

**0634**

**IN PARLIAMENT**

**HOUSE OF COMMONS**

**SESSION 2013–14**

**HIGH SPEED RAIL (LONDON - WEST MIDLANDS) BILL**

**PETITION**

Against – 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 Philip Sharkey and Catherine Colley

SHEWETH as follows:-

1. A Bill (hereinafter referred to as “the Bill”) has been introduced and is now pending in your honourable House entitled “A Bill to make provision for a railway between Euston in London and a junction with the West Coast Main Line at Handsacre in Staffordshire, with a spur from Water Orton in Warwickshire to Curzon Street in Birmingham; and for connected purposes”
2. The Bill is presented by Mr Secretary McLoughlin, supported by the Prime Minister, the Deputy Prime Minister, Mr Chancellor of the Exchequer, Secretary Theresa May, Secretary Vince Cable, Secretary Iain Duncan Smith, Secretary Eric Pickles, Secretary Owen Paterson, Secretary Edward Davey, and Mr Robert Goodwill.
3. Clauses 1 to 36 set out the Bill's objectives in relation to the construction and operation of the railway mentioned in paragraph 1 above. They include provision for

the construction of works, highways and road traffic matters, the compulsory acquisition of land and other provisions relating to the use of land, planning permission, heritage issues, trees and noise. They include clauses which would disapply and modify various enactments relating to special categories of land including burial grounds, consecrated land, commons and open spaces, and other matters, including overhead lines, water, building regulations and party walls, street works and the use of Lorries.

4. Clauses 37 to 42 of the Bill deal with the regulatory regime for the railway.
5. Clauses 43 to 65 of the Bill set out a number of miscellaneous and general provisions, including provision for the appointment of a nominated undertaker ("the Nominated Undertaker") to exercise the powers under the Bill, transfer schemes, provisions relating to statutory undertakers and the Crown, provision about the compulsory acquisition of land for regeneration, reinstatement works and provision about further high speed railway works. Provision is also made about the application of Environmental Impact Assessment Regulations.
6. The works proposed to be authorised by the Bill are specified in clauses 1 and 2 of and Schedules 1 and 2 to the Bill. They consist of scheduled works, which are described in Schedule 1 to the Bill and other works, which are described in clause 2 of and Schedules 2 and 3 to the Bill.
7. Your Petitioners are a married couple who reside at 32 Delancey Street (the Street), Camden Town, London, NW1 7NH. The Property, dated 1880's approx., is a 5 storey Victorian Terraced house. We purchased the freehold of this house in 1988 and have lived here ever since. Over the past 26 years, we have 'grown into' the house having had two children (now aged 20 and 17 years old) and both still living at home. Your Petitioners' son and daughter are students (one is an under graduate and the other taking her AS exams this summer).
- 7.1 Your Petitioner (male) is a self-employed photographer who is running a family Photography business that has been established for since 1953. Your Petitioners cycles to work in Oxford Street, through Regents Park. The second petitioner (female) works as a psychotherapist who has a study in the basement of the Property which is at the front of the house. She needs this space for privacy in order to write her patient reports and to speak on the phone sometimes to her patients and other times about her patients.

7.2 Your Petitioners chose this property originally as it was an affordable freehold property with a back garden, well located to Your Petitioners work, walking distance to Regents Park and Primrose Hill, shops, transport systems. Your Petitioners family have lived happily in their house and have developed strong ties and have become actively involved to the local community. Regents Park, Primrose Hill and the Zoo have been a constant source of enjoyment to Your Petitioners. All of Your Petitioners family cycle, walk or take buses to and from local environs and the West End. Your Petitioners support the local independent shops and enjoy the Indian restaurants in Drummond Street.

7.3 Your Petitioners still value living in this property and in this area because it continues to suits all the family's needs. However, this is not to say that in, for example, 5 years time, your Petitioners' situation will have changed. The children may have left home, the Photographic business may have come to an end – so your Petitioners can envisage a time when they may need and/or want to downsize and move elsewhere.

7.4 Your Petitioners' property is situated in a beautifully curved street of residential 4/5 storey terraced Victorian town houses which all abut the pavement. Your Petitioners' property, like most of the other Delancey Street houses, have access to the basements via steps from the pavement. There are two cellars under the pavement. Your Petitioners' garden backs onto an oasis of greenery from neighbouring gardens – which gives a sense of tranquillity. Your Petitioners park their car in the Residents Parking Bays in and around Delancey Street.

