



Kings Court, 12 King Street, Leeds LS1 2HL. Tel 0113 283 2500
Fax 0113 245 9412 Document Exchange 12051 Leeds 24
Email graham.whiteford@walkermorris.co.uk Web: www.walkermorris.co.uk

Carole Yeadon
Department of Place
Planning, Transportation and Highways
Highway Services
4th Floor
Britannia House
Broadway
Bradford
BD1 1HX

Our ref GGW/RMS/FIB.26-1

30 May 2017

Dear Ms Yeadon

The City of Bradford Metropolitan District Council (A650 Hard Ings Road Improvement Scheme, Keighley) Compulsory Purchase Order 2017

The Highways Act 1980 -and- The Acquisition of Land Act 1981

Our Client: Fibreline Limited, Victoria Park Mills, Hard Ings Road, BD21 3ND

As you know, we act on behalf of Fibreline Limited, who operate from premises at Victoria Park Mills, Hard Ings Road, Keighley. Fibreline recently received notification that the City of Bradford Metropolitan District Council had made and submitted a Compulsory Purchase Order for the acquisition of land and rights along the route of the widened A650 Hard Ings Road.

The land which is the subject of the Compulsory Purchase Order is shown on the enclosed plan. The red shaded area indicates the land required for road widening, while the blue shaded area indicates the land required for working space.

Our clients' business depends on the free movement of delivery vehicles from this single point of access on to Hard Ings Road. The factory operates 24 hours a day, with heavy goods vehicles entering and leaving the site at all times of the day. Fibreline operate a Just-In-Time method of manufacture and delivery of products. Deliveries are therefore scheduled to coincide with their customer's operational requirements, where Fibreline are one part of the wider supply chain for the production of beds, sofas, chairs and other furniture. The delivery of Fibreline's products at a precise time is therefore essential. Any disruption to the supply chain and an inability to fulfil orders could result in lost trade to customers; jeopardise on-going contracts with customers; and result in action being taken against Fibreline by their customers for loss of trade.

As such, our clients are particularly concerned that the land required for the proposed road widening scheme and working space will prevent access to and from the premises during the period of the works being done. The existing access is sufficient for one HGV to use at a time, while the land required for works includes the full width of the internal access road.

In the event that the Compulsory Purchase Order is confirmed by the Secretary of State, please could you provide a full schedule of accommodation works detailing how access to Fibreline can be maintained at all times?

Please note that negotiations are ongoing between Fibreline Limited and Axis Property Consultants, acting on behalf of City of Bradford Metropolitan District Council, to acquire the subject land shaded red on the enclosed plan. So far there have been no discussions regarding compensation for disturbance and loss of profits resulting from the acquisition of the land, construction works or impediments to access.

If you have any questions, please don't hesitate to contact me directly.

Yours sincerely,

Walker Morris.

WALKER MORRIS LLP

c.c. John Hill, Corporate Services, City of Bradford MDC