed.</li> </ul>	<p>because it provided the optimal performance across these assessment criteria, particularly in avoiding positioning any new CSEC or terminal tower closer to the Cotswolds National Trail whilst minimising engineering complexity and land use complications. In contrast, South End E was rejected despite offering marginally greater distance from the Cotswolds National Trail because this benefit was outweighed by significant disadvantages including the need for construction across multiple land parcels, increased overhead line conductor oversailing creating additional health and safety risks, and the requirement for temporary circuit diversions and auxiliary crossarms introducing additional technical complexity.</p> <ul style="list-style-type: none"> <li>The preferred cable route and the option appraisal process for its selection is detailed at paragraphs 7.29 to 7.33 above.</li> </ul> <p><u>Business operation impacts</u></p> <ul style="list-style-type: none"> <li>NGET recognises the concerns regarding the potential impact on business operations. However, it should be noted that losses arising as a result of the Order will be</li> </ul>

	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
		07-018, 09-013	Access Rights	<p><u>Business operation impacts</u></p> <ul style="list-style-type: none"> <li>Order will significantly disrupt Mr Stanley's Middle Colgate Farm (organic farming and high-end holiday lets) and Corinium Construction Limited's office/warehouse operations, affecting multiple income streams and business viability.</li> <li>The proposed freehold land take for the chosen CSEC site is far more than is required.</li> <li>NGET seeks permanent freehold acquisition for the construction compounds adjacent to each CSEC site where only temporary powers are needed. This interference cannot be justified.</li> </ul>	<p>compensated as appropriate in accordance with the relevant legislation, case law and established practice for compulsory purchase compensation.</p> <ul style="list-style-type: none"> <li>The area required for permanent freehold acquisition has been determined following a thorough development process. The land has been specifically selected to accommodate the essential electrical equipment within the CSEC, as well as providing necessary visual screening, and ensuring adequate space for construction activities and long-term maintenance access.</li> </ul>
		07-020, 09-012, 09-016	Construction Compound Rights		
		09-015	Permanent Land		
				<ul style="list-style-type: none"> <li>The construction swathe required for cable installation could temporarily occupy up to 100 metres in width along the 7 kilometres length of the cable route, which will substantially interfere with the farm's land use. This could involve the removal of organic topsoil, adjustments to the land height, and the installation of temporary access roads. There are significant concerns specifically with regards to the noise, pollution and vibration arising from the excavation of the works. Such activities will inevitably also include heavy lorry traffic; all of which will disrupt the farm's daily operations.</li> <li>The standard and quality of works NGET is proposing to adopt is unclear. This creates a high level of</li> </ul>	<ul style="list-style-type: none"> <li>While the construction compounds adjacent to each CSEC site will function as temporary facilities during construction for laydown areas, soil storage, parking, welfare and security facilities, permanent acquisition is sought because temporary possession powers under the Housing and Planning Act 2016 are not yet in force and therefore not available to NGET. The temporary site installation facilities will be removed following completion of construction, with the land available for restoration to its former use. NGET would be prepared to enter into an undertaking that, on completion of construction, it is the</li> </ul>

	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
				<p>uncertainty in respect of the objectors' remaining land and the long-term impact the works may have on their property.</p>	<p>intention to hand back land no longer required by NGET, noting that without the benefit of detailed design, the precise extent of land required cannot be determined at this stage.</p> <ul style="list-style-type: none"> <li>• The 100 metre construction swathe is required based on extensive lessons learned from previous projects. A construction haul road will be established at the centre of the swathe using multiple layers of stone. This is a crucial safety requirement to safely manage the interface between personnel and plant equipment. The remainder of the swathe is needed for cable installation activities and the segregated storage of different soil types, with topsoil and subsoil kept in separate bunds to prevent cross-contamination and enable proper land reinstatement. Further detail on how NGET will mitigate potential noise, pollution and vibration impacts are set out below.</li> <li>• All construction activities will be carried out in strict accordance with a detailed CEMP which will detail the standard and quality of works to be undertaken.</li> </ul> <p><u>Environmental concerns</u></p>

	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
				<p><u>Environmental concerns</u></p> <ul style="list-style-type: none"> <li>• The scope of the works will give rise to air and ground transmitted noise, pollution and vibration. There are no clear binding limitations on noise, pollution, and vibration. NGET should be compelled to use best available techniques in the construction and operation of the Project and its associated works and structures to ensure that no noise or vibration can be felt or otherwise experienced in or on the objectors' land and such that there are no other adverse effects.</li> <li>• NGET should be made strictly liable to comply in writing with strict standards to promote the environment. Appropriate measures and penalties should be in place to safeguard the interests of all those affected by noise, pollution, vibration and health and safety breaches.</li> <li>• A noise, pollution and vibration monitoring and mitigation system should be in place before commencement and during construction of any works in relation to the Project. There should also be a resultant damage mitigation and monitoring system in place before commencement and during enabling works and construction.</li> <li>• An expert report should be provided on the noise, pollution and vibration caused to the affected areas by</li> </ul>	<ul style="list-style-type: none"> <li>• An Outline Construction Environmental Management Plan ("OCEMP") has been prepared which covers the entire Project including the CSECs, underground cabling and access works (<b>CD B13</b>). The purpose of this document is to develop, maintain, implement, monitor and improve environmental control procedures in accordance with the relevant legal and statutory requirements. The OCEMP was submitted with the CSEC Planning Applications.</li> <li>• It is a planning condition of the CSEC planning permissions (<b>CD B1 and CD B2</b>) that a final CEMP is submitted and approved in writing by the relevant local planning authority, and strictly adhered to during construction and immediately post-completion of construction works. As stated at paragraph 1.1.3, the OCEMP will be updated to incorporate the requirements included within the planning conditions, any changes that are made to mitigation or control measures and will include all relevant licences.</li> <li>• Appendix C to the OCEMP outlines the construction phase mitigation measures which will be implemented to mitigate and/or minimise potential noise and</li> </ul>



