

IN PARLIAMENT  
HOUSE OF COMMONS  
SESSION 2005-6

**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 ALLPOINT PACKAGING LIMITED**

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 presented by Mr Secretary Darling supported by The Prime Minister, Mr Chancellor of the Exchequer, Secretary Margaret Beckett, Mr Secretary Hain, Secretary Alan Johnson, Secretary Tessa Jowell, and Derek Twigg.
- 3 Clause 1 of the Bill authorises the nominated undertaker to construct and maintain the works necessary for Crossrail. Schedule 1 lists the scheduled works.
- 4 Clause 2 brings into effect Schedule 2 which contains additional provisions about the works.

- 5 Clause 5 of the Bill gives effect to Schedule 5 which contains provisions for the temporary possession and use of the land required for the project.
- 6 Clause 6 authorises the Secretary of State to acquire compulsorily the land within the limits shown on the deposited plans. It also brings into effect Schedule 6. Part 1 of this Schedule lists the purposes for which certain parcels of land may be acquired or used, and Parts 2 and 3 deal with the application of compulsory purchase legislation.
- 7 Clause 50, which deals with compensation for injurious affection, provides that section 10(1) of the Compulsory Purchase Act 1965 shall have effect.
- 8 Your Petitioners, Allpoint Packaging Limited (Allpoint Packaging), were incorporated as a company in 1995. They operate a business which supplies packaging to customers throughout England. Your Petitioners have premises in Hayes in the London Borough of Hillingdon, Southall in the London Borough of Ealing, and Basingstoke in the County of Hampshire. In Hayes, Allpoint Packaging are lessees of premises off Rigby Lane, Swallowfield Way, which they have occupied since 1988.
- 9 Your Petitioners, and their rights, interests and property are injuriously affected by the Bill, to which they object for the following reasons.
- 10 Your Petitioners' leasehold property in Hayes will be gravely affected if the Bill is passed into law and the Crossrail project is constructed. Work 3/11 of Schedule 1 of the Bill passes directly across the southern end of land (London Borough of Hillingdon, number 164 on deposited plans) that your Petitioners occupy, and across the footprint of a building that they own. The area covered by Work 3/11 is also within the limits of deviation of works numbers 3/13A, 3/13B, 3/13C, & 3/13D.

- 11 Your Petitioners also occupy the area of land identified as London Borough of Hillingdon, number 165 on the deposited plans, which forms part of the same leasehold property referred to in paragraph 10 above. Land no. 165 is identified in Schedule 6, Part 1 of the Bill as being land which may be acquired or used for the provision of a working site, access for construction and the diversion of public utilities apparatus.
- 12 Of the two areas of land mentioned in paragraphs 10 and 11 above, number 164 is to be compulsorily acquired, and your Petitioners have been informed that number 165, will be required for the duration of the construction works at Stockley fly-over. Taken together the two areas comprise the whole of your Petitioners' Hayes premises and without them they will be unable to operate their business which would lead to the loss of 31 jobs. Your Petitioners therefore need permanently to relocate to alternative premises which, subject to receiving full compensation, they are anxious to achieve as soon as reasonably practicable.
- 13 In seeking compensation your Petitioners draw particular attention to the special nature of their existing premises, which are equipped in a manner that enables them to control their more than 1,000 stock lines very efficiently, and the need for them to be able to find new premises that are suitable for a similar type of operation. A real concern is that suitable premises are hard to find, and that they will be compelled to pay a markedly higher rent than they do now rendering their business unviable.
- 14 An additional factor is that the premises at Hayes are supported by a subsidiary unit in Southall, about two miles from the Hayes site. In relocating it will be necessary to find premises as least as near to the Southall unit if the business is not to be further adversely affected. Your Petitioners draw attention to the fact that in calculating the compensation package it may be necessary to provide for a larger site than at present (one which would amalgamate the site at Southall with the

replacement site) if a new site to replace the Hayes unit cannot be found in sufficiently close proximity to the unit at Southall.

- 15 Allpoint Packaging therefore seeks assistance with the relocation process, and compensation for the loss of their existing lease such that any new site is in all ways equivalent to their existing one and the change does not result in greater financial cost to your Petitioners, including provision for a larger replacement site if it proves necessary to amalgamate their site at Southall with the replacement site for Hayes. Your petitioners also seek compensation for the new warehouse which they have erected on the southern portion of their existing site at Hayes, and the reimbursement of their disruption and relocation costs including those incurred in notifying their clients of the change.
- 16 For the above reasons your Petitioners respectfully submit that the Bill should not be allowed to pass into law until such time as full compensation has been agreed.
- 17 There are other clauses and provisions of the Bill which, if passed into law as they now stand will prejudicially affect your Petitioners and their rights, interests and property and for which no adequate provision is made to protect your Petitioners.

YOUR PETITIONERS therefore humbly pray 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 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 Petitioners and in support of such other clauses and provisions as may be necessary or expedient for their protection, or that such other relief may be given to your Petitioner in the premises as your Honourable House shall deem meet.

AND your Petitioners will ever pray, &c.

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PETITION OF  
ALLPOINT PACKAGING LIMITED

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AGAINST, By Counsel &c.