

Our Ref: MK07/04B104431

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14 October 2019

avisonyoung.co.ukSecretary of State for Transport
National Transport Casework Team
Department for Transport
Tyneside House
Skinnerburn Road
Newcastle Upon Tyne
NE4 7AR**24 OCT 2019**

Dear Sir

**The Council of the City of Stoke On Trent Cobridge Junction Improvement
Compulsory Purchase Order 2019.****Objection Submitted on Behalf of Ravent Limited (Order Schedule Plot
Number 2.)**

I refer to the above Compulsory Purchase Order (CPO) made by Stoke on Trent City Council ("the Council"). We write on behalf of Ravent Limited to submit a formal objection to the Order on the following grounds:

- 1) The Council has failed to enter into meaningful negotiations to acquire Ravent Ltd's interest affected by the Council's proposals and CPO, and has also to consider and deal with the issues arising. Despite Ravent Ltd submitting a proposal to the Council for disposal of their interest in the land required, and to address necessary accommodation works to alleviate the adverse impact of the scheme, and impact upon occupational tenants, no formal response or offer has been received from the Council.
- 2) The Council has not yet fully explored or considered or presented any potential alternative solutions to their required road improvements, which might avoid acquisition of my client's interest.
- 3) Despite requests for a detailed schedule and programme of the junction improvement works proposed, and related timeframe, in order that our client might fully consider the adverse impact and all likely ramifications on their property interest, and their occupational tenants, non-have been provided by the Council. The detail on the scheme provided has been insufficient to fully consider the potential ramifications on Ravent Ltd.'s property, and the impact upon the Tenants who are also impacted. This again highlights that the Council has not entered into the meaningful negotiations they are obliged to under the Government guidance on compulsory purchase process.

- 4) It is not evident that the Council has full funding to deliver the scheme.
- 5) The Statement of Reasons fails to meet the requirements for justification of the use of compulsory purchase powers in terms of an evidence based support of a compelling case in the public interest.

Our client maintains that the Order should not be confirmed until the above matters are addressed. The grounds for objection show that the Council has failed to meet the Government guidance on compulsory purchase process. The Order should also not be confirmed until such time as the Council has progressed meaningful negotiations, proven full funding availability for the scheme, supported that a compelling case exists in the public interest, and has also considered and presented alternative schemes which would serve its road improvement needs.

We would be grateful if you would acknowledge safe receipt of this letter. Furthermore, we would ask that the objection be considered at any Public Inquiry held to access to merits of the proposed Order. We reserve our client's right to add or amend these grounds for objection, particularly in the light of any amendments to the Council's scheme or proposals.

Should you require any further information or clarification of the issues raised, please do not hesitate to contact me.

Yours faithfully



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For and on behalf of GVA Grimley Limited t/a Avison Young