

GEORGE F. WHITE

RESIDENTIAL . COMMERCIAL . RURAL . DEVELOPMENT

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The Planning Inspectorate
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Our Ref: Job-0000999/CH/JH
Your Ref:
Date: 23/08/2023

SENT BY E-MAIL ONLY

stephen.waterfield@planninginspectorate.gov.uk

Dear Sirs

THE NATIONAL GRID ELECTRICITY TRANSMISSION PLC (SCOTLAND TO ENGLAND GREEN LINK 1) COMPULSORY PURCHASE ORDER 2023

We write on behalf of Mr Keith Davidson of 35 Weetwood Court, Weetwood, Leeds, West Yorkshire, LS16 5NT who owns Seaham Grange Farm, to object to the above Order and proposed acquisition of land and new rights in the area of Seaham to Hawthorn Pit, County Durham pursuant to the Electricity Act 1989 and Acquisition of Land Act 1981.

Mr Davidson owns the freehold of land registered under title number DU259678.

We object to the proposed acquisition on the following grounds:

1. The Applicant has not provided sufficient details in respect of the scheme nor engaged adequately with Landowners.
 - a. They initially failed to agree to pay for Mr Davidson's professional and legal fees in dealing with this matter. National grid would only agree to a maximum limit of £2,000. My client is taking the risk of incurring our fees in dealing with this matter.
 - b. We do not have access plans where they wish to take access.
 - c. National Grid have not properly assessed the implication of putting a cable 900mm deep on costal land.
 - d. National Grid have not properly understood the drainage.
 - e. National Grid are not clear if they require any compounds or not and I am yet to receive plans of the compounds and/or any other infrastructure on the land
 - f. I have asked for meetings with National Grid numerous times and have only achieved one meeting two months ago but this was for another client. Before this meeting we had a date arranged with the drainage contractor, Bell Ingram and National Grid. National Grid and Bell Ingram failed to attend the meeting (the drainage contractor did) and they had not informed me they were not coming so it took another month to arrange a further meeting but this was for the benefit of another client not Mr Davidson.
 - g. I also understand these objections are replicated by other agents and the NFU.
2. National Grid have not mitigated the claims and costs of the project and considering drainage. The consultation has been so poor that I firmly believe that National Grid have not identified all costs and

factors which reasonably could be expected to find out if proper consultation was carried out. I note in National Grid's Statement of Case they have stated the NGET has provided the landowner with detailed Heads of Terms setting out its requirements and this was accompanied by NGET Best Practice Guide. These are generic documents that do not ensure the land holding and business is fully understood. The Heads of Terms provided do not deal with our objections above. The Best Practice Guide is a general guide and not a strategy that can be applied to the individual clients.

In addition, Bell Ingram have now suggested we use SEGL2 heads of terms which we welcome given they deal with some of the points we have raised initially. Although there are still issues with them (given this statement of case) we believe there should be some time given to agree the new heads of terms along with an incentive payment.

3. With regards to point 12.106 I would be grateful if National Grid can explain which accesses, they will use temporarily and which they will use permanently and for them accesses can they detail how they will be maintained.
4. I understand that 12.109 of the National Grid's Statement of Case they state that they have justified the need for the project, which I don't disagree with however my concern is that this is a publicly funded scheme and therefore National Grid should ensure that this is the best use of public funds especially in the current climate however how can they fully justify this scheme when National Grid do not fully understand the land holdings, the businesses, the drainage, other activities or ventures that are currently happening. Therefore, because they do not fully understand this how they can properly budget for the scheme, therefore I would ask National Grid to set out the projected costs of land drainage and compensation in full and justify how they balance costs and mitigation against compensation.

I understand that excavation works on SEGL1 are due to happen on shore until 2027/2028. We have planning secured for solar, they expect to be up and running in 2024/2025 at Seaham Grange. I.e. Before National Grid starts work there. The route of the pipeline goes straight through the solar park. Has National Grid taken into account compensation and devaluation of this in their budgets?

Statement of case (12.111) says they don't know about the residential development. We have supplied a plan of the developments on National Grid and had the met us earlier in the process they would have understood this on site.

5. National Grid's Statement Case is correct at 12.1.14 in that the drainage consultant met with the relevant landowners to gather information on land use and agricultural farming practices to help form an appropriate drainage strategy and cable depth. However, this does not resolve my objection above, drainage contractors basically said that the depth of the cable should be 1.5m as opposed to 900 metres however National Grid are not willing to accept this until a formal report has been submitted.

We have informed National Grid of a current underground Northern Power cable which has not been buried deep enough and is now exposed to the surface of the land which means the area of the land cannot be farmed until the cable is removed. This has been ignored by National Grid.

The land affected slopes gently upwards from the coast and it's the higher elevation land that's most affected by the shallow underground cable depth. This supports our theory that weather erosion, coupled with modern farming practices, has led to the cable being exposed. SEGL1 cable is proposed to run east to west across Mr Davidsons land, therefore, it will be prone to the same conditions.

I cannot stress enough how important it is getting the cable depth deep enough and will be critical to avoid constant outages and repairs but also to ensure Mr Davidson can continue to farm the land in a safe and productive way.

