

**From:** [Suzanne Tucker](#)  
**To:** [West Midlands Interchange](#)  
**Subject:** West Midlands Interchange – TR050005  
**Date:** 07 August 2019 15:31:50  
**Attachments:** [image001.png](#)  
[image005.png](#)  
[image006.png](#)  
[image009.png](#)  
[image015.png](#)  
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[LinkedIn\\_a6f0fb09-2a1b-4a65-a336-9026bbb3ca81.png](#)  
[Facebook\\_efcd0337-e78c-4729-bf43-114f38b24f4.png](#)  
[Twitter\\_7e9b0hda-269a-48a7-9a4h-281e2203551c.png](#)  
[Google+\\_3b6945d-b4ee-4f49-a449-8bc1a40f2d38.png](#)  
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[Dementiafriendslogo\\_3e295082-c97f-45d1-84bf-439492399616.png](#)  
[cyberessentials\\_7309fb88-226d-48a6-bcc6-db17f55dce92.png](#)  
[greenteamlogo2\\_6543a4d2-721d-43c4-877b-048685118fcc.png](#)

Dear Sir

**Application by Four Ashes Limited for an Order Granting Development Consent for the West Midlands Interchange – TR050005  
The Inglewood Investment Company Limited (the Company) - 20015438**

On behalf of Inglewood Investment Company Limited, we reply to the ExA's request for more information dated 30 July 2019, question 3.8.2, as follows:

Discussions with the Applicant have progressed further than the comments set out by the Applicant: the Company and the Applicant have reached a conditional agreement for the acquisition of the Company's land.

Indeed, the Company would invite the ExA to note that it has diligently and properly considered the new information supplied to it by FAL in relation to the proposed West Midlands Interchange (such information being confidential) and the Company considers, based on its consideration of that information, that it no longer seeks to rely upon the appraisal that was previously submitted (the "Previous Appraisal").

Accordingly, the Company invites the ExA to conclude that it should not place any reliance on the Previous Appraisal as part of its assessment of the merits of FAL's application for a Development Consent Order (Ref TR050005); and the Company hereby withdraws all of its objections to the proposed Development Consent Order and all objections to any powers of compulsory acquisition which would be granted pursuant to the Development Consent Order.

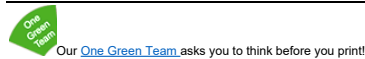
Yours faithfully

<b>Suzanne Tucker</b> Associate		<b>Direct Tel:</b> 01952 208426 <b>Fax:</b> 01952 291716 <b>DX:</b> 707201 Telford 4 <b>Website:</b> <a href="http://www.fbcmb.co.uk">www.fbcmb.co.uk</a>	Routh House Hall Court Hall Park Way Telford TF3 4NJ	
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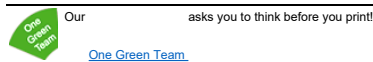


<b>Suzanne Tucker</b> Associate		<b>Direct Tel:</b> 01952 208426 <b>Fax:</b> 01952 291716 <b>DX:</b> 707201 Telford 4 <b>Website:</b> <a href="http://www.fbcmb.co.uk">www.fbcmb.co.uk</a>	Routh House Hall Court Hall Park Way Telford TF3 4NJ	
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**From:** Suzanne Tucker  
**Sent:** 06 August 2019 07:11  
**To:** 'Hutton, Laura-Beth'  
**Cc:** Niall Blackie ; 'Tom Follows' ; Sarah Baugh ; Thomson, Morag  
**Subject:** RE: West Midlands Interchange

Many thanks Laura-Beth, we'll await sight of a copy of the completed document.

Kind regards

Suzanne

**From:** Hutton, Laura-Beth  
**Sent:** 05 August 2019 22:27  
**To:** Suzanne Tucker  
**Cc:** Niall Blackie ; 'Tom Follows' ; Sarah Baugh ; Thomson, Morag  
**Subject:** RE: West Midlands Interchange

Suzanne

I am advised that the transfer has now been completed.

Kind regards  
Laura-Beth

Laura-Beth Hutton | Principal Associate | Planning and Infrastructure Consenting | Eversheds Sutherland

T: +44 115 931 7642

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**From:** Suzanne Tucker [<mailto:suzanne.tucker@fbcmb.co.uk>]

**Sent:** 05 August 2019 13:04

**To:** Hutton, Laura-Beth <[Laura-bethHutton@eversheds-sutherland.com](mailto:Laura-bethHutton@eversheds-sutherland.com)>

**Cc:** Niall Blackie <[niall.blackie@fbcmb.co.uk](mailto:niall.blackie@fbcmb.co.uk)>; 'Tom Follows' <[tomf@inglewoodinvestment.com](mailto:tomf@inglewoodinvestment.com)>; Sarah Baugh <[sarah.baugh@fbcmb.co.uk](mailto:sarah.baugh@fbcmb.co.uk)>; Thomson, Morag <[MoragThomson@eversheds-sutherland.com](mailto:MoragThomson@eversheds-sutherland.com)>

**Subject:** RE: West Midlands Interchange

Laura-Beth

I am pleased to hear that the Transfer is expected to compete today, and I would be grateful if you could keep us updated on that; however, the deletion of the text referring to the point is only appropriate once it has been completed, and we do not agree to the deletion until then.

