

SUMMARY OF ORAL REPRESENTATIONS MADE AT COMPULSORY ACQUISITION HEARING 22 SEPTEMBER 2021, ON BEHALF OF TRAVELODGE HOTELS LTD

Travelodge's hotel at the existing Black Cat Round about would be compulsorily acquired as part of the proposed Scheme. The Applicant has stated in their view it will be necessary to extinguish the hotel business.

The hotel provides employment and supports the safety of the strategic road network in accordance with government policy. Travelodge objects to compulsory purchase of the Hotel in the absence of appropriate support from the Applicant to assist re-location on the strategic road network.

The Applicant is required to seek to acquire land by negotiation wherever practicable. Authority to acquire land compulsorily should only be sought as part of an order granting development consent if attempts to acquire by agreement fail.

The Compulsory Purchase Association Land Compensation Claims Protocol is a statement of best practice in relation to land compensation claims. Adoption of the Protocol is a relevant consideration in the award of costs in an Upper Tribunal decision. It provides guidance on what reasonable attempts to acquire an interest by agreement looks like. The Protocol states:

"2.2. A compensating authority is encouraged at an early stage:

2.2.1. to provide information or valuation evidence available to it potentially relevant to a Compensation Claim and if possible before the claim is made; and

2.2.2. provide their valuation to assist with the constructive dialogue between the parties."

To date the Applicant has not provided their valuation of Travelodge's compensation nor for the freehold interest. The Applicant has not inspected the Hotel nor asked to inspect the Hotel for the purposes of valuing compensation.

The Applicant is invited to engage with Travelodge's agent as a matter of urgency in order to make reasonable attempt to acquire the interests by agreement.