

IN PARLIAMENT

HOUSE OF COMMONS

SESSION 2013–14

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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 JO HURFORD.

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 Petitioner lives at Flat 71, 30-40 Grafton Way in a flat owned by Camden Council. Your Petitioner has lived at this property since 2010 and had not heard of The Proposer HS2 before the tenancy began. Your Petitioner's property will not be demolished as a result of the Bill but it is located 0.061 of a mile from the land potentially required during construction (HS2 Vol 2 Map book CFA1, LV-03-001). The HS2 Environmental Statement says during construction Grafton way will have an increase in traffic of 30% which will cause pedestrian severance (Vol2, CFA1 12.4.26) and this will continue after 2026, and by 2041 will be in the PM only (12.5.32) The flats in the building Your Petitioner lives in are separated into two sides with an

internal public corridor. Your Petitioners flat is on the 3rd floor and comprises of 2 rooms with windows (bedroom and living room) being directly above the traffic on Grafton Way and 2 rooms which are internal with no windows (bathroom and kitchen). The flats of people living on the opposite side of the internal corridor are in reverse but their windows which overlook a private courtyard (which no tenants have access to) rather than a road.

Your petitioner is starting her own business hand making bags out of mostly recycled products in order to not only have a viable business before long, but also to help the environment. Your Petitioner dose this in her living room and any traffic hold-up in the nearby area causes a greater number of vehicles moving much slower than normal below your Petitioners windows, which causes Your Petitioner a great deal of stress and affects her ability to work because your Petitioner finds the noise of diesel vehicles idling below extremely noisy, irritating and smelly. Also when the vehicles are nose-to-tail the impatient drivers honk their horns, causing a cacophony of sound which has a negative effect on your Petitioners state of mental health.

During 2011 Your Petitioner thought in depth about what to do to help her community after finding out so many people felt helpless when faced with letters from The Promoter. Local people felt no body outside Camden knew what was going on and many did not have access to the internet so Your Petitioner started the Save Drummond Street Group on Facebook but then changed this to a more publicly accessible Page in January 2012. It is for this reason Your Petitioner feels she has a right to Petition on the effects on Drummond Street, which is just a short walk from her house.

8. Your Petitioner and their rights, interests and/or property are injuriously affected by the Bill, to which your Petitioner object for reasons amongst others, hereinafter appearing.

9. Not only will Your Petitioners home atmosphere and health be affected by the proposed scheme but your petitioner is also affected as a member of the wider Euston community.

With regard to Your Petitioners home, there are two issues, 1. Air quality, Your Petitioners flat is directly above the street below, not set back, so all traffic fumes come inside. As a result of the scheme 30% extra traffic will drive below Your Petitioners windows which will cause an increase in in air pollution. The Promoter has highlighted this problem in their Environmental Statement Vol 2 CFA1 4.4.7. The increase in flow will cause vehicles to be queuing for the traffic lights with motors idling and their fumes entering Your Petitioners

flat. This increase in pollution will cause health problems as many studies have shown air pollution increases risk of heart disease, asthma and cancer. Also the removal of spoil and general construction works will create a lot of dust, which could easily encroach into Your Petitioners area. These 2 issues together would cause a huge cumulative impact. 2. Noise. The noise created by 30% extra traffic will cause a significant reduction in Your Petitioners quality of life as there will be no quiet enjoyment of home atmosphere. You Petitioner thinks construction noise has been under estimated in the ES especially with regard to night time works. Noise seems to carry much further at night and Your Petitioner is certain she will hear it as she is a very light sleeper. All residents ought to be entitled to a quiet at night in order that they get enough sleep and are able to function properly during the day. Not being able to sleep properly is very stressful and noise at night can cause mental health issues to increase which will impact the wider community.

