

SEFTON COUNCIL

Sefton Council (Southport Eastern Approach)

Compulsory Purchase Order 2025

Proof of Evidence of:

Peter Eustance

20 January 2026

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Introduction

Personal details

- 1.1. My name is Peter Eustance. I am employed by SLC Property as Associate Director, Acquisition & Development, based at home in Liverpool, Merseyside.
- 1.2. SLC Property (SLCP) is a specialist infrastructure property consultancy which has offices in Birmingham and Newcastle.
- 1.3. I am a member of The Royal Institution of Chartered Surveyors (RICS) having qualified in 1990. I attended the BSc Land Management course at Reading University.
- 1.4. Prior to my current role I held the position of Associate Director in the Claimant and Compensation team at Ardent and prior to that the role of Director in the North West Valuation Team at CBRE
- 1.5. Since 2018 I have been involved in land acquisitions on behalf of Sefton, Wirral, and Kirklees Council's and for Northumberland County Council (NCC)
- 1.6. Other projects that I have been involved in include the reopening of the Northumberland Line,
- 1.7. I have been instructed on the Southport Eastern Approach (SEA) project for Sefton Council (SC) since Spring 2023 having led on the land and property elements of the scheme from an early stage.
- 1.8. We have engaged with all the landowners of the 54 plots impacted by the scheme and have completed acquisition or surrender of 5 of the interests. There are 12 plots currently in solicitors' hands for surrender or acquisition. 7 of the land plots have an interest which is unregistered, and the CPO is needed as a last resort to purchase this land should future negotiations fail. In addition, 16 plots are owned by Sefton Council which will be transferred to the scheme
- 1.9. Where I have not undertaken discussions personally with landowners, I have been kept fully informed by colleagues at SLCP and SC's consultants WSP and Brabners. Where SLCP have engaged in direct discussions and I have not been involved colleagues have reported details of the meetings to me. Where appropriate SC's consultants have provided me with notes of meetings and correspondence where relevant.
- 1.10. The evidence which I have prepared and provided in this Proof of Evidence has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the evidence is true, and the opinions expressed are my true and professional opinions.

Structure of this evidence

- 1.11. This evidence provides a summary of the objections received to the Sefton Metropolitan Borough Council (Southport Eastern Access) Compulsory Purchase Order 2025 (Order), which was made on 12 June 2025.
- 1.12. My evidence addresses the following:
 - a) Section 2: Describes the Scheme objectors and details of their objections. It describes the status of each of the objections (withdrawn or outstanding) plus responses to the objections from Sefton Council to date.
 - b) Section 3: Describes the conclusions of my evidence.
- 1.13. Further evidence to which my statement refers provides Sefton Council's overview of and case for the Scheme, including the need and objectives, is being provided by other witnesses from the project team as follows.
- 1.14. Andrew Dunsmore of Sefton Council has set out in a separate Statement of Case the Sefton Council overview of the case for the Scheme, including the need and the objectives of the CPO. Andrew Ivey of WSP has written a Statement of Case which provides an overview of the design of the Scheme and the land

required to implement it.

Objectors

- 2.1. This section describes the Scheme objectors and details of their objections. It describes the status of each of the objections (withdrawn or outstanding) plus responses to date.
- 2.2. The Order, together with other accompanying documents, were published on 12 July 2025 and the statutory objection period concluded on 8 August 2025.
- 2.3. By the end of the objection period six statutory objections were received.
- 2.4. Two statutory objections have been withdrawn since the publication of the Statement of Case.
- 2.5. At the time of writing this Proof of Evidence, there are now 4 statutory objections, as follows.