Kind regards

Suzanne

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**Suzanne Tucker**

Associate

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**From:** Hutton, Laura-Beth <[Laura-bethHutton@eversheds-sutherland.com](mailto:Laura-bethHutton@eversheds-sutherland.com)>

**Sent:** 05 August 2019 12:12

**To:** Suzanne Tucker <[suzanne.tucker@fbcmb.co.uk](mailto:suzanne.tucker@fbcmb.co.uk)>

**Cc:** Niall Blackie <[niall.blackie@fbcmb.co.uk](mailto:niall.blackie@fbcmb.co.uk)>; 'Tom Follows' <[tomf@inglewoodinvestment.com](mailto:tomf@inglewoodinvestment.com)>; Sarah Baugh <[sarah.baugh@fbcmb.co.uk](mailto:sarah.baugh@fbcmb.co.uk)>; Thomson, Morag <[MoragThomson@eversheds-sutherland.com](mailto:MoragThomson@eversheds-sutherland.com)>; Peter Frost <[peter.frost@kilbridegroup.com](mailto:peter.frost@kilbridegroup.com)>

**Subject:** RE: West Midlands Interchange

Suzanne

The transfer is expected to complete today. In any event, the deletion of the paragraph simply clarifies that we accept Inglewood is the correct owner. Completion of the transfer doesn't change that - we are simply formalising what we have said during the Examination (and agreed with Niall).

Kind regards  
Laura-Beth

Laura-Beth Hutton | Principal Associate | Planning and Infrastructure Consenting | Eversheds Sutherland

T: +44 115 931 7642

M: [REDACTED]

-  
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**From:** Suzanne Tucker [<mailto:suzanne.tucker@fbcmb.co.uk>]

**Sent:** 05 August 2019 11:49

**To:** Hutton, Laura-Beth <[Laura-bethHutton@eversheds-sutherland.com](mailto:Laura-bethHutton@eversheds-sutherland.com)>

**Cc:** Niall Blackie <[niall.blackie@fbcmb.co.uk](mailto:niall.blackie@fbcmb.co.uk)>; 'Tom Follows' <[tomf@inglewoodinvestment.com](mailto:tomf@inglewoodinvestment.com)>; Sarah Baugh <[sarah.baugh@fbcmb.co.uk](mailto:sarah.baugh@fbcmb.co.uk)>; Thomson, Morag <[MoragThomson@eversheds-sutherland.com](mailto:MoragThomson@eversheds-sutherland.com)>

**Subject:** RE: West Midlands Interchange

Thanks Laura-Beth.

Please see my further comment in green.


Kind regards

Suzanne

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**Suzanne Tucker**

Associate

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**From:** Hutton, Laura-Beth <[Laura-bethHutton@eversheds-sutherland.com](mailto:Laura-bethHutton@eversheds-sutherland.com)>

**Sent:** 05 August 2019 10:41

**To:** Suzanne Tucker <[suzanne.tucker@fbcmb.co.uk](mailto:suzanne.tucker@fbcmb.co.uk)>

**Cc:** Niall Blackie <[niall.blackie@fbcmb.co.uk](mailto:niall.blackie@fbcmb.co.uk)>; 'Tom Follows' <[tomf@inglewoodinvestment.com](mailto:tomf@inglewoodinvestment.com)>; Sarah Baugh <[sarah.baugh@fbcmb.co.uk](mailto:sarah.baugh@fbcmb.co.uk)>; Peter Frost <[peter.frost@kilbridegroup.com](mailto:peter.frost@kilbridegroup.com)>; Thomson, Morag <[MoragThomson@eversheds-sutherland.com](mailto:MoragThomson@eversheds-sutherland.com)>

**Subject:** RE: West Midlands Interchange

Suzanne

Thank you for your email. Please see below in red.

