

IN PARLIAMENT
HOUSE OF COMMONS
SESSION 2005–06

CROSSRAIL BILL

P E T I T I O N

Against the Bill – 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:

ROYAL MAIL GROUP PLC
AND
POST OFFICE 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”).

Relevant clauses of the Bill

- 3 Clauses 1 to 20 of the Bill together with Schedules 1 to 9 make provision for the construction and maintenance of the proposed works including the main works set

out in Schedule 1. Provision is included to confer powers for various building and engineering operations, for compulsory acquisition and the temporary use of and entry upon land, for the grant of planning permission and other consents, for the disapplication or modification of heritage and other controls and to govern interference with trees and the regulation of noise.

- 4 Clauses 21 to 44 of the Bill together with Schedule 10 make provision for the application with modifications and the disapplication in part of the existing railways regulatory regime which is contained in and in arrangements made under the Railways Act 1993 and associated legislation. In particular, they provide for the disapplication of licensing requirements, the imposition of special duties on the Office of Rail Regulation (“ORR”), the modification of railway access contract and franchising arrangements and the disapplication of railway closure requirements and of the need for consent from Transport for London in relation to impacts on key system assets. Provision is also included to enable agreements to be required as between the nominated undertaker and controllers of railway assets, to govern the basis for arbitration and to provide for the transfer of statutory powers in relation to railway assets.
- 5 Clauses 45 to 59 of the Bill together with Schedules 11 to 14 contain miscellaneous and general provisions. These include provision for the making of transfer schemes, the designation of nominated undertakers, the devolution of functions and as respects other actions to be taken by the Secretary of State. Provision is also made in particular for the disapplication or modification of various additional miscellaneous controls, for the treatment of burial grounds, for the application of provisions of the Bill to future extensions of Crossrail, for the particular protection of certain specified interests and as respects arbitration.

Your Petitioners and their properties

- 6 Your Petitioners are Royal Mail Group plc and Post Office Limited (a wholly owned subsidiary of Royal Mail Group plc). Royal Mail Group plc was formerly Consignia plc, the successor company to the former statutory corporation called the Post Office. The undertaking of the Post Office corporation was transferred to Consignia Plc on 26 March 2001 pursuant to the Postal Services Act 2000.

Consignia plc was renamed the Royal Mail Group plc on 4 November 2002. Royal Mail Group plc is the operator of universal postal service functions through the Royal Mail letter post delivery and collection service handling letters, postal packets, parcels and high value (registered) packets, and also operates Parcelforce Worldwide which is a priority parcels carrier. Post Office Limited operates the national network of post offices. Royal Mail Group plc's services are regulated by the Postal Services Regulator, Postcomm.

- 7 By the Post Office (London) Railway Act 1913, the Post Office (London) Railway Act 1924 and the Post Office (Site and Railway) Act 1954, your Petitioners were authorised to construct and maintain railways for the carrying of mail between certain main sorting offices, railway stations and other premises. Pursuant to these powers, your Petitioners constructed an underground railway (and associated conveyor tunnels and subways) for the bulk transport of mail between railway stations and sorting offices in London on a line running between Paddington District Office and Whitechapel Eastern District Office, with station stops at the Western District Sorting Office, West Central District Office, Mount Pleasant Sorting Office, and Liverpool Street main line station ("Mailrail").
- 8 Your Petitioners own or have an interest in a number of properties, including Mailrail, which are in the vicinity of the proposed railway and works, and will be directly affected by the proposals of the Bill, including but not exclusive to its provisions for the compulsory acquisition of private property interests. In particular, the following properties owned or in which your Petitioners have an interest are affected (the parcel numbers referred to below are as shown on the deposited plans for the Bill and described in the Book of Reference):

City of Westminster

- (a) Mailrail at (1) Paddington Station (parcels 94 & 95), Oxford Street (in respect of subsoil at parcel 630), and Charing Cross Road (parcel 687)
- (b) The tunnels leading from Paddington Station concourse to Mailrail (parcels 100, 101 & 102)
- (c) Paddington Mail Centre at 31 London Street, W2 1AA