10. You Petitioner is also concerned that my main way of crossing Euston Road will be cut off. I current use the underpass between the two entrances to Euston Square tube as an unhindered, less polluted, safer way to cross to get from my home to Drummond Street and St James Gardens. The ES talks of remodelling Euston Square Station but there is no mention of if the pedestrian underpass route will be maintained.

11. Your Petitioner is concerned that the character and quality of her local area will be changed forever for the worse if either The Promoters use either the Option 8 Station design or the new level deck scheme presented in the document 'HS2 plus' by the Chairman of HS2 in March 2014. These schemes will make the station of vast size widening the footprint causing the demolition of homes and business and the loss of St James Gardens. The Euston area has had lots of new glass and steel developments built and if one looks at Tottenham Court Road you will see it is very hard to find a business there which is not part of a chain. Your Petitioner is concerned that the station development will house yet more chain shops, things we have a surplus of in the area. As the Promoter has failed to fully evaluate other station proposals that would cause no loss to the existing community Your Petitioner feels the reason behind using a wide station is a land grab for developers.

12. St James Gardens where Your Petitioner gos for peace and quiet will be gone. There is nowhere else like it in the area, it was a former burial ground and I love to look at the headstones. It has huge trees, lovely old rosebushes and the Council makes a wonderful wildflower patch there every summer. It is very important to have such a place in a built up area. Your Petitioner is also concerned that no habitat study was done and that there may be species of wildlife living there that need protecting.

13. Your Petitioner has concerns about the effect of the construction of the works on businesses in Drummond Street as these are small and independent businesses

which may not be able to stand being cut off from their customers for the duration of the construction phase. The street is renowned for its Indian restaurants and food shops it is well known throughout the world for this fact, the potential loss of any of these business will be a severe loss to the community and will change the character of the Euston area for the worse. One business on the street will be lost through demolition, as will the popular Bree Louise pub in neighbouring Euston Street. A high proportion of the businesses' trade comes from people using/passing through Euston station, a wall is to be erected across the east end of the street causing the street to be cut off from customers coming from Euston. The businesses will be situated immediately next to major construction works for a number of years. Your Petitioner considers that the scale of the impacts on these business has been severely underestimated by the Promoter, who have not listened to the business owners or members of the Community during what was meant to be a series of community engagements. This process was a farce, seeming to be a box-ticking exercise for the Promoters rather than actual engagement. Throughout the Community Forum process there have been requests that Drummond Street not be used for construction vehicle access. Eventually Drummond Street was removed from the safeguarded area causing great happiness for your Petitioner and the business owners. However at the Community Forum in ##### and subsequently in the ES V2 CFA1 12.4.14 we are told Drummond Street will still be used for some lorry access. The isolation effects have not been properly considered. ES:10.4.3-10.4.7 Drummond Street will experience exactly the same effects as The Exmouth Arms and worse than the Roj Cafe. In a cafe there is a potential that construction workers may come to purchase a bite to eat. They will not however sit down to lunch in a Drummond Street restaurant. It is incomprehensible that HS2 says Drummond Street will not have a significant amenity effect this is clearly not the case. The businesses are already having financial hardship because of the Promoter. People who are not very well informed have heard about the Proposed Scheme and have been wrongly assuming demolition is already taking place. This is causing a reduction in customers and businesses are suffering as a consequence.

14. Your Petitioner is concerned that the loss of houses on the Regents Park Estate will cause certain community members to no longer be able to see each other. Although the Promoter has guaranteed that Council tenants will be rehoused in the area, leaseholders who have exercised the right to buy, or whose predecessors in title have done so, would only receive statutory compensation. Given the shortage of housing of equal value in the area, they are very unlikely to be able to afford a new home in the area and will be forced to move away. Your Petitioner's closest friend is a leaseholder who will lose her home. Your Petitioner knows from experience that it is very difficult to see friends who live far away, Your Petitioner is very upset that the Promoter is causing our support network of friends to be torn apart.

