

Apr 2 15

IN PARLIAMENT

HOUSE OF COMMONS

SESSION 2005-2006

CROSSRAIL BILL

P E T I T I O N

Against the Additional Provisions – 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:

LONDON INTERNATIONAL EXHIBITION CENTRE PLC

SHEWETH as follows:-

- 1 A Bill (hereinafter referred to as the “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 Provisions”).

4 Your Petitioner deposited a petition against the Bill in September 2005 (number 173). Your Petitioner and its rights, interests and property are injuriously affected by the Additional Provisions, to which your Petitioner objects for reasons amongst others, hereinafter appearing.

Your Petitioner’s concerns

5 The Additional Provisions seek to acquire the following additional parcels of land for the purposes of the Bill in order to take account of a realignment of Seagull Lane, in the London Borough of Newham:

LONDON BOROUGH OF NEWHAM IN GREATER LONDON

Parcel Number 42a

Property Private road and footways (Seagull Lane)

Parcel Number 42b

Property Road and land (junction of Seagull Lane and Western Gateway)

6 Your Petitioner objects to the compulsory acquisition of these two parcels of land. The proposed acquisition and use of them will not address or ameliorate the concerns of your Petitioner set out in its original petition.

- 7 Your Petitioner's international exhibition venue holds a large number of major exhibitions and events throughout the year attracting a large number of vehicles. Seagull Lane provides access to your Petitioner's exhibition venue. It is an access route which is intrinsic to servicing the exhibition venue both in terms of deliveries to the venue and visitor access.
- 8 The nature of the preparation for such exhibitions and events requires twenty-four hour access to the exhibition site from Seagull Lane. Seagull Lane is intrinsic to the smooth operation of the venue itself and each exhibition, as well as issues of general access. The operation of your Petitioner's exhibition venue will therefore be severely prejudiced if the works proceed in the manner outlined and the functioning of its business will be adversely affected by the lack of access from Seagull Lane.
- 9 The loss of access from Seagull Lane would also have substantial implications for traffic flow around the vicinity. This would result in an increase in congestion, which would restrict the ability of your Petitioner to set up large scale events during the construction work and thereafter. This would have implications for the dynamism of the area in both the immediate and longer-term future. Since this increased traffic congestion would run in tandem with the reconstruction of Custom House station, both the road network and the public transport network providing access to the exhibition venue would be put under immense pressure simultaneously.
- 10 The Environmental Statement accompanying the Additional Provisions indicates that the proposed changes to the construction access routes do not change the assessment or proposed mitigation as set out in the Environmental Statement accompanying the Bill. The Environmental Statement accompanying the Bill makes clear the severe effects the acquisition of Seagull Lane will have on your Petitioner's business.
- 11 Your Petitioner contends that the Promoters have failed in their obligation to consult properly. There has been no consultation regarding the new parcels to be compulsorily acquired. Your Petitioner also submits that there has been inadequate consideration of alternative sites for the carrying out of the proposed works.

General matters

- 12 As a general matter, your Petitioner submits that provision should be made for the Promoter to repay to your Petitioner all proper costs, charges and expenses (including the proper fees of such professional advisers as it may instruct) reasonably incurred in consequence of the Bill or of any provision made as a result of this Petition. There are other clauses and provisions in the Bill which, if passed into law as they are now proposed, will prejudicially affect your Petitioner and its rights, interests and property and for which no adequate provision is made to protect your Petitioner.

Conclusion

- 13 Your Petitioner submits that, in the respects mentioned above and in other respects, the Bill fails adequately to safeguard and protect the interests of your Petitioner.
- 14 Your Petitioner therefore respectfully submits that insofar as it relates to the matters mentioned the Additional Provisions should not be inserted in the Bill and the Bill should not be allowed to pass into law in its proposed form.

YOUR PETITIONER THEREFORE HUMBLY PRAYS your Honourable House that the Bill may not be allowed to pass into law as it now stands or is now proposed and that it may be heard by itself, its Counsel, Agents and witnesses in support of the allegations of this Petition against so much of the Additional Provisions as affects its property, rights and interests and in support of other such clauses and provisions as may be necessary or expedient for its protection, 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.

BIRCHAM DYSON BELL
Parliamentary Agents for
LONDON INTERNATIONAL EXHIBITION CENTRE PLC