- (d) Vehicle park, pumps, kiosk and premises at the West End Delivery Centre at 35-50 Rathbone Place W1T 1AA (parcel 550)

London Borough of Camden

- (e) Mailrail at Greville Street and Saffron Hill (at parcel 245 and parcel 275 respectively)
- (f) Esavian House at 181-183 High Holborn WC1V RL (in respect of subsoil at parcel 95)
- (g) West Central District Office in respect of subsoil fronting rear of 21-31 New Oxford Street (parcel 94)

City of London

- (h) Mailrail at Finsbury Circus, Blomfield Street, Liverpool Street, Broad Street, Old Broad Street, and Widegate Street (at parcels 105, 114, 117, 119, 120, 122, 135, 144, 147, 148 and (in respect of subsoil) at 99, 106, 107, 118, 199 & 208)

London Borough of Havering

- (i) Sorting office, electricity substation, bicycle shed, car park, access road, gardens, land and premises at Romford Mail Centre at Sandgate Close, Romford RM7 0AB (parcels 35 & 36), and acquisition of private access road and footways (Sandgate Close) (parcels 31 & 32)

London Borough of Newham

- (j) Private access road and land at Forest Gate Delivery Office at 199 Earlham Road, Forest Gate E7 9AA (parcel 666)

9 In addition, the following property, whilst not subject to the compulsory purchase provisions of the Bill, is in the immediate vicinity of the works and is likely to be directly affected by the works:

- (a) Fore Street Post Office at 72 Fore Street, London EC2Y 5EJ in the City of London, to be affected by Work 1/3B and 1/21

Your Petitioners' concerns generally

10 Your Petitioners support the concept and desirability of an East-West rail link and the improvement of public transport provision in London and the surrounding areas, and are therefore supportive of the Bill in principle. Furthermore, your Petitioners seek to work together with Crossrail, the Government and the local

authorities (in particular the City of Westminster) to facilitate the provision of Crossrail.

- 11 Your Petitioners do however have many substantial concerns respecting the works or powers proposed in the Bill as affecting your Petitioners' operational properties and Mailrail. Your Petitioners believe that, without adequate protection and mitigation, the impact of the works may cause your Petitioners to be unable to fulfil their statutory duties.
- 12 The proposed works will affect much of your Petitioners' operational property necessary for the collection and delivery of mail over major parts of London. The Paddington Mail Centre is the processing centre for all inward and outward mail for the West London postcode districts (W1 - W14). It is also responsible for local deliveries and collections in the W2 postcode district. The West End Mail Centre is responsible for the delivery and collection of mail in the W1 and WC1 postcode districts. The Romford Mail Centre is the processing centre for all inward and outward mail for the Romford and Ilford postcode districts. It is also responsible for local deliveries and collections in the RM 1, 2, 4, 5, 6, and 7 postcode districts. The Forest Gate Delivery Office is responsible for the delivery and collection of mail in the E7 postcode district.
- 13 The performance by your Petitioners of their statutory duties is also dependent upon road transport within the area of the works proposed in the Bill. Your Petitioners are greatly concerned that, without adequate protection and mitigation, the disruption to the road transport network caused by the proposed works may result in your Petitioners being unable to fulfil their statutory duties.
- 14 Your Petitioners also have a fundamental concern that, despite its adoption as a Government led project, Crossrail lacks appropriate levels of funding, and that this under-resourcing prejudices your Petitioners and other property owners' interests.
- 15 In the ordinary course, your Petitioners understand that a project of this sort would now be subject to much more detailed design work than it appears has been undertaken. In consequence, the impacts upon your Petitioners' property interests

are still ill-defined and your Petitioners are handicapped in their ability to engage with the Promoter in a positive fashion to safeguard their interests.

- 16 For these reasons, and having regard to the more detailed particulars referred to later in this petition, your Petitioners object to the Bill and its provisions here referred to and they allege and are prepared to prove that they and their property, rights and interests are injuriously and prejudicially affected by the Bill for the reasons (amongst others) here appearing.