15. Your Petitioner has serious concerns over the provision of information supplied by the promoter of the Bill, both prior to the deposit of the Bill and up to the date of the deposit of this petition. This has meant that thorough and detailed assessments of the proposed project, its impacts and benefits have been impossible to compile. Your Petitioner is concerned that requests for further information from HS2 enquiries and responses to specific requests remain outstanding. In particular, your Petitioner is still to be satisfied about the adequacy of the Environmental Statement. Baseline assumptions made over a number of generic issues have still to be substantiated. Certain community assets are given valuations of 'low value' without any explanation of how these values are defined or how the Promoter arrived at the valuations. Ancillary documentation such as the Code of Construction Practice remains in a draft form which is neither acceptable in principle, nor in its presumptions, proposals and extent of detail.

16. Your Petitioner sent very detailed comments to the promoter of the Bill in response to the Draft ES and the ES, on both occasions the reports compiled by the independent assessors seem very limited in detail in comparison to the amount of work put into individual responses. Your Petitioners raised a great deal of concerns about the adequacy and accuracy of the Draft Environmental Statement, which if individual responses were being scrutinized properly would have been corrected before publication of the ES, but had not been. For example Your Petitioner pointed out there was no reference Japanese Knotweed, this is a very big omission as it is a plant which is very hard to control. The Draft ES also contained misleading statements for example in the document Community Forum Area 2, Camden and HS1 link Page 5 states- 'on occasion it has been necessary to use technical terms. Given this, a glossary... is provided'. This was not automatically provided when the documents were sent out and had to be especially asked for, which seems not only a misleading fact but to be deliberately obstructive on behalf of the Promoter. Your Petitioner reserves the right to list all the rest of these deficiencies when appearing before the Select Committee. Fundamental deficiencies in the Environmental Statement identified by your Petitioner include (but are not limited to) the following points:

Where the ES states inaccurate points:

-V2 CFA1 In several places the ES mentions Arlington Street when they in fact mean Arlington Road. In some sections they correctly call it Arlington Road.

-V2 CFA1 2.2.21 The Chataway Estate is mentioned. There is no such place.

-V2 CFA1 10.4.36 'HS2 Ltd has undertaken engagement with business at Drummond Street so that any impacts on their business activities arising from the construction of the Proposed Scheme are reduced or eliminated.' There has been no engagement with the Drummond Street Traders Assn outside of the Community Forum arrangements and the business break-

out group within that, where the Promoters failed to take on board the concern raised. If statement 10.4.36 were true Drummond Street would not be being used for lorry access. Where the ES states the opinion of the (unknown) author(s) purporting it as fact:

-V2 CFA1 9.3.4 'St James Gardens have a neglected air'

-V2 CFA 1 9.3.5 'Regents Park Estate...the widespread on street parking throughout detracts from the quality and condition of the character of the area.....but overall tranquillity is low'

Some of the misleading points:

-V2 CFA1 4.2.3'...this methodology provides a means of assessing the scale and significance of effects that is partly dependant on the approximate number of receptors within close proximity to the dust generating activities. In doing so, it assigns a lower scale of effect to cases where the number of properties is small...' in effect this could make the figures for pollution appear less severe than they are when the effect on each individual receptor will be just as great no matter how many are situated together. You Petitioner wonders if the Promoter chose this particular methodology in order that the effects may appear less severe to someone who was casually glancing at the figures.

-V5 Draft ES Summary 7.2.21 'Double Deck options to minimise the landtake have also been explored extensively. Building the WCML platforms underground would require HS2 platforms to be approx 4m above Eversholt Street. This option would still require demolition of two housing blocks on the Regents Park Estate and the National Temperance Hospital. It would be very expensive and disruptive to build and construction would take approx 19 years.' This is a very misleading statement. The Double Deck Options referred to here are HS2s whereas The Pan Camden Alliances Double Deck Down2 option would cause no demolition of the National Temperance Hospital or homes on Regents Park Estate or businesses in Drummond Street. The Promoters have failed to do a proper costing and analysis of this despite many requests from Pan Camden, the Council and the public.

