

HIGH SPEED RAIL (LONDON – WEST MIDLANDS) BILL

Against – on Merits – 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:

THE CLAYDON ESTATE LLP, THE TRUSTEES OF THE SIR RALPH VERNEY NO.1 TRUST, THE TRUSTEES OF THE SIR RALPH VERNEY NO.2 TRUST and THE TRUSTEES OF THE SIR RALPH VERNEY NO.6 TRUST (together known and referred to as THE CLAYDON ESTATE)

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 promoted by the Secretary of State for Transport, Patrick McLoughlin (hereinafter called the “Promoter”).

Clauses of the Bill

- 3 Clauses 1 to 3 of the Bill, together with Schedules 1 to 4, make provision for the construction and maintenance of the proposed works including the ‘Scheduled Works’ set out in Schedule 1. Provision is included to confer powers for various works and operations, including railway, highway and other building and engineering works and operations. Powers are also included to enable entry onto and interference with land and buildings for investigatory, protective and other purposes, together with powers to enable occupiers to be required to undertake works to trees, powers to use watercourses, public sewers and drains for drainage purposes and powers temporarily to interfere with and use waterways.

- 4 Clauses 4 to 18 of the Bill, together with Schedules 5 to 15, make provision for the compulsory acquisition and the temporary use of land and for the extinction or exclusion of certain rights in land. Provision is also included for the application or variation of compensation provisions.
- 5 Clauses 19 to 36 of the Bill, together with Schedules 16 to 26, make provision for the grant of planning permission and other consents and for the disapplication or modification of various controls, including those relating to heritage, water, building control, party walls, street works, lorries, noise and local legislation.
- 6 Clauses 37 to 42 of the Bill, together with Schedules 27 and 28, make provision for railway matters. Provision is included for the application (with modifications) and disapplication in parts of the existing railways regulatory regime, enabling agreements to be required to be entered into between the nominated undertaker and controllers of railway assets and other railway facilities and for the transfer of statutory powers in relation to railway assets.
- 7 Clauses 43 to 65 of the Bill, together with Schedules 29 to 31, contain general and miscellaneous provisions. These include provision for the designation of nominated undertakers, the making of transfer schemes, provision for statutory undertakers, provision for the compulsory acquisition of land for regeneration and for relocation purposes, and powers for the reinstatement of land. Provision is also included to apply powers of the Bill to further high speed works, to confer a power of entry for further high speed works, as to the application of the Environmental Impact Assessment Regulations and as respects the application of arbitration.

Your Petitioners and their estate

- 8 Your Petitioners are the Claydon Estate LLP, the Trustees of the Sir Ralph Verney No.1 Trust, the Trustees of the Sir Ralph Verney No.2 Trust and the Trustees of the Sir Ralph Verney No.6 Trust.
- 9 Your Petitioners together own the Claydon Estate near Aylesbury, Buckinghamshire, which has been the ancestral home of the Verney family since 1620. Claydon House was built in the 1770s by the Second Earl Verney and given to The National Trust by Sir Ralph Verney in 1956. His son, Sir Edmund Verney, 6th Baronet, lives in the house today.
- 10 The total area of the Estate comprises 5000 acres (2023 hectares) and is spread across five parishes in Aylesbury Vale, Buckinghamshire: Middle Claydon, East Claydon, Steeple Claydon, Calvert Green and Grendon Underwood.
- 11 Subject to the interest of The National Trust in Claydon House, the estate comprises:
 - (a) Claydon House gardens and courtyard;

- (b) the Claydon Estate farm, comprising 2,200 acres of in-hand arable land,
 - (c) the parkland, originally designed by John Sanderson, a student of Capability Brown, and containing grazing land for cattle and sheep and three lakes which are used by fishing clubs;
 - (d) woodland, comprising 500 acres, including both ancient woodland and new plantations.
- 12 The Estate is predominantly a busy commercial farming operation with a number of other activities taking place, including tourism (the Claydon House gardens and courtyard as well as other areas of the Estate are open to the public), property letting, forestry and sporting activities. Farming is the principal activity of the estate and the main source of income - generating over 50% of the Estate's income.
- 13 Parts of the Estate are subject to compulsory acquisition or use under the Bill or lie adjacent to, but outside the limits of deviation or the limits of land to be acquired or used, specified on the deposited plans to the Bill.
- 14 The following areas of the Estate are identified in Schedule 5 of the Bill (Acquisition of land for particular purposes) as being subject to compulsory acquisition or use under the Bill for the purposes of (but not limited to) providing environmental mitigation:

