

HOUSE OF COMMONS
SESSION 2005-06

CROSSRAIL

PETITION

Against the Bill – 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 THE COUNCIL OF THE
ROYAL BOROUGH OF KENSINGTON AND
CHELSEA

SHEWETH as follows :-

1. A Bill (hereinafter called "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. Clauses 1 to 20 set out the Bill's objectives in relation to the construction and operation of the railway transport system mentioned in paragraph 1 above. They include provision for compulsory acquisition, planning permission,

heritage issues, trees and noise. Clauses 21 to 44 of the Bill establish a regulatory regime for the railway transport system and clauses 45 to 59 of the Bill deal with miscellaneous and general provisions.

3. The works proposed to be authorised by the Bill are specified in Schedule 1 to the Bill and the scheduled works are defined in the Bill as the works specified in Schedule 1 to the Bill which are works authorised to be constructed by the nominated undertaker (defined in the Bill and hereinafter referred to as "the nominated undertaker").
4. Your petitioners are the Council of the Royal Borough of Kensington and Chelsea. The Bill would authorise the compulsory acquisition of land belonging to your petitioners to which they object. Furthermore part of the area for which your petitioners are the local authority will be injuriously affected by the provisions of the Bill, and your petitioners accordingly object thereto for the reasons, amongst others, hereinafter appearing.
5. The London Government Act 1963, which established your petitioners, conferred important powers and duties upon your petitioners. Numerous enactments since that date have added to your petitioners' statutory powers and duties. Amongst other functions of your petitioners is that of the highway authority for all existing or proposed public highways in their area, except for those which are the responsibility of Transport for London. In addition, your petitioners are the traffic authority for most roads in their Borough. They are also the local planning authority, and are thus responsible for general planning and the preparation of development plans and local development schemes.
6. Your petitioners support the proposed Bill and welcome the decision to construct Crossrail. There are, however, a number of matters which cause great concern to your petitioners, arising from the proposals in the Bill. Some of these points apply generally and some of the points are specific to particular sites within your petitioners' Borough. Your petitioners are hopeful that many of their concerns can be met by agreement with the promoter.

Work Sites - General

7. Within your petitioners' Borough, works are proposed under the Bill on the Great Western Main Line. They will comprise, among others, realignments to the Reading railway, and the construction of rail lines and railway sidings, including works within the existing Old Oak Common railway depot. The construction of the proposed Westbourne Park reversing facility will require track work to be carried out within your petitioners' Borough.
8. Your petitioners note that there will be site preparation and construction activities at several sites within your petitioners' Borough. The matters with which your petitioners are particularly concerned are the problems of noise, vibration, dust and dirt, hours of working, visual impact and disruption to the safety of road traffic and pedestrians. Your petitioners submit that the nominated undertaker should be made subject to suitable standards in respect of each of these matters and that there should be a provision for a noise insulation policy and for compensation to be paid where these standards and policy are breached.
9. Your petitioners respectfully suggest that they should be able to specify, in respect of any development authorised by the Bill, the hours and days of the week in which work may be carried out. Those hours should be a matter falling within the ambit of arrangements which are to be approved by your petitioners under clause 10 of and Schedule 7 to the Bill. The table set out in Paragraph 7 of Schedule 7 to the Bill should, in your petitioners' respectful submission, be amended to include inappropriate proposed hours of working as a ground on which your petitioners may refuse to approve those arrangements. Hours of working are a crucial matter which your petitioners, as Local Planning Authority, need to be able to modify in order to preserve the local environment and local amenity.
10. Your petitioners note that the Bill and the supporting documents adopt similar regimes to those which were established for the construction of the Channel Tunnel Rail Link. Your petitioners are pleased to note that this regime will include the agreement of a Construction Code. Your petitioners will wish to

ensure that the Construction Code is complied with properly, and in that respect, your petitioners will incur a great deal of expenditure. Your petitioners wish to ensure that all of their reasonable expenses in monitoring construction sites are met by the nominated undertaker, together with expenditure incurred by your petitioners in planning and programming activities related to the Construction Code. Moreover, your petitioners are concerned that any subsequent work carried out on the railways by other organisations, such as Network Rail, should also be carried out according to the same standards as will govern the activities of the promoter and the nominated undertaker. Your petitioners request that the promoter will give an undertaking that it will be made a condition of any contract that any work on the railways should be carried out according to the same standards set out in the Control of Pollution Act 1974.

