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Date 9 February 2015  
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**For the attention of Chris White, Case Manager**

By email: [HPCConnection@infrastructure.gsi.gov.uk](mailto:HPCConnection@infrastructure.gsi.gov.uk)

Dear Sirs

**Application by National Grid for an Order granting Development Consent for the Hinkley Point C Connection Project (the "Order")**  
**Application reference number EN020001**

We write on behalf of our client First Corporate Shipping Limited, trading as The Bristol Port Company, ("BPC") and in particular in relation to an issue arising from the Examining Authority's first written questions.

Question 3.41 is addressed to BPC and the Applicant, and is as follows:

*"The RR made on behalf of the Bristol Port Company (BPC) claims that compulsory acquisition of rights is proposed over further land in its ownership not identified as such in the Book of Reference and asserts that the Book of Reference contains inaccuracies concerning the nature and extent of land ownership and interests in land across the dock estate. Please provide details of any such inaccuracies and suggest how these might be addressed."*

BPC's land affected by the proposed powers of compulsory acquisition falls partly in Section F of the scheme and, to a greater extent, within Section G. BPC's difficulty in answering Question 3.41 relates to those areas falling within Section G, which comprise the majority of the Parcels in which BPC has an interest.

BPC's comments concerning the accuracy of the Book of Reference, so far as it relates to Section G, were based on the contents of the original version of the Book of Reference which accompanied the DCO application (volume 3.3). Following issue of the original Book of Reference, a Schedule of Variation was published for each Section in September 2014 accompanied by a Split Plot Sub Report (volume 3.4). The Split Plot Sub Report indicated that various plots within Section G - including those in which BPC has an interest - were to be split. However, no revised plans were produced to show the intended plot divisions.

Recently, the Applicant has submitted an updated version of the Book of Reference (volume 3.3A) with accompanying Land Affected Plans and Land Plans (volume 4.2B) where appropriate for all Sections apart from Section G: the update includes not only the changes noted in the September 2014 Schedule of Variation but also further changes, as explained in the letter to you from Bircham Dyson Bell on behalf of the Applicant dated 22 January 2015:

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*"Since the Schedule of Variation was provided, a further land registry update has been carried out. New land ownership information has been identified as part of this update and minor changes to the class of rights being sought by National Grid are also reflected in the updated Book of Reference (Volume 3.3A) enclosed with this letter."*

However, the Applicant has not yet issued the updated version of the Book of Reference for Section G nor revised Land Affected Plans and Land Plans for the Section, its letter of 22 January indicating these would be issued "shortly".

The current form of the Book of Reference and accompanying Land Affected Plans and Land Plans for Section G cannot therefore be established from the published material since (a) no plans were made available in September 2014 of the intended split of various plots, and (b) the Applicant has anyway confirmed that further changes are in the course of being made to both the Book of Reference and the Land Affected Plans and Land Plans which were not part of the September 2014 material and it is possible, for example, that these may include further plot splitting affecting BPC's land.

In the circumstances, it would seem both a premature and unnecessary exercise, and one imposing an unreasonable costs burden on BPC, to require BPC to comment in detail at this time on the contents of an outdated Book of Reference and accompanying plans relating to Section G, when it does not have the correct plans relating to some of the entries to enable it to do so accurately or usefully and when it is known that updated versions are already being prepared and will be published imminently which may correct many, if not all, of the issues BPC had previously identified.

We would therefore suggest that BPC defers providing an answer to the Examining Authority's Question 3.41 in relation to Section G until the required updated documents for Section G are published. If they are published before Deadline 2, BPC will respond to the Examining Authority's Question 3.41 to the extent it is reasonably able to in the time available, and will provide full comments on any remaining omissions and inaccuracies as soon as possible after that date. We should be grateful for the Examining Authority's views on this suggestion.

We are sending a copy of this letter to Bircham Dyson Bell on behalf of the Applicant.

Yours faithfully

WEDLAKE BELL LLP

cc Bircham Dyson Bell