

**From:** [Noviss, Adrian](#)  
**To:** [Aquind Interconnector](#)  
**Cc:** [Kasseean, Anita](#)  
**Subject:** AQUIND (EN020022) DEADLINE 1 - BLAKE MORGAN LLP - RESPONSES TO ExA's FIRST WRITTEN QUESTIONS (ExQ1) [BMG-LEGAL.FID44973420]  
**Date:** 06 October 2020 23:17:34  
**Attachments:** [Blake Morgan LLP - Deadline 1 - Responses to first written questions - 6 October 2020 \(Blake Morgan LLP\).PDF](#)

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Dear Sirs

**Application by AQUIND Limited for an Order granting Development Consent for the AQUIND Interconnector Project (PINS reference: EN020022)**

**Responses to the Examining Authority's First Written Questions submitted by Blake Morgan LLP**

**Submitted in relation to Deadline 1 of the Examination Timetable**

We refer to the Examining Authority's (ExA's) first written questions (ExQ1) in relation to Aquind Limited's application for a DCO for the Aquind Interconnector Project.

We attach our responses to the questions that were directed to Blake Morgan LLP.

Kind regards,

**Adrian Noviss**  
Associate  
For and on behalf of Blake Morgan LLP

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Date: 6 October 2020

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

**Blake Morgan LLP's Responses to the Examining Authority's First  
Written Questions (EXQ1)**

**Submitted in relation to Deadline 1 of the Examination Timetable**



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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)**

**Blake Morgan LLP's 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>Response</b>
CA1.3.80	Blake Morgan LLP on behalf of The Owners of Little Denmead Farm	Who are the owners of Little Denmead Farm who are represented ([R-055] refers.)	<p>The owners of Little Denmead Farm are Mr Geoffrey Carpenter and Mr Peter Carpenter.</p> <p>They both jointly own the freehold interest to Little Denmead Farm, which is registered at HM Land Registry under title number HP763097.</p> <p>A copy of the Official copy of Register of Title and of the title plan has been provided as part of our Client's written representations, which we have submitted on their behalf in relation to Deadline 1 of the Examination timetable.</p>
CA1.3.87	Blake Morgan LLP on behalf of The Owners of Little Denmead Farm	<p>Peter and Geoffrey Carpenter appear to be represented by both yourselves and Ian Judd and Partners ([RR-055] and [RR-168]). 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.</p> <p>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</p>

			<p>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 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>
CA1.3.89	Blake Morgan LLP on behalf of The Owners of Hillcrest	<p>Michael Edwin and Sandra Helen Jeffries appear to be represented by both yourselves and Ian Judd and Partners ([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</p>

			<p>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>
CA1.3.91	Blake Morgan LLP on behalf of Robin Jeffries	<p>Robin Jeffries appears to be represented by both yourselves and Ian Judd and Partners ([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 Jeffries. 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</p>

			<p>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>
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**Blake Morgan LLP**

**6 October 2020**