

THE CROSSRAIL BILL

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 ALASTAIR MAC ENNALS AND SUSAN JANE ENNALS

SHEWETH as follows:-

1. A Bill (hereinafter called "the Bill") has been introduced into and is now pending in your honourable House entitled "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 Alastair Mac Ennals and his wife Susan Jane Ennals of 69 Hunter Avenue Shenfield Brentwood Essex CM15 8PF who have resided at that address for over twenty years and now own the property. Your Petitioners' property is a detached, four bedroom house with a small garden at the front and the rear. The rear garden backs on to the existing Southend

"loop line", and main Chelmsford line, with a steep sloping tree lined embankment where the top of the embankment is level with the height of the first floor bedroom windows of the house.

Apart from a fenced off electricity sub-station, which is set back from Hunter Avenue, the house also immediately adjoins the existing season ticket car park in Hunter Avenue.

In addition, the first Petitioner has commuted to London from Shenfield Station for nearly thirty-five years and both of your Petitioners travel to London mainly using the fast/semi-fast train service.

5. It will be appreciated that your Petitioners and their property will be adversely affected by the Promoters' proposals in particular because:
- (a) Your Petitioners' property backs on to the site of the proposed realignment of the Southend "loop line" and the creation of the new Eastern Sidings at Shenfield Station intended to accommodate the extension of Crossrail to Shenfield.

It is not at present clear to your Petitioners how these works will be achieved but, inevitably - and the Environmental Statement deposited with the Bill makes clear - your Petitioners and their property will be significantly affected by additional noise, dust, vibration and/or visual impact both during the construction works and on a permanent basis with the proposed use of the new Eastern Sidings at more frequent and unsocial hours with the parking of trains.

- (b) Your Petitioners and their property will be significantly and adversely affected by increased noise, dust, vibration, food detritus, and/or visual impact close to their property through:-
- (i) Use of the season ticket car park in Hunter Avenue for offices, canteen and working site arrangements at Shenfield Station including deposit and removal of material and equipment.
- (ii) Associated construction traffic, whether or not the actual traffic coming to and from that work site is confined to the western end of Hunter Avenue as the Promoters now appear to be proposing.
- (c) For the reasons set out in (b) above, access to your Petitioners' property will be adversely affected by traffic congestion in Hunter Avenue caused by construction traffic in Hunter Avenue even if that traffic is so confined. Hunter Avenue and associated roads are only suitable for use by two way traffic of cars and are not designed or wide enough for daily construction lorry use.

- (d) The Environmental Statement deposited with the Bill indicates that some residents of Hunter Avenue in Shenfield will be significantly affected by noise (both day and night) and/or visual impact, to the extent that some residents may be eligible for noise insulation or even rehousing. There will also be associated dust and dirt plus vibration which may damage foundations, structure and fabric of the houses. Your Petitioners will be so affected but are not clear as to the remedies being proposed for them either during the construction work, currently estimated to take between eighteen months to two years, or on a more permanent basis if the proposed works in the Bill go ahead.

Whatever short or long term remedies are proposed by the Promoters, there will be significant additional impact from the proposed construction works, the use of the Hunter Avenue season ticket car park and the eventual use of the Eastern Sidings by trains particularly in hot weather when windows must be opened to allow circulation of air and even in winter for ventilation purposes.

- (e) Disturbance to your Petitioners and their property for a period of at least eighteen months to two years also appears to be accepted by the Promoters in the Environmental Statement deposited with the Bill, since their property has been specifically identified in that Statement.
- (f) As users of the train service from Shenfield Station to London, your Petitioners will be adversely affected by the significant increase in train fares which will inevitably follow the unnecessary replacement of any existing services from Shenfield Station to London by Crossrail in order to recover the costs incurred in constructing Crossrail.
6. Your Petitioners and their rights interests and property will be injuriously affected by the proposals in the Bill to which your Petitioners object, for the reasons, amongst others, already indicated in paragraph 5. and hereinafter appearing.
7. Shenfield station currently has five platforms which enable a fast/semi-fast service to be provided via Shenfield in and out of Liverpool Street basically to/from Clacton and other East Coast seaside towns, to/from Southend-on-Sea, and north to Ipswich, Harwich, etc. There is also a slow service from these platforms at Shenfield station into Liverpool Street - the Metro service - starting every ten minutes. At present, there is a unified franchise for both services run by "One". All the tracks use safer overhead lines for power into Liverpool Street rather than the third rail of the London Underground and other rail services. Your Petitioners' understanding

is that the Promoters propose to replace the existing slow Metro service with a service starting more frequently (but still slow) from Shenfield station with use of an additional platform 6 and increased provision of sidings at Shenfield station.