11. Your petitioners would hope and expect that, through agreements relating to the Construction Code practice, uniform hours of operation for the different worksites will be agreed with the promoter. Your petitioners will be seeking to ensure that the promoter agrees to such requirements. If the promoter does not, your petitioners submit that the promoter should be required to agree uniform hours. Your petitioners note that the Environmental Statement envisages that construction works will be carried out between the hours of 7.00am and 7.00pm on weekdays, and 7.00am and 2.00pm on Saturdays. Your petitioners submit that construction activity so early in the morning and late in the evening will result in an unacceptable increase in noise and pollution for those occupying properties close to the construction site. Your petitioners have in place established hours for noisy construction works in their Borough. They are 8.00am until 6.30pm on Mondays to Fridays, and 8.00am to 1.00pm on Saturdays, with no noisy works permitted at all on Sundays. Your petitioners request your Honourable House that weekday hours be reduced to 8.00am until 6.30pm, and that hours on Saturdays be reduced to 8.00am to 1.00pm.
12. Your petitioners are also concerned to ensure that the nominated undertaker is required to adopt the very highest standards in respect of mitigation of the effects of noise, dust and vibration caused during the construction period and

in particular that the Construction Code replicates your petitioners' best practice requirements imposed on other major construction projects in their Borough. There should also be a guarantee that any future changes to industry standards will also be complied with.

13. Your petitioners are concerned about the potential effects on road traffic, pedestrians and property owners near to worksites. Your petitioners are keen to ensure that all of the residents, businesses and property owners in their Borough are properly compensated for damage caused by the construction and use of Crossrail and most importantly that they are consulted fully as regards the construction programme at worksites.
14. Your petitioners submit that the nominated undertaker should provide detailed plans, method statements, work programmes, and schedules of deliveries (particularly abnormal deliveries) in relation to each working site, well in advance of the commencement of operations. Your petitioners should be notified well in advance of any alterations in methods of construction and construction operations, particularly in relation to site servicing and set up arrangements.
15. Your petitioners seek undertakings and assurances from the promoter as regards the management of construction worksites so as to prevent loss of amenity to residents in your petitioners' Borough. The physical area of each proposed worksite should be kept to a minimum with the safety of the public, whether pedestrians or other road users, being of paramount importance.
16. Your petitioners are concerned about the interrelationship between the implementation of the proposals and the congestion charge, particularly its proposed extension to your petitioners' Borough. This will have an impact particularly in the Ladbroke Grove and Great Western Road areas, as the worksites for Crossrail are close to the boundaries for the proposed congestion charge. Your petitioners are concerned that there will be a considerable increase in congestion arising on and just outside the boundaries to the congestion charge zone, particularly through heavy traffic seeking to use routes which would avoid incurring the charge. Your

petitioners therefore request that the promoter should give them assurances that they have considered and taken into account the effect of the congestion charge extension when devising the routes for works traffic and other traffic accessing the worksites.

Construction Traffic

17. It is clear that the construction site in your petitioners' Borough will be a centre to and from which large quantities of construction materials and equipment will be transported, together with staff. There will also be the problem of removal of spoil from the working sites. The matters which your petitioners submit should be subject to their control in this respect are the routing of lorries and other vehicles, access to work sites, hours of operation, number of vehicle movements and size of vehicles and miscellaneous related matters. Your petitioners submit that the nominated undertaker should be required to use every endeavour to utilise rail, river and canal for transport purposes, particularly as the Grand Union Canal is closely situated to the Royal Oak worksite west. Your petitioners are particularly concerned to note that the promoter estimates that, during peak hours of work, there will be approximately 110 lorries per day accessing the Royal Oak worksite west, which will be situated at the former Paddington New Yard site adjoining the A40 Westway. The nominated undertaker should be required to minimise the cumulative impact of lorry movements by properly managing them, keeping them to a minimum, using the strategic road network and confining movements to normal worksite hours. Furthermore, it is not made clear how the Bill will interact with the Traffic Management Act 2004, and your petitioners seek clarification or consultation on that issue.

