

IN PARLIAMENT
HOUSE OF COMMONS
SESSION 2005-06

Crossrail Bill

Against – on Merits – Praying to be heard by Counsel, &c.

To the Honourable the Commons of the United Kingdom of Great Britain and Northern Ireland in Parliament assembled.

THE HUMBLE PETITION of AXA SUN LIFE PLC

SHEWETH as follows:-

- 1 A Bill (hereinafter referred to as "the Bill") has been introduced and is now pending in your honourable House intituled "A Bill to make provision for a railway transport system running from Maidenhead, in the County of Berkshire, and Heathrow Airport, in the London Borough of Hillingdon, through Central London to Shenfield, in the County of Essex, and Abbey Wood, in the London Borough of Greenwich; and for connected purposes".
- 2 The Bill is promoted by Her Majesty's Government.
- 3 (a) Clause 1 authorises the construction and maintenance of the works for the delivery of the railway transport system, which is known as Crossrail Line 1. The works are listed in Schedule 1 and shown on the plans and sections deposited with the Bill.
(b) Clauses 2 and 3 authorise ancillary works and give effect to Schedules 2 and 3 respectively.
(c) Clause 5 and Schedule 5 enable the nominated undertaker for Crossrail to take temporary possession of land in connection with the Crossrail works.
(d) Clause 6 authorises the Secretary of State compulsorily to acquire so much of the land within the limits shown on the plans and sections accompanying the Bill as may be required for the Crossrail works. Clause 6(3) and Parts 2 and 3 of Schedule 6 apply certain legislation relating to compulsory purchase compensation, subject to modification. The

power of compulsory acquisition is subject to a five year time limit, extendable by order of the Secretary of State.

- (e) Clause 7 provides, among other things, authority for the Secretary of State by further compulsory purchase order to acquire land outside the limits shown on the plans and sections or land within the limits but not subject to the powers under clause 6, if required in connection with the Crossrail works.
- (f) Clause 8 extinguishes private rights of way over land within the limits of deviation and within the limits of land acquired and held in connection with the authorised works.
- (g) Clause 10 provides for the grant of deemed planning permission for development authorised by the Bill and Clause 10(5) in particular applies Schedule 7 which sets out certain controls in favour of local planning authorities over detailed aspects of the Crossrail works.
- (h) Clause 11 provides that deemed planning permission for the scheduled works will be subject to a 10 year time limit, extendable by order of the Secretary of State.
- (i) Clause 19 modifies Sections 60 and 61 of the Control of Pollution Act 1974 so that appeals relating to control of noise from construction sites are dealt with by the Secretary of State or through arbitration as opposed to the Magistrate's Court.
- (j) Clause 20 prohibits an order being made by the Court in the event that any proceedings are brought by a person aggrieved by a statutory nuisance, in circumstances where (a) the nuisance complained of is noise emitted from premises or noise emitted by vehicles machinery or equipment in a street and (b) these arise in consequence of the exercise of powers under the Bill in accordance with notices or consents issued under the Control of Pollution Act 1974.
- (k) Clauses 45 and 46 make provision for transfer schemes and nomination of undertakers respectively.
- (l) Clause 47 and Schedule 12 disapply and modify certain statutory controls.
- (m) Clause 50 applies Section 10(1) Compulsory Purchase Act 1965 (compensation for injurious affection) subject to the proviso that liability for compensation for land injuriously affected by the Crossrail works falls to the nominated undertaker, as opposed to the Secretary of State.
- (n) Clause 54 provides a power to modify deposited plans or the book of reference if they are inaccurate.

INTRODUCTORY

- 4 Your Petitioner is a life assurance company, covering group and personal pensions, life assurance, and investment bonds. Your Petitioner was formed in 1997 following the merger between Sun Life Group and AXA Equity & Law. Your Petitioner holds a variety of investments including a number of property interests in London. In particular, Your Petitioner owns the freehold interest in Candy

House, 20-21 The Mall, Ealing and holds a contractual interest in respect of part of the warehouse and distribution park known as Isis Reach, Belvedere.

5 Clause 6 of the Bill authorises the compulsory acquisition of part of Candy House (identified as plot 145 in the Book of Reference).

