

IN PARLIAMENT
HOUSE OF COMMONS
SESSION 2005-2006

CROSSRAIL BILL

PETITION

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 MR KEVIN HIGGINS

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 clause 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"). Your petitioner is Mr Kevin Higgins (hereinafter referred to as the Petitioner). The Bill would authorise the construction and operation of the railway system and its associated development through Romford and your petitioner object to the part of the works outlined below.

4. Objection is taken to the works proposed to be undertaken in Romford between Whalebone Lane (A112) in the west to Waterloo Road in the east. Those works consist mainly of a train maintenance depot, new sidings, and control centre on land to the North of Beechfield Gardens and Crow lane, and a new railway line and rail underpass (dive-under) over Westland's Playing Fields and Westland's Rough to access the train depot.
5. Your petitioner is a local resident, whose rights, interests and enjoyment of property are injuriously affected by the Bill.
6. Your petitioner does not object in principle to the decision to construct a cross London rail link, but does object to the works proposed to be carried out as referred to above.

Use of Existing Depot as Alternative Site

7. Your petitioner avers that it is not necessary to construct a train maintenance depot on the proposed site at Romford. It will be possible to use existing facilities for train maintenance at either Old Oak Common Depot or North Pole Depot on the Great Western Mainline Sites.
8. Additionally, the control centre proposed within the scope of this development could be sited independently from the depot at any new or existing site, space permitting.
9. Your petitioner notes the assertion of the promoters that the only viable location for a depot is along the Great Eastern Line because this is where operating services will commence during the staged construction and opening of the railway. However, there is capacity on alternative railway lines in the west of London on which to undertake testing and commissioning of Crossrail services which can be serviced from either the existing depots of Old Oak Common or North Pole, the latter of which is to be vacated by EuroStar in 2007. The staged construction can be carried out from one of these existing depots.

Alternative Site for New Depot

10. Alternatively, your petitioner considers that if a depot has to be newly-constructed then a better site leading to fewer and less severe community impacts will be the Brentwood A12 Hotel site, Nags Head Lane, Brentwood.

Unacceptable Harm from Construction and Operation of Proposed Romford Depot

Visual Impact

11. The depot will be constructed on ground which will be raised by 3-4 metres. It is a substantial building which will be visible from numerous viewpoints in the locality, including the petitioner's property. It is extremely close to residential properties and in relation to all properties is on a higher level creating views directly on to the railway line and depot in many cases. It will be overbearing and dominant in the landscape.
12. The new railway and railway dive-under on Westland's playing fields will similarly create unacceptable views for the large number of residents and schoolchildren in this area.
13. Your petitioner is also concerned about the harm to visual and residential amenity from the proposed new access road and retaining wall for the stabling area close to Beechfield Gardens properties.

Noise and Disturbance

14. Your petitioner avers that there will be substantial interference from noise, vibration and increased activity in the vicinity of the train depot, stabling area and control centre. The activities within the depot include the use of wheel lathes and carriage washing facilities. The noise of train brakes applied during the movement of rolling stock into and out of the sidings, stabling areas and depot and compressors will cause serious interference with living conditions. The houses, whose bedrooms are level with the trains, on roads such as Beechfield, Cotleigh and Stockland will in particular suffer substantial interference.
15. Noise arising from the trains as they pass into and out of the dive-under at Westland's playing fields is also a serious concern.

Light Pollution

16. It is also averred that there will be serious disturbance from light used to illuminate the depot, surrounding sidings, car parks and access points.

Loss of Greenbelt and Green Corridor

17. The loss of the greenbelt land caused by the new railway line and dive-under is of particular concern to your petitioner given the paucity of green areas in Romford and the importance of retaining greenbelt land in this densely-urban location.
18. Furthermore, the land is used as a green corridor for flora and fauna and should be conserved in the interests of nature conservation. Its loss would be contrary to the London bio-diversity plan.

Loss of Recreational Land and Open Space and Loss of Useable Subway

19. Your petitioner considers that the loss of use of Westland's Playing Fields, Westland's Rough and Jutsums recreation ground both during the period of construction and thereafter is unacceptable and would conflict with current government policy which encourages an increase in mass participation in sport and physical activity. In addition it will significantly diminish the opportunity of schoolchildren including my own to undertake outdoor sports.
20. The extension to the well used Nursery Walk underpass required by this development will create an indefensible space that will not be conducive to pedestrian safety especially at night.
21. The addition of a second bridge spanning Jutsums lane will exacerbate an already precarious but necessary route for pedestrians due to the lack of protection it affords from fast moving road traffic.

Over development of the Locality

22. Your petitioner considers that the construction of the depot and control centre and their subsequent operation will lead to over development of this part of the Borough. The residents have borne numerous developments and redevelopments in a small intensive area including an extensive general hospital development and numerous residential projects.

Costs of Proposed Depot, Underpass and Contaminated Land

23. Your petitioner is aware that the current predicted cost of the proposed depot, underpass and necessitated ancillary development is £430 million. This inordinately high build cost is due to the development issues expected to be encountered including the removal of a contaminated gas holder. The final cost is likely to be much higher and therefore they consider that use of an existing depot would be more cost-effective.

24. Whilst your petitioner appreciates that the return to economic use of contaminated areas of land is generally a benefit, use of this land is not in their view acceptable as this land has reverted to Greenfield status.

Overprovision of Car Parking Spaces

25. Your petitioner considers that the depot and control centre will provide an excess of car parking spaces not necessary for those developments. Such overprovision will not be conducive to the use of other transport modes and will positively encourage car use.

Effect of Construction on Residential Amenity

26. The time predicted for the construction of this proposed facility in the Romford area is between five and six years. Your petitioner considers that the effects on his living conditions for this length of time is unacceptable.
27. Your Petitioner is concerned that as recently as September 2005 Crossrail announced substantial changes to the proposed works. They have also admitted to a technical error in mapping resulting in misrepresentation of affected areas. As a result of this Crossrail intends to make appropriate amendments to the Bill before Parliament and produce technical revisions after the closing date for the submission of Petitions. The Petitioner also submits that the level of consultation by Crossrail has been inadequate and inconsistent throughout the process to date.
28. In light of the above, the Petitioner reserves the right to raise the above matters and any further matters of concern relating to the substance of the Crossrail Bill and this Petition that may arise from continuing discussions, the preparation and publication of reports, any possible revisions that may be made to current work site proposals or any other matters relevant to our expressed concerns that may occur in due course and prior to his representation before the Select Committee.
29. For the foregoing and connected reasons your petitioner respectfully submits that, unless those clauses of the Bill referring to the proposed depot facility at Romford are removed or amended, then the Bill should not be allowed to pass into law.
30. There are other clauses and provisions in the Bill which, if passed into law as they now stand will prejudicially affect your Petitioner and his rights, (including his human rights) interests and property and for which no provision is made to protect your Petitioner and other clauses and provisions necessary for their protection and benefit are omitted therefrom.

YOUR PETITIONER THEREFORE HUMBLY PRAYS your Honourable House that the Bill may not be allowed to pass into law as it now stands and that he may be heard by his Counsel, Agents and witnesses in support of the allegations of this Petition against such of the clauses and provisions of the Bill as affect the property, rights and interests of your Petitioner and in support of such other clauses and provisions as may be necessary or expedient for their protection, or that such other relief may be given to your Petitioner in the premises as your Honourable House shall deem meet.