18. Your petitioners are anxious about the consequences of surface road working and temporary and permanent stopping up and alteration of highways. Your petitioners' anxieties relate to the impact on pedestrian and vehicular traffic flows, safety aspects, damage to the highway and loss of parking. Your petitioners are particularly concerned for the mobility impaired. Your petitioners submit that the nominated undertaker should be required to carry out such reasonable measures as your petitioners may specify, to allay

their anxieties.

19. In particular, your petitioners as highway and traffic authority require that the promoter should provide clear information relating to, and must be fully consulted on, all proposals to make temporary or permanent road closures, traffic diversions, and changes to traffic flow, and about any physical alterations whatsoever to the highway within the Borough.
20. The powers under the Bill to close highways temporarily are very wide. The nominated undertaker would be able to close any street in your petitioners' area for the purpose of the works. The closure of most highways would require the consent of the highway authority, but for a number of highways only consultation with the highway authority is required. Your petitioners wish to secure that consultation is carried out properly, with a minimum period agreed between your petitioners and the promoter for notification of intended closures (with exceptions for emergencies).
21. Your petitioners note that works are due to be carried out underneath the Great Western Way, and Portobello Bridge. Your petitioners submit that the nominated undertaker should be required to carry out and fund all necessary remedial and repair works to the highway and bridge strengthening to a standard specified by your petitioners in respect of all highways and bridges for which they and others in the Borough are the responsible authority.
22. Your petitioners submit that the promoter should be required to carry out, at the promoter's own cost, detailed condition surveys before and after the construction period on land in their ownership which is to be and is affected by the proposals, particularly on highways which are to be used as worksites or which will be heavily used by construction traffic.
23. The promoter anticipates that spoil will be removed by rail during the night, which could prove to be noisy, particularly at railway joints or crossovers. Your petitioners are concerned that track designated for hauling spoil which is situated close to residential property should be inspected prior to the commencement of the works for any deterioration, particularly rail discontinuities, track defects, open joints and corrugation of the rails, as

these are likely to cause significant noise and vibration. Where there are any such deteriorations, your petitioners submit that the best practicable means should be adopted to as to minimise such noise and vibration. Your petitioners also request that prior to work commencing, site specific surveys should be carried out where track is to be laid so as to identify any places where deterioration has occurred, or might occur in the future.

Acquisition of Council and other Land

24. Your petitioners note that the Bill will authorise the acquisition of easements over the eastern part of Canal Way so as to enable access to be gained to Canal Close, which in turn leads to the Canalside Activity Centre and the *Ladbroke Grove Memorial erected in memory of the victims of the Paddington train crash*. Your petitioners are particularly concerned about the potential interference with the use of Canal Way by pedestrians and request that any such interference is kept to a minimum.

Ground borne noise and vibration/ track design

25. There are a number of buildings in your petitioners' Borough which are above the proposed line of the railway or nearby and which are likely to be sensitive to noise and vibration during the construction period and when the railway comes into operation. Your petitioners note that the promoter suggests that ground borne noise or re-radiated noise from vibration has no significant impact below a certain level. Your petitioners request further information as to the reasonableness of the promoter's criterion and the sources upon which the promoter's suggestion is based. Your petitioners respectfully submit that the promoter should be required to ensure that ground borne noise and vibration during the construction period is kept to an absolute minimum by the use of the most advanced technology and machinery. Your petitioners are concerned that noise and vibration, while meeting design standards put forward by the promoter, may still be radiated into buildings to an unacceptable extent. In your petitioners' submission the nominated undertaker should be subjected to stringent design standards and, where the railway passes near to noise sensitive buildings, the

nominated undertaker should be required to install additional appropriate procedures and design methods to inhibit the transmission of noise and vibration into such buildings. Those standards should adopt your petitioners' own best practice approach in relation to these matters. In your petitioners' submission, the Bill should also provide that the nominated undertaker should put in place a comprehensive consultation and noise monitoring scheme and be subjected to a compensation code where agreed noise and vibration standards are breached.