6 In addition Your Petitioner understands that the following plots at Isis Reach, Belvedere are identified for acquisition, which may affect Your Petitioner's interests:

(a) 81, 82, 83, 84, 85, 86, and 87 - part of the privately maintained highway known as Norman Road, Belvedere;

(b) 92 and 93 - part of the estate road between Norman Road/Picardy Manorway and Manor Wharf, Belvedere

7 At Belvedere the works authorised by the Bill include the widening of Norman Road to facilitate access by construction vehicles, the use of the estate road by construction vehicles, the setting up of a handling site at the northern end of Norman Road for excavated material, the construction of a conveyor loading system from the handling site to Manor Wharf and the refurbishment of the Manor Wharf jetty. Your Petitioner understands that the purpose of the works is to provide a removal facility for fill material and spoil from the Plumstead railway goods yard which will form the portal site for the proposed tunnel under the River Thames. Your Petitioner understands that material will be loaded onto road hoppers at the goods yard and taken eastwards along Picardy Manorway and via Norman Road or the estate road to the excavated material handling site. From here the material will be loaded onto barges from the refurbished jetty using the conveyor system and taken for disposal at licensed sites in Essex. The period during which this facility is likely to be required is approximately 2 years and 6 months and may be operational 24 hours a day. Your Petitioner understands that the estimated number of lorry movements associated with the facility is 480 to 520 each day (or a total of 240 to 260 trucks).

8 To the rear of Candy House, the proposed works include extension of the existing mainline platforms at Ealing Broadway station in order to accommodate the Crossrail trains. This forms part of a programme of work to provide a reconstructed station at Ealing Broadway. Your Petitioner understands that at the eastern end of the extended platforms a footbridge will also be constructed providing an interchange facility between platforms and a means of emergency escape. Furthermore in order to facilitate emergency escape from the railway Your Petitioner understands that a deck will be constructed at the base of the footbridge on top of the existing embankment between the railway and Your Petitioner's property. From there, Your Petitioner understands that a permanent route will be created via a gated access at the railway boundary along plot 145 to The Mall.

9 Your Petitioner understands that in order to erect the footbridge temporary possession will be taken of plot 145 and the adjoining land to the east (identified as plot 146 in the Book of Reference). This will enable a crane and construction vehicles to be brought to the work site from The Mall. Your Petitioner understands that the duration of these works is likely to be approximately 9 months

depending on railway possessions and the need for alterations to railway services. However, the overall works programme at Ealing Station is likely to take approximately 2 years. The Bill also authorises the acquisition of plot 144 which forms part of the public highway at The Mall along part of the frontage to Your Petitioner's property. Your Petitioner understands that this area of highway may be stopped up temporarily to accommodate the works.

- 10 Your Petitioner is not certain that other properties in which it maintains an interest are unaffected by the works and Your Petitioner may wish to raise further objections and concerns in relation to such properties.
- 11 Your Petitioner and its rights, interests and property are injuriously affected by the Bill. Your Petitioner does not object to the principle of the proposed railway transport system. However, Your Petitioner is greatly concerned by the provisions of the Bill as they may affect its properties. For this reason and having regard to the more detailed particulars referred to below, Your Petitioner objects to the Bill.

Isis Reach, Belvedere

- 12 Your Petitioner questions whether the need for the spoil removal facility in this location has been demonstrated. No justification is given by the Promoter. Furthermore, there is no evidence that alternative means of spoil removal have been explored and no reasons are given why alternative means were rejected. Your Petitioner seeks removal of the provision within the Bill which authorises the acquisition of plots at Isis Reach for this purpose.
- 13 Your Petitioner is extremely concerned about the potential effects of the proposed facility and the absence of a full assessment of those effects. In particular, the Environmental Statement accompanying the Bill fails to assess the impact of the proposed lorry movements on the existing use and capacity of Norman Road, the estate access road (off which the part of the site in which Your Petitioner is interested is located), the junction with Picardy Manorway and the surrounding road network. There is no indication that baseline traffic conditions have been assessed, there is no detailed assessment of the likely impact of the facility on such conditions and no consideration is given to specific mitigation measures that may be required.
- 14 Your Petitioner submits that that Norman Road, the estate road and in particular the junction with Picardy Manorway are operating close to capacity with frequent periods of congestion; the existing occupiers of the Isis Reach warehouse and distribution park already generate approximately 900 lorry movements per day. Furthermore, no assessment appears to have been undertaken of the cumulative effects of both the Crossrail works and the proposed energy from waste generating station at Norman Road, Belvedere, which is currently the subject of an application by Cory Environmental Limited under the Electricity Act 1989 and Town and Country Planning Act 1990. The inquiry into this application has been re-opened in order to reassess the proposed generating station in light of Crossrail. Your Petitioner submits that before the Bill is passed with provision for the acquisition of any part of Isis Reach, Belvedere and for the authorisation of the spoil removal facility, the Crossrail proposals must themselves be assessed for their cumulative impact in conjunction with the proposed generating station.