Parish of Middle Claydon, Aylesbury Vale, Buckinghamshire

- (a) A public bridleway shown on the deposited plan sheet number 2-55 as plot number 1.
- (b) Agricultural land, hedgerows and a public bridleway shown on the deposited plan sheet number 2-55 as plot number 2.

Parish of Calvert Green, Aylesbury Vale, Buckinghamshire

- (c) Woodland and track (Sheephouse Wood) shown on the deposited plan sheet number 2-55 as plot number 9.

Parish of Grendon Underwood, Aylesbury Vale, Buckinghamshire

- (d) Agricultural land shown on the deposited plan sheet number 2-54 as plot number 28.
- (e) Agricultural land and track carrying public bridleways (GUN/28/1, GUN/33/1 and GUN/33/2- Three Points Lane) shown on the deposited plan sheet number 2-55 as plot number 30.

Parish of Steeple Claydon, Aylesbury Vale, Buckinghamshire

- (f) Agricultural land, hedgerow and public footpath (SCL/13/2) shown on the deposited plan sheet number 2-56 as plot number 3.
 - (g) Agricultural land shown on the deposited plan sheet number 2-56 as plot number 4.
 - (h) Land and woodland (Decoypond Wood) shown on the deposited plan sheet number 2-56 as plot number 6.
 - (i) Agricultural land shown on the deposited plan sheet number 2-56 as plot number 8.
 - (j) Agricultural land, hedgerows, ponds, watercourse, drain, public footpath (SCL/12/1) and pylons and overhead electricity cables shown on the deposited plan sheet number 2-56 as plot number 9.
 - (k) Agricultural land shown on deposited plan sheet number 2-56 as plot 12.
 - (l) Agricultural land shown on deposited plan sheet number 2-56 as plot 78.
- 15 The following areas of the Estate are identified in Schedule 5 of the Bill as being subject to compulsory acquisition or use under the Bill for (but not limited to) the provision of diversion and installation of overhead electric lines:

Parish of East Claydon, Aylesbury Vale, Buckinghamshire

- (a) Agricultural land, pylons and overhead electricity cables shown on the deposited plan sheet number 2-52 as plot number 4.
 - (b) Agricultural land, pylons and overhead electricity cables shown on the deposited plan sheet number 2-52 as plot number 4a.
 - (c) Agricultural land, track and pylon and overhead electricity cables shown on the deposited plan sheet number 2-52 as plot number 5.
 - (d) Agricultural land and pylon and overhead electricity cables shown on the deposited plan sheet number 2-52 as plot number 7.
- 16 The following areas of the Estate are identified in Schedule 8 of the Bill (Land in which only rights may be acquired) for the provision of access for construction and maintenance of utility diversions:

Parish of East Claydon, Aylesbury Vale, Buckinghamshire

- (a) Agricultural land and hedgerow shown on the deposited plan sheet number 2-52 as plot number 2.

- (b) Agricultural land and hedgerow shown on the deposited plan sheet number 2-52 as plot number 3.
- (c) Agricultural land and track shown on the deposited plan sheet number 2-52 as plot number 5a.
- (d) Agricultural land, verge, hedgerow and track shown on the deposited plan sheet number 2-52 as plot number 7a.

17 The following areas of the Estate are identified in Schedule 5 of the Bill as being subject to compulsory acquisition or use under the Bill for the purposes of (but not limited to) the diversion or installation of, or works to, utilities apparatus:

Parish of Steeple Claydon, Aylesbury Vale, Buckinghamshire

- (a) Agricultural land, hedgerow, drain and public footpath (SCL/12/1) shown on the deposited plan sheet number 2-56 as plot number 9a.
- (b) Agricultural land and public footpath (SCL/8/1) shown on the deposited plan sheet number 2-56 as plot number 75.