Statutory objectors:

- OBJ1 – Merseyside Waste Disposal Authority Withdrawn
- OBJ2 – McDonalds Real Estate LLP & McDonalds Restaurants Limited (Represented by Ms Bradshaw)
- OBJ3 – SP Energy Networks - Withdrawn
- OBJ4 – B&Q Limited (Represented by Mr Sowerby)
- OBJ5 – Veolia ES Merseyside & Halton Limited (Represented by Mr Billingsley)
- ONJ6 – Leicestershire County Council (Represented by Mr Pitman)

- 2.6. SC responded to each of the objectors as their objections were received and met with the statutory objectors on several occasions to help them understand the scheme, to remove their objection.
- 2.7. A summary of the objections received, and SC's response was included in the Statement of Case, and included in Appendix B to this proof

Statutory Objections from Landowners directly affected by the CPO

Statutory Objection OBJ1 – Merseyside Waste Disposal Authority (Represented by Mr Perry)

- 2.8. Issue: Merseyside Waste Disposal Authority (MWDA) have interests in plots along Foul Lane numbered 7,9,11,12, and 17, with plot 19 having tenants being Veolia ES Merseyside and Halton Limited who are a separate objector. MWDA are supportive of the scheme, however via their agent Bruton Knowles (BK) represented by Mr Perry, they served an objection relating to severance of the site and disruption to their operation.
- 2.9. Response: BK have now withdrawn their objection to the Order.

Statutory Objections OBJ2 – McDonalds Real Estate LLP & McDonalds Restaurants Limited (Represented by Ms Bradshaw)

- 2.10. Issue: McDonalds Real Estate LLP & McDonalds Restaurants Limited are the landowners for Plot 54 to the south of Kew Roundabout and part of their land holding is included in the CPO for the scheme.
- 2.11. On their behalf, Montagu Evans (ME) served an Objection to the CPO on the following grounds:
 - a) The purpose of the scheme can be achieved without acquisition of the Company's land.
 - b) Insufficient evidence of reasonable efforts made by the Council to acquire the Company's interest by agreement.
- 2.12. Response: SLCP and ME have agreed a draft settlement agreement which has been approved and agreed by McDonald's Board which will lead to the withdrawal of this Objection.

Statutory Objection OBJ3 – SP Energy Networks (SPEN)

- 2.13. Issue: SC and the design team have been working with SPEN on this project since initial commencement of engagement in 2023. SPEN made an objection on 9 July 2025. The general point to the objection is to avoid SP Manweb assets (managed by SPEN) being adversely impacted and for the applicant to engage as much as possible to avoid such impacts.
- 2.14. Response: SC and SPEN have agreed a Protective Provisions agreement and this objection has been withdrawn.

Statutory Objection OBJ4 – B&Q Ltd(Represented by Mr Sowerby)

- 2.15. Issue: B&Q Limited are the tenants for Plot 21 to the north west of Kew Roundabout and part of their land holding is included in the CPO for the scheme. Their landlords have also served an objection which forms OBJ6 below.
- 2.16. Whilst B&Q Limited are supportive of the order and have been in consultation since 2023, they have served an objection via Womble Bond Dickinson (WBD), with representation from Richard Sowerby of Sanderson Weatherall (SW), on 9 July 2025.
- 2.17. The grounds of objections are as follows:
 - a) No terms have been agreed between B&Q Ltd and the Acquiring Authority regarding the Order
 - b) The Order may affect B&Q Ltd.'s operations as the powers sought by the Acquiring authority could result in some constraints on their daily business activities
- 2.18. Response: SLCP and SW have agreed a draft settlement which has been approved and agreed by B&Q which will lead to the withdrawal of this Objection

Statutory Objection OBJ5 – Veolia ES Merseyside & Halton Limited (Represented by Mr Billingsley)

- 2.19. Issue: Veolia ES Merseyside & Halton Limited (Veolia) are tenants of MWDA at plot 19. An objection has been served by Veolia on 10 July 2025. Whilst they understand the reason for the CPO their concerns and objections are as follows:

- a) The land described in Plot 19 forms part of the northern access to the Site, which serves as the primary access and egress for the Site. The works to implement the Scheme at the Site will cause significant operational and management difficulties for both the Household Waste Recycling Centre (HWRC) and the Waste Transfer Station (WTS) at the Site.
- b) The loss of part of the Site will give rise to substantive disruption to the operation of the Site and considerable service continuity issues and will also result in restrictions and impediments to the configuration and circulation space within the Site.
- c) In the event that access to the Site is temporarily suspended, users of the Site would need to be diverted to the nearest alternative waste facility which is located in Formby. This facility is much smaller than the Site and will invariably place huge additional pressure on the Formby site, as well as the inconvenience and significant additional travelling time for existing users of the HWRC - these and other business impacts will need to be considered.
- d) If the northern access were to be permanently removed, it would require a complete overhaul of the operational requirements of the Site which would have implications for users of the Site including reduced service accessibility, increased travel times, and greater strain on other surrounding service centres and infrastructure. As a well-used Site and busy access point, Veolia would also expect as a minimum requirement that there are clear markings and signage.