	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
				<p>the Project. The relevant experts should also monitor the noise, pollution and vibration impact for the period of the construction works.</p> <ul style="list-style-type: none"> <li>• Binding limits of pollution and airborne dust particulates to be imposed by NGET. Pollution levels and dust emissions should also be monitored before and after enabling works and construction of the works at suitably agreed points at the properties and in the immediate vicinity. Strict adherence to maximum pollution and particulate levels should be required and where maximum pollution and airborne particulate levels are exceeded NGET should be required to cease work and mitigate the excess levels.</li> </ul>	<p>vibration impacts. These include the following (non- exhaustive list).</p> <ul style="list-style-type: none"> <li>○ The contractor shall implement Best Practicable Means (BPM) as per recommendations set out in BS5228 (Code of practice for noise and vibration control on construction and open sites) and current guidelines set down by the Health and Safety Executive.</li> <li>○ The contractor will comply with the noise regulations or restrictions imposed by the local authorities. The contractor will apply to the Local Authorities for prior consent under Section 61 of the Control of Pollution Act 1974 for noisy activities where required and implement all noise control measures required to meet any noise limits agreed with the local authorities.</li> <li>○ The contractor will undertake sound level readings in the event of receipt of complaints regarding noise and/or vibration.</li> <li>○ All generators and compressors used on the site shall be 'sound</li> </ul>

	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
					<p>reduced' models fitted with acoustic linings and all ancillary pneumatic percussive tools shall be fitted with mufflers or silencers.</p> <ul style="list-style-type: none"> <li>○ For all construction activities the following construction noise limits as set out in Section E5 of BS5228 will apply (subject to any alternate agreement in terms of a Section 61 Consent): <ul style="list-style-type: none"> <li>▪ 65 dB for daytime;</li> <li>▪ 55 dB for evening and weekends (Saturday after 1pm and Sunday); and</li> <li>▪ 45 dB for night-time.</li> </ul> </li> <li>• Appendix B to the OCEMP outlines the construction phase mitigation measures which will be implemented to mitigate impacts in relation to dust. This includes the following (non-exhaustive list). <ul style="list-style-type: none"> <li>○ The development and implementation of a communication plan that includes community engagement before work commences on site.</li> </ul> </li> </ul>

	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
					<ul style="list-style-type: none"> <li>○ The development and implementation of a Dust Management Plan which will include, as a minimum, the measures set out in Appendix B to the OCEMP.</li> <li>○ Regular on-site and off-site monitoring, complaint recording and response systems, including recording of all inspections of haul routes and any subsequent action in a site log book.</li> <li>○ Imposition of a maximum speed limit of 15 mph on haul roads and work areas;</li> <li>○ Site layout planning to locate dust causing activities away from receptors, as far as is possible.</li> <li>○ Use of water-assisted dust sweeper(s) on the access and local roads, ensure vehicles are covered to prevent escape of materials during transport and implementation of a wheel washing system.</li> </ul> <ul style="list-style-type: none"> <li>● Paragraph 3.9 of the OCEMP provides that during the works, required monitoring will</li> </ul>

	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
				<p><u>Failure to negotiate and/or consult</u></p> <ul style="list-style-type: none"> <li>• NGET has failed in its duty to undertake reasonable steps to negotiate with affected homeowners and the tenant.</li> <li>• Planning permission was sought before any notice was given to the affected landowners.</li> <li>• The only negotiations undertaken between NGET and the objectors' agents related to compensation for the</li> </ul>	<p>be detailed in the CEMP and include as a minimum monitoring for noise, vibration, dust (on-site and off-site), environmental incidents and routine inspections. Arrangements will be put in place to investigate and provide reports on any potential or actual significant pollution incidents.</p> <p><u>Failure to negotiate and/or consult</u></p> <ul style="list-style-type: none"> <li>• NGET's agents, Dalcour Maclaren, have made extensive and demonstrable efforts to engage with Mr Jonathan Morton Stanley and his agents. As detailed at Appendix 1, first contact was made in October 2021 with project background and survey access requests. Engagement has been continuous since that date. Draft HoTs for land acquisition and rights were provided by NGET's agents in July 2024. The HoTs were discussed at the September 2024 agent meeting and re-issued in July 2025 at the agent's request. Multiple requests for engagement on the HoTs were made: in December 2024, March, April, May and June 2025. A telephone call was made with the agent in July 2025 requesting feedback on the HoTs, followed by a Teams call on 30 July 2025 to discuss the HoTs and seek feedback. Notwithstanding these efforts,</li> </ul>