- (a) It is not understood by your Petitioners how the overhead line/third rail issue will be resolved but it is clear that additional costs are inevitable and safety may be compromised unless a link between the existing main line services and the start of Crossrail is provided closer to London than Shenfield station, for example at Stratford or Liverpool Street.
 - (b) If Crossrail started at Stratford or Liverpool Street it would still provide the advantage of a link, as at present, with the Docklands Light Railway, Jubilee and Central lines as well as main line services but would avoid unnecessary costs/finance being incurred for replacing an existing service from Shenfield station.
8. As regards the Promoters' proposals, in particular those to extend Crossrail as far east as Shenfield station, your Petitioners consider that the logic, timing and economic sense of Crossrail has not been established on the basis of the grounds set out in paragraphs 9. to 19. below.

Accordingly, your Petitioners also on those grounds consider that the extension of Crossrail to Shenfield should not proceed but that an interchange between existing mainline services and Crossrail should be established at Stratford or Liverpool Street.

9. The logic and economic sense is not established.

The main purpose of Crossrail appears to be to alleviate congested underground traffic in London itself (from Liverpool Street to Paddington) with possible associated benefits arising from new lines/branches of Crossrail to Abbey Wood. There seems to be little or no benefit from incurring considerable expense for the replacement of existing services into London from Shenfield station or the provision of services from Shenfield to Heathrow. In that connection, the Promoters' precise intentions for the use of Shenfield station is not clear to your Petitioners but it is apparent:-

- (a) From the Environmental Statement deposited with the Bill some (but not all) of the existing services from Shenfield will be replaced by Crossrail and it seems that the existing slow Metro service will be so replaced. In that respect your Petitioners would point out:-
 - (i) the existing flexible and unified franchise arrangements will be lost as

regards train services into London

- (ii) there will be an unknown impact on freight services currently using the "slow" lines which may require freight services to operate at unsocial hours in future
- (iii) the main use of Shenfield station is by commuters into London rather than from Shenfield across London to Heathrow and that position seems unlikely to change

It is not clear to your Petitioners from the Promoters' material the increased passenger numbers (if any) who will wish to travel to Heathrow (by a slow/all stops service) rather than to London with an interchange to the underground and Crossrail services say at Stratford or Liverpool Street.

- (iv) even the Promoters do not appear to anticipate (in the Environmental Statement deposited with the Bill) a significant increase in passenger numbers arising from the provision of Crossrail from Shenfield station; decentralisation of offices from London also make such an increase unlikely quite apart from more people working from home.
- (v) the saving in journey times (starting from Shenfield station) anticipated by the Promoters is minimal/a matter of a few minutes
- (b) in correspondence, the Promoters have argued that Stratford is not a suitable site for an interchange with Crossrail trains (if the Crossrail service terminated there) but, for example, Stratford has been used for many years in the past for sidings for main line services even if this is not currently the case. Alternatively, with Abbey Wood as a new branch/terminus an interchange with Crossrail at Liverpool Street, possibly with a spur to Stratford would appear to be more appropriate.
- (c) in correspondence, the Promoters have also argued that it is difficult to alter the existing train service timetable from Shenfield station to Liverpool Street if a more frequent service is required. This appears to be illogical since either there is track space available for a more frequent service, as envisaged by the Promoters, or not.
- (d) the only logical or economic reasons for Crossrail extending to Shenfield station appear to be political, to extend the political responsibility/regime of Transport for London and economic for the sole purpose of the Promoters' recovery of the substantial costs of Crossrail by way of fares over as wide an area as possible. Neither factor is considered by your Petitioners as being sufficient justification for incurring the additional costs and disturbance involved by those proposals if an alternative/abbreviated scheme as far as Stratford provides most (if not all) of the benefits envisaged by the

Promoters at significantly reduced/core costs.