26. Your petitioners have already mentioned in paragraph 25 that the promoter should be required to use the best possible methods and equipment to minimise noise and vibration during operation of the railway. Your petitioners are also concerned to ensure that high standards are met in terms of the lifespan and maintenance of the running tracks. Appropriate standards should be incorporated in the contracts between the Secretary of State and the nominated undertaker to ensure that the nominated undertaker meets those standards.
27. Your petitioners note that noise limitations set out in the British Standard BS8233: 1999, which establishes limitations on noise limits for work at night, are incorporated in the Government's Planning Policy Guidance number 24 ("Planning and Noise"), to which local planning authorities must have regard when assessing planning applications. The promoter does not regard such limitations as practical. Your petitioners request that the promoter should give an undertaking that the promoter proposes to adhere to the standards as set out in BS8233: 1999 for the duration of the construction period.
28. The promoter is seeking a noise criterion on fixed permanent plant to be set at 5dBA above background level. Your petitioners are concerned about this level, as it is above the level which they would accept when considering applications for planning permission within your petitioners' Borough. For any planning permission for new plant within their Borough, your petitioners impose a condition to the effect that it should not increase the existing background LA90 noise level at 1 metre from the nearest residential façade or 1.2 metres above any residential garden, terrace or balcony. Any ambient

background noise level should not therefore increase measurably when the plant is running. Your petitioners therefore request that the promoter should not exceed the usual design noise criterion, which is fixed at -10dB below the existing LA90 background level at any of the locations within your petitioners' Borough where plant is to be operated.

29. Your petitioners ask your Honourable House to require the promoter to advise upon the exact locations in your petitioners' Borough where noise levels are to be assessed, and to provide information on the source of the criterion used by the promoter, so that your petitioners can carry out their own assessment as to what the rating level should be, and whether it will comply with your petitioners' own criterion as summarised above.

Operational Railways

30. Your petitioners note that there will be times when the nominated undertaker will need to take possession of existing tracks. This will inevitably cause disruption to passengers coming through your petitioners' Borough and they therefore seek assurances and guarantees that such track possessions will be kept to a minimum.

Contamination

31. Your petitioners are concerned with the promoter's interpretation of the words "ground break". In areas of track modification, the promoter has stated that no ground break will occur which has led to all potentially contaminated sites within your petitioners' Borough being classed as low priority, with no pollutant linkage, and no plan to undertake any site investigations. Your petitioners are extremely concerned by this as they are of the opinion that the ground will be disturbed, because it is hard to envisage only the top few centimetres being affected, particularly if ancillary equipment has to be re-sited, and that this therefore would constitute ground break and will create a pollutant linkage. If such a pollutant linkage is confirmed, in accordance with "Model Procedures for the Management of Land Contamination", as published by the Environment Agency and DEFRA, a further assessment of ground conditions must be undertaken at no cost to

your petitioners, and on-site monitoring must be carried out, again at no additional cost to your petitioners, whilst works are being undertaken to detect any emissions to the air. Your petitioners therefore request further information from the promoter on exactly what will occur during the process of track re-modelling.

Dust and air pollution

32. Your petitioners are concerned to note that the petitioners have not used up-to-date data on a number of occasions, leading to a number of inaccurate conclusions within the Environmental Statement and attached reports. Your petitioners, by way of example, draw the attention of your Honourable House to the fact that updated versions of other reports relating to the ecology of your petitioners' Borough have been published, but the promoter does not appear to have consulted them. Your petitioners submit that the promoter should use the more up-to-date information and that the Bill should not proceed in its current form until the promoter has carried out a proper assessment and, where necessary, published further environmental information.
33. Your petitioners are concerned that the promoter does not appear to propose monitoring dust levels prior to the commencement of any works. Your petitioners submit that a baseline study should be undertaken, otherwise it will be difficult to monitor dust levels during the works, and subsequently to manage the dust levels. Your petitioners require, at the minimum, that dust monitoring be carried out at all sites where the risk is classified as high or medium and that the location of monitors are agreed in advance with your petitioners, and request an undertaking from the promoter that all such monitoring will be carried out, and at the nominated undertaker's expense at all such sites.

Authorisation procedures

34. In line with the Channel Tunnel Rail Link Act, the Bill contains provisions which provide outline planning permission for the development authorised by the Bill and disapples a number of other statutory regulation regimes which

would normally apply in relation to the construction of works, including the listed buildings and conservation area controls in the Planning (Listed Buildings and Conservation Areas) Act 1990, the Control of Pollution Act 1974 and the London Lorry Ban. Your petitioners wish to ensure that, if those controls are to be removed or suspended, then in their place there is a robust alternative approval mechanism in each case, in which your petitioners play a full part. Your petitioners will, in conjunction with other local authorities affected by the Bill, be seeking to ensure that such arrangements are put in place, but if that is not achieved then your petitioners would respectfully request that the promoter be required to accept satisfactory arrangements including realistic timescales for the consideration of applications.