V2 CFA1 2.1.2 It is confusing as to why Euston is stated as the best terminus 'serving passenger requirements, including onwards travel' when the onward travel times are quicker from Old Oak Common than from Euston to most destinations than from Euston the exceptions being the destinations on the 2 lines that run through Euston. However as this ES states (12.5.16) journey times will be slower on Northern line Charing Cross Branch and the Victoria line after construction then possibly there is no benefit unless you are to travel on the one unaffected line - Northern Line Bank branch. From the perspective of onward travel Old Oak Common would make a better terminus.

-2.6.5 Re Draft ES and Design Refinement consultations - '..provided with information..' We were eventually but not without extreme difficulty. Your Petitioner had to telephone multiple times to get all the documents needed to complete the Consultations. During one call I asked why they didn't automatically send us all we needed the first time we rang. The woman on the other end of the phone said 'We are only allowed to send documents that are requested' This is highly unfair as there was no list of documents so I didnt know what to ask for and only after I was quite a way through reading the CFA 1 & 2 books did I realise there was a Volume 1 as well. I had mistakenly assumed Volume 1 and CFA1 were the same

thing. I also did not know that the Design Refinement Consultation was running simultaneously with the Draft ES, not until the Community Forum on 13 June 13. Also I had to ring again to get response forms for both consultations as they were not sent out with the documents. This problem was not totally remedied for the ES Consultation. Although all the documents came for CFA1 I had to ring again to ask for CFA2 and I had to ring a 3rd time to ask for response forms for neighbours who cannot send email responses. At least 1 response form ought to have come with the documentation, especially since so many people pointed this out to HS2 after the Draft ES Consultation, as well as on the phone during it. '..invited to engage on issues pertinent to the draft Environmental Statement and the development of the Proposed Scheme...was held on 24 May 2013 at the Bengali Workers Association...' Your Petitioner wonders if this is meant to imply that the public had some influence on the Proposed Scheme? If so your Petitioner requests your honourable House ask the Promoter to make available the list of what points they took back from those occasions. Your Petitioner attended the one at the Bengali Workers Assn. Lots of things were said in this meeting which space prevents me listing, none of which seem to have influenced the ES or the proposed scheme.

Where the ES is inadequate:

-2.2.35 Although the Promoter has noted that there will be cumulative construction impacts for your Petitioners buildings as it is opposite CFA1/4 (as defined in the ES) they have failed to take into account the full extent of it. We will suffer greatly as 12.4.26 states that during the construction period we will have 30% more traffic on Grafton Way which will cause moderate adverse pedestrian severance. This traffic will not only create extra noise but most importantly it will create extra fumes in our flats as we live directly above the traffic, not set back from the road. 11.4.14 point 5 'Torrington place, increases in road traffic noise approx 3db' and 12.4.77 States 'Changes in traffic flow will result from construction traffic, local road closures ...Particularly A400 Tottenham Court Road northbound and Gower Street southbound together with the roads in between' Your Petitioners street Grafton Way is one of these road as is Torrington Place. The noise on Grafton Way will be the same as Torrington Place as they are parallel one-way roads with the flow of traffic going in the same direction. These effects are not just for the construction period as 12.5.32 says in 2026 – 2041 will have pm traffic that will cause a moderate adverse effect. And yet with all of this the Promoter has not identified your Petitioners building as needing the mitigation of soundproofed double glazing and air filtration, which your Petitioner requests the Promoter to provide.

