

**IN PARLIAMENT
HOUSE OF COMMONS
SESSION 2005-06**

CROSSRAIL BILL

Against – on Merits – Praying to be heard by Counsel, &c.
To the Honourable the Commons of the United Kingdom of Great Britain and Northern Ireland in Parliament assembled.

THE HUMBLE PETITION of Heathrow Motors

SHEWETH as follows:-

1. A Bill (hereinafter referred to as “the bill”) has been introduced and is now pending in your honourable House intituled “a bill to make provision for a railway transport system running from Maidenhead, in the county of Berkshire, and Heathrow Airport, in the London Borough of Hillingdon, through central London to Shenfield, in the County of Essex, and Abbey Wood, in the London Borough of Greenwich; and for connected purposes.”
2. The Bill is presented by Mr Secretary Darling, supported by The Prime Minister, Mr Chancellor of the Exchequer, Secretary Margaret Beckett, Mr Secretary Hain, Secretary Alan Johnson, Secretary Tessa Jowell, and Derek Twigg.
3. The main clause of the Bill to which objection is made is Clause 6 : Acquisition of land within limits shown on deposited plans together with the provisions contained within Schedule 6.
4. Your Petitioners are freehold owners of a property at Unit 3, Rigby Lane, Hayes, Middlesex, UB3 1ET.
5. Your Petitioners and their rights, interests and property are injuriously affected by the Bill, to which your Petitioners object for reasons amongst others, hereinafter appearing.
6. Your Petitioners object to the Bill principally on the grounds that firstly, the acquisition of part only of the site would render the remaining part totally inoperable for the present business. Secondly, the proposed acquisition of their site necessitates finding a suitable alternative site within a specified area of search in order for the business to survive, remain competitive and continue to provide employment in the area. **Accordingly, based on their searches and enquiries to date, they require a minimum notice period of 18 months which is not adequately provided for under present legislation.**

7. For the foregoing and connected reasons your Petitioners respectfully submit that, unless the Bill is amended as proposed above, clause 6, so far affecting your Petitioners, should not be allowed to pass into law.
8. There are other clauses and provisions of the Bill which, if passed into law as they now stand will prejudicially affect your Petitioners and their rights, interests and property and for which no adequate provision is made to protect your Petitioners.

YOUR PETITIONERS therefore humbly pray your Honourable House that the Bill may not be allowed to pass into law as it now stands and that they may be heard by their Counsel, Agents and witnesses in support of the allegations of this Petition against so much of the bill as affects the property, rights and interests of your Petitioners and in support of such other clauses and provisions as may be necessary or expedient for their protection, or that such other relief may be given to your Petitioner in the Premises as your Honourable House shall deem meet.

AND your Petitioners will ever pray, &c.

27 July 2005

Preamble

The principal concerns regarding the Bill in relation to Heathrow Motors are:

- i) Heathrow Motors' customer base is formed in the immediate surrounding area.
- ii) Only the southern part of their site is designated within the limit of deviation but if only this is acquired, this will render the rest of the site inoperable for their present use.
- iii) There are particular and stringent statutory and bye-law controls on their business operation of vehicular body repairs and spraying which, based on their earlier experiences when legislation was not so restrictive, **makes it imperative that they have a minimum of 18 months compulsory purchase notice.** Heathrow Motors requested that they be permitted to make their own representations which are attached.

HEATHROW MOTORS

Unit 3, Rigby Lane, Hayes, Middx. UB3 1ET
Telephone: 020 8573 3876 Fax: 020 8561 4380
Email: heathrowmotors@aol.com

19,07,2005

We hereby authorize Paul Timothy Richards to act as agent on behalf of Heathrow Motors in all matters relating to the Crossrail Bill.

