

IN PARLIAMENT

HOUSE OF COMMONS

SESSION 2006-07

CROSSRAIL BILL

P E T I T I O N

Against the Additional Provision (No. 4) – 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:

PADDINGTON CHURCHES HOUSING ASSOCIATION LIMITED

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 16 May 2007 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 2007” (hereinafter referred to as “the Additional Provision (No. 4)”).

- 4 Your Petitioners are Paddington Churches Housing Association Limited, a registered charity (Company number IP17210R) in the business of acquiring, developing, letting, managing and selling affordable housing, and part of the Genesis Housing Group. Your Petitioners and their rights, interests and property are injuriously affected by the Additional Provision (No. 4), to which your Petitioners object for reasons amongst others, hereinafter appearing.

Your Petitioners’ concerns

- 5 The Additional Provision (No. 4) includes the following parcel of land near Pier Road in the London Borough of Newham.

LONDON BOROUGH OF NEWHAM

Parcel Number	282
Property	Land and premises, Pier Road
Ownership	Freehold
Effect	Acquisition

- 6 This parcel of land was included in the original Bill but has been included again because one of the Crossrail running tunnels, for which this land was to be taken, is to be realigned as a consequence of the provision of a station at Woolwich on the other side of the River Thames. The land concerned is proposed to be redeveloped by your Petitioners for the provision of housing and designs for this purpose have been produced and supplied to the Promoter.

- 7 Your Petitioners were informed by the Promoter before the lodging of the Additional Provision (No. 4) that the tunnel realignment consisted of the tunnel being lowered by between 70 centimetres and 2 metres, and that there 'should not' be any horizontal realignment, and that the Promoter would confirm this in due course.
- 8 No such confirmation has been received to date, and as your Petitioners are planning to develop their land very close to the land to be used for the Crossrail tunnels, they are obliged to lodge this petition to protect their position.
- 9 Your Petitioners require an assurance from the Promoter that the new tunnel alignment will not interfere with their plans for the site and if such an assurance is not forthcoming (or is not possible) then will seek from your Honourable House a requirement that the realigned tunnel will have no greater effect on your Petitioners' proposals than the previous alignment.
- 10 There are other clauses and provisions in the Bill proposed to be amended by Additional Provision (No. 4) which, if passed into law as they are now proposed, may 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 as proposed to be amended by Additional Provision (No. 4) fails adequately to safeguard and protect the interests of your Petitioners.

12. Your Petitioners therefore respectfully submit that insofar as it relates to the matters herein mentioned the Additional Provision (No. 4) should not be inserted in the Bill and the Bill should not be allowed to pass into law in its proposed form unless and until the matters raised by your Petitioners herein are addressed to their satisfaction, whether by further amendments to the Bill or otherwise.

YOUR PETITIONERS THEREFORE HUMBLY 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. 4) 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 Petitioners in the premises as your Honourable House shall deem meet.

AND YOUR PETITIONERS WILL EVER PRAY, &c.

BIRCHAM DYSON BELL LLP
Parliamentary Agents for
PADDINGTON CHURCHES HOUSING ASSOCIATION LIMITED

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12 June 2007