

IN PARLIAMENT
HOUSE OF COMMONS
SESSION 2013–14

HIGH SPEED RAIL (LONDON - WEST MIDLANDS) BILL

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 URSULA BROWN

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 Old Oak Common in the London Borough of Hammersmith and Fulham to a junction with the Channel Tunnel Rail Link at York Way in the London Borough of Islington and 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 has been a resident of Woodhall, Robert Street, on the Regents Park Estate, since 1998. Your petitioner's property is located within 150 metres of the proposed Main Construction Site on a residential street which is required for utility works and which will be heavily used by construction traffic during the construction of the Scheme.

8. Your Petitioner believes that she and her property, rights and interests would be injuriously and prejudicially affected by the provisions of the Bill if passed into law in their present form and therefore objects to the Bill for the reasons, amongst others, hereinafter appearing.

9. The Bill includes powers for the Secretary of State and the Nominated Undertaker to carry out construction works which are estimated to take 10 years to complete and will involve lorry movements amounting to 1,000 construction vehicles per day along residential streets which your Petition believes are unsuitable for such traffic. This will result in the creation of dust and noise, poor air quality, and severe severance for residents along these routes.

10. AIR QUALITY: The area around Robert Street already suffers from poor air quality and Your Petitioner is deeply concerned that the increased traffic would increase pollution levels even higher. This would be further exacerbated by the proposed loss of street trees and green spaces, which are of particular importance in a densely populated area. Your Petitioner believes that these impacts have been seriously underestimated in the Environmental Statement.

11. SEVERANCE: The Environmental Statement notes that the construction works would result in significant pedestrian severance for residents in Robert Street but no mitigation is proposed and it is unclear from the Environmental Statement how normal daily life will be maintained. This would be made worse by disruptions to local transport services during construction works. No assurances have been given about continuing access for emergency vehicles, delivery vehicles or refuse collection during road closures associated with utility and construction works.

12. ROAD SAFETY: Your Petitioner is deeply concerned at the increased risk of accidents reported in the Environmental Statement and for which no mitigation is proposed, and no assurances given for the maintenance of pedestrian crossings or the current speed limit of 20 mph and associated traffic calming measures.

13. CUMULATIVE EFFECTS: Your petitioner suffers from several chronic health conditions including inflammatory arthritis which are largely controlled by medication and exercise. Since retiring in 2011 most of your Petitioner's time is spent attending various activities around the Regents Park Estate. The cumulative effects of construction works would seriously impact on my life and health over an extended period of time, probably in excess

of 10 years. No account has been taken of the cumulative nature of these several effects and no attempt made to mitigate them.

14. ENVIRONMENTAL STATEMENT: Your Petitioner is concerned that the Environmental Statement fails to give sufficient or accurate information on several aspects of the proposed works and that it is written in a way which is very difficult for residents to understand the impacts and to respond effectively.

15. 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 submits 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 communities. And they need to suggest necessary changes from the results of that review before works design and construction strategies have been finalised or construction contractors employed.

16. In order to minimise the impacts of construction traffic lasting over a decade, your Petitioner asks your honourable House to require that the Promoters adopt the principle that rail haulage is used for the delivery and removal of construction materials wherever possible, and that the use of residential streets is avoided.

17. Your Petitioner requests that the siting and number of construction sites be reconsidered to enable the maintenance of street trees and green spaces which are of great importance in a densely populated area, and to reduce the need for construction traffic movements

18. Your Petitioner further requests that close monitoring of air quality be undertaken and works suspended should pollution exceed the legal limits

19. Your Petitioner objects to the proposals in the Bill for the design of Euston Station which would have devastating effects on her community. Until plans for Euston Station are clarified your Petitioner requests that consideration is given to making a temporary

terminus at Old Oak Common and that designs are formulated which would be contained within the Station's current footprint. Your Petitioner further requests that the local community be fully consulted on the development of such plans.

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

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 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 Ursula Brown

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PETITION

of

URSULA BROWN

AGAINST,

BY COUNSEL, &c.