Approved by



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CROSSRAIL PETITION

INTRODUCTION

- 1 Heathrow Motors is a family run business established in 1956 and operate an accident repair centre for both car and commercial vehicles. We have been based in Hayes for nearly 16 years and within that time have built a lucrative customer base in the area, not only due to the service we offer, but also because of our convenient location.
- 2 Our quality and customer service are second to none. We have built up a substantial amount of goodwill from our existing client base within the immediate locality.
- 3 We have contractual agreements with several large companies including The London Borough of Hillingdon, maintaining their fleet of dustcarts, coaches and other essential utility vehicles, including those for both disabled and elderly people (passenger service).
- 4 Other clients who are important for a large percentage of our turnover include Federal Express Europe, Air Canada and Heathrow Airport Limited, who all operate in close proximity to Heathrow Airport. We need to keep their fleet of vehicles constantly on the road so repairs need to be done quickly and efficiently, and be returned as soon as possible.
- 5 We are situated in convenient location for these customers and any relocation would jeopardize the business relationships that we currently have with them. We are obligated under contractual agreements for 80% of our turnover that if we were unable to deliver the service required as we now provide, the chances of us retaining the clients would be very slim. Our customer base is contained within a 3 mile radius of Heathrow Airport
- 6 With the nature of our business we have previously had massive problems leasing or renting a suitable site, because of the increasingly restrictive Hazchem legislation, and accordingly premises with the permission of the relevant authorities to paint spray are very rare. When we have looked for premises in the past before moving to Rigby Lane it took us 10 years of searching to find the right premises with the permission to paint spray.
- 7 The prospect of relocating and finding a suitable alternative site where authorities would permit us to relocate to is going to be very difficult based both on past experience and initial enquiries to date.

COMPULSORY PURCHASE

- 8 Any Compulsory Purchase will have a major negative impact on our business. The proposed plan if initiated would include the removal of our spray oven/mixing room and if taken would render us unable to trade.

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- 9 We utilize every square metre of our site and have no alternative space to relocate a spraying facility. In addition our rear vehicle access to our workshop would disappear leaving our site inoperable. This access is continuously in use on a daily basis, vehicles that are moved in from the front of the workshop are prepared for painting and then left in a queuing system to the rear of the property, once painted they are then parked for fitting up and then removed from the rear of the property. To lose this rear access would mean all vehicles would have to enter and leave the workshop from the front, leaving us with no space to actually work, due to a constant 'shunting' of vehicles through the working space.
10. Our existing site of 4,000 square feet is customized to suit our requirements and because of this is therefore worth more to us as an operational business entity, than the market value of the property.
11. For six months now we have been working with The London Borough of Hillingdon and local estate agents to look for alternative sites, but unfortunately to date none have been made available. However our industrial usage and local authority consent for paint spraying are specific to our existing site and any relocation we may undertake will be hindered by the lack of alternative sites, which after a conversation with Jansons (our local commercial estate agents) has only confirmed the difficulty of finding units with the same permitted industrial usage as we require to operate.
12. Any disruption to our business will, (as we must be able to trade on a day to day basis), be devastating and obviously incur costs for relocating staff, plant and machinery etc.

If we were to retain our customers and staff who all live locally to our premises, we would have to move within a 3 mile radius of our present site. Any time restrictions on moving would increase relocation costs, as we would require a minimum of 18 months notice, given the particular Local Authorities and statutory restrictions that are peculiar to our trade.

