

Secretary of State for Transport
C/O Transport Infrastructure Planning Unit
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Our Ref

17 May 2021

By email only: transportinfrastructure@dft.gov.uk

Dear Sir / Madam

**NETWORK RAIL (HUDDERSFIELD TO WESTTOWN (DEWSBURY) IMPROVEMENTS) ORDER
MAMA'S AND PAPA'S – COLNE BRIDGE ROAD, HD5 0RH**

CBRE Ltd. has been instructed by Mama's and Papa's ("M&P") in connection with their land and property interests that will be impacted by the above Order.

At the time the Order was made M&P held leasehold interests in two units, one on the west of Colne Bridge Road and the other on the east. They have recently vacated the unit on western side of the road and no longer have an interest in the property. We therefore write in respect of their leasehold interest in the premises to the east of Colne Bridge Road.

The unit is occupied by M&P as their head office facility. This includes several hundred employees based at head office, warehousing facilities for 'just in time' deliveries to business and consumer customers, and company stores. The site comprises over 150 parking spaces for staff and public visitors to the retail factory shop also located on site.

A number of plots are included within the Order that are occupied by M&P. Whilst not limited to, the following plots are of major concern as follows:

- 11-019 – temporary possession working site and construction access
- 11-025 - temporary working site and construction access for utilities
- 11-031 - acquisition
- 11-032 - access for construction
- 11-048 - working site and access for construction
- 11-063 - working site and access for construction

The proposed Order will interfere with their interest and occupation in property. We are, therefore, instructed to make a formal objection on the following grounds:

1. The use of compulsory powers is premature; the Acquiring Authority has not made an attempt to acquire the interest by agreement. No terms have been put forward for consideration by M&P.
2. The plots of land identified above comprise of the external areas surrounding the unit. If the business is denied the use of these areas it will be incapable of operating from the unit resulting in its closure with significant losses.

We reserve the right to amend or extend this objection accordingly in due course. Please confirm receipt of this objection.

Yours faithfully



**JOHN SAYER MRICS ACIARB
SENIOR DIRECTOR**