

# **The Mayor's Office for Policing and Crime (Perivale) Compulsory Purchase Order 2020**

## **Local Government Act 1972 Police Reform and Social Responsibility Act 2011 Local Government (Miscellaneous Provisions) Act 1976 Acquisition of Land Act 1981**

### **POSITION STATEMENT**

#### **1 INTRODUCTION**

- 1.1 This Position Statement is submitted by Segro (Perivale Park) Limited ("**SEGRO**") in advance of the Public Inquiry into The Mayor's Office for Policing and Crime (Perivale) Compulsory Purchase Order 2020, which commences on 18 May 2021.
- 1.2 On 2 October 2020 the Mayor's Office for Policing and Crime ("**MOPAC**") made the Perivale Compulsory Purchase Order 2020 (the "**Order**") pursuant to relevant powers in the Local Government Act 1972, Police Reform and Social Responsibility Act 2011, Local Government (Miscellaneous Provisions) Act 1976 and the Acquisition of Land Act 1981.
- 1.3 On 29 October 2020, the Order was submitted to the Ministry of Housing Communities and Local Government ("**MHCLG**") for confirmation by the Secretary of State.

#### **2 SEGRO'S OBJECTION TO THE CPO**

- 2.1 SEGRO submitted a written objection to the making of the Order on 28 October 2020.
- 2.2 SEGRO's objections to the Order can broadly be summarised as follows:
  - (a) Ground One — MOPAC has failed to demonstrate that it has made all reasonable efforts to engage with SEGRO to acquire the Order Land by agreement.
  - (b) Ground Two - MOPAC has failed to demonstrate that the entirety of Order Land is required for the claimed statutory purpose and that there is no alternative site(s) or alternative means which would serve MOPAC's stated needs for the same purpose equally instead of seeking powers to acquire compulsorily the land of an unwilling landowner.
  - (c) Ground Three — MOPAC has failed to provide any or any substantive information as to the sources of funding available for acquiring the land.
  - (d) Ground Four — MOPAC has in overall terms failed to demonstrate a compelling case in the public interest to acquire the relevant land for the purposes claimed and which are proportionate interference with SEGRO's rights under Article 1 of the First Protocol of the European Convention on Human Rights,

### **3        MAINTENANCE OF OBJECTION**

- 3.1        SEGRO has reviewed MOPAC's Statement of Case and does not consider that it provides any further justification for the making of the CPO beyond that previously submitted.
- 3.2        Accordingly, SEGRO maintains all four grounds of objection as outlined in its letter of objection and will be presenting evidence at the inquiry in support of those grounds.
- 3.3        SEGRO will continue to explore suitable settlement options with MOPAC. SEGRO notes that the parties met on Friday 26 March 2021.

**30 March 2021**