7.5 Delancey Street is narrower at the Camden High Street end – widening towards the top end of the Street where it adjoins Parkway. The top end of the street is wider, spacious and very light – and has direct views across the railway cutting towards the South. Delancey Street is at the centre of a unique Camden community that coexists with the railway cutting which is located at the top end of the street and where it joins Parkway/Mornington Terrace. Your petitioners' property is approx. 151.m from the cutting. (This measurement was taken by Your Petitioners with a professional surveyor's measuring wheel, and walking in a direct route from front door up diagonally across Delancey Street and through the garden of the Edinboro Castle Pub to the fencing to the Cutting.)

7.6 The Cutting and it's neighbouring roads including Delancey Street are part of two Conservation residential areas and given the proximity to the West End is a peaceful and authentic neighbourhood – consisting of historic building and structures, such as the Stevenson retaining wall within the Cutting, listed privately owned and social housing and peppered with a handful of unique businesses such as the York and

Albany, Edinboro Castle Pub, the Portuguese Deli and the coffee bean shop in Delancey Street. From Your Petitioners' house Regents Park is 3 or 4 minutes walk and Primrose Hill is 6 or so minutes walk. There is a real sense of a community within Delancey Street – with the Portuguese Deli as a central hub of activity with tables outside for coffees and cakes! The local Church in Arlington Road uses Delancey Street part of its route for its bi-annual religious processions. There is an Annual summer fete held in Albert Street, a neighbouring road.

7.7 Delancey Street is a one way street which is connected to Camden High Street at the eastern end and Parkway at the top[western end]. Arlington Road, Albert Street and Mornington Terrace all connect to Delancey Street. Although Delancey Street is a main thoroughfare with two bus stops, (the C2 and 274), during off peak times, it can be relatively peaceful. Delancey Street has residential parking on the right side of the Street.

7.8 The Bill includes powers for the Secretary of State and the Nominated Undertaker to do construction works which are estimated to take 10-15 years to complete. Timing is still undecided due to the rethinking of the Euston Station plans.

7.9 Your Petitioners' property will not be demolished as a result of the Bill but Your Petitioners will be directly and specially affected. Your Petitioners' Property is located within 151 metres of the line and construction footprint at the Cutting at the top end of Delancey Street. Due to the construction at Euston and the Cutting and utility works on Delaney Street, the following measures will impact on Your Petitioners' lives and Property:

- (i) The planned construction works in the Cutting are estimated to take 10 years and will consist of demolition of 15 m high Park Village East retaining wall, reconstruction of PVE retaining walls as high as 35 m, deep excavation and construction of retaining walls, Northern section of the high speed dive under, demolition and reconstruction of Mornington Street Bridge and Granby Terrace Bridge, reception of tunnel boring machinery, installation of new tracks, gantries etc. – plus much more.....
- (ii) There is likely to be noisy construction work 24 hours a day, 7 days a week. As stated in Environmental Statement, (ES) Vol 2 2.4.9 *'The following activities are likely to require work to be undertaken outside core working*

*hours: The demolition of bridges over the existing railway; construction of elements of the retaining structures at Park Village East; deliveries of large components, such as bridge beams, heavy plant and equipment; elements of the utility diversions in Euston Road and elsewhere in order to avoid daytime traffic disruption.....'*

- (iii) Your Petitioners' property is located 3 minutes walk away from Mornington Street Bridge which is one of the bridges planned for demolition and Park Village East is 2 minutes walk away (at the top of Parkway).
- (iv) Delancey Street will be used as a diversion route arising from the closure of Mornington Street over bridge and Park Village East. The duration of these diversions is anticipated to be 4 years between 2016-2020 (Table 6-46, Appendix TR-001-000)
- (v) The Street has also been identified as part of the construction traffic routes to/from the three local satellite compounds (Park Village East, Mornington Street Bridge and Mornington Terrace Sidings)
- (vi) Your Petitioners' property has been served with a Parliamentary Notice Schedule A. This authorises the compulsory acquisition of the basement cellars.
- (vii) The above Notice is due to planned utility construction works on Your Petitioners' street. The Utility works as stated in the ES Vol 2 12.4.19 will mean both lanes of Delancey Street will be required during construction for extensive utility works by Thames Water, National Grid, UK Power Networks and Telecommunications. The works will take the form of a 'rolling work' site that would be moved along the utility diversion route over time and may remain open for considerable periods of time.
- (viii) Neighbouring road closures and/or limited access and major congestion pressures points are expected in and around Your Petitioners' property on Parkway, Arlington Road/Delancey Street, Hampstead Road, Granby Terrace, Albany Street, Park Village East, Prince Albert Road, Mornington Terrace, Mornington Crescent, Mornington Street Bridge, and Robert Street.