- (e) in so far as the Promoters are still changing their proposals there may be further arguments as to why the scheme should terminate nearer London than Shenfield station. Your Petitioners' right to present those arguments is reserved.
10. As a general point, your Petitioners consider that there are few (if any) benefits for your Petitioners, other local residents, Shenfield businesses or even the majority of users of train services from Shenfield station or intermediate stations into Stratford and Liverpool Street. Indeed, there is likely to be a detrimental effect for all concerned caused by the Promoters' proposed works at Shenfield station; some Shenfield businesses may never recover lost trade, once purchasers have found other suppliers of goods and services in neighbouring towns, and local residents could lose their shops unnecessarily because (for example)
- (a) no provision has been made by the Promoters to replace parking for cars which will be lost during construction works and/or
 - (b) congestion of local roads through lorry traffic created by those works.

Such factors combined with the finance involved in the extension of Crossrail to Shenfield station do not justify that extension when such financial resources are limited and should be used to best effect elsewhere in the Crossrail scheme.

11. Accordingly, your Petitioners would argue that, on economic and logical grounds, there is no point in replacing an existing rail service when a shortened and cheaper alternative is available with Stratford as the terminus. Further, for these and other reasons your Petitioners also consider that the logic and economic sense of extending Crossrail east beyond Stratford to Shenfield station has not been established by the Promoters.
12. The timing of Crossrail is flawed as regards any extension to Shenfield. Since the Crossrail proposals were submitted in the Bill to Parliament, it has been announced that the UK has been awarded the Olympics in 2012. The main site will be at Stratford and Weald Park at Brentwood will also be used. This has various implications as regards any extension of Crossrail to Shenfield station, including:
- (a) the timing of Crossrail, even if phased, will conflict with the works for the Olympics at Stratford
 - (b) the availability of land at Stratford will not be known until after the

Olympics have taken place

- (c) the position/demands for an extension of Crossrail to Shenfield may well change with such delays.

13. For these and other reasons, your Petitioners consider the timing proposed by the Promoters is now inconsistent and the revised timescale required supports either a shorter scheme as far as Stratford only or a delay until after the Olympics when a further review of Crossrail should take place as regards its extension to Shenfield.

14. The financing of Crossrail is illogical as regards any extension to Shenfield.

Your Petitioners understand that Crossrail is to be financed through private funding rather than through borrowing; this appears to have several implications

- (a) with the experience of Railtrack and the Channel Tunnel, private financing sources will be reluctant and inordinately expensive
- (b) for that reason, costs should be restricted as far as possible and exclude unnecessary expenditure on an extension to Shenfield
- (c) rail fares from Shenfield station are likely to rise to an exorbitant extent under the current proposals with little or no prospect of any benefits arising from Crossrail for train passengers from Shenfield station into London

15. Lack of consultation with your Petitioners.

Apart from one exchange of correspondence, initiated by your Petitioners, your Petitioners have not been consulted directly on or informed of the proposals of the Promoters despite (apparently) having been specifically identified as occupying a property in Hunter Avenue affected by pollution arising from the Promoters' proposals. In addition, publicity about local meetings appears to have been poor and details of the proposals have been changed within a few months or have not been made readily available to local residents in Shenfield. Your Petitioners (like many other residents) do not have personal access to websites and the internet.

16. Your Petitioners were on holiday at the time of the meeting organised at short notice by Brentwood Borough Council on 2nd June 2005 so were only alerted to the Promoters' more detailed proposals by hearsay from neighbours following that meeting. Further, the comments made in the Explanatory Statement deposited with the Bill completely underestimate the

current pleasant character/quality of Shenfield and the adverse impact on Shenfield, its residents and businesses arising from the Promoters' proposed works at Shenfield.

17. Further, views have been expressed in the Environmental Statement deposited with the Bill, in particular for example as regards the effect (or lack of effect) of a reduction in working hours.

