

**From:** [Samuel Green](#)  
**To:** ["Pike, Andrew"](#)  
**Subject:** RE: Your complaint  
**Date:** 31 October 2023 16:42:00

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Dear Andrew,

Thank you for your further email.

It is pleasing to note that you have recognised the errors in my email which, in my opinion, serves to demonstrate that you must clearly have an understanding of right and wrong and a yearning to ensure that 'misapprehensions' (a mistaken belief or interpretation of something) are corrected where they are made, particularly on the basis of factual evidence - you will appreciate this reflects the very basis of my own approach to SPB, requesting that the firm acknowledges (similarly based on hard evidence proving beyond doubt the facts of the matter) the patently false statement contained in section 9.1 of the representation of objection submitted on behalf of Mr and Mrs Parkin that '**The Applicants are Directors are Yorkshire Land Limited**' and that SPB simply provides clarification of the matter to the Case Officer and an apology to ourselves.

The matter is really very simple - My wife and I are not and never have been Directors of the said company, contrary to the specific statement made by SPB that we are. It is therefore highly disappointing and concerning that SPB, as a professional regulated legal practice, continue to ignore this fact and refuse our reasonable request to correct the false statement and provide an apology to us.

Yours sincerely

Sam Green  
Mr & Mrs S. Green

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**From:** Pike, Andrew <andrew.pike@squirepb.com>  
**Sent:** Tuesday, October 31, 2023 3:35 PM  
**To:** Samuel Green <samuel.green@britannicholdings.com>  
**Subject:** Your complaint

Dear Mr Green,

I refer to your email below. I should correct some misapprehensions in that email:

- Sir Roger is not an employee of SPB (and as stated previously, not a lawyer, not involved in this matter and not involved in the handling of complaints). You patently sought to involve him because of perceived social connections and for no other reason;
- You say "*we believe that SPB must already have been in receipt of [your solicitor's correspondence to the case officer and to ELG]...prior to my contact with you*", because "*[it] is no longer available to view...in relation to our planning application and was removed by North Yorkshire Council several days prior to my initial contact with Will Swarbrick of SPB on 25*

October 2023". You are apparently forgetting that you attached copies of that correspondence to your email of 12 October 2023 to Sir Roger. We did not see it prior to finalising the Objection.

Otherwise, I have nothing to add to my previous email and I have made this firm's position clear.

Regards,



**Andrew D. Pike**

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**From:** Samuel Green <[samuel.green@britannicholdings.com](mailto:samuel.green@britannicholdings.com)>

**Sent:** Tuesday, October 31, 2023 12:15 PM

**To:** Pike, Andrew <[andrew.pike@squirepb.com](mailto:andrew.pike@squirepb.com)>

**Subject:** [EXT] RE: Your complaint

Dear Andrew,

Whether or not you agree with or understand my initial reasoning for contacting Sir Roger, you do state in your email regarding my intentions in contacting Sir Roger that ***"You are not contacting him to seek details of the lawyer dealing with that matter, or of the person to whom a complaint should be addressed"*** and these statements would appear to suggest that you have no objection to me having contacted Sir Roger in principle. On this basis, you will appreciate it is a fact that within my second and final email to Sir Roger of 23 October 2023, I stated:

"I would be grateful if you could at least confirm (if you are not able to deal with this matter personally) that my email and notification contained within it, regarding in particular the false and unjust allegation which has been made about us by Squire Patton Boggs on behalf of Mr and Mrs Parkin that ***"The Applicants are Directors of Yorkshire Land Limited"*** has been passed onto the necessary department/member of staff at Squire Patton Boggs to deal with and respond as a matter of urgency."

This is an entirely reasonable request for me to make of Sir Roger, as an employee of Squire Patton Boggs (SPB) yet is something I do not believe was ever acted upon by Sir Roger.

As you acknowledge plainly in your email, it would be professional misconduct for a solicitor to seek to mislead any person by making statements known to be false. Unless

one wishes to engage in fantasy over fact (which would certainly not be right and proper of a solicitor in particular) the statement, which you confirm in your email is contained within section 9.1 the representation submitted by SPB on behalf of Mr and Mrs Parkin, that **'the applicants are Directors of Yorkshire Land Limited'** is not an alleged untruth, as you appear to suggest, but to the contrary, is patently false.