18 The following areas of the Estate are identified in Schedule 5 of the Bill as being subject to compulsory acquisition or use under the Bill for the purposes of (but not limited to) the provision of balancing pond and associated works and access for maintenance:

Parish of Steeple Claydon, Aylesbury Vale, Buckinghamshire

- (a) Agricultural land, hedgerow, drain and public footpath (SCL/12/1) shown on the deposited plan sheet number 2-56 as plot number 9b.

19 The following areas of the Estate are identified in Schedule 5 of the Bill as being subject to compulsory acquisition or use under the Bill for the purposes of (but not limited to) the provision of for worksite and access for construction:

Parish of Steeple Claydon, Aylesbury Vale, Buckinghamshire

- (a) Agricultural land and pylons and overhead electricity cables shown on the deposited plan sheet number 2-56 as plot number 21.
- (b) Agricultural land, hedgerows, ponds and buildings shown on the deposited plan sheet number 2-56 as plot number 26.

20 The following areas of the Estate are identified in Schedule 5 of the Bill as being subject to compulsory acquisition or use under the Bill for the purposes of (but not limited to) the provision of flood mitigation measures:

Parish of Steeple Claydon, Aylesbury Vale, Buckinghamshire

- (a) Agricultural land, hedgerow, drains and public footpath (SCL/8/4) shown on deposited plan sheet number 2-58 as plot number 109.

21 In addition, the following areas of the Estate have been identified in the documents accompanying the Bill as being affected by the HS2 project in the parish of Steeple Claydon:

- (a) Agricultural land, woodland and public footpath (SCL/13/2) shown on deposited plan sheet number 2-56 as plot number 2.
- (b) Land and woodland (Decoypond Wood) shown on deposited plan sheet number 2-56 as plot number 5.
- (c) Agricultural land and hedgerow shown on deposited plan sheet number 2-56 as plot number 7.
- (d) Land and woodland shown on deposited plan sheet number 2-56 as plot number 13.
- (e) Access track shown on deposited plan sheet number 2-56 as plot number 14.
- (f) Agriculture land and hedgerow shown on deposited plan sheet number 2-56 as plot number 17.
- (g) Access track shown on deposited plan sheet number 2-56 as plot number 18.
- (h) Land and telecommunication mast (BUK0201) shown on deposited plan sheet number 2-56 as plot number 22.
- (i) Agriculture land and hedgerow shown on deposited plan sheet number 2-56 as plot number 23.
- (j) Access road carrying public footpath (SCL/12/1) shown on deposited plan sheet number 2-56 as plot number 25.
- (k) Agricultural land shown on deposited plan sheet number 2-56 as plot number 50.
- (l) Access road carrying public footpath (SCL/12/1) shown on deposited plan sheet number 2-56 as plot number 53.
- (m) Agricultural land shown on deposited plan sheet number 2-56 as plot number 54.
- (n) Agricultural land and public footpath (SCL/8/1) shown on deposited plan sheet number 2-58 as plot number 77.

- (o) Agricultural land, woodland, public footpaths (SCL/9/3 and SCL/7/2) shown on deposited plan sheet number 2-59 as plot number 89.
- (p) Agricultural land, river, bed and banks thereof (unnamed river), hedgerows, drains, ponds, tracks and public footpaths (SCL/8/1, SCL/9/2, SCL/8/3, SCL/8/4, SCL/7/1 and SCL/9/1) shown on deposited plan sheet number 2-59 as plot number 92.
- (q) Agricultural land, pond and woodland shown on deposited plan sheet number 2-59 as plot number 93.

22 The provisions of the Bill will therefore have a seriously adverse impact on parts of the Estate and thereby on the Estate as a whole. Accordingly, your Petitioners object to the Bill and its provisions referred to above and they allege, and are prepared to prove, that they and their property, rights and interests are injuriously and prejudicially affected by the Bill for the reasons (amongst others) hereinafter appearing.

