

SUPPLEMENTARY STATEMENT

DOGGER BANK SOUTH OFFSHORE WIND FARMS

CAH1 HEARING – RIPLINGHAM ESTATES LIMITED
AND THE LOS TRUSTEES

STATEMENT BY REGISTERED ID NO. 2005086 – MICHAEL GLOVER MRICS, FAAV
OF
MICHAEL GLOVER LLP, CHARTERED SURVEYORS,
GLOBE HOUSE, 15 LADYGATE, BEVERLEY, HU17 8BH

SITE REFS.

Riplingham Estates Limited – Vinegar Hill Farm, Beverley – (DM PARCEL REF: 2586)
(Land Plan: 17-011) (10,135 m²)

Los Trustees – Land at Molescroft, Beverley – (DM PARCEL REF: 2432)
(Land Plan: 14-006) (32,110 m²)

AGENDA ITEM CAH1

Supplementary Statement

1. This statement is supplementary to that submitted via Caroline Hopewell on 13th January 2025.
2. We believe that the nature of our representation has been misunderstood by the Inspectorate and wish to clarify the nature of our representation.
3. Our concern is about the CONDUCT of the Applicant and not the issue of compensation per se. It is amply illustrated in the government guidance that compensation is not a matter for consideration by the Inspectorate.
4. The Inspectorate are interested in the progression of voluntary agreements, which we are also happy to progress on behalf of our clients.
5. I attach a copy of our email and letter of 16th January 2025 enclosing an AI analysis which illustrates our concern.
6. The Applicants are represented by professional agents and it is abundantly clear that, as I have put it, 'black is white' arguments are being put forward which make it impossible for us to progress a voluntary agreement. Months have elapsed, over which period we have been faced with the same argument which we believe we have shown to be wholly erroneous.
7. Compulsory acquisition should be a last resort and the parties should be able to reach agreement if reasonable discussion takes place. We have proved beyond reasonable doubt that, in our view, contempt is being shown for the Compulsory Purchase process by virtue of the arguments being advanced by the Applicant through their agents.

8. Our representation is therefore about the CONDUCT of the Applicant and not about compensation per se and, therefore feel that the Applicant should not be afforded Compulsory Purchase powers until such time as these attitudes change. I have set out clear reasoning why the Applicant's conduct is unacceptable and should not be endorsed.

We believe that this is a matter within the jurisdiction of the Panel and is a matter that should register concern.

M W Glover MRICS FAAV
Michael Glover LLP

17th January 2025

Subject: Dogger Bank South-Riplingham Estates Ltd and Los Trustees

From: Michael Glover <[REDACTED]>

Date: 16/01/2025, 14:10

To: Georgina Hurley <[REDACTED]>

CC: digitalvault@mglp.karoo.co.uk, <[REDACTED]>

Dear Georgina,

Please see attached a letter together with an AI response to a question we posed, such question relating to the issue between us that is impeding progression of a voluntary agreement. On the attached you will note that the question and the AI response does not support your contention that land on the urban fringe without planning consent or allocation is not worth more than similar land in open countryside.

We are happy to have a further meeting on the conditions set out in the accompanying letter.

We will also be making a further statement to the Inspectorate before the closing date.

Kind regards,

Michael Glover.

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Michael Glover LLP, Chartered Surveyors.

Tel: [REDACTED]

Michael Glover <[REDACTED]>

Attachments:

1601-01.pdf	549 KB
DBSRIPSTLOS.pdf	501 KB
mglp.vcf	340 bytes

ChatGPT



Does agricultural land sold on the urban fringe achieve higher sale rates per acre than similar agricultural land quality and parcel size sold in open countryside? If so, what are the reasons for it and typically by what percentage increase?



Yes, agricultural land sold on the urban fringe typically achieves higher sale rates per acre compared to similar land in the open countryside. The price premium is primarily due to its proximity to urban areas, which offers potential for future development or higher-value uses. Here's an explanation of the key factors and typical percentage increases:

Reasons for Higher Sale Rates:

1. Development Potential:

- Land on the urban fringe is often perceived as having potential for rezoning or future development for residential, commercial, or industrial purposes.
- Buyers may speculate on the possibility of increased land value if planning permissions are granted.