- 15 Your Petitioner seeks protection from the adverse consequences of the spoil removal facility. In particular, should the facility be shown to be necessary and the relevant provision retained in the Bill, Your Petitioner submits that provision should be made for the Promoter and the nominated undertaker to consult fully with and be personally bound to Your Petitioner in relation to any proposed traffic movements over or in the vicinity of Your Petitioner's property. Further Your Petitioners submit that any proposed use of Norman Road, the estate access road and the junction with Picardy Manorway should be subject to comprehensive restrictions requiring the Promoter or nominated undertaker only to operate vehicles at agreed times and routinely to undertake wheel-cleaning, road cleaning, road maintenance and all other measures required in order to mitigate the effects of construction traffic. Your Petitioner seeks provision within the Bill and further or alternatively binding assurances in this respect.

Candy House, Ealing

Impacts on Investment Strategy

- 16 Your Petitioner questions the need and justification for maintaining a work site in this location and for providing a temporary means of access to the works site and a permanent means of escape through Your Petitioner's property. Your Petitioner requires the Promoter to give consideration to alternative locations for work sites, temporary access and means of escape and to select such alternatives in preference to the current proposals. Your Petitioner seeks removal of the provisions within the Bill which authorise the acquisition of its property for purposes connected with the proposed works.
- 17 Your Petitioner's property is currently in use as offices. The existing lease of the property will determine in October 2005 when the property will become vacant. Your Petitioner fears that the property is already suffering significant blight due to the provisions of the Bill. Your Petitioner is concerned that due to the compulsory acquisition of part of the property and the works proposed in close proximity to the property, there will be little or no tenant interest in the offices. Your Petitioner anticipates that the offices will be unlettable as a result of the proposals and that it will be impossible to secure a tenant for any significant period of time. Your Petitioner seeks provision for full compensation in respect of the blight effect of the proposals and associated loss of future rental income and further or alternatively requires the Promoter to be bound personally to Your Petitioner to indemnify Your Petitioner in this regard.
- 18 On 8 July 2005 Your Petitioner applied to the London Borough of Ealing for planning permission to develop the property by demolition of the existing building and provision of a new mixed use commercial and residential building. Notwithstanding Your Petitioner's concerns regarding the necessity of the proposed acquisition of interests in Your Petitioner's property and the proposed works to the rear, Your Petitioner has included in the design for the development, a means of permanent escape for use in connection with the proposed railway. Your Petitioner has incurred considerable expenditure in preparing and submitting the planning application.
- 19 Your Petitioner is greatly concerned that the proposed acquisition and use of Your Petitioner's property as provided for in the Bill is causing uncertainty regarding the timing and delivery of the proposed development and will hinder or delay the grant of planning permission by the local planning

authority. In particular, the works proposed by the Bill and the extent of compulsory acquisition which is authorised are not particularised in sufficient detail to enable Your Petitioner or the London Borough of Ealing to ascertain the likely actual interface between the proposed development of the property and the authorised works. Even were planning permission to be granted, Your Petitioner is extremely concerned by the possibility that restrictions will be placed on the planning permission, taking account of the works proposed in the Bill, which will be unworkable. Further, Your Petitioner is concerned that the proposed development will be unmarketable due to the uncertainty regarding the extent of acquisition and the interface with the works proposed by the Bill.

