

On behalf of Katherine Lee
Land Parcels Affected 7/77, 7/80, 7/81

Following the representations made at Compulsory Acquisition Hearing 2 (CAH2), and previous submissions, I write on behalf of our client, Katherine Lee ("the landowner"), to provide this written representation for Deadline 4. The landowner is affected only by third party works.

1. Current position

The landowner is affected does not object in principle to the proposed scheme. However, they maintain that the current proposals affecting their land are not yet sufficiently defined, justified, or negotiated, and therefore they cannot support the exercise of compulsory acquisition powers at this stage.

2. Engagement with third party matters

Engagement on this matter remains extremely limited. A meeting was held on 23 April 2026 with Dalcour Maclaren, acting on behalf of UKPN in relation to the diversion of UKPN assets. This engagement was welcomed as a positive step.

During that meeting, Dalcour Maclaren were made aware of earlier discussions with Fisher German regarding a more viable and suitable alternative route within an adjoining field. This field is already encumbered by the wider scheme infrastructure and therefore represents a potentially more logical and less impactful option.

Dalcour Maclaren confirmed that they would take instructions from their client. However, since that meeting, there has been no further engagement or follow-up.

More broadly, there remains insufficient clarity regarding the UKPN utility works. In particular, further detail is required on:

- a. The relationship and coordination mechanisms between the Applicant and utility providers
- b. The justification for the chosen routes and construction methodologies
- c. Practical matters, including drainage, reinstatement, soil handling, and future access arrangements

3. Extent of Land Take

The primary concern remains the extent and justification of land take associated with the scheme.

The cumulative impacts of the proposed land take include:

1. Temporary loss of productive agricultural land
2. Long-term occupation of land
3. Fragmentation of fields, reducing operational efficiency
4. Disruption to established farming operations and land management practices

Despite the landowner having proposed a viable and less impactful alternative route, there is no evidence that this has been meaningfully considered. This raises a clear concern that avoidable land take has not been minimised, as would be expected.

4. Technical Matters

As outlined in our Deadline 1 submission, and consistent with concerns raised more widely, a number of critical technical issues remain unresolved, particularly if the current route is pursued over the proposed alternative.

These unresolved matters reinforce the importance of properly consulting with the landowners to understand the practical implications. The information provided to date remains high-level, which makes it difficult for our client to fully understand the practical implications of the proposals, particularly in respect of:

1. Land use impacts
2. Construction methodology
3. Duration and phasing of works
4. Soil management and reinstatement
5. Ongoing operational constraints and access

It is essential that the Applicant provides a single, consolidated document setting out how these matters will be dealt with together with detailed mitigation measures.

5. Agricultural and business Impacts

As stated at the CAH2, the cumulative effects of the scheme will have a clear and material impact on the landowners' business.

These impacts extend beyond temporary disruption and include:

- Temporary loss of productive land and reduced efficiency
- Disruption to established farming practices
- Long-term implications for business viability

These are fundamental considerations when assessing whether the compulsory acquisition powers are proportionate and justified.

6. Compulsory acquisition

Our client has not yet been provided with sufficient information to make a proper and informed assessment of the proposals or their impacts. The current lack of clarity materially prejudices their ability to engage meaningfully in the process.

The landowners' position remains that compulsory acquisition powers should:

- a. Be used only as a measure of last resort
- b. Be exercised only where impacts are fully understood
- c. And follow genuine and meaningful negotiation

At present, our client does not believe these conditions have been satisfied.

7. Conclusion

Our client therefore maintains the representations set out at Deadline 1 and respectfully request that the Examining Authority ensures the Applicant:

- a. Clearly justifies the extent of land take and rights sought
- b. Demonstrates proper consideration of reasonable alternatives
- c. Provides detailed responses to outstanding technical matters and mitigation measures
- d. Clarifies third-party coordination and cumulative impacts
- e. Engages in meaningful and timely negotiations

f. Provision of Heads of Terms and legal documentation before the close of the Examination, noting that the form and content of such documentation has not yet been clarified
The Applicant has not yet provided sufficient clarity regarding the scope, justification, and coordination of the proposed compulsory acquisition and temporary possession powers.
Without this information, it is not possible to conclude that the powers sought are proportionate, justified, or appropriately targeted.
Until these matters are resolved, our client is not in a position to properly assess the impact of the scheme on their business. Accordingly, their concerns are maintained pending satisfactory resolution.