	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
				<p>damage caused to the land by drilling trial holes for the Project.</p> <ul style="list-style-type: none"> <li>• There have been no negotiations between the objectors and NGET regarding the acquisition of rights their land (or in respect of the proposed freehold acquisition).</li> <li>• There has been a lack of consultation and engagement and the statutory requirements have not been met.</li> </ul>	<p>NGETs agents have not received substantive response in writing to the HoTs and await further communication from Mr Jonathan Morton Stanley's agent Knight Frank.</p> <ul style="list-style-type: none"> <li>• NGET notified all owners of its application for planning permission to construct the CSEC and associated accesses pursuant to the requirements of Article 13 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. A copy of the notice to Mr Jonathan Morton Stanley, related cover letter and an extract of the application form confirming the same are included at <b>CD B12.1, B12.2 and B12.3.</b></li> </ul> <p><u>Public Interest Test</u></p> <ul style="list-style-type: none"> <li>• NGET maintains that the compelling case in the public interest to proceed with the Order has been clearly demonstrated. As detailed in this Statement of Case, the Order will lead to the removal of approximately 7 kilometres of overhead line and achieve the net removal of 16 pylons which will</li> </ul>

	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
				<p><u>Public Interest Test</u></p> <ul style="list-style-type: none"> <li>NGET does not convincingly demonstrate that the benefits of the Project outweigh the negative impacts on local businesses and landowners. The lack of detailed justification for the selected route and the absence of a thorough explanation of the decision-making process undermine the argument that the public interest test has been met. Consequently, NGET fails to establish a compelling case for the compulsory acquisition of land and rights necessary for the Project.</li> </ul> <p><u>Aarhus Convention</u></p> <ul style="list-style-type: none"> <li>There is a notable lack of detailed explanation regarding the decision-making process for selecting the direct burial route from N4 CSEC to S4 CSEC. This absence of clarity may contravene the Aarhus Convention's principles, which advocate for comprehensive public access to information and</li> </ul>	<p>significantly benefit the landscape and visual qualities of the Cotswolds National Landscape. Whilst NGET acknowledges that there will be some temporary adverse short-term effects as a result of construction activities, upon operation only beneficial effects are predicted which will only increase over time. Such benefits are set out in detail at paragraph 4 of this Statement of Case and demonstrate that there is a compelling case in the public interest for making the Order.</p> <p><u>Aarhus Convention</u></p> <ul style="list-style-type: none"> <li>NGET has provided comprehensive information about the Project including the optioneering process and route selection methodology (see paragraph 7 above). The objection suggests that an "absence of clarity" regarding the decision-making process may contravene Aarhus Convention principles. However, the objection provides no authority for this proposition.</li> <li>The Aarhus Convention is an international treaty which has been implemented in UK domestic law through specific legislation. The Convention operates through these</li> </ul>

	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
				<p>meaningful participation in decisions affecting the environment.</p> <ul style="list-style-type: none"> <li>The lack of detailed justification for the selected route and the absence of a thorough explanation of the decision-making process undermine the argument that the public interest test has been met.</li> </ul>	<p>specific implementing measures, not through general principles requiring detailed explanations of all decision-making processes.</p> <ul style="list-style-type: none"> <li>To the extent that additional environmental information is sought, the Environmental Information Regulations 2004 provide a mechanism for requesting such information from public authorities. The objection has not identified any specific legal requirement under UK law implementing the Aarhus Convention that has not been met, nor provided any authority for the proposition that the level of explanation provided is insufficient under the applicable domestic legal framework.</li> </ul> <p><u>Human rights consideration</u></p> <ul style="list-style-type: none"> <li>NGET has given full and adequate consideration to Article 8 of the European Convention on Human Rights which protects the right to respect for private and family life. As set out at paragraph 11 above, Article 8(2) permits interference with this right where it is "in accordance with the law and is necessary in a</li> </ul>

