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Dear Sirs

THE OXFORDSHIRE COUNTY COUNCIL (DIDCOT GARDEN TOWN HIGHWAYS INFRASTRUCTURE – A4130 IMPROVEMENT (MILTON GATE TO COLLETT ROUNDABOUT), A4197 DIDCOT TO CULHAM LINK ROAD, AND A415 CLIFTON HAMPDEN BYPASS) COMPULSORY PURCHASE ORDER 2022

THE OXFORDSHIRE COUNTY COUNCIL (DIDCOT GARDEN TOWN HIGHWAYS INFRASTRUCTURE – A4130 IMPROVEMENT (MILTON GATE TO COLLETT ROUNDABOUT), A4197 DIDCOT TO CULHAM LINK ROAD, AND A415 CLIFTON HAMPDEN BYPASS) (SIDE ROADS) ORDER 2022

Our Client: MAYS PROPERTIES LIMITED

We write to object to the above scheme on behalf of our client, Mays Properties Limited (“MPL”).

MPL owns land including that comprised within plots 1/6a and 1/6b, as identified in the Schedule to the CPO. This land forms part of a larger plot of land which MPL has secured and implemented planning consent for road side uses.

The primary grounds of objection are:

1. The making of the Order is premature because the scheme is not the subject of an implementable planning consent.
2. The promoter needs to identify that it has the funding to implement the scheme. Whilst the scheme is subject to HiF funding and a subsequent increase in that funding together with a commitment by the promoter to fund the then identified shortfall from funds and borrowing there is no clarity that this is sufficient to make the increased costs consequent upon very significant cost inflation. It would be premature to confirm compulsory purchase powers without certainty of funding.
3. There has been inadequate attempts made to acquire the land by Private Treaty – at the time of the making of the CPO no offer had been made to MPL.
4. No part of the proposed Road, cuttings or embankments is intended to be placed on plot 1/6a. Accordingly that plot is not required for the purpose of the construction of a highway and should be

deleted from the CPO. The Acquiring Authority has failed to show any compelling case to take land for purposes that are not for the purpose of constructing thereon a highway, namely the Road, and its cuttings and embankments.

5. No provisions of the CPO authorise the taking of any land for temporary purposes and accordingly such parts of the Plots as are not required for permanent compulsory acquisition should be deleted from Schedule 1 to the CPO. The Objectors believe that the Acquiring Authority propose taking plot 1/6a identified on the attached plans for temporary purposes only. There is no power under the CPO to do so.
6. The proposed stopping up of Backhill Lane will, if confirmed remove existing rights of access to MPL's retained land.

We reserve the right to add to or amend the grounds of Objection

Yours faithfully



Blake Morgan LLP