

**RE: LAND AT THE STONEGATE HOUSING ESTATE, WILLENHALL,  
WALSALL, WEST MIDLANDS (THE FORMER WILLENHALL TOWN GAS  
WORKS SITE)**

**ENVIRONMENTAL PROTECTION ACT 1990, SECTION 78L(1)**

**CONTAMINATED LAND (ENGLAND) REGULATIONS 2006, REGULATION 8**

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**NOTICE OF APPEAL**

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**To:** Planning Inspectorate  
Environmental Appeals Team  
Room 3/25 Hawk Wing  
Temple Quay House  
2 The Square  
Bristol BS1 6PN  
Tel: 0303 444 5584  
Email: [environment.appeals@pins.gsi.gov.uk](mailto:environment.appeals@pins.gsi.gov.uk)

**Name of Appellant:** Jim 2 Limited

**Address:** Company Secretary  
Registered Office  
Jim 2 Limited  
Gate House  
Turnpike Road  
High Wycombe  
Buckinghamshire  
HP12 3NR

1. The Appellant appeals against the Remediation Notice (“the Notice”), dated 17 March 2015, which was served on the Appellant on 19 March 2015 by Walsall Metropolitan Borough Council (“the Council”) in respect of Land at the Stonegate Housing Estate, Willenhall, Walsall, West Midlands (“the Land”). A copy of the Notice is lodged with this Notice of Appeal.
2. The grounds on which the Appellant appeals against the Remediation Notice are appended to this Notice.
3. The Appellant wishes the appeal to be in the form of a hearing. The reason for this is that the appeal raises complex issues of a legal, technical and factual nature which require to be tested in evidence and to the subject of formal submissions.
4. In accordance with Regulation 8(2)(a)(i), (iii) and (iv) of the Contaminated Land (England) Regulations 2006, the Appellant has served copies of this Notice and of the Remediation Notice on the following:
  - (1) The Council.
  - (2) All freeholders, leaseholders and occupiers of land and premises detailed in Schedule 5 to the Notice (“Names and addresses of persons whose consent is required for remediation purposes”) whose names and addresses appear in that Schedule.
  - (3) The Leaseholders listed at the Annex to the Grounds of Appeal, who are named as appropriate persons and whose names and addresses are:
    - Richard Warwick and Rosalind Mary Warwick of 15 Brookthorpe Drive, Willenhall WV12 4TX and Flat 7, Broome Court, Water Orton Road, Castle Bromwich, Birmingham
    - Colin Peter Pickering and Marie McCourt of 32 Brookthorpe Drive, Willenhall, WV12 4TX and 16 Starcross Road, Acocks Green, Birmingham
    - Brian Frederick Carter and Dorothy Joyce Carter of 38 Brookthorpe Drive, Willenhall WV13 3TX and 6 Walkers Heath Road, Kings Norton, Birmingham
    - John William Whitehouse and Jacqueline Anne Whitehouse of 3 Oakridge Close, Willenhall WV12 4EN and 7 Hilton Road, New Invention, Willenhall

- Graham Thomas Fowler and Irene Joyce Fowler of 11 Brookethorpe Drive, Willenhall WV12 4TX
- (4) Aggregate Industries UK Limited as parent of E Fletcher Builders Limited, named as an appropriate person in the Grounds of Appeal, at Bardon Hall, Copt Oak Road, Markfield, Leicestershire LE67 9PJ and also by way of notice to DLA Piper UK LLP, 1 St Paul's Place, Sheffield, S1 2JX.
- (5) Triton Investments Limited, named as an appropriate person in the Grounds of Appeal, at 1 Theobald Court, Theobald Street, Borehamwood, Hertfordshire WD6 4RN and care of Westbury, 2<sup>nd</sup> Floor, 145-147 St John Street, London EC1V 4PY.
- (6) Shenstone Properties Limited, named as an appropriate person in the Grounds of Appeal, at Devonshire House, 60 Goswell Road, London EC1M 7AD and also at Minster Cottage, Minster Pool Walk, Lichfield, Staffordshire WS13 6QT.

Dated: 7 April 2015

Signed:

A handwritten signature in black ink that reads "Squire Patton Boggs (UK) LLP". The signature is written in a cursive, flowing style.

Squire Patton Boggs (UK) LLP