	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
				<u>Human rights consideration</u> <ul style="list-style-type: none"> <li>NGET has failed to give adequate consideration to the right to respect for private and family life as set out in Article 8 of the European Convention of Human Rights.</li> </ul>	<p>democratic society in the interests of... the economic well-being of the country." The Order has been made pursuant to statutory powers under Section 10 and Schedule 3 of the Electricity Act 1989, ensuring any interference is in accordance with law. NGET has also adopted a proportionate approach by seeking only the minimum land and rights necessary for the Project. This consideration has directly informed the decision to limit land take rather than acquire freehold title to all affected land. There is a compelling case in the public interest for the Order to facilitate the landscape enhancement benefits of the Project. Any interference with Article 8 rights is justified and proportionate, particularly given that compensation will be available for any losses incurred.</p>
4.	<b>Dunkerton Properties Projects Limited and Dowdeswell Conservation Limited represented</b>	09-008, 09-011, 09-023, 10-002, 10-007,10-013	High Voltage Alternating Current (HVAC) Rights,	<ul style="list-style-type: none"> <li>Do not object to the Order in principle (in fact positively support the principle of it) but consider an alternative way of delivering it to be more appropriate.</li> <li>The proposed solution falls short in fully realising the Project's goal to maximise landscape enhancement benefits. Southern Option S5 presents a more persuasive design solution compared to Southern</li> </ul>	<ul style="list-style-type: none"> <li>NGET welcomes the support for the principle of the Project.</li> <li>As detailed in NGET's response to Objection 3 above, whilst NGET recognises that Option S5 would result in the removal of additional pylons, this option presents fundamental technical challenges and</li> </ul>






	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
	by Charles Russell Speechlys	09-008, 09-009	Overhead Line Rights	<p>Option S4 (if indeed that is what is intended), as they are positioned in areas that would offer greater visual advantages and better align with the Project's objectives. These options are located in less intrusive areas and would lead to more substantial visual improvements to the landscape, thereby supporting the Project's overarching aim of achieving maximum enhancement to the landscape.</p> <ul style="list-style-type: none"> <li>The proposal to conclude the Project at Southern Option S5 would significantly support the Project's aim of enhancing the landscape and visual amenity. Removing existing overhead lines and pylons in these areas would improve the scenic quality for motorists on the A40 and enhance the experience for visitors to Dowdeswell Wood and Reservoir. By selecting Southern Option S5, the Project would maximise landscape enhancement benefits, aligning with the</li> </ul>	<p>disadvantages that materially reduce the landscape enhancement benefits.</p> <ul style="list-style-type: none"> <li>Option S5 is heavily constrained in terms of space for landscape and visual mitigation measures. The Cotswold Way National Trail also runs directly through it meaning walkers would be likely to experience significant residual visual effects from new CSEC infrastructure. Furthermore, Option S5 (and Option S6) was ultimately rejected due to fundamental technical challenges relating to topography, crossings, and construction constraints (see paragraphs 7.15 to 7.18 above). These challenges make this option neither technically feasible nor economically efficient.</li> </ul>

	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
		09-008	Overhead Line Removal Rights	<p>Project's objectives to conserve and enhance the natural beauty of the Cotswolds National Landscape. These options would also encourage public understanding and enjoyment of the protected landscapes, offering positive socio-economic impacts by attracting more visitors to the area.</p> <ul style="list-style-type: none"> <li>Ending the Project at S5 would meet the obligations under Section 38 and Schedule 9 to the EA 1989 whereas the current proposals would not. Similarly, ending the scheme at S5 would satisfy the obligations under Section 85 of the Countryside Rights of Way Act 2000, whereas the current proposals would not.</li> <li>Utilising option S5 or S6 would do more than the current proposal to deliver the following principles: <ul style="list-style-type: none"> <li>result in the greatest landscape enhancement benefits;</li> <li>result in the greatest opportunities to conserve and enhance natural beauty, wildlife and cultural heritage whilst avoiding unacceptable impacts on the natural and historic environment which cannot be mitigated;</li> <li>result in the greatest opportunities to encourage public understanding and</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>In contrast, the selected solution meets NGET's obligations under the 1989 Act and Section 85 of CRoW Act 2000 by delivering significant landscape enhancement (net removal of 16 pylons and undergrounding of approximately 7km of OHL) whilst maintaining technical feasibility and economic efficiency. This represents an appropriate balance between these factors and achieves the Project's aims.</li> <li>NGET's detailed assessment of all 6 southern CSEC configuration options (including South End F and South End E) against multiple criteria is set out at paragraphs 7.24 to 7.27 above. South End F was selected due to its optimal performance across these assessment criteria. South End E was given full consideration but was ultimately rejected because, while it offered marginally greater distance from the Cotswolds National Trail, this benefit was outweighed by significant disadvantages (see paragraph 7.25 to paragraph 7.27 above).</li> </ul>
		09-008, 09-011	Electricity Infrastructure Construction Rights,		

	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
		10-003, 10-004	Access Rights	<p>enjoyment of protected landscapes including positive socioeconomic impacts;</p> <ul style="list-style-type: none"> <li>○ be technically feasible in the context of the wider transmission system; and</li> <li>○ be economical and efficient.</li> </ul> <ul style="list-style-type: none"> <li>• Even if ending the Project at S2/S3 were the most sensible end-points for the Project (which is denied), although various locations for the CSEC are identified at paragraph 10.2.9 of the Statement of Reasons, the reasoning for selecting “South End F” is entirely opaque and cannot possibly be considered to satisfy the public interest test (amongst others). Insufficient consideration has been given to utilising South End E.</li> <li>• The chosen cable routes are also unclear. Further detail is required to properly consider what is being proposed.</li> </ul>	<ul style="list-style-type: none"> <li>• The preferred cable route and associated option appraisal process is set out at paragraphs 7.29 to 7.33 above.</li> </ul>