In other words, Your Petitioners' Property and the Street will be hemmed in by construction and congestion.

- 8 Your Petitioners and their property are injuriously affected by the Bill, to which your Petitioners object for reasons amongst others, hereinafter appearing.

9 The Bill includes powers for the Secretary of State and the Nominated Undertaker to do construction works which are estimated to take 10 years or more to complete. At the time of Your Petitioners writing this – the plans for the Scheme and construction details remain unclear. However, given the information Your Petitioners have been given through the official channels of the HS2 ES and Code of Construction Practice – the Scheme will have a considerable impact of Your Petitioners’ quality of life and on Your Petitioners’ house and street. The Bill effectively will allow HS2 to do whatever they think works best for them – even beyond the remit of the actual Railway line. There is now discussion about property development and alleged regeneration over Euston Station and along the open Cutting up to Parkway. There appears to be little protection for residents from unreasonable construction hours or environmental considerations including noise, dust, and air quality. Furthermore, currently there is no right for compensation for damages suffered including blighted property prices in urban areas. At the present time, Your Petitioners’ protection from such threats will be removed without a change in current proposals.

Due to the construction measures set out above in paragraph 16, Your Petitioners believe that there will be severe adverse impacts on the quality of their lives and that of their son and daughter and on their property:

### 9.1 Noise

Your Petitioners will suffer accelerated noise from ;

- (i) The extensive and lengthy construction at the Cutting which will not fall within the normal working hours. Your Petitioners can expect to hear this construction night and day including weekdays for years and years. Although Your Petitioners’ house is not immediately next to the open Cutting, it is still within a close range where noise can be heard; for example, at night, trains can be heard from Your Petitioners’ bedroom at the top of the house, especially during the summer months when the windows are open.
- (ii) The planned construction utility works in Delancey Street. This is going to consist of deep excavations, drilling, digging, utility vehicles removing waste. As Your Petitioners’ have a Parliamentary Notice which can acquire the Property’s cellars, this could mean that heavy utility works will take place right outside the house. The Cellars are underneath the pavement and 4 feet from the basement window of the property. (N.B on further discussion with Matt Edgar, the HS2 stakeholder for this area, it seems unclear as to

whether the cellars will be acquired – however this does not detract from the fact that HS2 have the powers to decide what they need to do regarding works in/above/beside the cellars on the pavement and road by Your Petitioners' Property.

- (iii) The extra traffic and estimated 70 extra construction HGVs daily using Delancey Street as a diversion route and construction route.

Your Petitioners' property abuts the pavement, which means there is no protection from the noise on the street. The property is situated in the narrower part of the street – where there is a tunnelling effect due to the tall terraces of houses of either side. When a noisy bus or lorry passes, an echo sound bounces off the buildings and vibration can be felt especially at the top of the Property which is Your Petitioners' bedroom.

Your Petitioners have very good reason to be concerned about unacceptable levels of noise following a recent construction work within the Street. See example below.....

*From January to May 2014 Thames Water replaced the Victorian pipes throughout the entire street. This entailed – pneumatic drilling, diggers, skips, tarmac rollers, lane closures, bus stop closures, limited pavement access. The works moved up the street over the weeks – working from one side to the other side of the road. The volume of noise was at times so intolerable that Your Petitioners could not work in her basement study – and had to find an alternative space to work. On several occasions, Your Petitioner was talking to a patient on the phone when the drilling started right above the basement windows on the pavement – it was very distracting and meant Your Petitioner could not fully focus on the serious problems her patient was talking about.*

*At the height of the works – the noise was deafening, it was impossible to stay in the front rooms of the house. Due to the lane closures, the traffic was at a grid lock – with engines being revved – dust from the drilling and digging and removing waste, pollution from the grid locked traffic, and vibrations to the property due to the drilling and lorries at stand still outside the property.*

In addition to the study being situated in the basement at the front of the Property, Your Petitioners and their son's bedrooms are at the front of the property, as is the sitting room and dining room.