2.20. Response: MWDA and SC via their agents have agreed a draft agreement which will be on tripartite terms with Veolia ES which addresses both parties concerns and objections. The case is currently in discussion between the parties with agreement sought together with the purchase of some additional adjacent land to assist the scheme

2.21. In view of 2.9 above and MWDA withdrawing their objection, we anticipate that the matter will be agreed and documented and as such the objection by Veolia will be withdrawn in advance of the Inquiry.

Statutory Objection OBJ6 – Leicestershire County Council (Represented by Mr Pitman)

2.22. Issue: Leicestershire County Council (LCC) are the freeholders for Plot 21 to the north west of Kew Roundabout and part of their land holding is included in the CPO for the scheme. Their tenants B&Q have also served an objection which forms OBJ4 above.

2.23. An objection was received from Savills on behalf of LCC on 11 August 2025 having been made on 7 August 2025. The grounds of objection made were:

- a) Insufficient grounds to acquire the land by agreement
- b) Limited engagement and insufficient information available

2.24. Response: LCC changed their asset managers from Colliers IM to DTZ IM in February 2025. We were in contact with Colliers in November 2023 and provided them with details of the scheme in December 2024. We then met with the new advisors on 18 February 2025 where we set out the proposals. Following this meeting on MS Teams we did chase up a number of times with 7 emails and a number of mobile calls to little avail until we were informed Savills were acting on 11 August by way of their letter.

2.25. We also provided DTZ IM with Heads of Terms save as to price on our initial meeting on 18 February 2025 and a follow up copy on 1 July and the updated version to Savills on 20 August following their appointment.

2.26. Given our emails to both Colliers and DTZIM included details of the proposals and we spent 5 months chasing LCC to find the advisors to progress negotiations together with the details of paragraph 2.26 above both grounds of objection would appear flawed and thus the objection should be disregarded.

- 2.27. During due diligence we have discovered that additional land is required which is detailed within plot 21 and which we seek to acquire via powers under s 14 of Acquisition of Land Act 1981. This is set out in more detail in the other proofs of evidence.
- 2.28. The land will need to be included in the CPO using s14 powers but we are liaising with LCC via their agents, Savills to obtain their consent for this alteration.

Conclusion

- 3.1. In conclusion, this proof of evidence sets out objections and discussions with objectors to the scheme (section 2 confirming the compelling case set out by SC and WSP to justify the use of CPO powers to acquire the land for SEA Active Travel Scheme).
- 3.2. Having had regard to the Convention and the Human Rights Act 1998, Sefton Council confirms that the need for the scheme and the benefits to the national and local economy outweigh the landowners' affected interests which will be impacted by the need to purchase their land.
- 3.3. It demonstrates that the design of the scheme has been rationalised to demonstrate that the land acquisition has been minimised to include only the land essential to achieve the Scheme objectives and that the need and purpose for each plot has been clearly documented in Appendix A.
- 3.4. We have engaged with all the landowners impacted by the scheme and have completed acquisition or surrender of 5 of the interests. There are 12 plots currently in solicitors' hands for surrender or acquisition. 7 of the land plots have an interest which is unregistered, and the CPO is needed as a last resort to purchase this land should future negotiations fail. In addition, 16 plots are owned by Sefton Council which will be transferred to the scheme
- 3.5. It has provided an overview of the objections to the Orders, and Sefton Council's response to confirm that we have engaged with objectors during and following the objection period; and where applicable have reached agreements to remove objections. Where an objection remains or a plot remains unacquired then this is because CPO is required as a last resort.
- 3.6. I confirm that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those that are within my own knowledge I confirm to be true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth

Appendix A – Reason for Acquisition of Each Plot of Land

The CPO identifies the land required for the scheme, the plans included in the CPO break this down into land ownership which are identified by various plot numbers, the table below should be viewed in conjunction with the CPO and confirms the reason and need for the acquisition of each plot.

