

IN PARLIAMENT
HOUSE OF COMMONS
SESSION 2013–14

HIGH SPEED RAIL (LONDON – WEST MIDLANDS) BILL

PETITION

Against the Bill– 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 **THOMAS JAMES AND EAMON O'LOUGHLIN**.

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 between Euston in London and a junction with the West Coast Main Line at Handsacre in Staffordshire, with a spur from Old Oak Common in the London Borough of Hammersmith and Fulham to a junction with the Channel Tunnel Rail Link at York Way in the London Borough of Islington and a spur from Water Orton in Warwickshire to Curzon Street in Birmingham; and for connected purposes.
- 2 The Bill is presented by Mr Secretary McLoughlin, supported by The Prime Minister, The Deputy Prime Minister, Mr Chancellor of the Exchequer, and Secretary Theresa May, Secretary Vince Cable, Secretary Iain Duncan Smith, Secretary Eric Pickles, Secretary Owen Paterson, Secretary Edward Davey, and Mr Robert Goodwill.
- 3 Clauses 1 to 36 and 45 to 58 of the Bill set out the powers sought for the construction and operation of the railway referred to in paragraph 1 above. They include provision for compulsory acquisition, planning permission, heritage issues, trees and noise. Clauses 37 to 45 of the Bill establish the regulatory regime for the railway and clauses 59 to 65 deal with miscellaneous and general provisions.
- 4 The works proposed to be authorised by the Bill are described in Schedule 1

of the Bill.

- 5 Your Petitioners are **Thomas James and Eamon O'Loughlin** (hereinafter referred to as "your Petitioners"). Your Petitioners are the freehold owners of land comprising title number AGL139308 known as the Coach Park Site, Atlas Road, Park Royal, NW10. The Bill seeks authorisation for the compulsory acquisition of your Petitioners' interests at this property.
- 6 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.
- 7 The Bill seeks authorisation for the compulsory acquisition of the Coach Park Site, which is used as a bus garage by the lessees of the site, London United Busways Limited (company number 02328561).
- 8 The land is proposed to be acquired for the purposes of a satellite construction compound and the provision of a road from Old Oak Lane along Victoria Road to Wales Farm Road.
- 9 The lessees of the property operate a bus service from the Coach Park Site which serves the local community. There are alternative sites in close proximity which are more appropriate for the purposes of provision of the satellite construction compound without compromising the continuity of the bus service, for example Plantagent House and Tudor House on Victoria Road in Park Royal which are currently used as storage warehouses and do not involve the employment of a significant number of staff. There is also available land at the Origin Site, Rainsford Road, Park Royal.
- 10 Your Petitioners have not been adequately informed by the promoters of the Bill of the clear purposes for the land and how long it is intended to be used for.
- 11 Discussions with the promoters of the Bill have not shed any light on this.
- 12 Your Petitioners seek that the promoters of the Bill use an alternative location from the Coach Park Site for the provision of the satellite construction compound in this location.

Length of compulsory purchase powers

- 13 The Bill seeks authorisation for the grant of compulsory purchase powers for a period of 5 years from the date when the Bill receives Royal Assent. The Bill further allows for this period to be extended for a further 5 years by the Secretary of State.

- 14 Your Petitioners consider that 10 years is too long a period of time for landowners to be subject to the threat of compulsory acquisition. Such threat will stall any development plans and could lead to vacant properties. It is submitted that the compulsory acquisition powers should be restricted to a period of 5 years only, with no potential for the period to be extended.
- 15 For the foregoing and connected reasons your Petitioners respectfully submit that, unless the Bill is amended as proposed above, clauses 4 to 10, 15 and those seeking to authorise the compulsory acquisition together with the deposited plans so far affecting your Petitioners, should not be allowed to pass into law.
- 16 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.

Signed by Richard Guyatt as agent for your Petitioners

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AGAINST, agreed by your Petitioners
The Bill –
On Merits –
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