Your Petitioners are worried that the cumulative impact of noise generated from the HS2 scheme will mean: disrupted sleep, disrupted peace particularly during evenings, night time and weekends. In addition it will cause disrupted work for Your Petitioner's work which could lead to loss of earnings. For Your Petitioners' son and daughter – it will impact on their studying and concentration and potentially on their futures. The tranquillity of the back garden will also be lost. In effect, there will be nowhere to go to get away from the noise and disruption from the construction works and associated traffic.

## 9.2. Vibration and Damage

The effects of heavy drilling from the construction works on Delaney Street and from the construction HGVs using the street as a construction and diversion route will create considerable vibration to Your Petitioners' property.

During the recent road works in the street, Your petitioners' property shook from the drilling outside on the pavement. Your Petitioners are concerned that due to the shallow foundations of their Property, the extensive utility works could lead to cracks and other structural damage.

In 1997 Your Petitioners' Property had subsidence from a neighbour's tree in the back garden. The back part of the property needed underpinning and all the drains running the full length of the house were cracked and needed replacing.

## 9.3 Traffic

Your Petitioners have identified that the following issues will increase traffic flow and increase traffic grid lock on Delancey Street.

- (i) Delancey Street is to be a construction and access route for construction traffic from the 3 local construction compounds – which will be operating for 4 years to 11 years – with up to 70 HGVs transporting concrete and other materials to and from each site. Information taken from ES Vol 5 Appendix TR-001-000 Table 6-41
- (ii) The ES states that as a result of road closures within the vicinity of Euston, Delancey Street has been identified as a diversionary route for public traffic for the duration of these closures, namely Mornington Street Bridge and Park Village East.
- (iii) A major traffic congestion point at the junction of Arlington Road and Delancey Street has been identified. As identified on Map Number TR-03-001

reference T01-03-Ma – it indicates a temporary adverse effect upon traffic flows and delays to vehicles of major significance, arising during the construction works.

12.4.24 states 'As a result of road closures and associated traffic diversions, construction of the Proposed Scheme will result in increases in daily traffic flow causing a significant increase in traffic related severance to Arlington road'.

Arlington Road crosses Delancey Street – and most traffic using Arlington Road turns into Delancey Street to head up towards the West and North.

- (iv) A major congestion point has also been identified at the junctions of Parkway and Prince Albert Road. In addition Parkway has been identified as having land closures resulting in adverse effects on traffic. Parkway is at the top of Delancey Street and will have a significant impact of the traffic heading up towards Parkway from Delancey Street.

Your Petitioners would like to point out that there are inconsistencies within the ES regarding traffic impact on Delancey Street.

On the one hand the ES has identified all of the above – and yet on the other hand it states that Delancey Street will not suffer any significant traffic and transport effects during construction.

This is clearly not going to be the case. Your Petitioners are very concerned that the HS2 technical advisors have omitted to recognise the significant impact its Scheme will have on Delancey Street in terms of traffic and its cumulative effects.

Your Petitioners would like to stress that the recent experience of the utility works in the Street was a relatively short period of time, however, Your Petitioners suffered from inconvenience and loss of quality of life in terms of peacefulness, air quality, noise and vibration and loss of residential parking, plus awkward access to and from their Property. **The HS2 traffic congestion in Delancey Street will not be temporary is the same way – but could last for the duration of the construction stage.** In addition, the ES states that Delancey Street will suffer from moderate adverse effects of traffic once the scheme is completed due to permanent pedestrian severance.

The cumulative effect of increased traffic will have a very adverse impact of Your Petitioners quality of life and health. It will give rise to higher levels of dangerous air quality due to exhaust fumes and construction dust. In addition heavier traffic will impact on noise and vibrations.

Living in the street with continual grid lock and increased traffic flow will trigger severe stress because Your Petitioners will have nowhere to get away from it due to the position of house to the road and traffic. **With excessive traffic Your Petitioners' Property does not feel like a sanctuary but instead feels invaded by noise, dust and vibrations.**

#### 9.4 Air Quality

Your Petitioners are very concerned about the impact on the Air quality in and around Delancey Street.

*Example:*

*As Your Petitioners' house is situated within one metre of the road – there is no shield from the dust and toxic exhaust fumes from the traffic. The level of pollution is very noticeable inside the property particularly in the front rooms on the ground and basement floors as there is an accumulation of black dust around the air vent, windows and doors.*

The air quality in Delancey Street is already dangerously high and exceeds the legal limits of Nitrogen Oxide because it is situated at the centre of two major 'hot spots' of air pollution – Parkway and Camden High Street.

