

The Secretary of State for Communities and  
Local Government  
National Planning Case Work Unit  
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**Our Ref:** PM/SEF  
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**Date:** 09 December 2016

Dear Sir

**THE LEICESTER CITY COUNCIL (LEICESTER WATERSIDE)  
COMPULSORY PURCHASE ORDER 2016  
LAND AT  
NUMBER ON ORDER MAP – PLOT 35  
DJINN GENIE (LONDON) LTD**

We act for Narrinder Sandhu and Djinn Genie (London) Ltd in respect of Compulsory Purchase and related matters. Our clients have forwarded to us a copy of a letter advising them that Leicester City Council made the abovementioned Compulsory Purchase Order on 16 November 2016.

On behalf of our clients, WE HEREBY OBJECT to the making of the Order. The grounds for our client's objection are set out below:-

1. Our client's business operates from two premises – one in Bath Lane and one in New Henry Street. Both properties are functionally essential to the other, so acquisition of one will have a severe detrimental effect on the business. The proposed scheme involves the acquisition of the entirety of the New Henry Street premises. The council is aware of the link between the two premises but has not yet made any substantive effort to assist the business in overcoming the difficulties which would arise as a result of the acquisition.
2. Paragraph 6.16 of the statement of reasons states that the council has prepared a relocation strategy to assist existing businesses find suitable alternative accommodation. In reality, this strategy amounts to nothing more than the council trawling local estate agents and sending schedules of available property to affected landowners. Efforts to incentivise local agents to bring forward off-market properties were unrealistic in an active market. The council's strategy has failed to produce a single suitable property.
3. The Waterside area accommodates a number of thriving businesses from various sectors. These provide employment and generate income for the city area. The council scheme proposes to clear these away and replace them with a mixture of residential and commercial property. Nothing within the statement of reasons indicates whether the council has assessed the likely demand for the proposed commercial space
3. Section 9 of the statement of reasons deals with delivery and funding of the scheme. In total, £51 million of public funds is being used to fund and underwrite the scheme. It is clear that the scheme would not be viable without this funding, which raises fundamental questions about the appropriateness of the scheme in the first place. This is reinforced by the fact that the council had

originally attempted to market the scheme as a development opportunity but was unable to secure sufficient interest. As a result the City Council has had to take responsibility for funding the development itself.

4. Paragraph 9.5 explains that in order to ensure that the scheme is delivered in a timely manner the Development Agreement requires Keepmoat to deliver the infrastructure works across the whole site, plus not less than 100 houses and not less than 1,858 sq m of office accommodation. These figures represent approximately one third of the proposed provision of housing and commercial space. There is no indication of what measures are in place to secure completion of the entire development. This raises the possibility that the development may never be completed.
5. Our client is of the opinion that compulsory purchase powers should not be used in a situation where the outcome of the scheme is uncertain.

Our client reserves the right to submit further grounds of objection in the light of a greater understanding of the acquiring authority's proposals in the future.

If you have any queries, please contact our Mr Moran who will be pleased to assist.

Yours faithfully



**MASON OWEN**

For and on behalf of Narrinder Sandhu and Djinn Genie (London) Ltd