

## PETITION

**IN PARLIAMENT  
HOUSE OF COMMONS  
SESSION 2005-06**

### **CROSSRAIL BILL**

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

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

### **THE HUMBLE PETITION OF TAG INVESTMENT AND PROPERTY COMPANY LIMITED**

SHEWETH as follows:-

1. A Bill (hereinafter referred to as 'the bill') has been introduced and is now pending in your Honourable House entitled the 'Crossrail Bill'.
2. The bill is a hybrid bill and promoted by The Department of Transport and Crossrail London Rail Links Limited. The Preamble to the Bill recites that it is 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'.
3. The objection is made against the following Sections and any other Section which may be detrimental to your Petitioner.
  - Section 5, 'Temporary Possession and use of land'.
  - Section 6, 'Acquisition of land within limits shown on deposited plans'.
  - Section 50, 'Compensation for injurious affection'.
4. Your Petitioner, Tag Investment and Property Company Limited, is a private property investment company and the owner of the property at number 78, Cowcross Street, described in Schedule A and B of the Notice to Owners, Lessees and Occupiers as number 40 in the London Borough of Islington in Greater London.
5. Your Petitioner and it's property is injuriously affected by the Bill, to which your Petitioner objects for reasons amongst others, hereinafter appearing.

6. The property at 78 Cowcross Street is an investment property and currently leased to tenants up until the year 2013. Schedule A of the Notice details the acquisition of 'subsoil beneath block of offices, archway, car park, steps, areaway, basement, cellar and premises (78, Cowcross Street) including subsoil beneath adjoining public highway (Cowcross Street)'. Schedule B of the Notice refers to the acquisition of 'Subsoil only at a depth of 9 metres or more below the surface of the ground'.
7. Your Petitioner objects to the Bill because any compulsory purchase price offered will not compensate for the possible loss or partial loss of the property, and disruption, with regard to future rents and property value, envisaged by the notice or future necessity to complete construction of the transport network.
8. Your Petitioner also alleges that, if only a partial acquisition is enforced, during the course of construction, the commencement of which, it is noted from Schedule 11, could be delayed for 10 years or more, the surrounding works, noise and dirt associated with a building site will severely effect the property's leasing prospects. The sale of the remaining property prior to and over the period of construction would be similarly prejudiced.
9. The provisions of the Bill, if passed into law as they now stand, will prejudicially affect your Petitioner's property interests, for which no adequate provision is made to compensate your Petitioner for loss of investment income and capital growth both now and in the future.
10. Your petitioner accordingly submits that, in addition to any compulsory purchase price, provision be made to award further compensation for loss for reasons, amongst others, hereinafter appearing.
11. Your Petitioner submits that provision be made to indemnify for loss of rents, at rates to include current and future rent reviews based on expectation and not resulting from rates both due to the pending inception and carrying out of the Crossrail construction project.
12. Your Petitioner further submits that provision be made to indemnify against any shortfall in capital realisation based on expectation and not resulting from a lower value both due to the pending inception and carrying out of the Crossrail construction project.
13. Your Petitioner also submits that provision be made to award compensation should any rights of way be obtained over the Petitioner's private property and should any use be made of the Petitioner's private property prior to and during the Crossrail construction project. In addition, costs, both to return the private property to its original state at the conclusion of its use in connection with the project, and to reasonably maintain the area of the private property in use during the Crossrail construction project, be fully reimbursed.

14. Your Petitioner's continued submission is that provision be made to reimburse any additional costs incurred in connection with any detriment suffered to the property or by the owners, lessees, or occupiers of the property as a result of the Crossrail construction project.

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 they may be heard by their Agent in support of the allegations of this Petition against so much of the bill that effects the property interests of your Petitioner and in support of such other clauses and provision as may be necessary or expedient for their protection, or that such other relief may be given to your Petitioner as your Honourable House shall deem meet.

AND your Petitioner will ever pray, &c.