You state in your email that you note our solicitors correspondence to the Case Officer of our planning application and ELG Planning, which you will note confirms the position that the land which has been the subject of our planning application is owned (and always has been) by me, Samuel Green and that neither my wife or I (the applicants) are Directors (or shareholders) of Yorkshire Land Limited. You acknowledge the date of this correspondence in your email, being 27 September 2023 and will therefore realise that this predates the representation submitted by SPB, dated 28 September. However, considering that this correspondence is no longer available to view or download from the Councils Planning Access Portal in relation to our planning application and was removed by North Yorkshire Council several days prior to my initial contact with Will Swarbrick of SPB on 25 October 2023 and subsequently your initial email to me of 26 October 2023, we believe that SPB must already have been in receipt of this documentation by some other means and therefore, were already aware of the facts in this regard prior to my contact with you.

That SPB are not therefore willing to provide a correction and apology is highly concerning in the face of the facts; nonetheless these facts do speak for themselves.

In addition to the foregoing, I had sent an earlier letter (entirely unconnected with the matter of our planning application) to Mr Parkin, which was posted by my own hand through the letterbox of his property at Branton Court on 16 September 2023 (some 12 days before the date of the SPB representation). This letter was headed 'Samuel S. Green' and stated in the first two paragraphs that:

*"My wife and I moved into Manor Cottage on Shaw Lane in the village in November last year, having previously lived near Birstwith. We have never formally met, but you may well have seen us pushing our baby in his pushchair down the lane numerous times in recent months - as we try not to pull our hair out getting him to sleep!"*

*"It would be good to meet you generally - I think we have a mutual contact in Gary Douglas (who lives not far from my father, Steven Green)"*

Mr Parkin (your instructing client) was therefore made aware of my name, that of my father (who is a Director of Yorkshire Land Limited) and also the presence of my wife and I, residing at Manor Cottage some time before SPB were instructed to submit the representation on behalf of Mr and Mrs Parkin, which contains the untruth regarding my wife and I being Directors of Yorkshire Land Limited. Considering Mr Parkin's standing as a one of the country's most successful businessmen, I am sure one of his many qualities will be attention to detail and that my correspondence will have been noted accordingly.

In the knowledge of my name and that of my father, it would therefore have been possible for SPB to review the details of Directors of Yorkshire Land Limited at Companies House prior to submission of the representation on behalf of Mr and Mrs Parkin, where it is blatantly apparent that I am not and never have been a Director (or shareholder) of the said company and certainly, given there are two Mr Green's (I.e. Steven Green & Sam Green) and that I had already made it known to Mr Parkin in my correspondence of 16 September that it was myself (Samuel Green) currently residing at

Manor Cottage with my wife, that the statement that 'the applicants are Directors of Yorkshire Land Limited' could not be 100% factually corroborated by SPB and could therefore be false – which it is.

Taking all of the above facts into account, the suggestion in your email that it has not been unreasonable for SPB to infer that the applicants are Directors of Yorkshire Land Limited does not therefore stand up to scrutiny and we believe that professional misconduct on the part of SPB in this matter is therefore blatantly apparent and certainly calls into question the professional reputation of the company.

Yours sincerely

Sam Green  
Mr & Mrs S. Green

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**From:** Pike, Andrew <[andrew.pike@squirepb.com](mailto:andrew.pike@squirepb.com)>  
**Sent:** Tuesday, October 31, 2023 10:11 AM  
**To:** Samuel Green <[samuel.green@britannicholdings.com](mailto:samuel.green@britannicholdings.com)>  
**Subject:** Your complaint

Dear Mr Green,

I refer to your email below and earlier correspondence.

I do not agree that the reason for you contacting Sir Roger Marsh is "*made clear*" in your email of 12 October 2023 to him. You acknowledge in that email that you do not know him. You are aware that he is not dealing with the relevant matter. You are not contacting him to seek details of the lawyer dealing with that matter, or of the person to whom a complaint should be addressed. Your stated purposes are to ask Sir Roger himself:

- to persuade our clients to withdraw their objection to your planning application; or, "*failing this*",
- to procure that alleged "*untruths*" in the objection submitted by this firm on their behalf (the "**Objection**") are corrected.

It is difficult to understand why you believed Sir Roger to be the correct recipient for either request. In any event, it would of course be entirely inappropriate for Sir Roger to intervene in a matter in which he has no involvement, in a manner contrary to the instructions of our clients.

However, it would also be professional misconduct for a solicitor to seek to mislead any person by making statements known to be false, and so I have carefully considered the alleged "*untruths*" to which you refer:

- the statement in the Objection (section 9.1) that "*the Applicants are Directors of Yorkshire Land Limited*" ("**YLL**") (the "**Directorship Statement**"); and

- the statement in the Objection (section 8.4) that: “...when occupied, the dwelling will enable the Applicant to see directly into the properties to the south, given that gable-end windows are to be installed on the side elevations” (the “**Window Statement**”). You say that the relevant windows will be opaque.

