



Shulmans^{LLP}

| 18 April 2019

**Application By Highways
England For An Order Granting
Development Consent For The
A63 Castle Street Improvement
Scheme**

**Written Representation On
Behalf Of Princes Quay Estate
Limited – Plot 3/7f |**

| 10 Wellington Place
Leeds
LS1 4AP
Ref: AB/BA/P33459.11 |

- 1 This written representation is an objection by Princes Quay Estates Limited to the proposed temporary acquisition pursuant to the DCO of part of the current Princes Quay Shopping Centre multi-storey car park at its south western corner.
- 2 The details of the objection are set out in the following appendices:
 - 2.1 Appendix 1 – Letter to Highways England dated 30 August 2018.
 - 2.2 Appendix 2 – Statutory Objection
- 3 Since submitting the Statutory Objection, Highways England have indicated that the temporary acquisition will be required on the following terms:
 - 3.1 For a period between August 2020 and August 2024
 - 3.2 Initially to erect scaffolding on the site. This will involve a temporary fence being erected on the site from August 2020 to February 2021.
 - 3.3 The site will then be used to provide safe access for pedestrians, cyclists and disabled users and again the fence will remain in situ on the site to form the boundary for the pedestrian footway with its removal planned for August 2024.
 - 3.4 The temporary acquisition will allow the Princes Quay car park to remain fully operational as normal except for the loss of six parking spaces.
 - 3.5 Compensation will be paid for the loss of these six spaces.
- 4 No legal undertaking or agreement has been provided by Highways England in respect of the matters referred to in the preceding paragraph.

Appendix 1



Our Ref: AB/BA/P33459.11

Your Ref: PQEL/JDL/A63/01

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30 August 2018

Dear Sirs

A63 (Castle Street Improvement Hull) Public Consultation: 2 August 2018 – 31 August 2018 Planning Act 2008 Section 42: Duty to consult on a proposed application – Previous consultation review

We are instructed by Princes Quay Estates Limited owners of the Princes Quay Shopping Centre.

Our clients have been in discussion with Highways England in relation to the part of the scheme proposing a bridge which requires permanent land-take, permanent rights and temporarily rights from our client to enable the construction of the bridge. Agreement has been reached in principal on these matters and is expected to be concluded in a legal agreement shortly. Subject to the completion of the legal agreement our clients do not object to the proposed bridge works.

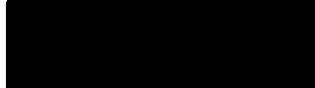
However, it would appear from plans circulated with the Section 42 Consultation Letter from Highways England dated 30 July 2018 that there is additional land owned by Princes Quay Estates Limited, not covered by the proposed agreement, and which Highways England propose to acquire temporarily, being part of the current Princes Quay Shopping Centre multi-storey car park at its south western corner ("the Land"). Our clients object to the temporary acquisition of this on the following grounds:

1. No explanation has been given to our client as to why it is necessary to acquire the Land temporarily to enable the scheme nor have any details been provided as to what the specific use of the Land would be in the context of the scheme. There appears therefore to be no justification for including the land in a DCO nor for its compulsory acquisition.
2. No information has been provided to our clients as to how long the Land would need to be acquired for.
3. The impact of temporarily acquiring the Land on the multi-storey car park (of which it forms a part) is unclear. The continued use of the car park is essential for the operation of the Princes Quay Shopping Centre.
4. Highways England have not made any attempts to purchase the Land by private treaty.
5. Our clients reserve the right to submit further grounds of objection pending receipt of further details from Highways England and also in the event that the agreement relating to the bridge does not complete as anticipated. In this context, our clients have

requested larger plans to establish the impact of the proposal. To-date these have not been provided. Our clients reserve the right to submit further grounds of objection following receipt of the requested plans.

Please also note our client have had sight of the objection submitted today by Princes Quay Retail Limited in respect of the alternative compound and agree with the points made by Princes Quay Retail Limited regarding the impact of the proposed compound on the Princes Quay Shopping Centre and its environs and object on this basis also.

Yours faithfully



SHULMANS LLP

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Appendix 2

National Infrastructure Planning

[Cymraeg](#)

[FAQs](#)

Highways:

A63 Castle Street Improvement-Hull

by Highways England

Acceptance

Pre-examination

[Find out](#)



The notification of Preliminary Meeting (Rule 6 letter sent

The letter also includes the draft Examination Timetable and Initial Assessment Issues.

[Overview](#)

[s51 advice](#)

[Documents](#)

[Relevant representations](#)

The views expressed in this page do not represent those of the Planning Inspectorate. This page consists of content submitted to the Planning Inspectorate by the public and other interested parties, giving their views of this proposal.

About this

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A63 Castle Street Improvement-Hull

Received **18 December 2018**

From **Shulmans LLP** on behalf of **Princes Quay Estates Limited Representation**

Princes Quay Estates Limited ("PQEL") own land adjacent to the bridge proposed as part of the DCO Scheme and have entered into an agreement with Highways England regarding permanent land take, permanent rights and temporary rights to enable the construction of the bridge. However, it appears from the plans accompanying the DCO that there is additional land owned by PQEL which is not covered by the proposed agreement and which Highways England propose to acquire temporarily. This land is part of the current Princes Quay Shopping Centre multi-storey car park at its south western corner. PQEL object to the temporary acquisition of this on the following grounds:

- (a) The continued use of the car park is essential for the operation of the Princes Quay Shopping Centre
- (b) Insufficient information has been given regarding the length of the temporary land take

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- (c) No guarantees have been provided to ensure that the car park can continue to operate without detriment.
- (d) Highway Directions signage to Princess Quay Shopping Centre and Myton Street Retail Park to be replaced/relocated. //



Contact in

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