

27 September 2021

Our ref: WIL2264 219357 (050)



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Dear Ms Vincent

RE: THE BRISTOL AIRPORT LIMITED (LAND AT A38 DOWNSIDE ROAD) COMPULSORY PURCHASE ORDER 2020 – RESPONSE TO SUPPLEMENTARY EVIDENCE

I write to respond to the supplementary proof of evidence submitted by Henry Church (BAL/W9/03) on behalf of my clients, Sir David Wills, Rupert Wills and Sandra Brown as **The Trustees of the Sir J V Wills Will Trust** C/o Michelmores, Broad Quay House, Broad Quay, Bristol BS1 4DJ, as owners of Plots 1 & 2 on the proposed scheme map.

At point 2.5 of Mr Church's Supplementary Proof of Evidence dated September 2021 he states:

"An offer to enter into a contract guaranteeing a minimum payment of compensation, and subject to any increased sums awarded by the Upper Tribunal of the Lands Chamber in the event that compensation cannot be agreed was made to Ms Black acting on behalf of the Sir JV Wills Will Trust on 25 May 2021 (see para 5.28 of my main Proof, BAL/W9/2), and remains open for acceptance."

That the offer of a contract has been rejected by my client as the minimum price is way below our opinion of market value so there is clearly no benefit in encumbering the freehold interest with a conditional contract.

I have provided views and evidence on value as requested by Mr Church but have received no substantive and evidenced counter offer from the acquiring authority to support its offer made.

In addition, the acquiring authority has not addressed our point that Plot 1 is not required at all so should not form part of this CPO application.

I hope the above information can be included within the Hearing in due course.



Yours sincerely

Lucy Back MRICS FAAV

Director

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