20 Such interference with Your Petitioner's rights and interests is not justified and is unnecessary. Your Petitioner seeks removal of the provisions within the Bill which authorise the works in the vicinity of Your Petitioner's property and the acquisition of interests in Your Petitioner's property. Further or alternatively, Your Petitioner seeks provision within the Bill (and further or alternatively requires the Promoter to be bound personally to Your Petitioner) to require the Promoter:

- (a) to particularise and be bound to the detail of the specific works on and in the immediate vicinity of Your Petitioner's property including the specification and timing of construction activities and required machinery and plant;
- (b) to undertake the proposed works on and in the vicinity of Your Petitioner's property on detailed terms to be agreed with Your Petitioner regulating the impact on and interface with Your Petitioner's proposed development;
- (c) to indemnify fully Your Petitioner against all and any costs, claims, damages, losses and expenses arising from the proposed works on and in the vicinity of Your Petitioner's property including but not limited to any matters arising from the interface between the proposed works and the construction of the proposed development, the blight effect of the proposed works and the resulting delay to the proposed development and the inability to market it successfully and any adverse effects on the value of Your Petitioner's proposed development.

General Construction Impacts

21 Whether or not Your Petitioner is successful in obtaining planning permission for the proposed development Your Petitioner is greatly concerned by the environmental effects of the works in the vicinity of its property and in particular noise and vibration from the proposed construction activities at the work site to the rear of the Property. Your Petitioner's property includes sensitive office uses at each level and the proposed development includes both commercial and residential uses. Your Petitioner is concerned that these uses will be adversely affected and that the revenue they generate and tenant interest will be significantly reduced.

22 The Environmental Statement accompanying the Bill acknowledges that will be significant temporary noise impact on Your Petitioner's property. However, Your Petitioner considers that there is inadequate data to ascertain the likely actual noise and vibration effects at Your Petitioner's properties. In particular, inadequate consideration is given by the Promoter to the perceived

nuisance effects of both vibration and noise. Your Petitioner submits that the Promoter should not be permitted to interfere with your Petitioner's rights and interests unless and to the extent that comprehensive assessments of the specific likely effects at Your Petitioner's property have been undertaken, demonstrating that with effective mitigation measures to which the Promoter is bound there will be no significant impacts.

- 23 A further concern to your Petitioner is the visual impact of the proposed works on Your Petitioner's property. Your Petitioner is concerned that the work site to the rear of the property will adversely affect visual amenity and deter tenants. This is not recognised in the Environmental Statement accompanying the Bill and Your Petitioner considers that inadequate consideration has been given to this aspect of the works and the mitigation measures to deal with it.
- 24 Your Petitioner is also extremely concerned by the likely amounts of dust that will be generated by the construction activities in the vicinity of Candy House and the effects of this on the environmental quality of the area around Your Petitioner's property and the maintenance requirements for the property and associated plant.
- 25 The Promoter recognises that adverse environmental effects will be caused by the construction of the works and proposes a code of construction practice, a series of individual agreements under the Control of Pollution Act 1974 and statements of policy to which the Promoter is to adhere. Your Petitioner is concerned that none of these measures will take into account the particular circumstances and character of Your Petitioner's property.
- 26 Your Petitioner requires the Promoter fully and properly to explore the environmental effects of the construction of the works on Candy House and that provision be made for all necessary mitigation measures specific to Your Petitioner's property to be employed. Your Petitioner requires the Promoter to be bound personally by a specific code of practice for works in the vicinity of Your Petitioner's properties in order to mitigate and regulate all environmental effects and operational impacts.
- 27 Your Petitioner is extremely anxious about the potential operational impacts of the works in the vicinity of its properties and in particular:
- (a) Services diversions and potential interruption to supply;
 - (b) Closure of highways or parts of highway, diversions and other restrictions or modifications to road access;
 - (c) General disruption to traffic circulation from as early as the site preparation works.
- 28 Each of these impacts will have a significant adverse effect on Candy House. Your Petitioner therefore seeks protection in relation to all operational consequences of construction activities in order to ensure that its properties may function as normally as possible during the works. Of particular concern is the potential interruption of access to the rear of Your Petitioner's property, including parking spaces, arising from use of plot 145 (forming part of the property) and plot 144 (forming part of The Mall).