Number on CPO Plan	Extent, description, and situation of the land	Proposed Use of the land Justification for inclusion in the CPO
1	All interests in 83.9 square metres of commercial premises (Old Hall Farm Business Park, Crowland Street, Southport, PR9 7RJ) excluding mines and minerals	To provide Highways Standard Cycleway along Foul Lane from its junction with Crowland Street and reopen highway along Foul Lane
2	All interests in 29.7 square metres of commercial premises (Old Hall Farm Business Park, Crowland Street, Southport, PR9 7RJ) excluding mines and minerals	To provide Highways Standard Cycleway along Foul Lane from its junction with Crowland Street and reopen highway along Foul Lane
3	All interests in 126.7 square metres of commercial premises (Old Hall Farm Business Park, Crowland Street, Southport, PR9 7RJ) excluding mines and minerals	To provide Highways Standard Cycleway along Foul Lane from its junction with Crowland Street and reopen highway along Foul Lane
4	All interests in 9.4 square metres of commercial premises (Old Hall Farm Business Park, Crowland Street, Southport, PR9 7RJ) excluding mines and minerals	To provide Highways Standard Cycleway along Foul Lane from its junction with Crowland Street and reopen highway along Foul Lane
5	All interests in 207.1 square metres of grassland, trees, and shrubbery; east of Foul Lane and south of Old Hall Farm Business Park except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Foul Lane from its junction with Crowland Street and reopen highway along Foul Lane
6	All interests in 439.7 square metres of hardstanding, disused car park, trees, and shrubbery; east of Foul Lane and north of railway except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Foul Lane.
7	All interests in 32.4 square metres of shrubland and access track; east of Foul Lane and south of railway excluding mines and minerals	To provide Highways Standard Cycleway along Foul Lane.
8	All interests in 784.9 square metres of grassland, cycleway, trees, and shrubbery; east of Foul Lane and south of railway except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Foul Lane.

9	All interests in 17.7 square metres of grassland, trees, and shrubbery; east of Foul Lane and south of railway excluding mines and minerals	To provide Highways Standard Cycleway along Foul Lane.
10	All interests in 660.5 square metres of public highway verge, grassland, cycleway, trees, and shrubbery; east of Foul Lane and south of railway except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Foul Lane.
11	All interests in 68.1 square metres of grassland, trees, and shrubbery; east of Foul Lane and south of railway excluding mines and minerals	To provide Highways Standard Cycleway along Foul Lane.
12	All interests in 4.2 square metres of trees and shrubbery; east of Foul Lane and north of Waste Transfer Station excluding mines and minerals	To provide Highways Standard Cycleway along Foul Lane.
13	All interests in 144.7 square metres of public highway, footway, verge, grassland, cycleway, trees, and shrubbery (Foul Lane) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Foul Lane.
14	All interests in 201.8 square metres of public highway, footway, verge, cycleway, and grassed area (Foul Lane) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Foul Lane.
15	All interests in 82.1 square metres of public highway, footway, verge, cycleway, and grassed area (Foul Lane) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Foul Lane and new left turn lane into Merseywaste site to alleviate traffic pressure on other occupiers along Foul Lane
16	All interests in 217.4 square metres of public footway, verge, and cycleway (Foul Lane) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Foul Lane and new left turn lane into Merseywaste site to alleviate traffic pressure on other occupiers along Foul Lane
17	All interests in 106.1 square metres of grassland, trees, and shrubbery; east of Foul Lane and north of Waste Transfer Station excluding mines and minerals	To provide Highways Standard Cycleway along Foul Lane and new left turn lane into Merseywaste site to alleviate traffic pressure on other occupiers along Foul Lane
18	All interests in 44.9 square metres of public footway, verge, and cycleway (Foul Lane) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Foul Lane and new left turn lane into Merseywaste site to alleviate traffic pressure on other occupiers along Foul Lane