So far as your Petitioners are concerned since your Petitioners' property will be exposed to additional noise and other disturbance for long periods, both day and night, a reduction in the proposed daily working construction hours (especially avoiding nightworking) would be of significant benefit.

18. That lack of consultation is considered to be fundamental to the proposals in view of their implications for those affected in Hunter Avenue, other residential and business areas of Shenfield and commuters using Shenfield station.
19. On that basis, your Petitioners consider that the Promoters have failed to demonstrate any justification or need (in terms of economic or business benefits versus detriment, unnecessary expenses and disturbance) for Crossrail or the terminus to be located at Shenfield rather than a terminus at Stratford or a link with Crossrail at Liverpool Street.
20. If this Bill is passed and the Promoters' proposal to extend Crossrail to Shenfield station is accepted, the Promoters should be required:
- (a) to ensure that consideration is given to the site of any additional Eastern Sidings being moved further down the line closer to open space areas where noise/disturbance will be less obtrusive.
 - (b) to ensure that similar consideration is given to alternative sites for any office, working space and canteen arrangements during the construction period.

In respect of (a) and (b), in addition, Hunter Avenue is not suitable for construction lorry traffic in any shape or form - there is likely to be damage to utility services, there is a sharp bend in the narrow road and parked cars which will restrict lorry traffic at the Western end and there are elderly residents as well as children going to/from local schools for whom lorry traffic will be an additional hazard and a source of pollution.

- (c) to limit the hours of operation during construction of the Eastern Sidings at Shenfield station and use of the Hunter Avenue car park - the present hours proposed by the Promoters are considered to be too long despite the

assessment in the Environmental Statement deposited with the Bill.

- (d) to take more seriously the very real problems that will be caused by the loss of a large number of short term and long term car parking spaces in Shenfield's shopper and commuter car parks. The Promoters should at least seek alternative parking facilities for commuters, e.g. the use of open land near Alexander Lane coupled with a Park and Ride facility using main roads; for shoppers more alternative parking space locally should be arranged without having to alter existing car parking restrictions imposed to protect local residents and ensure a more safe environment for those using the pavements and roads in Shenfield.
- (e) to limit the hours of use of the proposed Eastern Sidings by Crossrail.
- (f) to provide or bear the cost of full and adequate sound-proofing of your Petitioners' property and/or rehousing of your Petitioners during the use of the Hunter Avenue car park and construction of the Eastern Sidings.
- (g) to provide or bear the cost of full and adequate sound-proofing of your Petitioners' property as regards the additional noise which will arise from the use of Crossrail of the Eastern Sidings (once constructed).

For obvious reasons, your Petitioners would wish the Promoters to be required to mitigate all noise, dust, vibration, pollution and other disturbance arising from the Promoters' proposed works which might be caused to your Petitioners and/or their property. In that connection, some double-glazing was installed by your Petitioners into their property some years ago but, although expensive and seemingly effective at the time of installation, that double-glazing is now considerably out of date and will be extremely ineffective in dealing with the additional impending noise from the proposed Crossrail works at Shenfield station, in particular those for the new Eastern Sidings and subsequent use of those Sidings.

- (h) to pay your Petitioners adequate and proper compensation for any
- (i) damage to or subsidence of their property caused by or arising from the proposed works and/or their subsequent use by the Crossrail service
- (ii) loss in sale value of their property brought about by the planning blight and the proposed works, in the event of your Petitioners wishing to sell their property, and/or move elsewhere between now and the final completion of the proposed works by the nominated undertaker
- (iii) loss of sale value with construction and/or use of the new Eastern Sidings, which are already giving rise to planning blight, in such an event (as in (ii) above) occurring following completion of the proposed works

and such other compensation to which your Petitioners may be entitled.

Your Petitioners would point out that the Crossrail Bill has already caused devaluation to properties and disruption to property transactions close to Shenfield station and this will continue and worsen if and when works proceed due to the immense disturbance, noise, vibration, dust, fumes and pollution by the proposed works at Shenfield station as well as any subsequent use of those works by Crossrail.

21. There are other clauses and provisions in the Bill which, if passed into law as they now stand, will prejudicially affect the rights and interests 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.