

25 NOV 2020

Secretary of State for Transport
Case Work Team
Tyneside House
Skinnerburn Road
Newcastle Business Park
Newcastle upon Tyne
NE4 7AR

Our Ref: [REDACTED]

Date: 20 November 2020

Direct Line: [REDACTED]

Please ask for [REDACTED]

Dear Sirs

Re: **The Leicestershire County Council (A606 North and East Melton Mowbray Distributor Road) Compulsory Purchase Order 2020 ("CPO")**

We act on behalf of Susan Hatton, David Lovegrove and Bryan Lovegrove (the "Owners") who are the owners of a property known as [REDACTED] together with adjoining land to the south fronting Lag Lane (the "Property") which is registered under title numbers LT384472 and LT384466.

The CPO is being made to facilitate the construction of a new distributor road to the north and east of Melton Mowbray. The scheme for the new distributor road proposes in the side roads order that Lag Lane is to be stopped up as a public highway along the section marked S11(K-R). The section to be stopped up commences c. [30] metres to the north of the Owners' access to the Property off Lag Lane and extends southward along the Owners' entire frontage with Lag Lane down to the junction of Lag Lane with the B676 Saxby Road.

The CPO proposes the compulsory acquisition of land interests owned by the Owners identified as Plot 87 in the CPO. Plot 87 comprises 378 square metres of highway and highway verge land (Lag Lane) to the south of Thorpe Arnold.

The Owners object to the CPO. The reasons of objection include (but are not limited to) the following:-

The Owners object to the stopping up of Lag Lane as a public highway on the ground that it would be prejudicial to the existing and future access arrangements to the Property with no adequate or sufficient alternative access arrangements being provided.

The Owners consider that no sufficient justification for the stopping up of Lag Lane and the compulsory acquisition of Plot 87 has been provided.

Even if a proper justification for the stopping up of Lag Lane is provided, the Owners do not consider that the compulsory acquisition of the Owners' interest in Plot 87 is necessary to facilitate that stopping up.

There are, therefore, no compelling reasons for the compulsory acquisition of the Owners' interest in Plot 87.

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The Hill Dickinson Legal Services Group has offices in Liverpool, Manchester, London, Leeds, Sheffield, Piraeus, Singapore, Monaco and Hong Kong.

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The Owners' objections will be particularised in more detail in due course.

Yours faithfully