Compulsory purchase and subsoil acquisition and related matters

- 17 Your Petitioners object to the provisions of Clause 6 of the Bill, which they apprehend could adversely affect and interfere with some of your Petitioners' properties. Under these provisions, and those in Clause 7, the Promoter would be able to acquire compulsorily any one or all of those of your Petitioners' properties as set out in paragraph 8 above as are within the limits of deviation, or at least so much of the subsoil and undersurface thereof or such new rights therein, under or over as they may require for the purposes of the construction and use of the proposed works. In respect of these properties your Petitioners question the need for such extensive powers, fearing that their exercise could lead (by tunnelling, other construction works such as station works and the running of trains) to damage to these properties due to settlement or subsidence, and a serious detraction from your Petitioners' quiet enjoyment of them, with the result that significant loss and damage could be suffered by your Petitioners.

- 18 Your Petitioners are concerned that the proposed limits of lateral and vertical deviation in Clause 1 of the Bill would permit the route for the proposed works to be varied so as to bring the works closer to (either vertically or horizontally) Mailrail or your Petitioners' properties. The provisions of Clause 1 of the Bill could therefore well result, your Petitioners apprehend, in an inadequate vertical or horizontal distance between the tunnels forming part of the proposed works and Mailrail, or the bottommost part of the basements of some of your Petitioners' properties, causing possible permanent damage to Mailrail or to your Petitioners' properties. Your Petitioners therefore submit that such deviation could and should be more closely restricted.

- 19 In particular, your Petitioners are concerned about the effects of land acquisition at the West End Delivery Centre described above at paragraph 8 (d). The Bill proposes to use parcel 550 as a lorry holding area and as offices and storage for a period of up to 6 years. Parcel 550 is currently used as vehicle parking for your Petitioners' operational and staff vehicles. Your Petitioners are concerned that the loss of on-site vehicular parking will impact upon the operational capability of the West End Delivery Centre and seek measures to be provided in the Bill, or in agreement with the Promoter, to ensure that the West End Delivery Centre will remain fully operational throughout the construction period and thereafter.
- 20 Your Petitioners are concerned that the need for the acquisition of land at the West End Delivery Centre has not been fully demonstrated and query whether the Promoter has assessed alternative options, including the use of any similar open site in the area or the use of temporary platforms and offices on scaffolding over the yard at Newman Street, thereby allowing your Petitioners to enjoy a greater proportion of the yard for parking, as at present.
- 21 In addition, the West End Delivery Centre contains both surface and underground fuel tanks and surface pumps, for the use of your Petitioners' operational vehicles. Your Petitioners are not clear as to whether the Promoter wishes to relocate such fuel tanks, which would cause considerable disruption to your Petitioners' operations. Any relocation must be strictly necessary for the purposes of the proposed works, and your Petitioners seek assurances from the Promoter that all their vehicles will continue to be able to access all the fuel tanks, and that a fixed barrier will be installed adjacent to the pumps.
- 22 Work 2/13 proposes, among other things, a depot to be constructed 220 metres north of the junction of Oldchurch Road and Nursery Walk and adjacent to Romford Mail Centre and Transco gasworks. The Environmental Statement (Transport Assessment) states that the main works will consist of the new depot, stabling sidings and the construction of a Route Control Centre. Your Petitioners are concerned about the effects of land acquisition at Romford Mail Centre to enable the construction of the depot and associated works. The Environmental Statement states that, as part of the enabling works, it would be necessary to relocate your Petitioners' sorting office, standby electricity generator, and

alterations made to parking and vehicle turning facilities, and removal of a section of Sandgate Close (on which your Petitioners' delivery vehicles access Romford Mail Centre). Such facilities are essential to the operations at Romford Mail Centre and your Petitioners fear that the construction of the depot and associated works will adversely affect your Petitioners' ability to carry out their statutory duties. Your Petitioners submit that the Promoter should be required to provide further details in relation to the construction of the depot to allow your Petitioners to better assess how it will affect the Romford Mail Centre, including detailed plans, method statements, timetable data, details of vehicle movements during and post construction of the depot and associated works, details of the revised access for your Petitioners, and other particulars of works with regards to the construction of the depot and associated works. In particular, your Petitioners seek clarification regarding lorry movements at the site as the Supplementary Environmental Statement proposes on site remediation of the work site, whereas the Environmental Statement proposes off-site remediation with contaminated material taken off site by road and rail. Your Petitioners seek measures to be provided in the Bill, or in agreement with the Promoter, to ensure that Romford Mail Centre will remain fully operational and accessible throughout the construction period and thereafter.