5.	<b>R H Barnes and Sons represented by Knight Frank</b>	06-004, 06-006, 06-008, 06-019, 06-021, 06-023, 06-024, 06-025, 06-026, 06-028, 07-007, 07-008, 07-016	Overhead Line Removal Rights	<ul style="list-style-type: none"> <li>Do not object to the principle of the aims of the Project.</li> <li>Order affects approximately 154 acres (20%) of their 750-acre agricultural enterprise across multiple holdings including Whalley and Puckham Farms, Warren Farm, and Dry Pool Farm, representing 35% of the entire underground cable route.</li> </ul> <p><u>Haul Road</u></p> <ul style="list-style-type: none"> <li>Proposed haul road from the construction compound north of the A40 is likely to severely affect the agriculture, shoot and leisure enterprise. The concern is noise, dust, pollution, vibration and disruption which will be suffered by the proposed route.</li> <li>In order of preference, the objector wants to see: <ol style="list-style-type: none"> <li>The construction compound relocated to a position on the route of the cable, perhaps closer to the CSEC. A relocation would eliminate the need for a haul road from the proposed compound close to Whalley Farm. They also support other objectors' proposal to locate the CSEC in S5 or S6. This would provide the opportunity to relocate the construction compound north of the A40 on the cable route between tower ZF328 and ZF327)</li> <li>The haul road re-routed west from its proposed position to follow a route marked either blue or yellow below.</li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>NGET welcomes the support for the Project's aims.</li> </ul> <p><u>Haul Road</u></p> <ul style="list-style-type: none"> <li>Relocating the main construction compound would not eliminate the necessity for the construction haul road. The local road network is not suitable or capable of managing the heavy machinery and equipment required for the Project, making a dedicated haul road essential regardless of compound location.</li> <li>The suggested alternative routes for the haul road (marked blue and yellow) have been previously investigated and assessed by NGET. The blue route presents challenging topography which would introduce significant health and safety risks. The yellow route was discounted as it would be very close to adjacent receptors, and following consultation, the selected route represented the most appropriate option balancing feedback from different stakeholders.</li> <li>The haul road has been positioned following consultation with affected parties including the Barnes. Based on feedback during the</li> </ul>
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		04-011, 06-011, 06-017, 06-029, 06-030, 07-001, 07-011, 07-012	Electricity Infrastructure Construction Rights & High Voltage Alternating Current (HVAC) Rights	<div data-bbox="763 252 1417 691"></div> <div data-bbox="860 724 1494 892"><p>3. Without prejudice to the alternatives in 1 and 2 above, if the location of the construction compound and the red haul road is demonstrated as the only viable option, the objectors require the Order to be specific on the following points:</p></div> <div data-bbox="956 925 1494 992"><p>a. the haul road should be located south and west of the "Middle Court" field boundary</p></div> <div data-bbox="1010 1027 1319 1331"></div> <div data-bbox="956 1364 1494 1461"><p>b. The haul road should avoid the productive field of Middle Court entirely. In order that Middle Court is not disturbed the</p></div>	<p>earlier development phase, the haul road has been sited to the west of an existing hedgerow to make best use of natural screening. To maximise this screening benefit, the haul road is positioned as close as practical to the hedgerow. NGET confirms that provisions can be made for a crossing point over the haul road.</p> <ul style="list-style-type: none"><li>• With regard to noise, dust and vibration impacts during construction, an OCEMP has been prepared which covers the entire Project including the CSECs, underground cabling and access works (<b>CD B13</b>). The purpose of this document is to develop, maintain, implement, monitor and improve environmental control procedures in accordance with the relevant legal and statutory requirements. It is a planning condition of the CSEC planning permissions that a final CEMP is submitted and approved in writing by the relevant local planning authority, and strictly adhered to and implemented during construction and immediately post-completion of construction works. As stated at paragraph 1.1.3, the OCEMP will be updated to incorporate the requirements included within the planning conditions, any changes that are made to mitigation or control measures and will include all relevant licences.</li><li>• Appendix B to the OCEMP outlines the construction phase mitigation measures</li></ul>
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		06-006, 06-010, 06-018, 06-020, 06-024, 06-027, 07-009, 07-015, 07-017, 07-022, 08-004, 08-005	Access Rights	<p>boundary of the Order and plans should be amended to remove part of Plot No 08-005 as cross hatched below</p>  <p>c. To facilitate access the fields to the south of Middle Court, provision needs to be included for a crossing point for agricultural and shoot purposes over the haul road.</p> <p>d. The noise of tracked vehicles, large dump trucks as well as roadgoing lorries and vans will cause significant noise dust and vibration with vehicles on the red haul route. The southwest prevailing wind places Whalley Farm directly down wind of the haul road. Significant disruption to the houses, holiday accommodation and the other leisure facilities will be felt over the three year construction period. NGET should in the Order be required to</p>	<p>which will be implemented to mitigate dust impacts. This includes the following (non-exhaustive list).</p> <ul style="list-style-type: none"> <li>○ The development and implementation of a communication plan that includes community engagement before work commences on site.</li> <li>○ The development and implementation of a Dust Management Plan which will include, as a minimum, the measures set out in Appendix B to the OCEMP.</li> <li>○ Regular on-site and off-site monitoring, complaint recording and response systems, including recording of all inspections of haul routes and any subsequent action in a site log book.</li> <li>○ Imposition of a maximum speed limit of 15 mph on haul roads and work areas;</li> <li>○ Site layout planning to locate dust-causing activities away from receptors as far as possible.</li> <li>○ Use of water-assisted dust sweeper(s) on the access and local roads, ensure vehicles are covered to prevent escape of materials</li> </ul>
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		06-012, 07-013	Construction Compound Rights	<p>implement a number of mitigation measures including:</p> <ul style="list-style-type: none"> <li>i. constructing the haul road with a Tarmac surface particularly the section North and South of the Ham Road crossing extending north from the Ham Road at least 250m</li> <li>ii. a speed limit should be imposed on all vehicles to reduce noise and vibration as they pass Whalley Farm</li> <li>iii. clear hours of operation of the haul road will need to be set out restricting the haul road use to standard working hours</li> <li>iv. in dry weather the haul road will need to be sprayed to reduce the dust</li> <li>v. in wet weather Ham Road will need to be clear of mud and debris. Tarmacking the adjacent surfaces should mitigate the mud issue</li> <li>vi. experts in noise dust, pollution and vibration should be engaged by NGET to provide analysis of the effect of the Haul Road upon Whalley Farm. Such report should provide methods of</li> </ul>	<p>during transport and implementation of a wheel washing system.</p> <ul style="list-style-type: none"> <li>• Appendix C to the OCEMP also outlines construction phase noise and vibration mitigation measures including the following (non-exhaustive list). <ul style="list-style-type: none"> <li>○ The contractor shall implement Best Practicable Means (BPM) as per recommendations set out in BS5228 (Code of practice for noise and vibration control on construction and open sites) and current guidelines set down by the Health and Safety Executive.</li> <li>○ The contractor will comply with the noise regulations or restrictions imposed by the local authorities. The contractor will apply to the Local Authorities for prior consent under Section 61 of the Control of Pollution Act 1974 for noisy activities where required and implement all noise control measures required to meet any noise limits agreed with the local authorities.</li> <li>○ The contractor will undertake sound level readings in the event of receipt of complaints regarding noise and/or vibration.</li> </ul> </li> </ul>