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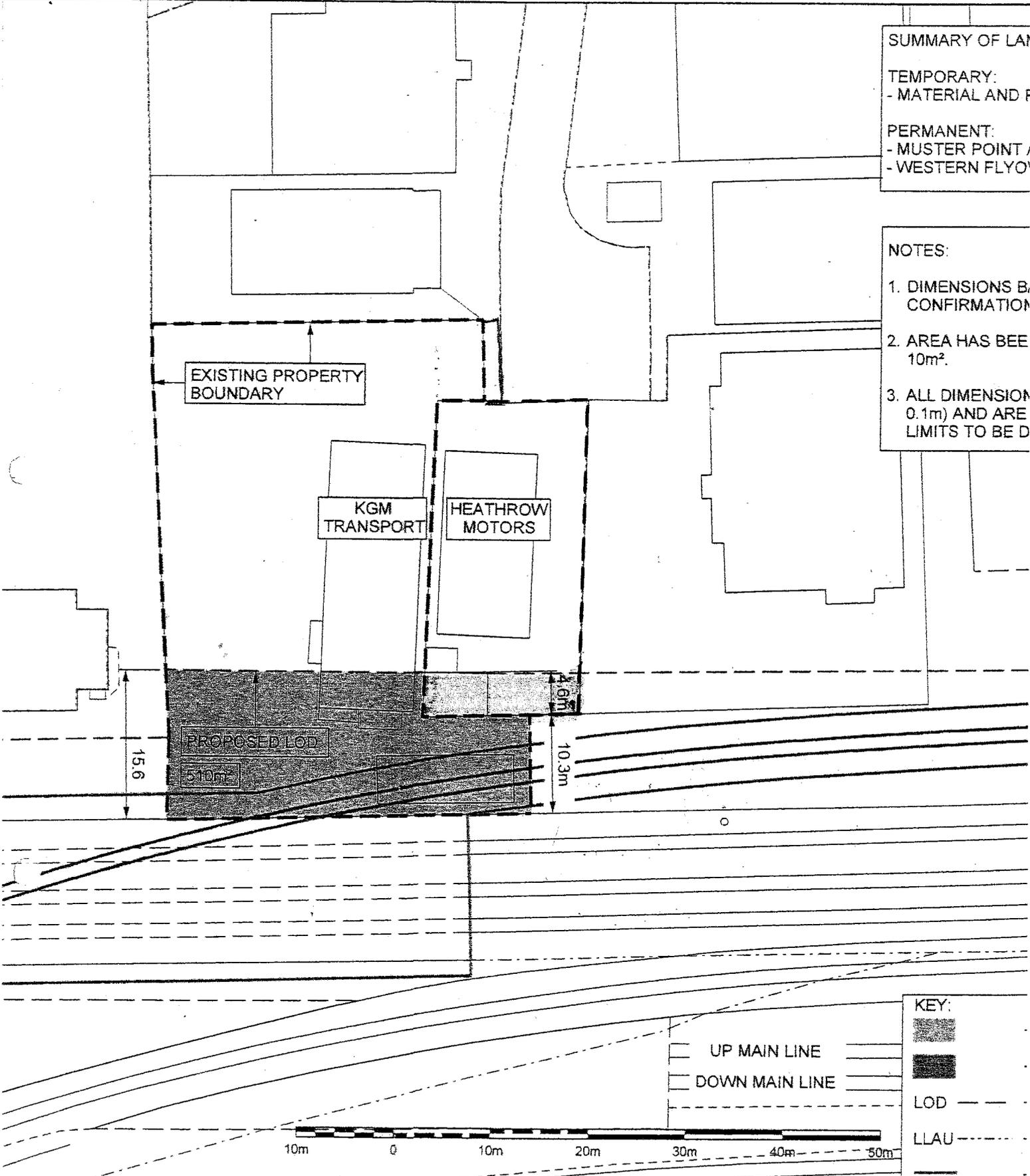
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SUMMARY OF LAND

- TEMPORARY:
 - MATERIAL AND F
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 - MUSTER POINT /
 - WESTERN FLYO'

NOTES:

1. DIMENSIONS B, CONFIRMATION
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3. ALL DIMENSION 0.1m) AND ARE LIMITS TO BE D



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BY	CHKD	APP	CAD	ACC	

CLRL LTD
 1 BUTLER PLACE
 LONDON
 SW1H 0PT
 T: 020 7941 7800
www.crossrail.co.uk
 CROSSRAIL LINE © 2004

1. CONFIRMATION OF ALL SURVEY DATA MUST BE OBTAINED FROM THE CROSS LONDON RAIL LINKS SURVEY TEAM.
 2. COORDINATES TO LUL GRID SEE STANDARD E 1122. ALL LEVELS ARE TO ORDINANCE DATUM NEWLYN.
 3. ALL MEASUREMENTS ARE IN MILLIMETRES UNLESS OTHERWISE STATED AND ARE TO BE CHECKED ON SITE WHERE APPROPRIATE.

CONTRACT No. / CONSULTANT:
 E1048 - Scott Wilson Railways

SCALE:
 1:500 @ A3

TITLE:
 CORRIL
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