

Blades, Nick - Oxfordshire County Council

From: Paul Curtis <paul.curtis@brown-co.com>
Sent: 05 September 2023 16:50
To: nationalcasework@dft.gov.uk
Cc: Jessica Bere; Slocombe, Gareth - Oxfordshire County Council
Subject: RE. PROJECT - OXFORDSHIRE CC A40 ACCESS TO WITNEY CPO AND SRO. FORMAL OBJECTION. CLIENTS M/S KEARNS

Dear Sir / Madam

RE. PROJECT – A40 ACCESS TO WITNEY
THE OXFORDSHIRE COUNTY COUNCIL (HIGHWAYS INFRASTRUCTURE- A40 ACCESS TO WITNEY) COMPULSORY PURCHASE ORDER 2023 **AND**
THE OXFORDSHIRE COUNTY COUNCIL (HIGHWAYS INFRASTRUCTURE- A40 ACCESS TO WITNEY) (SIDE ROADS) ORDER 2023
Clients – John Kearns and Ann Kearns, The Paddock, High Cogges, Witney OX29 6UN

As authorised agents acting for and on behalf of clients John Kearns and Ann Kearns as above we are instructed to lodge formal **objection** to the above proposed Compulsory Purchase Order and Side Roads Order.

Our clients are the freehold owners and occupiers of land and property affected by the above proposed Orders. The grounds of / reasons for **objection** are as follows –

1. The public need for and public benefit of the Project – A40 Access to Witney (Shores Green Slip Roads) which would be facilitated by the proposed Orders is **not** proven
2. It would appear that the Project, the above Orders and use of compulsory purchase powers have been promoted by Oxfordshire County Council for the benefit of private landowners and / or developers. This is ultra vires and a blatant misuse of statutory powers by Oxfordshire County Council.
3. The Project construction works will cause noise, dust and visual intrusion affecting clients enjoyment of their property
4. Subsequent use of the Project by vehicles will cause unacceptable noise and visual intrusion affecting clients enjoyment of their property
5. Notwithstanding clients stated concerns no mitigation landscaping works have been agreed by Oxfordshire County Council
6. Notwithstanding clients stated concerns no noise attenuation works have been agreed by Oxfordshire County Council
7. Notwithstanding clients stated concerns no mitigation drainage works have been agreed by Oxfordshire County Council
8. Notwithstanding clients stated concerns there are substantial compensation issues caused by and including but not limited to the actions of Oxfordshire County Council being ultra vires.
9. Our clients did not receive formal Notice of the proposed Side Roads Order

The above grounds of /reasons for **objection** are not exhaustive and the right is reserved to add to or amend same at any time in the future and / or at or prior to any statutory Inquiry

Entirely without prejudice to the above objections, it may be the case that future consultations and agreement with Oxfordshire County Council may enable all or some of the above objections to be partially or totally withdrawn

Please acknowledge receipt of this **formal objection** to the above Orders

Yours faithfully

Paul S Curtis Bsc MRICS FAAV

Paul Curtis BSc (Hons) MRICS FAAV
Land Agent, Partner

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For and on behalf of Brown & Co - Property & Business Consultants LLP

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