

Further Update Regarding Continued Objection to Proposed Third-Party Works

This submission is made on behalf of Ms Rosemary Sarah Lee and provides a further update to the previously submitted representations regarding the Applicant's proposal to include third-party works within the Order Limits affecting the land. This submission should be read alongside the representations submitted at Deadline 6.

Background and Current Position:

A meeting was held on 16 July 2026 between representatives for UKPN and the Landowner to discuss the proposed third-party works and the extent of the Order Limits affecting the land. The meeting took place in person on site and was attended by:

██████████ from Dalcour Maclaren, on behalf of UKPN and ██████████, on behalf of Ms Rosemary Lee, from Savills.

The purpose of the meeting was to explain the Landowner's concerns regarding the inclusion of the land within the Order Limits for the purposes of facilitating proposed third-party underground cabling works.

At that meeting, it was clearly explained that the adjoining landholding, to the east of Green Lane, identified on the attached plans, is already significantly affected by the Project and is capable of accommodating the required underground cabling works. Accordingly, our client maintains that there is no reasonable justification for imposing the proposed third-party works on their land when a more appropriate and less harmful alternative exists immediately adjacent. This position was clearly understood by the UKPN's representatives. It was apparent to all parties present that the extent of the proposed land rights being sought over our client's land is disproportionate when considered against the proposed works and the wider extent of land already affected by the Project in this location.

Failure to address the issue at an earlier stage:

There was clear frustration expressed by the UKPN's representatives during discussions, arising from concerns that it may now be difficult to amend the necessary land rights at this stage of the Development Consent Order process.

However, our client strongly objects to any suggestion that procedural timing should justify the continued inclusion of the land within the Order Limits.

The current situation has arisen because the Applicant failed to engage sufficiently and in a timely manner regarding alternative routing. Had this assessment and engagement been undertaken properly at an earlier stage, the issue would have been identified and addressed well before the Examination reached its current phase.

It is therefore wholly unacceptable that, as a consequence of the Applicant's failure to progress these matters in a timely and appropriate manner, our client should now be burdened with unnecessary land rights and the associated impacts on the farming business.

Those impacts have been described in detail within previous submissions and remain the basis of the our client's continued objection.

Update since the meeting:

As at 4 August 2026, Dalcour Maclaren has advised that a proposal to contain the third-party works entirely within the adjoining field has been approved internally as long as the route stays within the Order Limits and is subject to engineering and technical confirmation from UKPN.

We understand that, provided the revised alignment remains within the existing proposed Order Limits ie. to the east of Green Lane, the principal requirement would be an amendment to the proposed land rights rather than a fundamental alteration to the Project. The request has now been referred to UKPN for engineering and technical review.

Whilst this development is welcomed and appears to represent a positive step forward, it must be emphasised that such consideration should have been undertaken significantly earlier in the process. Had this work been carried out at the appropriate stage, any revised proposals could have been properly examined and scrutinised through the Examination process.

Furthermore, the stipulation that the route will remain within the Order Limits is wholly inappropriate and falls well short of the standards of good practice that would ordinarily be expected.

Retention Order Limits:

Even if the engineering review confirms that the third-party works can be accommodated within the adjoining field, our client remains deeply concerned by any proposal to retain the land within the Order Limits.

If the works can be delivered without entering or affecting her land, then there can be no legitimate planning, engineering or compulsory acquisition justification for retaining the Plots 7/77, 7/80, 7/81 within the Order Limits.

The continued inclusion of our client's land creates uncertainty and concern because the land would remain burdened by powers and rights associated with the Order despite no operational requirement for those powers to exist.

Our client therefore considers that the mere relocation of the works is insufficient. If the revised alignment is confirmed as feasible, the corresponding plots affecting the land should also be removed from the Order Limits.

Accordingly, our client's position remains that:

1. The proposed third-party works should be restricted to the field located to the east of Green Lane, as identified on the attached plan.
2. This approach is consistent with the overarching objective of minimising interference with private land interests and reducing impacts on affected parties.
3. The adjoining field is already subject to significant Project related disruption and therefore accommodating the additional cabling works would not result in the disproportionate impacts that would arise if the works were undertaken on our client's land.
4. The Applicant should not retain compulsory acquisition powers or temporary possession rights over our client's land where there is no demonstrable requirement for them.
5. In the event that the engineering review confirms that the third-party works can be undertaken within the adjoining field, Plots 7/77, 7/80, 7/81 should be deleted from the Order Limits in their entirety.

Conclusion:

In conclusion our client submits that, should the Applicant conclude that the third-party works can be accommodated within the adjoining field, there would be no reasonable or rational basis for retaining the affected plots within the Order Limits over the land.

There is no statutory barrier preventing the amendment of plans following the close of hearings and prior to the Secretary of State's determination. Sufficient time remains available for the Applicant to undertake the necessary amendments. Our client therefore requests that the Examining Authority notes the continued objection and to give significant weight to the fact that a viable alternative appears to exist which would avoid substantial and unnecessary impacts on the farming business.

For these reasons, the Applicant should be required to amend the proposals so that the third-party works are undertaken solely within the adjoining field and the Plots 7/77, 7/80, 7/81 are removed from the final Order Limits.