I note that correspondence sent on your behalf by Bell Park Kerridge, Solicitors on 27 September 2023 to (i) the relevant planning officer at North Yorkshire Council and (ii) ELG Planning, in relation to an objection to your planning application submitted by ELG Planning on behalf of a third party, asserted the following “*factual inaccuracies*” in that objection:

- the Directorship Statement (on the basis that you and your wife are the Applicants, and you are not directors of YLL); and
- that a social media post by YLL on 19 July 2022, describing the acquisition of property in Farnham by YLL, referred to a different site and not to the application site as asserted in that objection (the “**Social Media Correction**”).

However, the Social Media Correction is not true (and notably, although the same assertion was made in the Objection, the Social Media Correction is not repeated in your email to Sir Roger). The land delineated in the YLL social media post very clearly **did** include the application site.

The relevant planning application was made simply in the names of “*Mr and Mrs Green*”. Your parents Steven and Lorraine Green **are** directors of YLL. The 2022 social media post **did** indicate that YLL had acquired the application site. It was therefore not unreasonable to “*infer*”, as the Objection stated (section 9.5), that the Applicants were directors of YLL and that YLL itself might be involved in developing the site. Similarly, the planning application did not indicate that the gable windows would be completely opaque; even if inaccurate, the Window Statement was simply an error and not an attempt to mislead.

The Directorship Statement and the Window Statement were not therefore deliberate untruths; they were assertions made in good faith on behalf of our clients. As noted above, your solicitors have already corrected the Director Statement by correspondence to the planning officer. It was of course open to you to seek to challenge the Window Statement as part of the planning process. I do not accept that these are matters requiring correction by this firm now.

Finally, I should address your apparent suggestion that it is in some way improper for separate parties to discuss and co-ordinate their response to a planning application. I have no knowledge that there has been any such discussion between our clients in this matter and other persons, but even if there has, it is not something about which you can legitimately complain to this firm.

I conclude that there has not been any professional misconduct on the part of this firm. Complaints can of course be made directly to our professional regulator, the Solicitors Regulation Authority (see [www.sra.org.uk](http://www.sra.org.uk)).

Regards,

**Andrew D. Pike**  
Partner

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**From:** Samuel Green <[samuel.green@britannicholdings.com](mailto:samuel.green@britannicholdings.com)>

**Sent:** Thursday, October 26, 2023 11:48 AM

**To:** Pike, Andrew <[andrew.pike@squirepb.com](mailto:andrew.pike@squirepb.com)>

**Subject:** [EXT] RE: Your complaint

Dear Andrew,

Thank you for your email this morning confirming receipt of my correspondence with Sir Roger Marsh and more recently, my telephone conversation and subsequent email to Will Swarbrick, yesterday.

Whilst I appreciate Sir Roger is a business adviser to Squire Patton Boggs (SPB) and not a lawyer, the reasoning for contacting him is made clear in my initial email to him. You will appreciate my second email to Sir Roger - sent several days later in the absence of any reply to my first email - asks, on the basis that he is unable to deal with the matter personally, for the matter to be passed to the relevant department/member of staff at SPB to be dealt with as a matter of urgency (which would seem to me to be a reasonable request in the circumstances outlined in my emails to him) but since no reply confirming such has ever been forthcoming from Sir Roger, I subsequently contacted with Will Swarbrick, with whom I am familiar from his past employment at Walton & Co (Planning Lawyers) where I am a client.

Had the matter been dealt with in the first instance by Sir Roger in passing my email and details to the relevant department of SPB, you will appreciate that I would not have had to persist in attempting contacting various employees of the firm to request the matter be acknowledged and dealt with and I can confirm that now you have kindly contacted me and confirmed the matter is being looked into, that I will not be attempting to contact anyone else at SPB regarding the matter, other than yourself, as clearly there is no longer a need to do so.

I do appreciate your confirmation that this matter will now be dealt with and whilst you will be following due process internally, I can again confirm it is a **fact** that contrary to the representation on behalf of Mr and Mrs Parkin prepared by SPB, that we (the applicants of the planning application concerned and referred to in the representation on behalf of Mr and Mrs Parkin) are not and never have been Directors (or even shareholders for that matter) of Yorkshire Land Limited and therefore, I trust that this can and will be corrected in the interests of natural justice and an apology provided accordingly.

There is enough trouble in the world already and we certainly aren't looking to cause

any more. We simply wish to achieve fairness and for the record to be set straight, which is entirely reasonable in the face of the blatant untruth which was been published in a representation published in the public domain about us by SPB.

We look forward to hearing from you again shortly.

Kind regards

Yours sincerely

Sam Green  
**Mr & Mrs S. Green**

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