

22 November 2022

Our Ref: MPB/466354

savills

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Dear Sir/Madam

ARNOLD J WEBBER AND VALERIE J WEBBER, [REDACTED]
[REDACTED]

**NORTH SOMERSET COUNCIL (BANWELL BYPASS AND SOUTHERN LINK CLASSIFIED ROAD)
(SIDE ROADS) ORDER 2022
NORTH SOMERSET COUNCIL (BANWELL BYPASS AND SOUTHERN LINK) COMPULSTORY
PURCAHSE ORDER 2022**

We refer to the letter dated 10 October 2022 from Burges Salmon LLP, and the enclosed CPO Notice, copy SRO Plans, SRO Notice and Statement of Reasons. On behalf of Mr and Mrs Webber, we write to object to the Compulsory Purchase Order as stated above.

Mr and Mrs Webber are the owners of the property known as "Land on the north side of Eastermead Lane, Banwell". They occupy the entirety of the property for agricultural purposes, running cattle there and the land includes agricultural buildings.

The Compulsory Purchase Order and Side Roads Order proposes to take the majority of the land, the buildings and current access into the field and to use it as a replacement for a football pitch / pitches.

We object to the acquisition of the land for this purpose for the following reasons:

1. Lack of Evidence That All Options For Relocation Have Been Thoroughly Investigated

Mr and Mrs Webber's land is proposed to be taken for replacement of an existing football pitch. On a review of the plans, it does not appear that a significant area of the existing football pitch will be taken by the new road and not to the extent of the area proposed to compulsorily acquire. There will remain a significant area of football pitch. We have not been provided with any evidence to suggest that such a large area is required for replacement football pitches.

We contend that there are more suitable areas elsewhere in and around Banwell for the creation of a new football pitch and facilities and have not been provided with any substantive evidence otherwise.

2. Access

The access route to the new proposed football pitch is questioned as the access over Eastermead Lane, if used by people taking access to the pitch, would prevent access for agricultural purposes for Mr and Mrs Webber to reach their land, given that Eastermead Lane is a single track road.

3. Consultation

Mr and Mrs Webber were only told verbally just before the end of the public consultation period that their land would be intended to be taken for a replacement football pitch and were issued with plans indicating this shortly thereafter. Previous plans showed that none of their land would be taken. They were not given suitable time to consider and discuss the proposed option and do not therefore feel that the correct consultation process was followed.

4. Remaining Land and Viability

The plans accompanying the Compulsory Purchase Order show a thin strip of land will be left to Mr and Mrs Webber. The area of the land taken includes their access onto Eastermead Lane.

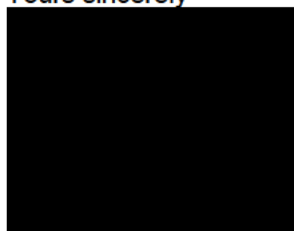
The entirety of the field forms an important part of their small, but currently viable, agricultural business which a significant reduction in area will adversely affect. We are concerned that there is no plan, nor we have not been provided with any plan, showing a suitable alternative access being provided onto their remaining land.

We have also not received any indication of the type of proposed boundaries and fencing that will be used. It is anticipated that if the land were used as a football pitch, there would be significant unauthorised entry onto Mr and Mrs Webber's land to collect loose balls and this would also affect the ability to run livestock on the land, which Mr and Mrs Webber currently do.

Please be aware that elsewhere Mr and Mrs Webber are affected elsewhere by the scheme and have no objections to that area.

We are willing to discuss the above matters with North Somerset District Council with a view to seeking a satisfactory conclusion for both parties involved but, until such time as a satisfactory conclusion is reached, this objection remains extant.

Yours sincerely

A large black rectangular box used to redact the signature of Matt Brown.

Matt Brown MRICS FAAV
Director