In addition, I understand that the drainage consultant has not been instructed to provide the pre and post drainage plans along with a detailed strategy of how the drainage is going to be dealt with pre and post construction. Therefore, how can my clients be sure that the drainage is properly going to be assessed and protected. If the drainage is not protected and preserved the devaluation on the

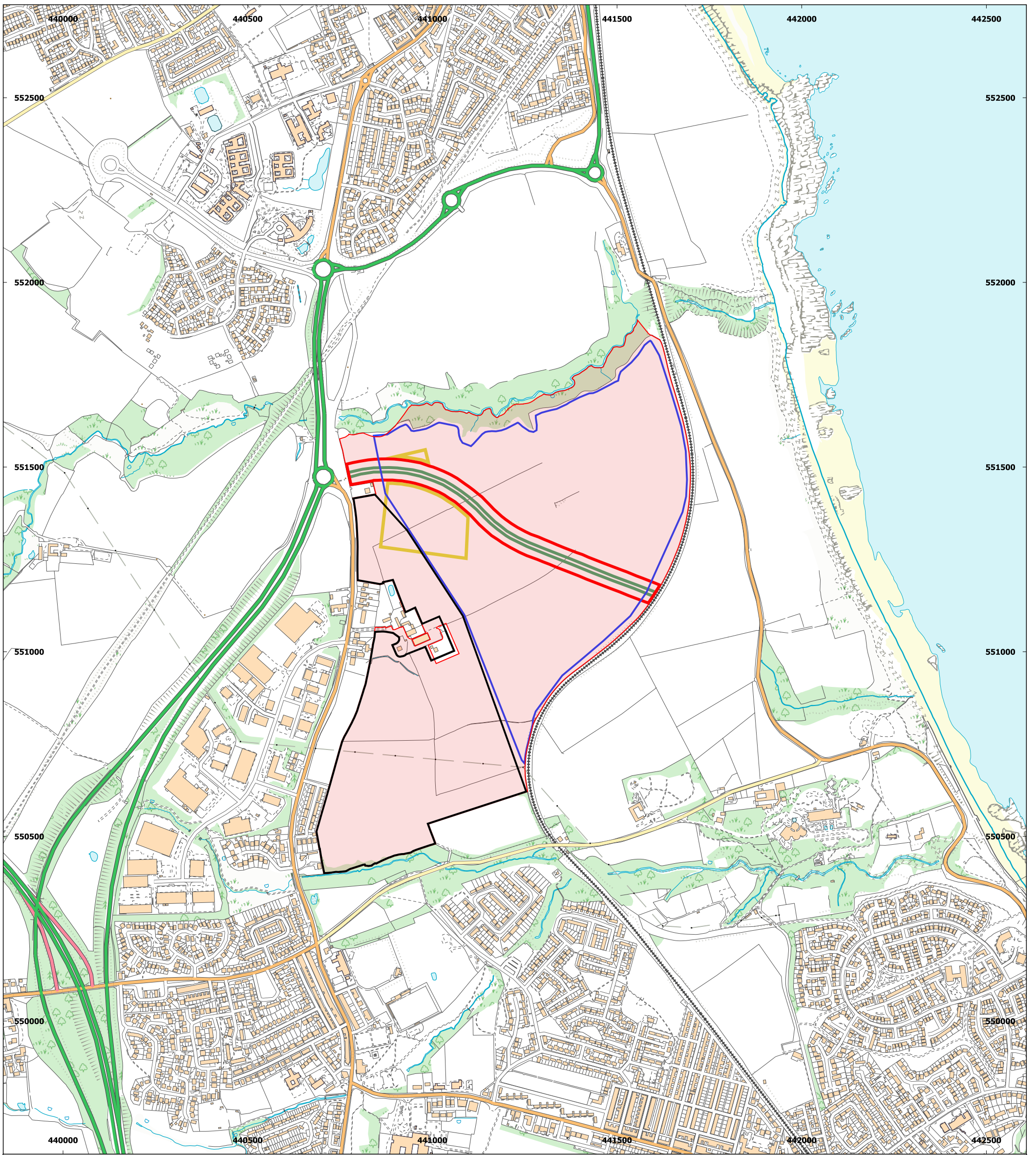
land holdings is significant, not only in the disturbance but also the devaluation of the whole holding.
I firmly do not believe that this has been considered.

Yours sincerely



Caroline Horn MRICS FAAV
Partner

For and on behalf of George F. White LLP

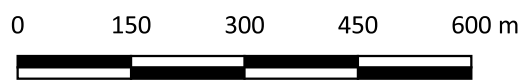


Legend

- DU259678
209.19 Ac/ 84.66 Ha
- Taylor Wimpey Option Plan
70.17 Ac/ 28.40 Ha
- ecaprenewables - Title Plan
119.51 Ac/ 48.36 Ha
- Option Area
14.84 Ac/ 6.01 Ha
- Construction Compound
10.40 Ac/ 4.21 Ha
- Anticipated Easement Strip
4.57 Ac/ 1.85 Ha



Scale - 1:10,000



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Client / Project:

Davidson, K J

Drawing Title:

Heads of Terms for Seaham Grange Park

Drawn By:

RD

Checked By:

JB

Date:

12.10.2022

Scale:

1:10,000 @ A3

Project No:

WOL609488

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Revision:

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