19	All interests in 47.8 square metres of private accessway (Waste Transfer Station, Foul Lane, Southport, PR8 5LA) excluding mines and minerals	To provide Highways Standard Cycleway along Foul Lane and new left turn lane into Merseywaste site to alleviate traffic pressure on other occupiers along Foul Lane
20	All interests in 4.5 square metres of public highway, footway, and cycleway (Foul Lane) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Foul Lane and new left turn lane into Merseywaste site to alleviate traffic pressure on other occupiers along Foul Lane
21	All interests in 58.7 square metres of commercial premises (Meols Cop Road, Southport, PR8 6JU) excluding mines and minerals	To provide Highways Standard Cycleway along New Foul Lane.
22	All interests in 8.8 square metres of public highway verge and footway (New Foul Lane) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along New Foul Lane.
23	All interests in 56.2 square metres of commercial premises (Unit 8, Meols Cop Centre, Southport, PR9 7RG) excluding mines and minerals	To provide Highways Standard Cycleway along New Foul Lane.
24	All interests in 1.9 square metres of public highway verge and footway (New Foul Lane) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along New Foul Lane.
25	All interests in 182.9 square metres of commercial premises (Unit 8, Meols Cop Centre, Southport PR9 7RG) excluding mines and minerals	To provide Highways Standard Cycleway along Kew Roundabout.
26	All interests in 6.5 square metres of public highway verge and footway (New Foul Lane) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Kew Roundabout.
27	All interests in 33.7 square metres of commercial premises (Unit 8, Meols Cop Centre, Southport PR9 7RG) excluding mines and minerals	To provide Highways Standard Cycleway along Meols Cop Road.
28	All interests in 58.6 square metres of commercial premises (Unit 8, Meols Cop Centre, Southport PR9 7RG) excluding mines and minerals	To provide Highways Standard Cycleway along Meols Cop Road.
29	All interests in 18.8 square metres of recreational ground (Meols Park, Scarisbrick New Road, Southport, PR8 6LH) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Meols Cop Road.
30	All interests in 44.8 square metres of recreational ground (Meols Park, Scarisbrick New Road, Southport, PR8 6LH) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Meols Cop Road.
31	All interests in 239.7 square metres of recreational ground (Meols Park, Scarisbrick New Road, Southport, PR8 6LH) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Kew Roundabout

32	All interests in 17.8 square metres of public footway (Scarisbrick New Road) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Scarisbrick New Road
33	All interests in 46.4 square metres of recreational ground (Meols Park, Scarisbrick New Road, Southport, PR8 6LH) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Scarisbrick New Road
34	All interests in 10.6 square metres of public footway (Scarisbrick New Road) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Scarisbrick New Road
35	All interests in 13 square metres of recreational ground (Meols Park, Scarisbrick New Road, Southport, PR8 6LH) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Scarisbrick New Road
36	All interests in 117.9 square metres of public footway (Scarisbrick New Road) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Scarisbrick New Road
37	All interests in 332.1 square metres of recreational ground (Meols Park, Scarisbrick New Road, Southport, PR8 6LH) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Scarisbrick New Road
38	All interests in 18.4 square metres of recreational ground (Meols Park, Scarisbrick New Road, Southport, PR8 6LH) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Scarisbrick New Road
39	All interests in 3.6 square metres of public footway (Scarisbrick New Road) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Scarisbrick New Road
40	All interests in 113.7 square metres of recreational ground (Meols Park, Scarisbrick New Road, Southport, PR8 6LH) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Scarisbrick New Road
41	All interests in 15 square metres of public footway (Scarisbrick New Road) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Scarisbrick New Road
42	All interests in 11.1 square metres of commercial premises (Scarisbrick New Road, Southport, PR8 5HL) excluding mines and minerals	To provide Highways Standard Cycleway along Scarisbrick New Road
43	All interests in 128.5 square metres of public footway and grassed verge (Town Lane Kew) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Scarisbrick New Road and Kew Roundabout

