

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 **QUATTRO HOLDINGS LTD.**

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 **Quattro Holdings Ltd.** (company number 03028415) (hereinafter referred to as "your Petitioners"). Your Petitioners are the freehold owner of land comprising title number AGL214309 known as Black Arrow House on Chandos Road, Park Royal, NW10 6NF and title number AGL75240 known as Websters Recycling Yard on Regency Street off Victoria Road, Park Royal, NW10. The Bill seeks authorisation for the compulsory acquisition of part of your Petitioners' interests at these properties.
- 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.

Acquisition of land at Black Arrow House

- 7 The Bill seeks to authorise the compulsory acquisition of part of the car parking area surrounding Black Arrow House, together with the foreground area of the property, for the purposes of the provision of the Railway and the road works from Old Oak Lane along Victoria Road. The 49 space surface car park services the 150 full time staff employed by the lessee JP Boden & Co Ltd within the 5 storey Black Arrow House office building which was fully refurbished in 2011 and acquisition of part of the car park area impairs the ability to provide adequate parking facilities for the size and nature of this office building. No alternative offering of car parking has been offered to your Petitioners and without such car parking the building will be unable to operate at full capacity. The property is severely blighted and the prospect for leasing the property in the future has been greatly diminished.
- 8 The notice served on your Petitioners fails to schedule JP Boden & Co Ltd (company number 02692601), Everything Everywhere Limited (company number 2382161) and Hutchison 3G UK Limited (company number 03885486) as lessees of Black Arrow House. The Bill poses a blight to the future occupation of the building without the car parking arrangements.
- 9 It is not clear to your Petitioners from the published information whether the proposed compulsory acquisition of Black Arrow House will be permanent or temporary and therefore future planning for the property is severely restricted.
- 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. From the published plans, it is not clear to your Petitioners why the acquisition of this land at Black Arrow House is necessary.

- 11 Discussions with the promoters of the Bill have not shed any light on this.
- 12 Your Petitioners seek clarity from the promoters of the Bill of whether the land at Black Arrow House is sought to be acquired on a permanent or temporary basis.
- 13 If the land is to be acquired permanently, your Petitioners seek that Black Arrow House be acquired in addition to the land currently identified for compulsory acquisition. This is as a result of the blight caused by the acquisition of the parking facilities serving this property which mean that the current tenants will be unlikely to renew their lease and it will be very difficult to attract new tenants to the building.
- 14 If the land is to be acquired only temporarily during construction, your Petitioners seek a written undertaking for the provision of alternative similar car parking facilities in close proximity to Black Arrow House during construction and on completion of the works the return of the land to its former condition, including any structures thereon.

Acquisition of land at Websters Recycling Yard

- 15 The Bill seeks authorisation for the compulsory acquisition of a 2 acre Recycling Yard and concrete batching plant, together with the acquisition of the private access road known as Regency Street. The land is proposed to be acquired for the purposes of a construction compound.
- 16 The yard is leased to Quattro (UK) Limited, a connected company of Quattro Holdings Ltd. The yard is in use 24 hours a day, 7 days a week and is used to recycle an average of 450,000 tonnes of material per year. This Recycling Yard is the only facility provided in a 3 miles radius and is clearly a well-used function. Quattro (UK) Limited employs 125 full time drivers and maintenance staff at the yard and 15 full time office staff to support the yard. Your Petitioners are not aware of any proposals to re-provide this important community function.
- 17 Again, it is not clear to your Petitioners from the published information whether the proposed compulsory acquisition of the Recycling Yard will be permanent or temporary and therefore future planning for the property is severely restricted.
- 18 Discussions with the promoters of the Bill have not shed any light on this.
- 19 Your petitioners seek a written undertaking from the promoters of the Bill that prior to the compulsory acquisition of any interests at this location, an alternative suitable site to which the operations of the existing Recycling Yard could be transferred will be acquired within the Borough of Ealing together

with the necessary infrastructure installed. This is vital to allow continuation of the operations of the Recycling Yard and to avoid the closure of this valued business and significant redundancies as a result.

Length of compulsory purchase powers

- 20 The Bill seeks authorisation for the grant of compulsory purchase powers for a period of 5 years from the date when the Bill received Royal Assent. The Bill further allows for this period to be extended for a further 5 years by the Secretary of State.
- 21 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 compulsory acquisition powers should be restricted to a period of 5 years only, with no potential for the period to be extended.
- 22 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.
- 23 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 Petitioners 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 Petitioner

IN PARLIAMENT

HOUSE OF COMMONS

SESSION 2013-14

HIGH SPEED RAIL (LONDON – WEST
MIDLANDS) BILL

PETITION

OF

QUATTRO HOLDINGS LIMITED

AGAINST, agreed by your Petitioners
The Bill –
On Merits –
Praying be heard by Counsel, &c.

Agent for your Petitioners:
Richard Guyatt
Bond Dickinson LLP
3 Temple Quay
Temple Back East
Bristol

BR16DZ