35. As part of the alternative consent regimes mentioned above, your petitioners must be able to recover from the promoter or the nominated undertaker their full costs of processing applications. Your petitioners note that the Bill provides the Secretary of State with the power to make an order relating to the payment of fees to the local planning authority in respect of requests for detailed planning consent. Your petitioners are pleased to note this, but seek assurances from the promoter about the level of those fees and the ability of the promoter to cover their costs of all applications.

Social Economic and Community Impact

36. Your petitioners recognise and warmly welcome the fact that the Crossrail proposals will provide a large number of employment opportunities during both the construction and operation phase. Your petitioners are keen to ensure that the nominated undertaker takes steps to seek to promote employment of local residents both temporarily and permanently.
37. Your petitioners have been concerned that the consultation so far carried out by the promoter of the Bill with local residents and businesses has not met the standards which your petitioners would expect. They respectfully submit that the promoter should be required to ensure that the nominated undertaker will put in place a comprehensive public relations strategy

ensuring that information about the construction and operation of Crossrail is disseminated to those residents and businesses who will be most affected. This should include the setting up of local information centres during the construction period to be staffed at reasonable and accessible hours.

SITE SPECIFIC CONCERNS

Worksite at Royal Oak West

38. Your petitioners are concerned about the level and composition of construction traffic which will be generated during the setting up of the work site, the initial construction stage when spoil will be removed by road, and during the main tunnelling stage when spoil will be removed by rail. Your petitioners request that the promoter should provide your petitioners with the data on, and their assessment of the potential effect of, the traffic and congestion which they anticipate will be generated by the works. Your petitioners require assurances that the promoter will limit the volume of road traffic to the limits which the existing road network can sustain.
39. Your petitioners note the promoter has indicated in the Environmental Statement that a number of receptors are at "high" or "medium" risk from dust. There are, however, no specific indications of which properties will be affected (only the number of receptors within a certain distance of the worksite), and your petitioners request that the promoter should provide a detailed list of all the properties which are to be affected by dust, and those measures which they propose to take to limit the impact of dust pollution affecting these properties.

Ladbroke Grove – renewal of existing tracks and re-laying of new tracks.

40. Your petitioners are concerned about the impact of noise which will occur during the renewal of existing track and re-laying of new tracks. Your petitioners note that the Environmental Statement indicates that 81 Southern Row, which is used as commercial premises, and which is owned by your petitioners, is potentially subject to a significant residual impact due to construction noise during the daytime for a period of 15 months. Your

petitioners are particularly concerned about the impact of noise on Octavia House, which is a residential block of some 68 flats situated next door to the west of 81 Southern Row but is not considered in the Environmental Statement. There are some families among the residents, and your petitioners are also aware of residents who have serious health problems. Your petitioners request that the promoter should provide your petitioners with full information on the impact of noise and pollution upon Octavia House, and those proposals which the promoter will take to mitigate against such noise and pollution. In addition, your petitioners are concerned that residents of Kensal House, a block of some 68 residential properties situated to the west of Great Western Road to the north of the railway, will also be affected by noise and adverse effects on air quality. There are a number of families, some with young children among the residents of this block. There may be other properties affected by noise and pollution, and your petitioners request that the promoter should provide a full noise and pollution assessment of all the properties which your petitioners consider likely to be affected by the construction works.

41. By its nature, all railway land is likely to be contaminated. The promoter states that there is no pollutant linkage because no ground break will be occurring, and therefore do not intend to carry out further work in assessing ground conditions. As mentioned in paragraph 31 above, your petitioners are concerned that re-modelling track will result in disturbance to land (and, in your petitioners' view, this will constitute ground break) and therefore they request further information from the promoter on what will be involved. If a pollutant linkage is found to exist, further assessment of ground conditions will be necessary by the promoter to determine any remedial measures.