44	All interests in 32.6 square metres of commercial premises (Esso MFG Town Lane, Scarisbrick New Road, Southport, PR8 5HL) excluding mines and minerals	To provide Highways Standard Cycleway along Scarisbrick New Road and Kew Roundabout
45	All interests in 445.1 square metres of commercial premises (Johnsons Toyota, Town Lane, Southport, PR8 5JH) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Town Lane Kew
46	All interests in 22.9 square metres of commercial premises (Johnsons Toyota, Town Lane, Southport, PR8 5JH) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Town Lane Kew
47	All interests in 216.5 square metres of commercial premises (Johnsons Toyota, Town Lane, Southport, PR8 5JH) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Town Lane Kew
48	All interests in 25.1 square metres of commercial premises (Johnsons Toyota, Town Lane, Southport, PR8 5JH) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Town Lane Kew
49	All interests in 3.1 square metres of commercial premises (Johnsons Toyota, Town Lane, Southport, PR8 5JH) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Town Lane Kew
50	All interests in 23.2 square metres of shrubbery, public footway, and verge (Town Lane) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Town Lane Kew
51	All interests in 1.3 square metres of shrubbery, public footway, and verge (Town Lane) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Town Lane Kew
52	All interests in 31.6 square metres of shrubbery, public highway, footway, and access road (Town Lane) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Town Lane Kew
53	All interests in 505.2 square metres of commercial premises (Tesco Stores, Town Lane, Southport, PR8 6RE) and public highway (Scarisbrick New Road) except those owned by the acquiring authority and excluding mines and minerals	To provide Highways Standard Cycleway along Kew Roundabout
54	All interests in 40.3 square metres of commercial premises (284 Scarisbrick New Road, Scarisbrick, Southport, PR8 5HW) excluding mines and minerals	To provide Highways Standard Cycleway along Kew Roundabout

Appendix B – Summary of Objections received

Ref	Status	Date received	Objector	Concern raised	
OBJ1	Statutory Objector	08.07.25	Merseyside Waste Disposal Authority	<p>1. Acquisition severs access to site and disrupts ongoing operations</p> <p>2. Statutory Objection</p> <p>NRIL objecting on grounds of Rights and Historic Rights being impacted upon by proposals</p>	Objection Withdrawn
OBJ2	Statutory Objector	03.07.25	McDonalds Real Estate LLP & McDonalds Restaurants Limited	<p>1. Scheme will adversely impact Retained Land as land required part of main frontage</p> <p>2. Scheme will impact Vehicular Access</p> <p>3. Council not justified requirement to take land</p> <p>4. Require mitigation measures to address impact on businesses and estate</p> <p>1. Purpose of scheme can be achieved without objector's land</p> <p>2. Insufficient evidence of reasonable efforts made by the Council to acquire the Company's</p>	<p>18.01.24 - Initial email to Property Team</p> <p>22.01.24 - Email from Emily Stewart in Property Team. PE sent ES plan of scheme and email with proposals and suggestions of times to meet.</p> <p>30.01.24 - Teams meeting with Emily Stewart and Rebecca Mayo. Ran through proposals and answered questions re timing and impact on McDonalds. ES/RM to send PE plan so can-do overlay of road scheme. PE sent email details to ES/RM</p> <p>22.05.24 - PE contacted re GI works. Rebecca Mayo requested Overlay Plan</p> <p>05.08.24 - Call from Rebecca Mayo to PE - finalising details re GI later in week</p> <p>19.08.24 - BB Confirmed GI completed without note</p> <p>18.09.24 - PE emailed post GI confirming current state of play</p> <p>12.12.24 - PE updated re Brabners letter</p> <p>11.02.25 - PE emailed Emily attaching Brabners Letter</p> <p>13.02.25 - PE emailed Emily overlay plan</p> <p>17.02.25 - Emily acknowledged plan</p> <p>12.03.25 - PE sent email chasing up further negotiations</p> <p>19.03.25 - Jane Bradshaw - Montagu Evans contacted as</p>

