

**IN PARLIAMENT**

**HOUSE OF COMMONS**

**SESSION 2006 – 2007**

**CROSSRAIL BILL – ADDITIONAL PROVISIONS - WOOLWICH STATION**

**Against - On Merits - Praying to be heard by Counsel, &c**

**To the Honourable the Commons of the United Kingdom of Great Britain & Northern Ireland in Parliament assembled**

**THE HUMBLE PETITION of Dobbyman Investments Limited**

**SHEWETH as follows:-**

1. An Additional Provision to the Crossrail Bill has been introduced and is now pending in your Honourable House intituled Crossrail Bill – Amendment of Provisions (May 2007).
2. Your Petitioner is an owner of property at Unit 15 Gunnery Terrace, Cornwallis Road, The Royal Arsenal, Woolwich, London SE18 6SW, which the Additional Provisions to the Bill may directly and specifically affect.
3. Your Petitioner and its rights, interests and property are injuriously affected by the Bill, to which your Petitioner objects for reasons amongst others hereinafter appearing.
4. Your Petitioner objects to the Bill for the following reasons:  
The Additional Provision contains inter alia that the acquisition of your Petitioner's land is necessary for the provision of a working site and access for construction and operational purposes.
5. Your Petitioner is the owner of a lease 999 years from 1st July 2000, which lease was acquired by it on 25th October 2002 for the purposes of its business of warehousing and distribution of pet food.

6. Your Petitioner submits that the principal purpose for the acquisition of its property is not for or ancillary to the construction of the station but to provide the main contractor (Berkeley Homes, etc) with land on which it (Berkeley Homes) may construct homes and/or offices or other commercial properties, this being the quid pro quo arrangement for Berkeley Homes' agreement to construct the station at no cost to the public purse. Your Petitioner submits that such acquisition is inappropriate and an abuse of power, even if compensation is paid for the property's acquisition.
7. The result of the Additional Provisions if passed would be to permanently deprive your Petitioner of its business. The Amendment of Provisions if passed requires only the use of the land for access only for the provision of a working site and access for construction and operational purposes. The Additional Provisions therefore and the acquisition of your Petitioner's land is not fundamental or necessary to the actual construction but merely for access to aid construction. Your Petitioner accordingly submits that the Additional Provisions should not be passed in its current state and that even if the property was necessary for access during construction and operational purposes, it could be taken temporarily only and then returned to your Petitioner at the end of construction.
8. Your Petitioner therefore prays that the Amendment of Provisions may not be allowed to pass into law as it now stands and that it may be heard by its Officers, Counsel, Agent and Witnesses in support of the allegations of the Petition against so much of the Bill as affects the rights and interests of your Petitioner and in support of such other clauses, amendments or provisions as may be necessary or expedient for its 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**

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**AGAINST, By Counsel, &c**

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