Your Petitioners' concerns

The Calvert Infrastructure Maintenance Depot

- 23 The Environmental Statement volume 2, Community Forum Area report 13 relating to the Calvert, Steeple Claydon, Twyford and Chetwode areas (hereinafter referred to as "CFA Report") provides information about the Calvert Infrastructure Maintenance Depot (the "IMD"). It states (at 2.2.12) that the IMD will be a permanent maintenance depot covering approximately 37ha of land and extending 3km to the east of HS2. The IMD is intended to be approximately 350m wide at the western end and 100m wide at the eastern end as illustrated in the Volume 2 Map books accompanying this CFA. The IMD is to be located alongside the HS2 route and immediately north of the existing Bicester to Bletchley line. Land for part of the IMD is to be compulsorily acquired from your Petitioners.
- 24 The IMD will be a substantial and permanent intrusion upon this peaceful rural landscape. Its construction and subsequent operation will also have a substantial and detrimental impact on your Petitioners' farming and other activities on their Estate.
- 25 The CFA refers very briefly to the consultation in 2011 on the siting of the IMD. The rationale for siting it at this location appears to be based upon the fact that it will be connected to the rest of the railway network via the existing but currently disused Bicester to Bletchley Line (see 2.6.7 of the CFA and the Information Paper F2 on the Infrastructure Maintenance Depot Strategy). Your Petitioners are not convinced this is the right location of the IMD. They allege that the Promoter should be put to proof on the need for the IMD at this location.

- 26 During construction of the IMD and HS2 works, the intrusion will be exacerbated when additional land is occupied as a worksite. Vehicles and workforce needing to access the site will place an unacceptable strain on the local road network.
- 27 Once constructed, the IMD will be a continuing intrusion. Your Petitioners are particularly concerned about night time working at the IMD and about noise and light pollution to the whole of 'the Claydon bowl' area, which is one of the most tranquil areas of this part of England. The IMD is to be functional 24 hours a day, seven days a week with up to 300 staff arriving and departing, in addition to deliveries by road and rail. Your Petitioners do not accept the statement in the CFA that there will be no significant effects.
- 28 The IMD will require lighting for all of its external working areas, including general circulation areas and walkways, with enhanced lighting to loading areas (see CFA at 2.4.11). Your Petitioners are concerned to ensure the external lighting at the IMD satisfies the environmental guidance for a 'dark sky' lighting installation. Your Petitioners seek a commitment from the Promoter that it will comply with current guidance and best practice measures for the reduction of light pollution.
- 29 Given the special nature of the landscape in this area, the IMD needs to be designed with particular sensitivity to its surroundings. At this stage only the outline design of the IMD is available with detailed design to be approved later by the local planning authority. Your Petitioners seek a commitment that the Promoter will also consult with your Petitioners on the design of the IMD.
- 30 Your Petitioners contend that the land to be taken for the IMD and associated environmental mitigation is excessive. A substantial area of land between the IMD and the village of Steeple Claydon is to be taken for tree planting. This land is prime arable land forming part of your Petitioners' business and a necessary source of income. The land take in this area should be restricted to the minimum necessary.
- 31 In respect of any land that may still need to be taken for tree planting and landscaping, it is not clear who is to own it in the longer term and how it is to be managed. This should be a matter for agreement with your Petitioners in the first instance, with powers to ensure necessary mitigation only being used as a last resort.
- 32 The CFA acknowledges the possibility of the spread of noxious weeds as a consequence of the IMD and the HS2 railway line. Your Petitioners require a commitment from the Promoter that your Petitioners will be consulted upon and agree an appropriate management regime for the control of weed growth which could threaten your Petitioners agricultural interests.