			<p>interest by agreement.</p> <p>instructed by McDonalds - PE emailed back with details 20.03.25 - PE called Jane Bradshaw - She away until 31.03.25 - PE to call on 02.04.25 02.04.25 - PE forwarded Notice of Requisition 11.04.25 - RFI returned by JB 14.04.25 - PE met JB on Teams call. Outlined scheme and impact upon McDonalds. J B to consult with McD's whether they look to put in extra lane and whether the scheme affects the proposals 24.06.25 - JM contacted PE re CPO Details and whether McDonalds will require objection. 30.06.25 - JM contacted PE re CPO details. PE emailed across 01.07.25 - PE called JM re case. She is awaiting instructions. To discuss upon return from leave on 29/7. McD's likely to put in a holding objection 03.07.25 - ME forwarded objection. PE called to challenge comments on limited negotiations with agents. 10.07.25 - PE met JB at CPA. Discussed basics of case. To pick up post A/L. Followed up with email on 14.07.25 to rearrange call 06.08.25 - PE had call with JB. To send across information re McDonalds and offer to settle 13.08.25 - PE called JB - Left V/M 18.08.25 - JB called PE. Discussed case and PE suggested offer. PE sent updated Heads of terms 20.08.25 - PE called re Level survey. McD's fine and can proceed 02.09.25 - PE emailed JB with details from wsp and resent HoT 16.09.25 - Called Jane Bradshaw to chase up case 30.09.25 - SoC sent 01.10.25 - Email from JB re SoC - PE responded to pursue discussions 29.10.25 - PE left VM for JB to chase up case 10.11.25 - PE emailed and called JB to chase up case 12.11.25 - PE called JB to chase up case 17.11.25 - ME forwarded revised HoT - PE emailed with response 19.11.25 - Left VM for JB 27.11.25 - Email correspondence regarding agreement 01.12.25 - JB email advised recommendations to McDonalds board on 11.12.25</p>
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OBJ3	Statutory Objector	09.07.25	SP Energy Networks	SPEN objecting to the scheme's impact on SPM assets which are within the proposed Order limits	Objection Withdrawn
OBJ4	Statutory Objector	09.07.25	B&Q Limited	1. No Terms Agreed Between parties 2. Order may affect B&Q operations	<p>15.11.23 - Sarah Cooper contacted PE post initial consultation</p> <p>16.11.23 - PE responded - arranged meeting 22.11.23</p> <p>22.11.23 - Met on Teams - covered issues arising and sent plans and details</p> <p>12.12.24 - PE contacted re Brabners letter</p> <p>16.12.24 - SC acknowledged receipt</p> <p>12.02.25 - PE forwarded letter and plan</p> <p>19.03.25 - SC called PE re issues at store to be forwarded to MW and also wanted to know details of LCC agents so can tie up with them.</p> <p>20.03.25 - Emailed response of action</p> <p>31.03.25 - Updated that chasing up DTZ for response</p> <p>02.04.25 - PE sent Notice of Requisition</p> <p>02.04.25 - SC acknowledged receipt of Notice</p> <p>15.04.25 - PE chased up Notice of Requisition</p> <p>01.07.25 - PE emailed out update re CPO and chaser to negotiate</p> <p>11.07.25 - SC sent email and noted B&Q serving protective objection</p> <p>09.08.25 - Liz McLoughlin of SW contacted PE as acting for B&Q and sent across Fee request. PE contacted AD and confirmed fees by way of email on 11.08.25. Subsequently spoken</p> <p>20.08.25 - Call with Richard Sowerby at SW re case</p>