17. Mitigation

Your Petitioner asks your honourable House to bear in mind that that most of the traffic effects in Grafton Way will be permanent, they will continue during the operational phase not just during construction so for noise soundproofed double or triple glazing must be fitted to Your Petitioners windows by the Promoter and with

regard to air pollution an air filtration system must be installed. If the Promoter refuses to pay for air filtration for affected properties then Your Petitioner respectfully requests that the costs to the NHS of our long-term illness caused by The Promoter be added to the cost of the Proposed Scheme. With regard to the Construction zone Your Petitioner request your honourable House to require an undertaking from the Promoters that the Nominated Undertaker will be required to use the lowest emission construction vehicles and machinery that are available in order not to exacerbate the level of air pollution in the area. An Ultra-low Emission Zone should be introduced around the station and Grafton Way MUST BE included in it. Air quality should be independently monitored, and with regard to construction dust, if limits are breeched the Promoter should be forced to halt construction.

With regard to Construction noise. You Petitioner requests your honourable House to require an undertaking from the Promoter to comply with noise thresholds (which could perhaps be set by the local Authorities along the route) and if they break them Councils should be given the right to be able to halt construction, or preferably The Promoter should abandon its plans to work during the night.

ES V2 CFA1 12.4.26 Says Grafton Way as well as many others will get 30% more HGVs daily. Therefore there is no question that appropriate mitigation and compensation must be offered to those living there. If this project is in the National Interest then fair compensation must be paid to those of us who will suffer every day but will get no benefit from the train.

The pedestrian route under Euston Road must be maintained. The Promoter should build a new pedestrian underpass below Euston Road so that pedestrians will be able to cross the road unhindered by any works taking place to Euston Square Station. This will be required in any case as the Promoter estimates there will be an increase to the volume of people using the station as a result of HS2 so it may be difficult to use the station as both an underpass and an entrance even if the Promoter leaves the entrances and exits in the same location as they are today.

Your Petition submits that a station within the current footprint such as the DDD2 station devised locally by the Pan Camden Alliance is the best for not only herself but the entire Euston Community. Your Petitioner submits that the terminus be temporarily at Old Oak Common until proper plans for Euston have be thought out after improved consultation with the local community, in order that there is a world class station which will not encroach on such a vast amount of land as the current proposal. Your Petitioner feels the reason behind using a wide station is in order for developers to make more money at the expense of the existing Community. Your Petitioner that asks your honourable House requires the Promoter to do a full evaluation of Pan Camdens proposal as well as several other designs within the current footprint. Your Petitioner requests that one of these slim-line station designs

is used for the final station. In addition Your Petitioner requests that new shops in the station development be made affordable to small businesses in order to stop so many businesses in the area being identical chains.

The loss of St James Gardens will be devastating for Your Petitioner. What we currently have in St James Gardens is a wild space for the community to feel as if they can 'get back to nature' this is a rare thing in such an urban setting. It is very important for peoples mental health and wellbeing to have a space such as this to chill out when stress becomes too much. Your Petitioner is very concerned that The Promoter does not seem to have taken this point properly into account. Open space in your Petitioners area is in short supply and Your Petitioner is therefore keen to ensure that its loss is kept to a minimum, especially as due to this lack of space if the Promoter were to provide a 'replacement' garden it may not be in an easily accessible distance from Your Petitioners home. Therefore Your Petitioner would prefer that The Promoter uses a station design for Euston that is inside the current footprint such as Pan Camden Alliances DDD2 station, this option would relieve the need for any mitigation at all with regard to St James Gardens. If the Promoter refuses to build the new station within the current footprint Your Petitioner requests that a garden of equivalent value in terms of size, and quality of tranquillity be given to the Community. Your Petitioner requests the fact that the Promoters will return the 25% of the Garden which was not in the permanent land take to public use be ignored, because ES Vol 2 CFA1 2.3.17 tells us it will be returned to public use as part of the station forecourt. In the map book there is a drawing of how the remaining part of St James Garden will be. It will be a grassed area for people to walk over to get to the station. Although this could be termed a 'return to public use' it is not returning it as any kind of a garden for the community to enjoy, it is for the station users only. Therefore this 'soft landscaping' of the forecourt should be ignored when considering the size of Garden the Community needs replacing. In addition The Proposer should provide adequate opportunity and funding for archaeological investigation in St James Gardens In your Petitioners' submission the appropriate authority should be required to agree a programme of such work with English Heritage. At publication of the ES The Proposers had still not completed a habitat study of the Garden so it is impossible to petition to save any particular species that may be present as they have not been recorded. Your Petitioner asks that the ES be redone once this has been carried out. The ES mentioned relocating 3 specific monuments but no mention is made of what will happen to the headstones and other memorials. 6.4.21 says there will be archaeological works and the word 'archive' is used but You Petitioner is unsure if this means they will **all** be retained or not. Your petitioner requests that all headstones and memorials be preserved for future generations, in a public place perhaps in the new station or in a museum. The ES fails to mention how bodies are to be transported once they are dug up and which