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				<p>monitoring the effects, agreed limits and plans to maintain the effects below such limits (such as, but not limited to the basic requests in iv) and v) above</p> <p>vii. planting tree screening on Whalley Farm west of the Farmhouse garden north for approximately 120m to join an existing hedge line. Semi Mature trees will be required to create the visual barrier for the converted barn to reduce visual intrusion for the holiday guests.</p>	<ul style="list-style-type: none"> <li>○ All generators and compressors used on the site shall be 'sound reduced' models fitted with acoustic linings and all ancillary pneumatic percussive tools shall be fitted with mufflers or silencers.</li> <li>○ For all construction activities the following construction noise limits as set out in Section E5 of BS5228 will apply (subject to any alternate agreement in terms of a Section 61 Consent): <ul style="list-style-type: none"> <li>▪ 65 dB for daytime;</li> <li>▪ 55 dB for evening and weekends (Saturday after 1pm and Sunday); and</li> <li>▪ 45 dB for night-time.</li> </ul> </li> <li>• Paragraph 3.9 of the OCEMP provides that during the works, required monitoring will be detailed in the CEMP and include as a minimum monitoring for noise, vibration, dust (on-site and off-site), environmental incidents and routine inspections. Arrangements will be put in place to investigate and provide reports on any potential or actual significant pollution incidents.</li> <li>• Paragraph 4.3.1 of the OCEMP provides that the hours of work on site are as follows:</li> </ul>
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				<p><u>Agricultural Impact</u></p> <ul style="list-style-type: none"> <li>• NGET is seeking powers over a significantly larger area than is required to construct and maintain the Project. The Statement of Reasons claims need for a 100m wide construction swathe but NGET's technical guidance (Undergrounding high voltage electrical transmission lines (January 2015)) states that a cable swathe of up to 65m wide is normally required for direct buried cables. Insufficient information has been provided to demonstrate that all of the land in the Order is necessary in the public interest for the scheme.</li> </ul>	<ul style="list-style-type: none"> <li>○ 7.00hrs – 19.00 hrs Monday to Friday;</li> <li>○ Saturdays (at reduced hours);</li> <li>○ No works are permitted on Sundays and Bank Holidays; and</li> <li>○ Additional after-hours working and weekend working may be required and is to be agreed with the Project Manager, the Site Manager and NGET and in compliance with planning conditions.</li> </ul> <p><u>Agricultural Impact</u></p> <ul style="list-style-type: none"> <li>• The 100m construction swathe is required based on extensive lessons learned from previous projects. While NGET's 2015 technical guidance referenced a swathe of up to 65m, this guidance has not been updated since publication and reflects earlier project experience. Current practice, informed by recent similar projects, demonstrates that up to 100m is necessary due to increased system requirements and for safe and efficient construction. A construction haul road will be established at the centre of the swathe using multiple layers of stone. This is a crucial safety requirement to safely manage the interface between personnel and plant equipment. The remainder of the swathe is needed for cable installation activities and the segregated storage of different soil types,</li> </ul>
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				<p><u>Land Reinstatement</u></p> <ul style="list-style-type: none"> <li>• The following information has not been provided: <ul style="list-style-type: none"> <li>○ comprehensive method statement as to how the agricultural land will be restored to full production;</li> <li>○ soil survey or report to assess the top soil depth or the method and timing of removal and storage;</li> <li>○ restoration plan or aftercare program for the agricultural soils.</li> </ul> </li> </ul> <p>The objector objects to the Project until the surveys have been carried out and expert reports and approved methods of reinstatement have been agreed.</p>	<p>with topsoil and subsoil kept in separate bunds to prevent cross-contamination and enable proper land reinstatement.</p> <p><u>Land Reinstatement</u></p> <ul style="list-style-type: none"> <li>• Appendix I to the OCEMP outlines soil mitigation measures which are required to be incorporated into the final CEMP and which will be implemented to minimise soil mishandling during construction, allowing for excavated materials to be used on-site. This includes the production of a detailed Soil Management Plan ("SMP") which will detail the soil characteristics across the construction footprint and include the following information (no-exhaustive list). <ul style="list-style-type: none"> <li>○ A detailed calculation of soil volumes and method for how the soil resources will be stripped, stockpiled, and re-used.</li> <li>○ Detail of the aftercare period and the requirements of likely management interventions required.</li> <li>○ Monitoring, including regular checks by the Soil Scientist during construction and during the aftercare period, will be undertaken (which will cease once the required soil condition has been established and the reinstatement signed off).</li> </ul> </li> </ul>
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				<p><u>Land Drainage</u></p> <ul style="list-style-type: none"> <li>No drainage survey nor information regarding how the underground works will affect the water table and land drainage has been provided.</li> </ul> <p><u>Commercial Shoot, Holiday and Leisure Businesses</u></p> <ul style="list-style-type: none"> <li>Construction works are likely to affect the objector's commercial shoot. A plan of mitigation (alternative locations) and/or compensation measures should be agreed.</li> <li>Damage may be caused to the objector's holiday and leisure business. A comprehensive approach to noise, dust and visual intrusion during construction is needed.</li> </ul> <p><u>Lack of Engagement and Negotiation</u></p> <ul style="list-style-type: none"> <li>Meaningful negotiation regarding the acquisition of rights and the mitigation measures have not taken place.</li> </ul>	<p><u>Land Drainage</u></p> <ul style="list-style-type: none"> <li>Appendix G to the OCEMP addresses land drainage concerns, requiring pre-construction surveys of existing drainage systems, establishment of new/restored field drains where necessary to maintain functionality during construction, and reinstatement to ensure no detriment to existing drainage regimes.</li> </ul> <p><u>Commercial Shoot, Holiday and Leisure Businesses</u></p> <ul style="list-style-type: none"> <li>NGET recognises the concerns regarding the potential impact on business operations. However, it should be noted that losses arising as a result of the Order will be temporary during the construction period and therefore limited in scope. Such losses will be compensated as appropriate in accordance with the relevant legislation, case law and established practice for compulsory purchase compensation.</li> </ul> <p><u>Lack of Engagement and Negotiation</u></p> <ul style="list-style-type: none"> <li>NGET's agents, Dalcour Maclaren, have made extensive efforts to engage and negotiate with Mr John Barnes and Mrs Rosemary Barnes and their agents Knight</li> </ul>
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				<ul style="list-style-type: none"><li>• Serious and diligent attempts to move forward by agreement has not taken place. An offer via a standard HoTs is acknowledged, however its terms are not satisfactory. The financial terms appear to be take it or leave it and there are no provisions for mitigation or construction methods to satisfy the objector's concerns.</li></ul>	<p>Frank. As detailed at Appendix 1, first contact was made in October 2021 with project background, and engagement has been continuous since that date. Draft HoTs for the acquisition of rights were provided in July 2024, with meetings held between July and December 2024 to provide clarification on the Project. In 2025, continued engagement focused on discussing the HoTs including meetings in February and May 2025, with NGET confirming its willingness to consider mitigation works and advance payments to assist with impacts to the landowner's businesses. The HoTs were re-issued in July 2025 at the agent's request, followed by communications specifically to discuss mitigation measures for the holiday accommodation and commercial shoot businesses. NGET's agents have repeatedly invited the landowner's agents to respond with comments on the HoTs and have confirmed NGET's understanding of concerns regarding business impacts and willingness to consider advance payments to assist with any financial impact. Notwithstanding these efforts, NGET's agents have not received any substantive response in writing to the HoTs and await further communication from the landowner's agents Knight Frank.</p>
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	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
6.	Mr Ivan Drake and Mrs Ann Drake	02-035, 03-002, 03-010	Overhead Line Removal Rights	<ul style="list-style-type: none"> <li>• In favour of the aims of the Project and keen to agree detailed HoTs with NGET.</li> <li>• Agents report that longstanding questions relating to the following remain outstanding: <ul style="list-style-type: none"> <li>○ construction methodology;</li> <li>○ specification of the proposed access track;</li> <li>○ plans for drainage;</li> <li>○ methods of land stabilisation prior to establishment of newly planted vegetation; and</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• NGET welcomes Mr and Mrs Drake's support for the Project aims and their commitment to working collaboratively.</li> <li>• NGET's agents, Dalcour Maclaren, have maintained continuous engagement with Mr and Mrs Drake since October 2021, both directly and through their agents Knight Frank and subsequently Carver Knowles. Full details are set out in the Schedule of</li> </ul>

