

Secretary of State for Transport  
National Transport Casework Team  
Department for Transport  
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Date 13 June 2017  
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Dear Sir,

**Re: The City of Bradford Metropolitan District Council (A650 Hard Ings Road Improvement Scheme, Keighley) Compulsory Purchase Order 2017**

I am writing in relation to the above CPO, to which I am instructed to lodge an objection on behalf of Mr Tariq Ghafoor, owner of parcel 9.

My client notes that DCLG 2015 General Guidance on Compulsory Purchase and the Crichel Down Rules ('the Guidance') states at paragraph 2:

*'Acquiring authorities should use compulsory purchase powers where it is expedient to do so. However, a compulsory purchase order should only be made where there is a compelling case in the public interest..... Compulsory purchase is intended as a last resort'*

At paragraph 16 the Guidance states:

*Acquiring Authorities are expected to provide evidence that meaningful attempts at negotiation have been pursued or at least genuinely attempted*

My client objects to the CPO and asks the Secretary of State to refuse to confirm the CPO for the following reasons:

1. It is not expedient for the Council to use compulsory purchase powers in relation to his land. My client has made the Council aware that he is prepared to dispose of his interest by agreement however the Council's opening offer falls considerably short of reflecting the market value of the land proposed to be acquired and the considerable injurious affection it will cause to my client's retained land. My client does not consider that the Council's attempts to acquire to date have been meaningful.

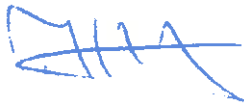


2. There is no compelling case for the Council to include the whole of parcel 9 for the purpose of permanent acquisition of all interests. The Council has confirmed that around half of the parcel is only required temporarily and as such it is not reasonable for the Council to seek permanent acquisition powers over the entirety of the parcel.

In summary, my client considers that the making of the CPO is premature and unnecessary in relation to his land. My client is prepared to allow the Council to acquire the extent of land required permanently and to grant a licence over the land required temporarily, subject to agreeing compensation that reflects the fact that the Council's scheme will inhibit my client's aspirations to develop his site in the future; the retained land will be too small for any development or alternative use to be viable.

Yours faithfully,

Jonathan Stott



**Jonathan Stott**  
**Managing Director**