Operational railway impacts

- 29 Your Petitioner is greatly concerned by the impacts on its property of the operational railway including additional noise and vibration from the running of Crossrail trains and the use of the extended platforms and seeks protection against such impacts through provision in the Bill or binding assurances from the Promoter.
- 30 In particular, your Petitioner is apprehensive about the future use of plot 145 which forms part of the property. Your Petitioner understands that the proposed use is for temporary construction access and thereafter emergency escape but the provisions within the Bill for compulsory acquisition of this land neither limits the nature of the interest to be acquired nor restricts the purposes of such acquisition. In the context of Your Petitioner's aspirations for the redevelopment of the property Your Petitioner submits that the uncertainty that the unrestricted power of acquisition creates for Your Petitioner is unacceptable and unnecessary.
- 31 Your Petitioner seeks further provision with the Bill and further or alternatively binding undertakings from the Promoter limiting the use of the power of acquisition of plot 145 to temporary construction access and thereafter emergency escape only and restricting the power of acquisition to a right to use through lease or licence, in both instances on terms to be agreed with Your Petitioner including the precise route of any permanent means of escape.

Ambit of powers

- 32 Powers sought to be conferred on the Promoter by the Bill are extremely wide and Your Petitioner submits that such powers ought to be more constrained in the interests of Your Petitioner and other landowners.
- 33 In particular, clause 7 authorises the Promoter to acquire compulsorily land outside the limits of deviation for the scheduled works and outside the limits of land to be acquired or used, where it is required for or in connection with the works authorised by the Bill or otherwise for or in connection with the proposed railway system.
- 34 Your Petitioner respectfully submits that such powers, particularly in the context of Central London, are unacceptably wide and threaten to blight property, including its own interests, in the immediate vicinity of the limits of deviation. Further express authority for the acquisition of land outside the limits should be necessary, and considered only in specific instances on its merits and given only if acquisition is proven at the relevant time to be necessary for the construction of the railway system.
- 35 Your Petitioner is also concerned that the provisions in the Bill for renewal of compulsory purchase powers and planning permission (clauses 6(7) and 11(2) respectively) are too widely drawn and prolong the period of blight suffered by your Petitioner's properties and others. Whilst the renewal of compulsory acquisition powers is subject to special Parliamentary procedure, your Petitioner submits that greater protection should be given to owners and occupiers of land affected by the proposed works through regulation of the circumstances in which such renewal may be ordered. In the event that the validity of the powers or the planning permission is extended, Your Petitioner seeks provision for affected landowners and occupiers to be consulted and to be given the opportunity to

make representations. Your Petitioner submits that as it currently stands the Bill fails to provide for such matters. This is a significant omission. During the time limit for compulsory acquisition powers (5 years) and for implementation of planning permission (10 years) circumstances can change significantly and so too the impact of the exercise of such powers or the implementation of such permission. It is essential that impacts should be comprehensively reassessed. Your Petitioner submits that the same considerations should apply to the power to correct deposited plans (Clause 54).

36 Your Petitioner is also concerned by the absence of any specific provision to compel the Promoter to implement mitigation measures identified in the Environmental Statement accompanying the Bill. Failure to include such provision will, your Petitioner submits, be contrary to the purposes of Council Directive 85/337/EC, as amended by Council Directive 97/11/EC.

37 Your Petitioner also submits that such compulsion should include an express obligation on the Promoter to undertake specific measures to limit structural and other damage to properties along the route of the works including Your Petitioner's properties. Such measures should include establishing a schedule of condition prior to commencement of the works, the incorporation of specific measures agreed with owners of the affected properties in order to strengthen and protect individual buildings, continuous monitoring of properties during the course of the works, a revised schedule of condition following completion of the works and regular monitoring of properties in the first few years of railway operation. Without such provision, there is inadequate protection for landowners and occupiers against the potential effects of the works.

Compensation provision

38 Your Petitioner further submits that provisions within the Bill regarding compensation in respect of compulsory acquisition and other matters are not sufficient to compensate Your Petitioner adequately for the loss, damage and inconvenience, which it may suffer as a result of the construction and subsequent use of the proposed railway system. Your Petitioner seeks further provision within the Bill and further or alternatively binding undertakings from the Promoter indemnifying Your Petitioner against losses costs and damage caused by the adverse effects of the proposed works, particularly during the construction period.

39 Of particular concern to your Petitioner is any instance where, notwithstanding the powers provided for in the Bill it is ultimately considered unnecessary to acquire compulsorily any part of a particular property and yet such property is nonetheless adversely and injuriously affected by the construction of the proposed works and the operation of the railway system. In those circumstances the compensation provisions within the Bill are inadequate.