Other land take

- 33 In addition to your Petitioners land being acquired for the IMD, a significant number of small parcels of your Petitioners' Estate are proposed to be acquired either for specific purposes such the provision of environmental mitigation or without a specific purpose being specified, as set out in this petition. Your Petitioners submit the Promoter has not adequately and satisfactorily made out a case for the acquisition of these plots of land either in the Bill or the accompanying documents.
- 34 Much of the Estate is farmed in hand. To do so, your Petitioners have structured their business accordingly and have incurred considerable fixed costs in the form of plant and machinery and the employment of a full time manager and full time assistant. These costs cannot readily be reduced in response to a reduction in the land available to be farmed. Therefore any reduction in the Estate by compulsory purchase weakens the financial viability of the Estate and should be kept to a minimum. Where it is unavoidable, your Petitioners seek compensation for this form of loss.
- 35 Your Petitioners seek to ensure that any interest in its land acquired by the Promoter (in terms of the area over which it is to subsist, the form in which it is to take at law and any express or implied constraints which may be imposed upon the remainder of your Petitioners' estate) should be strictly limited only to that which is absolutely necessary for the construction, safe operation and maintenance of the HS2 works.
- 36 In the case of any land not needed for the permanent railway works, the land should not be compulsorily acquired. If it is only needed temporarily, only temporary possession should be taken. Unnecessary compulsory purchase will cause unnecessary and avoidable difficulties and uncertainty for your Petitioners. There are likely to be adverse tax consequences and your Petitioners will suffer from the uncertainty of not knowing whether the land will be conveyed back to them and, if it is, at what cost to them.
- 37 Moreover, where land is to be taken temporarily, it should be subject to a lease or licence from your Petitioners. This will provide an income from the land rather than your Petitioners having to wait for compensation later. It will also enable a mechanism for agreeing how land will be reinstated, including the drainage arrangements for the land.
- 38 Your Petitioners require a commitment from the Promoter that it will actively engage with the Estate to agree and mitigate against the loss of land and reconsider whether the land currently proposed to be taken is strictly and necessarily required for the project.
- 39 At the western side of the Estate, the works include the provision of a waste transfer railway siding and road works to enable waste to be transported across the high speed railway to a waste disposal facility at Calvert. Your Petitioners seek a

commitment from the Promoter to reconsider the location and design of these works so as to avoid or reduce the impact on your Petitioners' Estate.

- 40 In the same area, the Promoter is proposing to acquire compulsorily a substantial belt of valuable agricultural land for tree planting in order to provide new habitat for the Bechstein bat. There has been no proper justification or explanation from the Promoter or HS2 Limited of this intention and no discussion with your Petitioners of the impact it will have on their farming operation or on that of their farming tenant at this location. It will effectively cause severance unnecessarily by rendering an area of useful land more difficult to work. There are other ways of providing new habitat for the Bechstein bat in this area, which would not require so much land to be taken and would not cause the same degree of severance. Your Petitioners seek a commitment from the Promoter to reconsider this aspect of the proposals in discussion with your Petitioners.
- 41 Your Petitioners also seek a commitment from the Promoter that the future ownership and management of any such land will be agreed with them.
- 42 Furthermore, Sheephouse Wood SSSI is directly affected by the proposed scheme. This ancient woodland is of national importance housing a number of butterfly species including the black hairstreak (a species which is only found in the clay belt ancient forest running through Oxfordshire and Buckinghamshire to the East Midlands in the UK) and 40 species of bird. Your Petitioners submit that the construction activity taking place in such close proximity to this SSSI will have a permanent detrimental impact on the woodland and its flora and fauna which no amount of mitigation can adequately compensate. At the very least, therefore, special measures should be taken to reduce to an absolute minimum the disturbance to this area.
- 43 There are other areas in respect of which your Petitioners wish to engage actively with the Promoter in order to agree alternative, more suitable areas for the proposed works or mitigation than are currently identified.

Roads

- 44 Your Petitioners are concerned about the impact of the proposed works on the local road network, in particular Queen Catherine Road and Addison Road which affords an essential means of access to different parts of the Estate, particularly with regards to Queen Catherine Road and its crossing of the East-West railway line. Your Petitioners understand that there will be a traffic management plan associated with the works but your Petitioners have not yet received adequate assurances that the current access to the different parts of the Estate will be maintained as now at all times and especially at harvest time. Your Petitioners seek a commitment from the Promoter to this effect.

Footpaths

- 45 The Bill contains provisions for the diversion of footpaths across your Petitioners' land. Your Petitioners seek a commitment from the Promoter that due regard will be had to your Petitioners farming requirements when it is being decided when and how footpaths are to be diverted and that unnecessary disruption to your Petitioners farming operation will be avoided.