23 Your Petitioners are also concerned that the Bill proposes the acquisition of the private access road adjacent to Forest Gate Delivery Office (parcel 666), for the provision of access for construction and maintenance. The private access road constitutes the only vehicular access to Forest Gate Delivery Office and your Petitioners seek assurances from the Promoter that they will continue to be able to access the Mail Centre throughout the construction period and thereafter. In addition, your Petitioners seek clarity from the Promoter as to the frequency and size of the vehicles to be accessing the private road in order to better assess the effect on your Petitioners' operations.

24 The use of the land at parcels 550 (in the City of Westminster) and 666 (in the London Borough of Newham) are for the provision of a worksite and for provision of access for construction and maintenance respectively. Your Petitioners do not believe such uses will be required permanently. Your

Petitioners maintain that compulsory acquisition of the land is therefore not justified, and that parcels 550 and 666 should be moved from Schedule 6 of the Bill (acquisition of land shown within limits on deposited plans), to Schedule 5 of the Bill (temporary possession and use of land).

25 In addition, your Petitioners are concerned about the effect of the proposed works on Mailrail and its associated conveyor tunnels and subways. Although your Petitioners no longer use Mailrail for the transportation of mail, Mailrail remains the responsibility of your Petitioners. Should any part of Mailrail or its associated conveyor tunnels and subways be compromised and become deformed due to the proposed works, your Petitioners fear that the entire length of Mailrail may become unusable for any purpose. Your Petitioners are also concerned that any compromise to the integrity of Mailrail and its associated conveyor tunnels and subways could lead to liability to third party landowners. Your Petitioners seek inclusion within the Bill, or alternatively agreement with the Promoter, of provisions protecting Mailrail and its associated conveyor tunnels and subways from interference, damage or other injurious affection by the proposed works.

26 Your Petitioners submit that the Promoter should not be permitted by means of the Bill to interfere with private property rights and interests unless, and except to the extent (if any) that this can be demonstrated both to be necessary for the purposes of the Bill and to be in the public interest. Your Petitioners have not been provided with full justification for the proposals in the Bill affecting their properties and Mailrail and your Petitioners submit that the Promoter should demonstrate and be put to strict proof of the need for and desirability of the proposals in the Bill as affecting your Petitioners' properties and Mailrail and that the resulting powers for the compulsory acquisition of land or of interests in land, the power to construct works and the exercise of works and ancillary powers within the limits of deviation should be restricted in relation to your Petitioners' properties and Mailrail to the extent (if any) to which they can be strictly justified and so as to minimise or prevent interference with those properties.

Subsidence, settlement and associated damage to properties during and after construction

- 27 Your Petitioners are concerned about settlement effects on Mailrail and their properties. In particular, your Petitioners are concerned about the effect of Work 1/11A (a passenger subway connecting Crossrail to the Bakerloo line) on the tunnels connecting Mailrail to Paddington Main Line Station (parcels 100, 101 and 102), and Work 1/3B on Mailrail in the vicinity of Liverpool Street Underground and Train Station. Your Petitioners have engaged an expert adviser who envisages probable settlement of Mailrail at parcel 101 due to the alignment of Work 1/11A, and possible settlement of Mailrail due to Work 1/3B in the vicinity of Liverpool Street Underground and Main Line Station. Your Petitioners fear that Mailrail could deform to such an extent that it would no longer be usable. Your Petitioners request an amendment to the Bill to change the alignment of Work 1/11A and 1/3B and carry out any other remediation measure to protect the integrity of Mailrail and its associated conveyor tunnels and subways.
- 28 Your Petitioners would wish to see an effective and agreed monitoring system in place before commencement and during construction of the works, to measure the exact effect of any settlement on all of your Petitioners' properties and Mailrail. There must in your Petitioners' submission be a threshold agreed between your Petitioners and the Promoter for ground movement within the vicinity of the properties and Mailrail. If that threshold is exceeded then it is imperative that the undertaker nominated to carry out the works is obliged to cease construction until such time as remedial measures are in place which will minimise settlement and consequently avoid distress to Mailrail or building as the case may be. Your Petitioners request that they be given at least 28 days' notice of the intended passage of the tunnel boring machines beneath their properties or Mailrail.
- 29 Any necessary safeguarding or remedial measures are to be agreed between your Petitioners and the Promoter or nominated undertaker. Your Petitioners would wish that full provision be made for the Promoter or nominated undertaker to meet the full cost of carrying out any remedial or safeguarding work, and that such provisions should include a requirement that the Promoter or nominated undertaker pay and repay to your Petitioners the costs, charges and expenses

