

Secretary of State
c/o John McKenna
Department for business, Energy and Industrial
Strategy
c/o Evesheds Sutherland (International) LLP
2 New Bailey Square
6 Stanley Street
Salford
M3 5GX

beiseip@beis.gov.uk

9 May 2022

Our ref: MJSB/U000111
Your ref:

By email only

Dear Sir

**The National Grid Electricity Transmission (Little Horsted Substation Connection)
Compulsory Purchaser Order 2022 (“CPO”)**

We are instructed by our clients, Ibstock Bricks (1996) Limited and other Ibstock companies, (our client) to advise on compulsory purchase matters in respect of their freehold interests in properties (“the property”) that will be affected by this CPO. The map references include plots 83, 84, 85, 86, 149, 150, 151, 152 and 153.

We write to object on behalf of our client to the above-mentioned compulsory purchase order (“the Order”) on the following grounds:

1. Our client does not wish to be deprived of part of their freehold interest in, and occupation of, the property.
2. Our client is anxious to retain its representation in this area and currently operates a profitable business from the property which it intends to develop further. The acquisition of parts of the property as proposed, will cause significant disruption, inconvenience and costs to our client. This will involve considerable capital costs and potentially increased operational costs.
3. National Grid has not demonstrated that there is a sufficiently compelling case in the public interest to justify interfering with our client’s rights.
4. National Grid already has sufficient rights over our clients land to enable them to undertake their proposed works without the need for this proposed CPO.

5. No offer has been made to purchase our client's leasehold interest. It cannot be said that compulsory purchase powers are required on the grounds that it is not possible to acquire the interest by agreement.
6. As there are no compelling grounds for acquisition of our client's property, we request that the Order is not confirmed in relation to this property.

We would be grateful if you would acknowledge receipt of this letter and keep us informed of progress.

Yours faithfully

A handwritten signature in blue ink that reads "Gerald Eve".

Gerald Eve LLP

mbanton@geraldeve.com
Direct tel. +44 20 7333 6316
Mobile. +44 77831 416985