parish has agreed to take them. You Petitioner raised this point in her Draft Es response in the section Draft Construction Code of Practice and also at the Euston Community Forum Breakout meeting (on 3rd July 2013?) therefore there was plenty of time for the Promoter to find out this information before publication of the ES. Therefore Your Petitioner asks that this is also included in a new ES.

Using a station design inside the current footprint would remove the need for most of the mitigation with regard to Drummond Street. However if the Promoter insists on using a wide station there are several mitigation points that will help businesses:

- The Promoters must directly liaise with the Drummond Street Traders Assn to ensure they are having all points of concern addressed over the construction phase.
- Direct access must be maintained at all times directly from the station to Drummond Street. This must be well signposted and well lit.
- Taxi drop off points should not be on Cobourg Street they should be within the station, preferably underground as they are at present.
- Businesses should be compensated for any loss of trade, this will include the losses they are already beginning to suffer.
- Drummond Street must not be used by any construction vehicles at all.
- The hoardings around the Station will have murals depicting Drummond Street, and enticements for customers to go there.
- A promotional voucher system will be offered to workers and passengers to encourage them to use Drummond Street. All costs of printing and discounts will be borne by the Promoter.
- Access and parking for vehicles making deliveries to Drummond will be maintained throughout the construction period and provision will be made for this to continue throughout the operational phase.
- All parking spaces must be retained in the wider area so customers can not only access business but also the Mosque in Starcross Street.
- All businesses should be given soundproofed double or triple glazing, and soundproofing in general, as should the mosque.
- A system of effective pest control must be implemented.
- Pollution will be monitored, if it gets above acceptable levels the local authority will have the right to halt construction.

-Drummond Street will be promoted to construction worker to encourage them to eat there, as it is unlikely they will do so unprompted.

Using a station design inside the current footprint would remove the need for mitigation with regard to Regents Park Estate. However if the Promoter insist on causing loss of homes Your Petitioner respectfully submits that leaseholders in the Estate should be compensated to the value of an equivalent property in the area in terms of size, and help should be given to them to enable them to find a new home in the area.

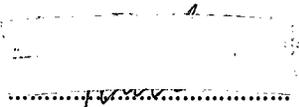
With regard to the Environmental Statement it should be redone with all relevant information that was previously omitted included and all misleading statements removed.

18. For the foregoing and connected reasons your Petitioner respectfully submit that, unless the Bill is amended as proposed above, so far affecting your Petitioner, should not be allowed to pass into law.
19. There are other clauses and provisions of the Bill which, if passed into law as they now stand will prejudicially affect your Petitioner and their rights, interests and property and for which no adequate provision is made to protect your Petitioner.

YOUR PETITIONER 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 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.

AND your Petitioner will ever pray, &c.

Signed



Jo Hurford, your Petitioner

IN PARLIAMENT

HOUSE OF COMMONS
SESSION 2013-14

HIGH SPEED RAIL (LONDON - WEST MIDLANDS) BILL

PETITION OF JO HURFORD

Against the Bill – On Merits – By Counsel &c

JO HURFORD

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