

**I & A Simkin**  
**Comments upon the Statement of Common Ground (SoCG)**

1. The SoCG was provided by the Applicant on 26<sup>th</sup> October 2020.
2. In relation to the Record of Engagement, from our records we consider there to be correspondence omitted from your record. The dates and corresponding details are as follows and have been subsequently added to the amended (tracked changes) SOCG document attached:
  - 26/04/2019 - Letter from Gateley Hamer (GH) to landowner - Land interest questionnaire sent.
  - 03/09/2019 - Letter from HE to landowner - Access Licence Agreement for Agricultural Assessment Surveys sent.
  - 06/12/2019 - Email from GH to land agent - Updated land plans following meeting sent.
  - 09/12/2019 - Letter from GH to landowner - Updated land plans following meeting sent.
  - 30/01/2020 - Email from GH to land agent - Confirmation of amendments to land interest schedule
  - 17/03/2020 - Letter and Notice from HE to landowner - Section 56 letter and notice notifying persons of accepted Application arrived with landowner and agent.
  - 17/09/2020 - Letter from HE to landowner and agent - Survey access form sent.
3. The correspondence of the 01/06/20, S56 – Additional Relevant Representation, was not received by Messrs Simkin or ourselves, therefore this will need to be removed from the record of engagement.
4. Section 3.2.1 states there is a reference number for each matter in the table, however this is not evident within the table.
5. Messrs Simkin would like to reserve their position to comment on Compensation Issues. The draft Heads of Terms document requires revising following the acceptance of the Formal Request for Scheme Changes, therefore until such time as an updated document is provided to my client, we are unable to respond.

6. Messrs Simkin do not agree with the Applicant's response in relation to the Bridleway realignment Issues, stating the Bridleway provides connectivity, and maintains its argument that the realignment and proposed crossing facilities are considered dangerous to Bridleway users, specifically horse riders, due to the increased road noise and proximity of traffic. The Applicant has not evidenced the requirement for the land to be compulsory acquired. We have commented further on this point within our Written Representation.