The air quality in the street is inevitably going to severely deteriorate during the entire period of the construction of HS2 in Camden. As a result Your petitioners' health will be at risk.

#### 9.5 Parking

Currently there is Residents Parking Bays situated up the right side of the Street. With the planned Utility works for the Street, Parking bays will be suspended. No mention of this has been made in the ES – and as a result no measure has been considered for alternative arrangements. Residents Parking is already pressured in this area and as a result can prove very difficult to find a place to park near to the property. This is exacerbated during times of road works and restricted bays.

#### 9.6 Buses

Currently Delancey Street's two buses C2 and 274 have two bus stops in the Street. The ES has identified that the utility works and phases of construction will affect bus routes. For Example [1e, the ES states that the C2 bus will experience increased journey times. In addition, the bus stops in the Street will be temporarily suspended. Your Petitioners' use

the buses frequently for work and leisure – and thus any changes will have an impact on their travel arrangements and ease of getting to and from destinations.

### 9.7 **Blighted Property Prices and Compensation**

Your Petitioners' believe that their property value will be severely blighted as a result of the Parliamentary Notice and the surrounding construction works. Living within a continual, long-term building site with its associated problems could deter any future buyer. There is already a sense of uncertainty and fear.

Your Petitioners' have invested all their earnings into their property and have viewed it as their pension. By the time the scheme is finished – anytime between 10-20 years (depending on the final design for Euston Station), Your Petitioners will be in their late 60's –late 70's). During this time, Your Petitioners' will be considering retirement and may need to sell their property in order to release capital. Your Petitioners' do not feel it is fair or just for them to bear the brunt of losing hard earned money because their property and local environment will be blighted due to the HS2 Scheme. Currently, the Government has not offered adequate compensation or mitigation to Your Petitioners or any other Camden residents living next to or near to the Construction of HS2.

It is unfair that the Government consider rural areas to be more severely impacted upon than urban areas. The local environment around Camden Cutting is densely populated, and survives within a very fragile infrastructure whereby any small change, such as a traffic signal failure, has a major impact on all neighbouring roads. The assumption that because residents are used to noise, traffic, trains, is not a justifiable argument to ignore the rights, quality of life, financial losses and health of Your Petitioners and their neighbours. **The HS2 scheme will put a huge burden emotionally, physically and financially on the lives of Your Petitioners' and this should be reflected in compensation and other mitigating measures.**

25. The Scheme is not a normal temporary construction scheme – but an extraordinary one both in terms of the cumulative nature of the impact and the prolonged duration, however, there is no matching extra-ordinary compensation scheme offered to Your Petitioners' area.

26. Not only is it disruption from the traffic and construction in Delancey Street, but it is disruption to the whole neighbourhood. So, wherever Your Petitioners want to go, they will face chaos. Whether its walking to Regents Park, cycling to the West End via Hampstead Road, eating at their local Indian Restaurant in Drummond Street or trying to find a residential parking space in or around Delancey Street – it will become an obstacle course.

## 10. **Mitigation and Compensation**

Your Petitioner objects to the powers that are proposed to be provided by the Bill to the Secretary of State and the Nominated Undertaker and respectfully submit that the Bill should be amended or undertakings should be required so that HS2 Limited, the Secretary of State and/or the Nominated Undertaker must review the construction strategy for the project and its related works by considering their cumulative impacts on Your Petitioners.

Your Petitioners ask this Honourable House to require HS2 Limited to implement the following mitigation and compensation measures:

- (i) Your Petitioners support the proposed request for Old Oak common to be considered as a permanent or, failing that, a temporary terminus for HS2.
- (ii) If it is decided that HS2 will terminate at Euston Station, Your Petitioners request that the final section of track from the Cutting is tunnelled so disruption to the Cutting and approach to Euston is kept to a minimum.
- (iii) Your Petitioners endorse the design for a Double Deck Down Station at Euston in order to limit the size and scale of the footprint and land that is taken up.
- (iv) Your Petitioners would like an undertaking from HS2 Limited that a full survey will be carried out by independent specialists on the impact of disruption, traffic, noise air pollution, diversion routes, blighted property prices on Camden Cutting area including Delancey Street. In addition that monitoring on these issues will be routinely carried during construction and results are shared with both local residents and Camden Council.
- (v) Your Petitioners would like an undertaking that traffic, particularly the use of HGVs are reduced to a minimum on Delancey Street and that it is not to be used as a diversion or construction route.
- (vi) Your Petitioners would also like an assurance that any construction traffic, particularly HGV's have zero emission and that there are no diesel construction vehicles.
- (vii) Your Petitioners would like an undertaking that there will not be night-time or weekend construction works.

