

AP 214

IN PARLIAMENT
HOUSE OF COMMONS
SESSION 2005-06

CROSSRAIL BILL

PETITION

Against the Additional Provision (No. 2) – 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:

HAMMERSON UK PROPERTIES PLC

SHEWETH as follows:—

- 1 A Bill (hereinafter referred to as “the Bill”) has been introduced into 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 the Secretary of State for Transport (hereinafter called “the Promoter”).

3 On 9 May 2006 the Promoter deposited certain amendments to the Bill, together with an additional Environmental Statement, revised plans and sections and a supplementary Book of Reference, collectively entitled “Amendment of Provisions May 2006” (hereinafter referred to as “the Additional Provision (No. 2)”).

4 Your Petitioners deposited a petition against the Bill in September 2005 (number 177) and a petition against the January 2006 Amendment of Provisions (number AP4). Your Petitioners and their rights, interests and property are injuriously affected by the Additional Provision (No. 2), to which your Petitioners object for reasons amongst others, hereinafter appearing.

Your Petitioners' further concerns

5 The Additional Provision (No. 2) seeks the following additional parcel of land for the purposes of the Bill

CITY OF LONDON

<u>Parcel</u>	86a
<u>Number</u>	
<u>Property</u>	Subsoil fronting Moor House, London Wall
<u>Interest</u>	Owner
<u>Effect</u>	Acquisition

6 The land belonging to your Petitioners is the subsoil below the street Moorfields adjacent to Moor House. Previously the land was only to be used for street works but is now the site of the altered diversion of the Moorgate sewer, which was previously to be rerouted to the west of Moor House.

7 Your Petitioners also understand that the alterations to the Farringdon-Barbican crossover mean that the Moorgate Shaft, which is within their building, will be used a year earlier than was previously the case.

8 Your Petitioners believe that the Bill and supporting environmental statements do not adequately mitigate these new construction effects of Crossrail on their land. Your Petitioners therefore request that the Promoter is not authorised to acquire any additional land from them, nor use the Moorgate Shaft for a longer period until your Petitioners are satisfied that the construction effects have been adequately mitigated.

General matters

9 As a general matter, your Petitioners submit that provision should be made for the Promoter to repay to your Petitioners all proper costs, charges and expenses (including the proper fees of such professional advisers as they may instruct) reasonably incurred in consequence of the Bill or of any provision made as a result of this Petition.

10 There are other clauses and provisions in the Bill which, if passed into law as they are now proposed, will prejudicially affect your Petitioners and their rights, interests and property and for which no adequate provision is made to protect your Petitioners.

Conclusion

11 Your Petitioners submit that, in the respects mentioned and in other respects, the Bill fails adequately to safeguard and protect the interests of your Petitioners and of their subsidiaries.

- 12 Your Petitioners therefore respectfully submit that insofar as it relates to the matters mentioned the Additional Provision (No. 2) should not be inserted in the Bill and the Bill should not be allowed to pass into law in its proposed form.

YOUR PETITIONERS THEREFORE HUMBL Y PRAY your Honourable House that the Bill may not be allowed to pass into law as it now stands or as is now proposed and that they may be heard by themselves, their Counsel, Agents and witnesses in support of the allegations of this Petition against so much of the Additional Provision (No. 2) as affects their property, rights and interests and in support of other such 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.

BIRCHAM DYSON BELL
Parliamentary Agents for
HAMMERSON UK PROPERTIES PLC