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**To:** [Aquind Interconnector](#)  
**Subject:** Ian Judd and Partners LLP Responses to the Examining Authority's First Written Questions (EXQ1)  
**Date:** 06 October 2020 10:20:51  
**Attachments:** [Ian Judd and Partners responses to first written questions - Deadlines 1 - 6 OCT 2020.pdf](#)

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Dear Mr Mahon

Please see attached Ian Judd and Partners LLP response to the Examining Authority's First Written Questions.

If you require any further information, please do be in contact.

Kind regards

Henry

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**Application by Aquind Limited for a Development Consent Order for the 'Aquind Interconnector' between Great Britain and France (PINS reference: EN020022)**

**Ian Judd and Partners LLP Responses to the Examining Authority's First Written Questions (EXQ1)**

**Submitted in relation to Deadline 1 of the Examination Timetable – 6 OCTOBER 2020**

**EXAMINING AUTHORITY'S FIRST WRITTEN QUESTIONS (EXQ1) RELATING TO COMPULSORY ACQUISITION:**

<b>Reference</b>	<b>Respondent</b>	<b>Questions</b>	<b>Resonse</b>
CA1.3.82	Ian Judd and Partners on behalf of Peter and Geoffery Carpenter, Michael and Sandra Jefferies, Robin Jefferies and Joe Tee	In Relevant Representation [RR-168], should Mr Carpenter be 'Geoffrey' and not 'Geoffery', should 'Hill Crest' be 'Hillcrest' and should 'Mill Farm' be 'Mill View Farm'?	We confirm that 'Geoffery' should have been 'Geoffrey', Hill Crest' be 'Hillcrest' and should 'Mill Farm' be 'Mill View Farm'
CA1.3.83	Ian Judd and Partners on behalf of Peter and Geoffery Carpenter, Michael and Sandra Jefferies, Robin Jefferies and Joe Tee	To what Land Plan [APP-008] plot numbers does Relevant Representation [RR-168] refer?	<p>Peter &amp; Geoffrey Carpenter- Freehold Interest</p> <p>1-32, 1-38, 1-51, 1-57, 1-69, 1-70, 1-71, 1-72</p> <p>Michael &amp; Sandra Jefferies - Freehold Interest</p> <p>1-11, 1-13, 1-15, 1-16, 1-17, 1-19, 1-23 and 1-24.</p> <p>Robin Jefferies - Freehold Interest</p> <p>1-26, 1-29 and 1-30</p> <p>Mr Tee - Freehold Interest</p> <p>3-05</p>

CA1.3.84	Ian Judd and Partners on behalf of Peter and Geoffery Carpenter, Michael and Sandra Jefferies, Robin Jefferies and Joe Tee	What land interest does Joe Tee have in respect of Relevant Representations [RR-168]?	Mr Tee is the Freehold Owner, with Mr & Mrs Moor of plot 3-05
CA.1.3.85	<i>Ian Judd and Partners on behalf of The Landowners of land at Kings Pond, Denmead being Julie Elliott, Robin Elliott, Richard Elliott and Phillip Elliot</i>	In respect of Relevant Representation [RR-194], do the parties listed make any representation in respect of Land Plans [APP-008] Plots 3-06 and 3-11?	<p>Ian Judd and Partners are acting on behalf of Julie Elliott, Robin Elliott, Richard Elliott and Phillip Elliot in connection with Plots 3-06, 3-08,3-09,3-10 and 3-11.</p> <p>The parties listed did not make an individual representations in respect of their land holding.</p> <p>We request the opportunity to represent the Landowners throughout the ExA.</p>
CA1.3.86	Ian Judd and Partners on behalf of Peter and Geoffery Carpenter, Michael and Sandra Jefferies, Robin Jefferies and Joe Tee	<p>Peter and Geoffery Carpenter appear to be represented by both yourselves and Blake Morgan LLP ([RR-168] and [RR-055]). Is this the case?</p> <p>If so, should these Relevant Representations be taken as one.</p> <p>If not, what are the differences between the Relevant Representations?</p>	<p>Blake Morgan LLP are the solicitors acting for Mr. Peter Carpenter and for Mr Geoffrey Carpenter in relation to their interest in Little Denmead Farm only. Ian Judd &amp; Partners are land agents and are advising Peter and Geoffrey Carpenter in relation to their land valuations.</p> <p>There are two sets of Relevant Representations submitted by each of Ian Judd &amp; Partners and from Blake Morgan LLP respectively, because even though Blake Morgan LLP had been instructed at the time of making their representation, there was some doubt as to whether Blake Morgan LLP's involvement would continue past this. This was because Peter and Geoffrey Carpenter hoped they may achieve a private agreement with the Promoter quickly. For this reason, Ian Judd and Partners took the view to reserve a right to make representations on behalf of Peter and Geoffrey Carpenter, as a precaution only should a private agreement not be reached.</p> <p>Blake Morgan LLP was subsequently instructed to represent Peter and Geoffrey Carpenter throughout the formal DCO process and Examination in relation to Little Denmead Farm. Due to this, please treat the Relevant Representations RR-055 and RR-168 as being separate, but please also note that Blake Morgan LLP will be the sole advisor who will make all</p>