40 Your Petitioner submits that the Bill should be amended in this respect to ensure that Your Petitioner is entitled to claim compensation in such circumstances for structural damage to property caused by the execution of the works, for interference with rights and for injurious affection caused by the execution of works and the subsequent operation of the railway system. Your Petitioner seeks provision to enable such claim to be made separately from any claim for compensation in respect of the acquisition of land or interests from your Petitioner under the powers of compulsory acquisition in

the Bill. Furthermore, your Petitioner submits that any such claim should be permitted at any time before the expiry of 5 years following the opening of the proposed railway system for use by members of the public.

41 Further, to the extent that the powers under the Bill are not exercised following its enactment, your Petitioner's properties may suffer blight and your Petitioner submits that there is no or alternatively that there is inadequate provision within the Bill for compensating your Petitioner in this regard.

42 Your Petitioner submits that provision should also be made within the Bill to enable your Petitioner to recover its own reasonable expenditure including the full costs of making good any damage to the structure of any of Your Petitioner's properties caused by the proposed works, the full cost of any works undertaken in mitigation of the proposed works and your Petitioner's costs in co-operating with the Promoter and in participating in the Parliamentary process or in anticipation thereof. Your Petitioner also seeks the inclusion of provisions within the Bill to compel the Promoter to indemnify owners and occupiers of interests in affected properties from losses claims and demands suffered in consequence of the construction, use or maintenance of the works or any act or omission of the Promoter and the nominated undertaker including their contractors and agents.

Environmental Impact Assessment

43 Your Petitioner responded to the request by the Promoter for comments on the Environmental Statement accompanying the Bill. However, Your Petitioner submits that the Environmental Statement is deficient in several respects and therefore fails to satisfy the requirements of Council Directive 85/337/EC, as amended by Council Directive 97/11/EC. In particular:

- (a) There is inadequate description of the likely significant effects of the project, particularly the specific effects in the vicinity of Your Petitioner's properties and no consideration given to direct and indirect effects - for example the effect on trade/local economy.
- (b) Insufficient data has been provided in order to identify and assess the main effects of the works, particularly in the vicinity of your Petitioner's properties.
- (c) There is insufficient detail of proposed mitigation measures, no assessment of their effectiveness in avoiding reducing or remedying significant environmental effects and no provision within the Bill compelling the Promoter to undertake identified mitigation measures.
- (d) There is insufficient analysis of alternatives in the context of each work section and no analysis of alternative methods of construction, alternative configurations and alternative locations for the proposed work sites and permanent works.

Human Rights

44 Your Petitioner submits that in its current form and without further amendment or provision as sought by your Petitioner, the Bill is incompatible with the right of your Petitioner peacefully to enjoy its properties and to carry on trade or business. The Bill would unfairly interfere with such right contrary to Article 1 of Protocol 1 to the European Convention on Human Rights and fails to provide Your

Petitioner with sufficient right of participation in future determinations of your Petitioner's rights (for example in relation to the extension of the time limit for planning permission) contrary to Article 6 of the Convention. In particular, in Your Petitioner's submission, the wide and extendable powers available to the Promoter and the inadequate provision for compensation in the particular circumstances with which Your Petitioner may be presented renders the Bill incompatible with the Convention.

CONCLUSION

- 45 For the foregoing and connected reasons Your Petitioner respectfully submits that, unless the Bill is amended as proposed above, the Bill should not be allowed to pass into law.
- 46 There are other clauses and provisions of the Bill, which, if passed into law as they now stand will prejudicially affect your Petitioner and its rights, interests and property and for which no adequate provision is made to protect Your Petitioner.

YOUR PETITIONER therefore humbly prays your Honourable House that the Bill may not be allowed to pass into law as it now stands and that it may be heard by its Counsel, Agents and witnesses in support of the allegations of this Petition against so much of the Bill as affects the property, rights and interests of Your Petitioner and in support of such other clauses and provisions as may be necessary or expedient for their protection and benefit, or that such other relief may be given to your Petitioner in the premises as your Honourable House shall deem meet.

AND your Petitioner will ever pray, &c.

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PETITION OF AXA SUN LIFE PLC

AGAINST, By Counsel, &c.

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