		02-039, 02-040, 02-043, 03-001	Electricity Infrastructure Construction Rights & High Voltage Alternating Current (HVAC) Rights	<ul style="list-style-type: none"> <li>○ the depth and width of cable runs.</li> <li>• Objection on the basis of insufficient detail has been provided by NGET to allow professional advisors to assess the potential environmental impact of the Project.</li> <li>• Remain committed to working with NGET to enable the Project to proceed in the most environmentally sustainable manner.</li> </ul>	<p>Landowner Engagement at Appendix 1. Draft Heads of Terms were provided in July 2024 with ongoing discussions continuing through July 2025.</p> <ul style="list-style-type: none"> <li>• NGET shares the landowner's commitment to environmental sustainability and will continue working collaboratively to agree mutually acceptable terms with Mr and Mrs Drake.</li> <li>• As mentioned above, an OCEMP has been prepared which covers the entire Project including the CSECs, underground cabling and access works (<b>CD B13</b>). The purpose of this document is to develop, maintain, implement, monitor and improve environmental control procedures in accordance with the relevant legal and statutory requirements. It is a planning condition of the CSEC planning permissions that a final CEMP is submitted and approved in writing by the relevant local planning authority, and strictly adhered to during construction.</li> <li>• Regarding the specific technical details requested: <ul style="list-style-type: none"> <li>○ Construction methodology: The final construction methodology will be confirmed by the principal contractor but will include the following key stages:</li> </ul> </li> </ul>
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	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
					<ul style="list-style-type: none"> <li>▪ Easement fencing;</li> <li>▪ topsoil strip;</li> <li>▪ haul road construction;</li> <li>▪ pre-construction drainage;</li> <li>▪ trench excavation;</li> <li>▪ duct installation;</li> <li>▪ backfilling;</li> <li>▪ joint bay excavation;</li> <li>▪ cable pulling and jointing;</li> <li>▪ testing and commissioning;</li> <li>▪ haul road removal;'</li> <li>▪ post construction drainage;</li> <li>▪ topsoil reinstatement; and</li> <li>▪ easement fencing removal.</li> </ul> <p>There is also the possibility of trenchless installation where required for specific locations.</p>