			<p>submissions to the ExA on their behalf in relation to Little Denmead Farm. Ian Judd &amp; Partners are still advising these parties as land agents as part of their wider group of advisors (and they may make oral representations as experts if necessary during any hearings), but it will be Blake Morgan LLP who will be submitting documents and making formal representations on Geoffrey and Peter Carpenter's behalf to the ExA.</p> <p>There is also one difference between RR-055 and RR-168 in that RR-168 (submitted by Ian Judd &amp; Partners) covers different clients and sites, in addition to Little Denmead Farm. RR-055 only relates to Little Denmead Farm.</p>
CA1.3.88	Ian Judd and Partners on behalf of Peter and Geoffery Carpenter, Michael and Sandra Jefferies, Robin Jefferies and Joe Tee	<p>Michael Edwin and Sandra Helen Jefferies appear to be represented by both yourselves and Blake Morgan LLP ([RR-168] and [RR-070]). Is this the case?</p> <p>If so, should these Relevant Representations be taken as one?</p> <p>If not, what are the differences between the Relevant Representations?</p>	<p>Blake Morgan LLP are the solicitors acting for Mr. Michael Jeffries and for Mrs Sandra Jeffries. Ian Judd &amp; Partners are land agents and are advising them in relation to their land valuations.</p> <p>There are two sets of Relevant Representations submitted by each of Ian Judd &amp; Partners and from Blake Morgan LLP respectively, because even though Blake Morgan LLP had been instructed at the time of making their representation, there was some doubt as to whether Blake Morgan LLP's involvement would continue past this. This was because Michael and Sandra Jeffries hoped they may achieve a private agreement with the Promoter quickly. For this reason, Ian Judd and Partners took the view to reserve a right to make representations on behalf of Michael and Sandra Jeffries, as a precaution only should a private agreement not be reached.</p> <p>Blake Morgan LLP was subsequently instructed to represent Michael and Sandra Jeffries throughout the formal DCO process and Examination in relation to Hillcrest. Due to this, please treat the Relevant Representations RR-070 and RR-168 as being separate, but please also note that Blake Morgan LLP will be the sole advisor who will make all submissions to the ExA on their behalf in relation to Hillcrest. Ian Judd &amp; Partners are still advising these parties as land agents as part of their wider group of advisors (and they may make oral representations as experts if necessary during any hearings), but it will be Blake Morgan LLP who will be submitting documents and making formal representations on Michael and Sandra Jeffries' behalf to the ExA.</p>

			<p>There is also one difference between RR-070 and RR-168 in that RR-168 (submitted by Ian Judd &amp; Partners) covers different clients and sites, in addition to Hillcrest. RR-070 only relates to Hillcrest.</p>
CA1.3.90	<p>Ian Judd and Partners on behalf of Peter and Geoffery Carpenter, Michael and Sandra Jefferies, Robin Jefferies and Joe Tee</p>	<p>Robin Jefferies appears to be represented by both yourselves and Blake Morgan LLP ([RR-168] and [RR-067]). Is this the case?</p> <p>If so, should these Relevant Representations be taken as one.</p> <p>If not, what are the differences between the Relevant Representations?</p>	<p>Blake Morgan LLP are the solicitors acting for Mr Robin Jefferies. Ian Judd &amp; Partners are land agents and are advising him in relation to his land valuation.</p> <p>There are two sets of Relevant Representations submitted by each of Ian Judd &amp; Partners and from Blake Morgan LLP respectively, because even though Blake Morgan LLP had been instructed at the time of making their representation, there was some doubt as to whether Blake Morgan LLP's involvement would continue past this. This was because Robin Jeffries hoped he may achieve a private agreement with the Promoter quickly. For this reason, Ian Judd and Partners took the view to reserve a right to make representations on behalf of Robin Jeffries, as a precaution only should a private agreement not be reached.</p> <p>Blake Morgan LLP was subsequently instructed to represent Robin Jeffries throughout the formal DCO process and Examination in relation to Mill View Farm. Due to this, please treat the Relevant Representations RR-067 and RR-168 as being separate, but please also note that Blake Morgan LLP will be the sole advisor who will make all submissions to the ExA on Robin's behalf in relation to Mill View Farm. Ian Judd &amp; Partners are still advising Robin Jeffries as land agents as part of his wider group of advisors (and they may make oral representations as experts if necessary during any hearings), but it will be Blake Morgan LLP who will be submitting documents and making formal representations on Robin Jeffries' behalf to the ExA.</p> <p>There is also one difference between RR-067 and RR-168 in that RR-168 (submitted by Ian Judd &amp; Partners) covers different clients and sites, in addition to Mill View Farm. RR-070 only relates to Mill View Farm.</p>