Light pollution, noise, vibration, disruption and disturbance

- 46 Your Petitioners' estate will be adversely affected by the proximity to the Estate of the HS2 works, for example by—
- (a) pre- construction activities such as surveys;
 - (b) construction traffic;
 - (c) construction noise and vibration;
 - (d) construction dust and dirt;
 - (e) light pollution; and
 - (f) visual impact.
- 47 Your Petitioners are concerned that the Bill does not set out sufficient means for compensating your Petitioners for such disturbance, which will continue for several years.
- 48 Your Petitioners expect the nominated undertaker to be appointed to carry out the works to be bound by the terms of a code of construction practice to regulate these and other matters. Nevertheless, your Petitioners submit that the Promoter and the nominated undertaker who is to carry out the works should be required to consult with your Petitioners about proposed working methods and in relation to all aspects of likely environmental impact on your Petitioners' Estate.
- 49 It is also unclear what remedy, if any, will be available to your Petitioners in the event of any failure to observe the terms of the code of practice or other environmental obligations. Where the Promoter has not agreed terms on such issues directly with your Petitioners, your Petitioners should have some other clear form of recourse in the event of a non-compliance by the nominated undertaker that affects them.
- 50 The Promoter should also be responsible for any expense incurred or loss suffered as a consequence of such matters.

Compensation

- 51 Your Petitioners further submit that such provisions with regard to compensation in respect of compulsory acquisition and other matters as are proposed in the Bill are inadequate to compensate your Petitioners for the loss, damage and inconvenience which they may suffer as a result of the construction and subsequent use of the proposed works.
- 52 Your Petitioners are concerned that Capital Gains Tax ("CGT") may unjustly become payable as a result of the compulsory acquisition of part of the Estate. As the amount of land being taken is greater than the 5% threshold stipulated by HMRC, the Estate is unlikely to qualify for the "small part" disposal relief. The Estate is also unlikely to qualify for the roll over relief as, in order to qualify for it, the proceeds of the disposal must be rolled over into qualifying assets for the purpose of business trading; for example farm buildings, equipment or farm land. Also, in order to qualify for the relief, the qualifying asset must be acquired within three years of the disposal/compulsory purchase. As the Estate has no need for further buildings or equipment, this is not a realistic option. Moreover, the purchasing of additional land is only a realistic option if it adjoins the Estate and comes up for within the three year period. As a consequence, it is likely that your Petitioners will be required to pay CGT on the land being compulsorily acquired, thereby suffering financial detriment as a direct consequence of the HS2 project. Your Petitioners seek a full dispensation from the Government in respect of any CGT liability incurred by the Estate as a consequence of the scheme. There is no justification for your Petitioners to suffer a loss of this kind and such a dispensation would not add to the cost of the project.

Costs

- 53 Your Petitioners submit that provision should be made for the Promoter to repay to your Petitioners all proper costs, charges and expenses (including the proper fees of such professional advisers as they may instruct) reasonably incurred in consequence of the Bill or of any provision made as a result of this Petition. Whilst it is understood that, under the statutory compensation code, your Petitioners may recover from the Promoter some of the costs they incur, they seek a commitment from the Promoter that he will also reimburse your Petitioners for other costs incurred, such as expense incurred in having to reorganise the Estate as a consequence of the works.

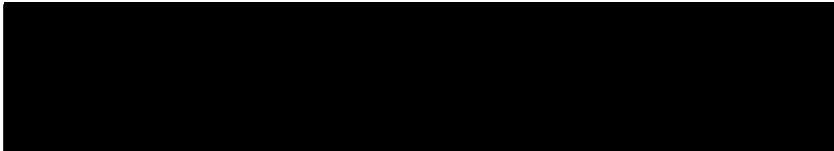
Conclusion

- 54 For the foregoing and connected reasons your Petitioners respectfully submit that, unless the Bill is amended as proposed above, so far affecting your Petitioners, the Bill should not be allowed to pass into law.

55 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.



Bircham Dyson Bell LLP

Parliamentary Agents for

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IN PARLIAMENT
HOUSE OF COMMONS
SESSION 2013-14

HIGH SPEED RAIL (LONDON –
WEST MIDLANDS) BILL

PETITION OF
THE CLAYDON ESTATE

AGAINST, By Counsel, &c.

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23 May 2014