Important details

Our Ref:

Your Ref.

ART/EB/J181

Date

21st November

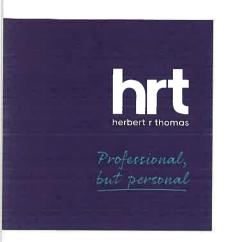
2022

Contact:

Andrew Thomas DI 01446 776386

AndrewThomas@hrt.uk.com

hrt.uk.com



O Cardiff Office

11–12 Jellicoe Court, Atlantic Wharf, Cardiff, CF10 4AJ

02922 671555 cardiff@hrt.uk.com



59 High Street, Cowbridge, CF71 7YL

01446 772911 cowbridge@hrt.uk.com

O Bridgend Office

The Toll House, 1 Derwen Road, Bridgend, CF31 1LH

01656 660036 bridgend@hrt.uk.com

O Neath Office

33 Alfred Street, Neath, SA11 1EH

01639 639541 neath@hrt.uk.com



RECORDED DELIVERY

The Secretary of State for Business Energy & Industrial Strategy c/o John McKenna Department for Business, Energy & Industrial Strategy

c/o Eversheds Sutherland (International) LLP 2 New Bailey Square 6 Stanley Street Salford M3 5GX

Dear Sirs,

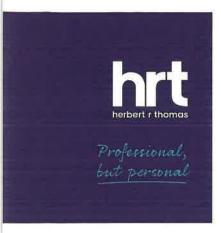
RE: The National Grid Gas plc (Western Gas Network Project)
Compulsory Purchase Order 2022, The Gas Act 1986 and
The Acquisition of Land Act 1981, compulsory purchase of land
and new rights in Gloucestershire, Worcestershire,
Warwickshire, Swansea and Powys
Our clients: Mr DG & Mrs C Jones, Plas Y Waun Farm, Plas Road
Pontardawe, Swansea, SA8 3HD - Land lying to the west of
Tan-Yr-Hiw Farm, Cilfrew, Neath, Title No. CYM333055
Freehold Interest
Grounds of Objection

We are instructed on behalf of David Gareth Jones and Caroline Jones to submit their grounds of objection to the proposed National Grid plc (Western Gas Network Project) Compulsory Purchase Order 2022 as follows: -

- 1. The proposed location for the construction compound rights is unsuitable for the following reasons:
 - a) access to the proposed site is from a narrow strip of land to the south-east of the Gas Distribution Station which is unsuitable for use, in its present, by heavy vehicles and machinery without significant drainage works being undertaken to alleviate ground and surface water drainage water problems and thereafter upgrading the access track by the importation of stone to provide a suitable surface to withstand heavy machinery.



Important details



- O Cardiff Office
 11–12 Jellicoe Court,
 Atlantic Wharf,
 Cardiff, CF10 4AJ
 - 02922 671555 cardiff@hrt.uk.com
- Cowbridge Office59 High Street,Cowbridge, CF71 7YL

01446 772911 cowbridge@hrt.uk.com

O Bridgend Office
The Toll House,
1 Derwen Road,
Bridgend, CF31 1LH

01656 660036 bridgend@hrt.uk.com

Neath Office33 Alfred Street,Neath, SA11 1EH

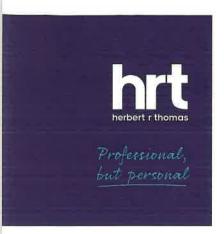
01639 639541 neath@hrt.uk.com

hrt Est. 1926

- It will be necessary to provide a new access splay to make this narrow strip of land accessible to heavy vehicles/Machinery.
- b) The topography of the proposed site is unsuitable for use as a compound.
- c) the proposed site is crossed by high voltage overhead wires and underground high-pressure gas pipes which provide unnecessary health and safety risks to personnel in the use of the proposed site as a construction compound. No details have been provided by National Grid plc as to how they propose to mitigate the risks associated with the above apparatus in the proposed use of the site as a construction compound.
- d) Land comprised within Title No. CYM333055 is used for the grazing of livestock by Mr DG & Mrs C Jones. Free and uninterrupted access to their land at all times and for all purposes is available over a farm track which passes through land to the south-east comprised within Title No. CYM379232. No consideration has been given to traffic management to ensure that Mr DG & Mrs C Jones can maintain uninterrupted access to their land, both through Title No. CYM379232 and land within their Title No. CYM333055, to the north-east of the Gas Distribution Station so that they can tend to the needs of their livestock on a daily basis.
- e) Despite correspondence between the parties to enable National Grid access by Licence Agreement to undertake a walk-on survey (Subject to Agreement of the terms of a proposed Licence Agreement), no walk-on survey for environmental or other purposes has been undertaken by National Grid plc on Title No. CYM333055. Whilst a Statement of Reasons under paragraph 9 states screening opinions have confirmed that the Project does not constitute development for which an Environmental Impact Assessment is required, nevertheless best practice suggests that mitigation of environmental damage should be considered by a responsible undertaker such as National Grid plc.
- f) Notwithstanding the Schedule of Engagement reproduced at Appendix 2 of the Statement of Reasons, (which unhelpfully excludes correspondence from the Landowners



Important details



- O Cardiff Office
 11–12 Jellicoe Court,
 Atlantic Wharf,
 Cardiff, CF10 4AJ
 - 02922 671555 cardiff@hrt.uk.com
- Cowbridge Office59 High Street,Cowbridge, CF71 7YL

01446 772911 cowbridge@hrt.uk.com

O Bridgend Office

The Toll House, 1 Derwen Road, Bridgend, CF31 1LH

01656 660036 bridgend@hrt.uk.com

Neath Office33 Alfred Street,Neath, SA11 IEH

01639 639541 neath@hrt.uk.com

hrt Est. 1926

Agent) Mr DG & Mrs C Jones, the objectors, maintain that National Grid plc have failed to enter into meaningful negotiations with them to acquire the necessary rights over their land by agreement. No consideration has been given to local comparable evidence in arriving at a settlement by agreement with the agents acting for National Grid favouring a 'Whole Scheme' valuation approach.

Land comprised within the adjoining Title No. CYM379232 is a
more suitable site upon which to place a construction
compound. In fact, it is land within this Title that was previously
used as a construction compound during the original
construction of the Gas Distribution Station.

Access to the land is better, the topography of the land more suitable (being directly off the adjoining farm track) and the Statement of Reasons confirm that screening opinions have confirmed that the Project does not constitute development for which an Environmental Impact Assessment is required.

It is the view of Mr DG & Mrs C Jones, the objectors, that the land comprised within Title No. CYM379232 is more suitable for use as a compound site and that National Grid plc has failed to demonstrate in their Statement of Reasons, or otherwise, that it is not a suitable site. Whilst it is accepted that tree saplings have been planted on the site, nevertheless these are immature and can be removed and replaced at minimal cost.

For the above reasons, Mr David Gareth Jones and Caroline Jones object to the National Grid Gas plc (Western Gas Network Project) Compulsory Purchase Order 2022.

Yours faithful

Andrew R Thomas

Chartered Surveyor & RICS Registered Valuer

BSc (Land Man) MRICS FAAV FLAA

Director