Modification of track layout and use of Canal Way

42. Your petitioners are concerned at the levels of traffic which are anticipated to use Canal Way. They require that the promoter should provide them with full information as to the level and composition of the construction traffic which the promoter anticipates will be generated during the establishment and operation of the work site. They are concerned that access to and along

Canal Way should not be restricted solely to construction traffic at any time during the construction of and operation of the work site, and seek reassurances from the promoter to that effect. Your petitioners require assurances that the promoter will limit the volume of road traffic to the limits which the existing road network can sustain.

43. Your petitioners are particularly concerned to ascertain from the promoter the anticipated noise impact upon the Kensal Gas Works site, now known as Ladbroke Green, where your Petitioners have granted planning permission for the provision of some 308 residential units (50% of which will be affordable housing units), with a new application pending for more residential units. The Ladbroke Green site is close to the railway and will be directly affected by the construction works. Your petitioners are concerned that the Ladbroke Green development scheme should not be adversely affected by the construction works, or by noise and pollution in the long term arising from the running of the railway. They are concerned particularly that the construction phase of the works planned by the promoter might coincide with those on the Ladbroke Green development, and request that, as far as possible, the promoter should timetable their works to avoid any such coincidence. They request that, if the Ladbroke Green development scheme proceeds at any time during the preparation for, or during the construction works at the Ladbroke Green site, monitoring of dust and pollution levels should be carried out by the promoter and at the promoter's own cost, particularly as permission has already been granted for such development to proceed.
44. Your petitioners draw to the attention of your Honourable House the fact that there are houseboats on the canal, a fact which does not appear to have been considered by the promoter in the Environmental Statement or elsewhere. Your petitioners request that the promoter should make provision for protection from dust, noise and pollution and other interferences for those living in, or occupying, houseboats in the vicinity of the works. Your petitioners submit that the Bill should not proceed in its current form without such provision being made.

45. While the Environmental Statement indicates that there is a low risk of contamination at the work sites within your petitioners' Borough, your petitioners are concerned with the promoter's interpretation of the words "ground break". In areas of track modification, the promoter has stated that no ground break will occur which has led to all potentially contaminated sites in your petitioners' Borough being classed as low priority, with no pollutant linkage, and no plan to undertake any site investigations. Your petitioners are extremely concerned, as they are of the opinion that the ground will be disturbed, even if only the top few centimetres, and this constitutes ground break and will create a pollutant linkage. Your petitioners ask your Honourable House to require that, if your petitioners are of the opinion that there is ground break and a potential pollutant linkage exists, then, in accordance with "Model Procedures for the Management of Land Contamination", as mentioned in paragraph 31 above, further assessment of the ground conditions will be carried out by the promoter at the cost of the promoter. Your petitioners therefore request further information on exactly what will occur during the process of track re-modelling. In addition, your petitioners have records of works previously undertaken on the adjacent Ladbroke Green site (formerly Kensal Gasworks) and can confirm that some contamination was left in situ. Your petitioners therefore submit that a survey of the retaining wall between the Ladbroke Green site and the railway line must be undertaken by the promoter.
46. Your petitioners are also concerned that a number of receptors in the vicinity have been identified as being at low risk from dust, but there is no further information as to the specific properties and routes which will be affected. Your petitioners request that such information should be provided to them.
47. Your petitioners are concerned that the promoter should comply with the Noise Insulation (Railways and Other Guided Transport Systems) Regulations 1996 (SI 428/1999) which provide a duty upon developers to offer noise insulation for developments where the noise increases over a certain level. Your petitioners request full details of the assessments used by the promoter so that they can validate the operational noise anticipated to affect the proposed Ladbroke Green development on the Kensal Gas works

site and 81 Southern Row and Octavia House.

48. There are other clauses and provisions in the Bill which, if passed into law as they now stand, will prejudicially affect the rights and interest of your petitioners and other clauses and provisions necessary for their protection and benefit are omitted therefrom.

YOUR PETITIONERS THEREFORE HUMBLY
PRAY

your Honourable House that the Bill may not pass into law as it now stands and that they be heard by themselves, their counsel, agents and 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 such other clauses and amendments as may be necessary and proper for their protection and benefit.

AND YOUR PETITIONERS will ever pray, &c.

HOUSE OF COMMONS
SESSION 2005-06

CROSSRAIL

PETITION

of

THE COUNCIL OF THE ROYAL BOROUGH OF
KENSINGTON AND CHELSEA

AGAINST,
BY COUNSEL, &c.