

Submission ID: 6373

Whilst my clients, Peter Watts and John Watts Baker are generally supportive of the A428 Scheme, they are concerned by the amount of their private farmland required under the early designs.

Some of this has been modified or withdrawn following our discussions and we are grateful. However, the latest proposal, as set out in the attached plans continue to include two areas for permanent acquisition which do not actually appear to be required permanently for you to deliver this NSIP scheme.

I refer to Plots 8/5 (g), 8/5 (f) and parts of Plot 9/7 (b) as marked on the attached plans (Contested Land). This land has been queried before and we were advised Highways England were trying to release these areas from permanent acquisition in the hope of arranging environmental covenants attached to the land so it could be acquired temporarily and passed back to my clients.

having taken legal advice, under the 2008 Planning Act; Section 122, the above Contested Land can only be Compulsory Purchased as part of a DCO if Highways England can prove the land is required to facilitate or is incidental to that development. In addition, Highways England need to demonstrate there is a "compelling case in the public interest for the land to be purchased compulsorily".

If the Contested Land is required for landscaping works, we do not believe this can be required permanently for landscaping to facilitate the A428 scheme. We are willing to accept temporarily acquisition to be returned to our client and covenanted as appropriate, possibly in conjunction with environmental mitigation land from elsewhere. We pointed out that there is alternative mitigation land elsewhere and are happy to discuss that in detail.

We would like to discuss the possibility of modifying the permanent acquisition of the Contested Land to avoid an objection which might delay the DCO process.

- NOTES**
1. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL OTHER RELEVANT DOCUMENTATION.
  2. DO NOT SCALE FROM THIS DRAWING, USE ONLY PRINTED DIMENSIONS.
  3. ALL DIMENSIONS IN MILLIMETRES, ALL CHAINAGES, LEVELS AND COORDINATES ARE IN METRES UNLESS DEFINED OTHERWISE.

**KEY**

- ORDER LIMITS
- PERMANENT ACQUISITION (224364.87 sq.m)
- TEMPORARY POSSESSION (80937.40 sq.m)
- TEMPORARY POSSESSION AND ACQUISITION OF NEW RIGHTS (9045.52 sq.m)
- PARCEL NUMBERS

TITLE NUMBERS AFFECTED: (CB204971)

**CONTESTED LAND**

**FOR INFORMATION**

Client  
Highways England  
Highways England Offices  
Woodlands  
Manton Lane  
Bedford  
MK41 7LW

Working on behalf of

Project Title  
**A428 Black Cat to Caxton Gibbet Improvements**

Drawing Title  
**A428 AGREEMENT PLAN  
PETER AND JOHN BAKER  
SHEET 2 OF 3**

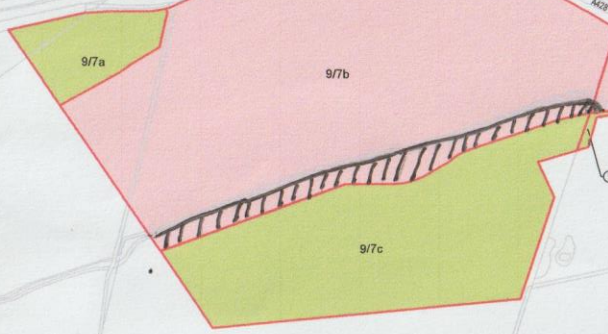
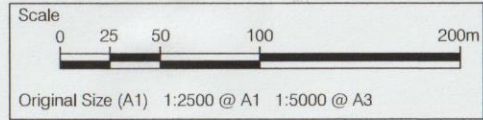
Designed GJ	Drawn GJ	Checked LC	Approved PG	Date 10/02/2021
Internal Project No. 60541541			Suitability S2	
Scale @ A3 1:5000			Zone A428	

THIS DOCUMENT HAS BEEN PREPARED PURSUANT TO AND SUBJECT TO THE TERMS OF AECOM'S APPOINTMENT BY ITS CLIENT. AECOM ACCEPTS NO LIABILITY FOR ANY USE OF THIS DOCUMENT OTHER THAN BY ITS ORIGINAL CLIENT OR FOLLOWING AECOM'S EXPRESS AGREEMENT TO SUCH USE, AND ONLY FOR THE PURPOSES FOR WHICH IT WAS PREPARED AND PROVIDED.

Project Office  
URS House  
Home Lane  
Bedford MK40 1TS  
Tel: (01234) 348641  
Fax: (01234) 218266  
[www.aecom.com](http://www.aecom.com)

**AECOM**  
AECOM Infrastructure & Environment UK Limited  
Registered in England Registered number: 580325  
Registered office: Scott House, Amcon Link,  
Basingstoke, Hampshire RG21 7PP

Drawing Number HE551495	Highways England PIN -ARD	I Originator -LLO -	I Volume -DR-LR-0521	Rev P01
Location				I Type I Role I Number



© Crown copyright and database rights 2016 Ordnance Survey 100030649 (2017)

P01 Date: 10 February 2021 13:00:49  
 File Name: H:\CAD TEAM\A428\A428 LAND PLAN\AGREEMENT PLANS\A428 AGREEMENT PLANS\_P3