2. Demand for Accessibility:

- Proximity to urban centers makes such land attractive for uses like hobby farming, equestrian facilities, or lifestyle properties.
- Accessibility to infrastructure, markets, and services adds to its desirability.

3. Market Dynamics:



- Increased competition among developers, investors, and lifestyle buyers can

Message ChatGPT



ChatGPT can make mistakes. Check important info.

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2. **Demand for Accessibility:**
 - Proximity to urban centers makes such land attractive for uses like hobby farming, equestrian facilities, or lifestyle properties.
 - Accessibility to infrastructure, markets, and services adds to its desirability.
3. **Market Dynamics:**
 - Increased competition among developers, investors, and lifestyle buyers can drive up prices.
 - Limited supply of urban-fringe land compared to open countryside creates scarcity.
4. **Alternative Uses:**
 - Land near urban areas may be used for agritourism, urban agriculture, or renewable energy projects, which can yield higher returns than traditional farming.
5. **Speculative Investment:**
 - Investors may pay a premium anticipating future growth and urban expansion, which could lead to land appreciation.

Typical Percentage Increases:

- The price premium for urban-fringe land can vary widely depending on location, demand, and zoning regulations.
- Studies and market analyses often show price increases ranging from **20% to 300%** compared to similar agricultural land in open countryside.
- In high-demand areas or regions with significant urban growth, the premium can exceed **500%**, particularly if the land has been rezoned or there is strong speculation of future development.

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Tel: (01482) 863747

Email: [REDACTED]



Chartered Surveyors,
Auctioneers,
Land and Estate Agents

Our Ref: MWG/ka/1601-01

16th January 2025

Ms Georgina Hurley
Dalcour Maclaren

BY EMAIL

Dear Georgina

Re: Dogger Bank South – Riplingham Estates Limited (Vinegar Hill Farm) and Los Trustees (Land at Molescroft, Beverley)

Further to earlier correspondence, and you will be aware from our statement issued to the Planning Inspectorate that we seriously contest your client's assertion that land values on the urban fringe are no greater than those in the open countryside. Your client's stance on this is amply illustrated by the correspondence.

Please see the attached Artificial Intelligence response to the question posed on the attached, such question going to the heart of the issue between us. You will note that your client's contention is totally at odds with both our arguments in the months leading up to the Hearing and the AI response which is in line with the points we have been making.

Your client's stance has been the impediment to having any chance of progressing a voluntary agreement and we made the points regularly in LIG discussions that a different approach was needed on the urban fringe. To date, you have completely rejected progressing matters in a manner which reflects those different circumstances, but I would hope that you have now had time to consider the matter in more detail.

Accordingly, you have offered a further meeting with us which we will be quite happy to undertake but only if your clients are going to be realistic about the differential circumstances that exist on the urban fringe. Your client's stance on this matter to date has involved us in a lot of extra work which we consider should have been unnecessary, had a reasonable approach been made and an acknowledgement of the differential circumstances. These issues were raised at a very early stage and continued to be raised throughout our discussions but, to date, have been ignored.

Our clients are very angry about this argument that you have put forward, which clearly 'flies in the face' of reality. As I have stated, we are happy to have a further meeting, but would need to see a different approach on your client's part.



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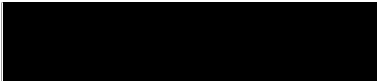


If you are going to maintain the current arguments then, regretfully, I don't think there is any point in meeting and, if the arguments of your clients are maintained, I think, regretfully, it will end up with the matter being decided by the Upper Tribunal (Lands Chamber) if they are awarded and seek to use CPO powers and progress the same arguments.

I would hope that this could be avoided as we have so much work to do currently and time spent trying to contest an argument that 'black is white' really does not sit well with us.

I look forward to hearing from you.

Yours sincerely



M W Glover MRICS FAAV
Michael Glover LLP



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