

The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

New Kings Court
Tollgate
Chandler's Ford
Eastleigh SO53 3LG

DX 155850 Eastleigh 7

DDI: 023 8085 7431
T: 023 8090 8090
F: 0844 620 3401
E: adrian.noviss@blakemorgan.co.uk

www.blakemorgan.co.uk

By email only: aquind@planninginspectorate.gov.uk

Our ref: 00609575/000001

6 October 2020

Dear Sirs

**Application by AQUIND Limited for an Order granting Development Consent for the AQUIND Interconnector Project (PINS reference: EN020022)
Notification of Request to participate in Open Floor Hearing, Compulsory Acquisition Hearing, and Draft DCO Hearing on behalf of Mr. Robin Jefferies (Registration Identification Number: 20025045)
Submitted in relation to Deadline 1 of the Examination Timetable**

Mr Robin Jefferies (our "**Client**") owns the freehold interest in Mill View Farm, Old Mill Lane, Denmead, PO8 0SN (the "**Land**"). The Land is situated within the Converter Station Area (Works No.2) and covers plots 1-26, 1-29 and 1-30.

We refer to your letter dated 15 September 2020 issued in connection with Section 89 of The Planning Act 2008 and Rules 8, 9 & 13 of The Infrastructure Planning (Examination Procedure) ("**Rule 8 Letter**").

Open Floor Hearings (OFH1 / OFH2)

The Rule 8 Letter requires notification as to whether our Client wishes to speak at one of the Open Floor Hearings.

We confirm that our Client wishes to speak at Open Floor Hearing 1 (scheduled for Monday 7 December at 10:00 hrs), but he can make himself available to speak at Open Floor Hearing 2 (scheduled for Monday 7 December at 18:30 hrs) if there is a high demand to speak at Open Floor Hearing 1.

Whilst formal written representations are being submitted on his behalf setting out legal and other technical arguments, our Client feels it is vital to personally present his position using his own "layman's" terms. The proposals are going to have a direct and significant impact on our Client's life and livelihood, which makes it a very personal matter to him. He will be losing part of his farm and business. Our Client would like a platform from which he can express directly to the Examining Authority the personal, sociological and emotional impacts the proposals will have on him. As the nature of open floor hearings is to give an opportunity to affected parties to speak directly and personally to the Examining Authority, this would be an appropriate forum for our Client.

Compulsory Acquisition Hearings (CAH1 / CAH2)

The Rule 8 Letter also requires notification as to whether our Client wishes to speak at one of the Compulsory Acquisition Hearings. Our Client is an Affected Person and as such, we would like to reserve our Client's position and right to speak (through Blake Morgan LLP).

The Promoter proposes to permanently compulsorily acquire a 9,495 square metre area of our Client's freehold interest within plot number 1-29, and to compulsorily acquire new permanent landscaping rights over 3,138 square metres of our Client's freehold interest within plot numbers 1-26 and 1-30.

We confirm that Blake Morgan LLP and where necessary, Ian Judd & Partners (as Land and Compulsory Purchase agents for our Client), would like to reserve a right to speak at Compulsory Acquisition Hearing 2 ("**CAH 2**") (scheduled for Friday 11 December at 10:00 hrs). We are also available to speak at Compulsory Acquisition Hearing 1 ("**CAH1**") (scheduled for Thursday 10 December at 10:00 hrs) if there is a high demand to speak at CAH2, though we note that CAH1 is principally aimed at the Applicant, local authorities and statutory bodies.

We have through our Client's Written Representations (submitted at Deadline 1) identified serious concerns about the need for and scope of permanent compulsory acquisition powers of the freehold interest, and powers establishing new landscaping rights in relation to the Land within the Order Limits. We would wish to discuss the following issues:

1. Whether the power to compulsorily acquire the entire freehold interest in plot 1-29 can be amended (and for the related amendments to be made where necessary to Book of Reference and Land Plans) in relation to our Client so that:

- a) It is subject to alternative options depending on whether Option B(i) or Option B(ii) is chosen for the converter station; and
- b) It is reduced so that it only covers the footprint of the converter station under Option B(i) that falls within plot 1-29; and
- c) It does not apply to our Client's freehold interest within plot 1-29 should Option B(ii) for the converter station be selected. Under Option B(ii), neither the footprint of the converter station or related embankment works will fall within plot 1-29.

2. The justification for the need for permanent landscaping rights over the full lengths of hedgerows, HR06 and HR09 (which are on the Land within the Order Limits). HR06 falls within plot numbers 1-26 and HR09 falls within plot numbers 1-30. Plot 1-26 and plot 1-30 are subject to permanent landscaping rights.

4. The general need for all of the land within plots 1-26 and 1-30 (which our Client owns) to be subject to the compulsory acquisition of new permanent landscaping rights.

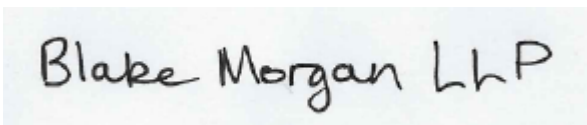
At this stage of the Examination, the above issues are relevant to CAH2 because they relate to the applicability to and extent of proposed compulsory acquisition powers as they affect the Land. We do not know at present whether these issues will be addressed sufficiently and to our Client's satisfaction by the Promoter through written representations, or whether our Client would have entered into a voluntary arrangement with the Promoter (as very slow progress is being made by the Promoter in that regard too) by the time of CAH2. As we are being asked to confirm participation at hearings at this stage, we would therefore like to reserve our Client's position and right as an Affected Person to speak (through Blake Morgan LLP) at CAH2 in relation to the above issues.

Draft DCO Hearing – 9 December 2020 at 10:00 hrs

The Rule 8 Letter also requires notification as to whether our Client wishes to speak at the draft DCO Hearing scheduled for 10:00 hrs on Wednesday 9 December 2020.

We would like to only observe this hearing and not speak at it on our Client's behalf.

Yours faithfully

A rectangular box containing the handwritten text "Blake Morgan LLP" in black ink on a light blue background.

Blake Morgan LLP