Kind regards  
Laura-Beth

Laura-Beth Hutton | Principal Associate | Planning and Infrastructure Consenting | Eversheds Sutherland

T: +44 115 931 7642

M: [REDACTED]

-

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**From:** Suzanne Tucker [<mailto:suzanne.tucker@fbcmb.co.uk>]

**Sent:** 05 August 2019 09:11

**To:** Hutton, Laura-Beth <[Laura-bethHutton@eversheds-sutherland.com](mailto:Laura-bethHutton@eversheds-sutherland.com)>

**Cc:** Niall Blackie <[niall.blackie@fbcmb.co.uk](mailto:niall.blackie@fbcmb.co.uk)>; 'Tom Follows' <[tomf@inglewoodinvestment.com](mailto:tomf@inglewoodinvestment.com)>; Sarah Baugh <[sarah.baugh@fbcmb.co.uk](mailto:sarah.baugh@fbcmb.co.uk)>

**Subject:** RE: West Midlands Interchange

Morning Laura-Beth

Thank you for your email and the attachments. I would comment as follows:

In relation to the [Statement of Reasons \(Doc 4.1A\)](#)

- a) Para 3.19.10 cites parcels 101,102,103,111 and 113, but omits reference to Parcel 112 **This is an error which hasn't been picked up by the previous reviews, so, apologies – we can correct this.**
- b) **As to the deletion of the paragraph referring to the disputed ownership of Parcel 103 (part of para 3.19.10 on page 13), this is perhaps a little premature: as I understand it, whilst the Transfer document has been executed it I am not aware that it has been completed or submitted to the Land Registry. This was specifically requested to be deleted and follows several discussions. Whilst the correction may not have been made formally at the Land Registry yet, it is accepted that the land is within Inglewood ownership and so the deletion of the paragraph is still correct. The deletion is only acceptable once the Transfer has been completed, the transfer is not effective until then.**

In relation to the [Book of Reference \(Doc 4.3A\)](#)

- a) In relation to Part 1, Parcels 101 and 102 (page 165), reference to Staffordshire Sand and Gravel should be deleted from column (6) as they have no interest in the land; **I will need to check again with our land referencers – their information shows there are some rights and so they are reluctant to remove it.**
- b) Similarly, in relation to Part 3, Parcels 101 and 102 (Page 303), reference to Staffordshire Sand and Gravel should be deleted as they have no interest in the land **as above.**

Thank you for highlighting that the ExA has directed questions to our client, we have noted this and will respond accordingly in due course (noting the deadline of 7 August). **Noted and thank you.**

Kind regards

Suzanne

**Suzanne Tucker**  
Associate



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**From:** Hutton, Laura-Beth <[Laura-bethHutton@eversheds-sutherland.com](mailto:Laura-bethHutton@eversheds-sutherland.com)>  
**Sent:** 30 July 2019 19:52  
**To:** Mark Turner <[mark.turner@fbcmb.co.uk](mailto:mark.turner@fbcmb.co.uk)>; Suzanne Tucker <[suzanne.tucker@fbcmb.co.uk](mailto:suzanne.tucker@fbcmb.co.uk)>; Rowan Jones <[rowan.jones@fbcmb.co.uk](mailto:rowan.jones@fbcmb.co.uk)>  
**Cc:** Niall Blackie <[niall.blackie@fbcmb.co.uk](mailto:niall.blackie@fbcmb.co.uk)>; Peter Frost <[peter.frost@kilbridegroup.com](mailto:peter.frost@kilbridegroup.com)>  
**Subject:** FW: West Midlands Interchange

Dear All

I have received Niall's out of office reply, apologies for sending this to you all but we have no other contact at FBC Manby Bowdler. Given the timeframes involved in the DCO (the Deadline to respond to the ExA is 7 August), please can you progress in Niall's absence? Kind regards

Laura-Beth  
Laura-Beth Hutton | Principal Associate | Planning and Infrastructure Consenting | Eversheds Sutherland  
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M: [REDACTED]

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**From:** Hutton, Laura-Beth  
**Sent:** 30 July 2019 17:56  
**To:** 'Niall Blackie'  
**Cc:** [Peter.Frost@kilbridegroup.com](mailto:Peter.Frost@kilbridegroup.com); Thomson, Morag ; Colin Cottage  
**Subject:** West Midlands Interchange

Dear Niall

We discussed providing a copy of the updated Book of Reference which deals with the matters discussed at the CA hearing for WMI. With apologies for the delay in sending this over, please see attached. I have also attached our updated Statement of Reasons. These were intended to be submitted at Deadline 6 but due to an administrative error they were accidentally missed off our submission and so they aren't on the PINS website yet, but they have been submitted.

You might also note there is a question addressed to your client in the Examining Authority's Rule 17 letter, issued today - <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050005/TR050005-001100-Reg%2017%20letter%20July%2030%20-%20FINAL.pdf>.

Kind regards

Laura-Beth  
Laura-Beth Hutton | Principal Associate | Planning and Infrastructure Consenting | Eversheds Sutherland  
T: +44 115 931 7642  
M: [REDACTED]

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