					<p>27.08.25 - Email to RS re lease to progress negs 28.08.25 - RS sent across lease - PE acknowledged 02.09.25 - PE emailed details of requirement from B&Q to RS post call. RS asked PE to chase up fee confirmation 09.09.25 - PE/RS meeting - discussed practical points. Issues such as Accommodation works and Traffic Management to chase up. 25.09.25 - Call with RS re land required. RS highlighted issue re area required which is not included in CPO. Email correspondence and SC revisiting. 30.09.25 - SoC sent to B&Q 01.10.25 - PE emailed RS re SoC. RS away until 6.10 15.10.25 - PE emailed additional plans to RS 22.10.25 - PE/RS Meeting. Highlighted issues and arranged meeting with AI 29.10.25 - RS called PE re query re dates of works. To discuss at meeting with AI next week 30.10.25 - Call and email with SW re Highway 06.11.25 - PE/AI and RS met to discuss issues around land required at B&Q and impact upon LCC also. To circulate notes post meeting 12.11.25 - PE spoke RS - has sent details to B&Q to chase up 18.11.25 - RS to chase up with client post our meeting 20.11.25 - PE/RS met. RS to seek instructions post meeting</p>
OBJ5	Statutory Objector	10.07.25	Veolia ES Merseyside & Halton Limited	Operational issues as result of the severance of site access and in line with MWDA their landlords	<p>11.02.25 - JC contacted PE post Brabners letter. PE ran through proposals over TEAMS and emailed details across. 02.04.25 - PE sent Notice of Requisition 07.07.25 - BK called - to be appointed by Veolia for surrender with Veolia 14.07.25 - James Cook contacted PE to arrange call 12.09.25 - Nigel Billingsley in touch re instruction by Veolia 15.09.25 - PE emailed NB re fees and covering discussions with MWDA 16.09.25 - PE confirmed fees from SC with NB 17.09.25 - Email from NB re Veolia meeting - PE responded re Veolia on site agreements with SC/MW.</p> <p>Allied to Portfield Objection above</p>

OBJ6	Statutory Objector	07.08.25	Leicestershire County Council	<p>1. Insufficient Steps to Acquire land by agreement</p> <p>2. Limited Engagement and Insufficient Information Available</p>	<p>PE Contacted to make initial contact</p> <p>15.11.23 PE informed NH that now received correspondence from B&Q. To meet once met with Designers next to confirm land affected</p> <p>12.12.24 PE informed NH of Brabners letter. NH raised some queries for PE to respond to</p> <p>18.12.24 PE responded to NH with details of land required and contact with B&Q</p> <p>11.02.25 - PE emailed Nigel attaching Brabners Letter. NH responded that no further action from Colliers as appointment passed to DTZ Investors</p> <p>11.02.25 PE emailed introductory email post DTZ IM appointment</p> <p>12.02.25 - PE arranged meeting with Sarah for 18.02.24 and email with details and photos</p> <p>18.02.25 - PE held meeting with Sarah. Covered background and post meeting sent plan and draft HoT. DTZ IM to appoint agents to act for them</p> <p>12.03.25 - PE emailed chasing up compensation surveyors details</p> <p>20.03.25 PE emailed post call with B&Q chasing up</p> <p>31.03.25 - PE chased up again</p> <p>02.04.25 - PE sent Notice of Requisition</p> <p>15.04.25 - PE chased up Notice of Requisition</p> <p>01.07.25 - PE emailed out update re CPO and chaser to negotiate. PE called and Sarah said they have not appointed surveyor yet. PE to send HoT's</p> <p>01.07.25 - Draft HoT's been sent to LCC and cc to Sam Brice</p> <p>11.08.25 - Emanuel Pitman at Savills been appointed to act for LCC. PE emailed</p> <p>12.08.25 - Arranged call for 20.05.25 once EP returns from leave</p> <p>20.08.25 - Email with updated Heads of Terms in advance of meeting. Held meeting. PE to send details re scheme and programme once received from BB</p> <p>02.09.25 - PE emailed details of scheme to EP</p> <p>17.09.25 - PE sent chasing up email to EP to progress discussions</p> <p>26.09.25 - Email from Savills re Inquiry dates and timetables.</p> <p>29.09.25 - PE response to Savills email.</p> <p>30.09.25 - Sent SoC to Savills</p> <p>01.10.25 - Emails w EP re additional land requirement. wsp to send updated plan. PE emailed that does not affect CPO</p> <p>15.10.25 - PE emailed additional plans to Savills</p>
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