	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
					<ul style="list-style-type: none"> <li>○ Access track specification: The access track will be constructed using different grades of compacted stone layers with a width between 5 and 8 metres to allow for passing points and safe construction. This approach provides necessary structural integrity while maintaining sustainability benefits, as the stone materials can be recycled and reused post-completion. Stone construction also provides operational flexibility for potential adjustments during construction if unforeseen circumstances arise.</li> <li>○ Drainage plans: Appendix G to the OCEMP addresses land drainage concerns, requiring pre-construction surveys of existing drainage systems, establishment of new/restored field drains where necessary to maintain functionality during construction, and reinstatement to ensure no detriment to existing drainage regimes. Pre and post drainage will form part of the principal contractor's scope and will include</li> </ul>



	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
					<p>detailed investigation and survey of any existing drainage.</p> <ul style="list-style-type: none"> <li>○ Land stabilisation methods: Appendix I to the OCEMP outlines soil mitigation measures including production of a detailed SMP which will detail soil characteristics across the construction footprint, methods for soil stripping, stockpiling and re-use, aftercare requirements, and monitoring during construction and aftercare periods to ensure proper reinstatement. Following construction, the land will be reinstated and replanted as appropriate.</li> <li>○ Cable depth and width: Cables will be installed at a minimum depth of 900 millimetres to the protective tile in accordance with industry guidelines. Depending on installation method, the width will be approximately 40 – 50 metres.</li> </ul> <ul style="list-style-type: none"> <li>• NGET will continue working collaboratively with the landowners throughout the detailed design process and ongoing HoTs negotiations.</li> </ul>

	Objector and Agent	Plot no's	Rights package (if applicable)	Issues/concerns raised in Objection	NGET response
7.	Mr Tom Howard Nicholas and Mr Jack Thomas Frank Nicholas represented by Carter Jonas				Objection withdrawn.