IN PARLIAMENT

HOUSE OF COMMONS

SESSION 2013–14

HIGH SPEED RAIL (LONDON – WEST MIDLANDS) 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 London Properties PTE 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, Secretary Teresa May, Secretary Vince Cable, Secretary Iain Duncan Smith, Secretary Eric Pickles, Secretary Owen Paterson, Secretary Edward Davey, and Mr Robert Goodwill

3 Clauses 4 to 10 set out the Bill's objectives in relation to the compulsory acquisition of land to build the railway mentioned in paragraph 1. Clauses 14 to 18 set out the Bill's objectives in regard of the temporary possession and use of land for activities around, predominantly construction of, the aforementioned railway. Schedule 1 sets out the scheduled works for the construction of the railway.

4 Your Petitioner is the freehold owner of a property known as Nash House, Old Oak Lane. This Property is identified at Sheet 1-45 of the Deposited Plans and is described in the Environmental Statement which accompanies the Bill. Your Petitioner's property is due to be demolished and re-instated under the provisions of the Bill and the site of the property is to form part of the Atlas Road Construction Compound during the construction phase of the works proposed under the Bill.

5 Your Petitioner and its rights, interests and property are injuriously affected by the Bill, to which your Petitioner objects for reasons amongst others, hereinafter appearing.

6 Your Petitioner objects to the works along Old Oak Lane identified in Schedule 1 of the Bill (work number 1/45), as the information provided is deemed to be factually incorrect. In particular, work occurring along Old Oak Lane has been considered based on the assumption that Nash House is a derelict office building. It should be noted that a planning permission, pre-dating the Bill has been exercised and redevelopment of the property as student accommodation, comprising over 300 units, to the significant benefit of the local area, is underway.

7 All works carried out along the Old Oak Lane will have an adverse effect on the viability of the residential rental building that will exist on the site. It will reduce the rents achievable, have an adverse effect on the quality of life of

residents and cause significant disruption.

8 The Bill proposes temporary occupation of the site for the Atlas Road Construction Compound, and provides for the demolition and reinstatement of the original use of the Property. It should be noted that this should be applied to the current use (redeveloped) of the Property as opposed to the use identified by the Bill. Your Petitioner is concerned that the compensation it receives will be inadequate, given the works that it is carrying out to Nash House and that the need for temporary possession of its site has not been properly tested

9 The uncertainty surrounding the Bill is causing your Petitioner significant blight, as there is no clarity on the impact of HS2 and the associated works on the site, nor whether the Bill will progress.

10 Should the land be deemed necessary for temporary or permanent use, your Petitioner request a guarantee that compensation to the full value of any loss of revenue or asset value will be awarded.

11 Even if your Petitioner's property is excluded from the Bill your Petitioner is concerned as to the effects of the nearby construction works on the amenity of those who will be living in the building and seeks measures to ensure that such effects will be adequately mitigated and/or that adequate compensation will be available to reflect the reduced rental levels that will be obtainable

12 For the foregoing and connected reasons your Petitioner respectfully submits that, unless the Bill is amended as proposed above, clauses and schedules concerning works along Old Oak Lane so far affecting your Petitioner, should not be allowed to pass into law.

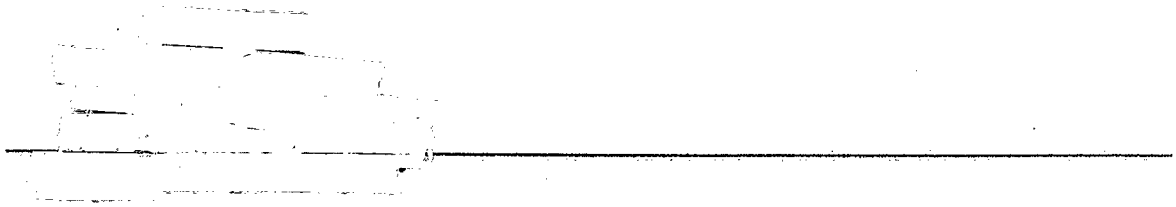
13 There are other clauses and provisions of the Bill which, if passed into law as

they now stand will prejudicially affect your Petitioner and its rights, interests and property and for which no adequate provision is made to protect your Petitioner.

YOUR PETITIONER therefore humbly prays 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 Petitioner 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 Petitioner will ever pray, &c.

Juliet Munn of King & Wood Mallesons LLP, Agent of the Petitioner



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