incurred by your Petitioners in consulting with their professional advisers (including structural engineers and legal advice) in relation to proposed works affecting your Petitioners' interests, and in inspecting the Promoter's work as it progresses.

Highway works

- 30 In addition to the compulsory acquisition of land, the Bill contains provisions which would empower the Promoter to alter the layout of apparatus in streets, to execute street works, to stop up streets permanently or temporarily and to lay out new means of access. Your Petitioners are concerned that the exercise of these powers may affect the delivery or collection of mail and access to your Petitioners' mail centres, delivery offices and post offices in the vicinity of the works, and may require re-siting of letterboxes and postal pouchboxes.
- 31 In particular your Petitioners are concerned about the impact of the proposed works on traffic flows and the consequent impact on your Petitioners' ability to carry out their delivery services at Paddington Mail Centre and the West End Delivery Centre. The peak traffic flow at Paddington Mail Centre is between 16:00 and 19:00 and approximately 360 of your Petitioners' vehicles access the site between 12:30 and 22:30. All vehicles accessing the Paddington Mail Centre are required to reverse into the building from London Street. Your Petitioners fear that the construction of a new link between Bishop's Bridge Road and London Street/South Wharf Road to provide taxi and drop-off facilities for Paddington Main Line Station will increase the traffic flow past Paddington Mail Centre and hamper through traffic and your Petitioners' vehicles from accessing the site. Any change required to the manner in which your Petitioners' vehicles access the Paddington Mail Centre will be likely to compromise operations.
- 32 Approximately 150 vehicles access the West End Delivery Centre in the morning, and 90 per hour in the afternoon and evening. Your Petitioners fear that planned traffic management and changes on surrounding roads due to the proposed works will have an adverse impact on journey times for your Petitioners' vehicles, particularly around Tottenham Court Road.

- 33 Access along streets to deliver mail to (and to collect mail from) customers is essential for the delivery of mail to (and the collection of mail from) your Petitioners' mail centres and delivery offices. Access is also essential for the delivery of stock (including cash and other valuables) to your Petitioners' network of post offices. Due to the security arrangements necessary for certain types of deliveries it is essential that no disruption or interference with vehicular or pedestrian access should occur.
- 34 Therefore, in order to secure the maintenance of proper and efficient letter delivery services, your Petitioners seek the inclusion of the following provisions in the Bill, or agreement with the Promoter:
- (a) appropriate arrangements to be agreed for continued access to your Petitioners' mail centres, delivery offices and post offices throughout the construction period and thereafter, in particular in relation to Paddington Mail Centre and the West End Delivery Centre;
 - (b) appropriate arrangements to be agreed for vehicular and pedestrian access to streets affected by the works throughout the construction period and thereafter;
 - (c) at least 6 months' full and advance notice and consultation to be provided in relation to any works, road diversions or stopping up which may affect mail collections or deliveries and the Promoter to take all reasonable steps to minimise any disturbance arising to collections and deliveries, in particular in relation to Paddington Mail Centre and the West End Delivery Centre; and
 - (d) full indemnity and compensation for any expenses incurred by your Petitioners in connection with the removal, storage, re-siting, return or substitution of a letter box or postal pouchbox, any additional security costs, or any delays in collection times through interference to or stopping up of streets or an inability to access or park at any of your Petitioners' properties or post offices.