- (viii) Your Petitioners feel strongly that all local construction satellite compounds could be located within the cutting next to the tracks rather than at street level. Materials can be transported by rail and canal rather than by road.
- (ix) Your Petitioners would like an undertaking from HS2 Limited that they will pay for an independent Structural Surveyor to assess and monitor the Property before, at regular intervals during construction works and after it is finished. Following an assessment of damage caused from the works and/or traffic, Your Petitioners would want an assurance that HS2 Limited will pay for the full cost of repairs and redecoration and/or temporary rehousing if necessary.
- (x) Given the current high levels of air pollution and noise in Delancey Street, Your Petitioners would like the noise thresholds for mitigating measures such as sound insulation and temporary rehousing to be lowered so Your Petitioners have the reassurance that they will be offered some help during the peak periods of intense construction and traffic. .
- (xi) Your Petitioners would also like HS2 to erect Sound insulation screens over the Cutting during construction in order to help muffle the noise.
- (xii) Temporary trees placed in planters in and around the Cutting and Delancey Street in order to provide a barrier/screen from noise and pollution. This will just allow an extra sense of protection from the Street once inside the house.
- (xiii) Your Petitioners would like to see HS2 Limited and the Government offering a **Property Bond** (as set out in the Camden Cutting Petition and Delancey Street Residents Association Petition). This would put Your Petitioners' and any potential buyer's minds at rest and alleviate those fears of uncertainty over blighted values. It would mean that Your Petitioners' would not potentially lose part of their investment – and indeed, future livelihood.
- (xiv) To help mitigate against the major level of disruption, the extraordinary length of time Your Petitioners' will be living within a building site and coping with its associated problems noise, traffic, air pollution Your Petitioners would like HS2 Limited and the Government to offer financial compensation in the way of a **Cash Payment** – as being offered in Rural areas. A cash payment that is extended to include Your Petitioners

Property. This would allow Your Petitioners to use the compensation for the said suffering, monetary loss, and distress caused by the Scheme.

- (xv) Your Petitioners would like HS2 Limited to assign a senior representative to oversee and take responsibility for all the utility and other construction works in Delancey Street. This way, problems can be sorted out quickly.
- (xvi) Your Petitioners would like an undertaking for HS2 Limited to wash down the pavements in Delancey Street on a weekly basis – this way reducing the impact of dust.
- (xvii) Finally, Your Petitioners would like an undertaking that HS2 Limited will repair and repaint the exterior of their Property once the works are completed.

11. For the foregoing and connected reasons your Petitioners respectfully submit that, unless the Bill is amended as proposed above, so far affecting your Petitioners should not be allowed to pass into law.

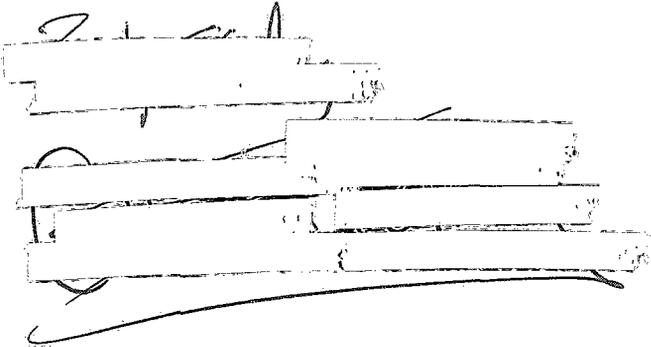
12. There are other clauses and provisions of the Bill which, if passed into law as they now stand will prejudicially affect your Petitioners and their rights, interests and property and for which no adequate provision is made to protect your Petitioners.

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 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 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.

PHILIP SHARKEY AND CATHERINE COLLEY

Signed

The image shows several lines of handwritten text, likely signatures, which have been heavily redacted with thick black horizontal bars. The redactions cover most of the text, leaving only the top line of a signature and some faint marks visible. The redactions are stacked vertically, covering approximately four lines of text.