Noise, vibration, disruption and disturbance during the construction period

- 35 The noise and vibration arising from the construction of the railway and its associated works and structures (such as ventilation shafts) is a matter of concern to your Petitioners. Your Petitioners submit that the Promoter should be compelled to use best available techniques in the construction (and operation) of the railway and its associated works and structures to ensure that these adverse effects are minimised. Your Petitioners submit that strict standards should be set beyond those currently envisaged by the Promoter and to which the Promoter must be made liable to comply.
- 36 Your Petitioners therefore submit that provision should be made that noise and vibration are minimised by reference to prescribed thresholds. If those thresholds are exceeded, the nominated undertaker should be obliged to cease construction until such time as remedial measures are in place which will reduce noise and vibration levels below the agreed threshold.
- 37 The surface works, particularly the use of working sites and the removal of spoil, will particularly impact upon your Petitioners' operations at their delivery offices. Major increases in lorry movements during the construction period are to be expected, the disruptive effect of which will be compounded by the permanent and temporary stopping up of nearby roads. In particular, the Environmental Statement (Transport Assessment) states that the Romford Maintenance Depot will be where the general maintenance of the whole Crossrail train fleet will take place. Your Petitioners submit that the nominated undertaker should be required to submit detailed plans, method statements, frequency and quantity of daily vehicle movements, and other particulars of works with regards to the use of working sites and removal of spoil in and around your Petitioners' properties.
- 38 Your Petitioners are also concerned about dust and dirt produced during construction. Your Petitioners wish to see the nominated undertaker undertake to adhere to strict measures to reduce dust and to carry out additional mitigation measures if dust continues to be a nuisance to your Petitioners' properties. In particular, your Petitioners request that a permanent boundary be erected between Romford Mail Centre and the proposed Romford Maintenance Depot, to reduce

the effect of noise and dust generated during the construction of the depot and thereafter, and vehicle washing facilities to be provided at the construction site egress.

Noise and vibration from the running of the trains after completion

- 39 The operation of the railway (including the use of ventilation shafts and other ancillary uses) must also be expected to give rise to air and ground borne noise and vibration in respect of which the Promoter is subject to no limitations in the Bill or the Environmental Statement. Your Petitioners submit that the Promoter should be compelled to use best available techniques in the construction and operation for the railway to ensure that these adverse effects are minimised. Furthermore, your Petitioners submit that the nominated undertaker should also be required to consult with your Petitioners with regard to noise and vibration monitoring.

Loss and Compensation

- 40 The provisions contained within the Bill for compensation for the compulsory purchase of property or of subsoil or new other rights will not enable your Petitioners or other landowners to recover the full loss and expenses which they will incur in consequence of the exercise of such powers. Your Petitioners therefore submit that the Bill should be amended to rectify this.
- 41 Your Petitioners also object that the compensation provisions of the Bill are inadequate to compensate your Petitioners or others in circumstances where no land (or interests in land) is acquired by the Promoter under the Bill, but where the value of such land and the properties erected on it is reduced or where such land and the properties erected on it is otherwise adversely or injuriously affected by the construction or use of the proposed works. Your Petitioners therefore submit that the Bill should be amended to provide for claims for adequate compensation in respect of damage arising to their property by the execution of the works, or for injurious affection thereof by the execution or working of these works, separately from any claim for compensation in the respect of acquisition of any land (or interest therein) from your Petitioners under the powers of acquisition.

- 42 Your Petitioners further submit that the Promoter should be required to indemnify them from all claims and demands which may be made in consequence of the construction, use or maintenance of the works under the Bill, or their failure or want of repair, or in consequence of any act or omission of the Promoter, his contractors or agents in carrying out the works under the Bill.
- 43 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.
- 44 There are other clauses and provisions in 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.

Conclusion

45 Your Petitioners submit that the Bill fails adequately to safeguard and protect the interests of your Petitioners and should not be allowed to pass into law without these issues being addressed.

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 themselves, Counsel or Agents and with 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 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.

IN PARLIAMENT
HOUSE OF COMMONS
SESSION 2005-06

CROSSRAIL BILL

P E T I T I O N
of
ROYAL MAIL GROUP PLC
And
POST OFFICE LIMITED

Against, the Bill – On Merits –
Praying to be heard by Counsel, &c.