

**IN PARLIAMENT
HOUSE OF COMMONS
SESSION 2013-14**

High Speed Rail (London – West Midlands) Bill

Against the Bill – On Merits – Praying to be heard by Counsel, &c.

TO THE HONOURABLE THE COMMONS OF THE UNITED KINGDOM OF GREAT
BRITAIN AND NORTHERN IRELAND IN PARLIAMENT ASSEMBLED.

THE HUMBLE PETITION OF KEVIN TIMOTHY MORAN AND MICHAEL PATRICK
MORAN

SHEWETH as follows:-

A Bill (hereinafter referred to as "the Bill") has been introduced and is now pending in your honourable House intituled "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".

- 1 The Bill is presented by Mr Secretary McLoughlin (referred to in this Petition as the "the Promoter"), 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.
2. Objections are being presented around numerous issues arising from the scheduled works in the Old Oak Common area in the London Boroughs of Ealing and Hammersmith and Fulham, the lack of mitigation of effects and the lack of compensation for communities impacted by the construction and operation of HS2.

CLAUSES OF THE BILL

- 3 Clauses 1 to 18 set out the Bill's objectives in relation to the authorisation of works and the acquisition of land and rights over land. Clauses 19 to 36 make provision for the deeming of planning permission and the disapplication of powers contained in other legislation on matters such as heritage issues, trees, traffic, and noise. Clauses 37 to

42 set out the regulatory regime for the railway. Clauses 43 to 56 establish further powers relating to the Nominated Undertaker, additional related works, and the Crown. Clauses 57 to 65 of the Bill deal with miscellaneous and general provisions.

- 4 The works proposed to be authorised by the Bill are specified in clauses 1 and 2 of and Schedules 1, 2 and 3 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, and which are works authorised to be constructed by the nominated undertaker (defined in the Bill and hereinafter referred to as "the Nominated Undertaker").

YOUR PETITIONERS

- 5 Your Petitioners are trustees for a family owned property known formally as Hilltop Works on Old Oak Common Lane, which is in the process of being converted into 9 residential flats (1 – 9 Kildun Court) ("the Property") affected by the HS2 Old Oak Common interchange construction and operation, and the works described in the HS2 Environmental Statement. Their rights, interests and property are injuriously affected by the Bill, as will be the rights, interests and property of their prospective tenants.
- 6 Your Petitioners see themselves as part of the community of Wells House Road. They support and agree with the petition that is submitted on its behalf by the Wells House Road Residents Association, but make this petition in respect of their own unique circumstances.

YOUR PETITIONERS' CONCERNS

- 7 Whilst Your Petitioners support the overall objectives of the Bill and recognise the long terms benefits to the area within which the Property is situated, Your Petitioners take objection to the part of the works and the provisions of the Bill that are injurious to them, their prospective tenants and their neighbours. In summary, Your Petitioners are concerned that the Bill does not, amongst other things:
- a. provide adequate property compensation given the severe adverse impacts of the proposed works on properties in the Wells House Road area;

- b. adequately mitigate the impacts arising from works due to be carried out under the Bill, in particular relating to:
 - i. impacts on health and amenity of local residents as a result of noise, vibration, dust and light pollution; and
 - ii. the significant disruption to public and private transport and therefore access to local services; and
- c. provide sufficient assurances to local residents that their concerns and interests will be heard and protected throughout the proposed ten year construction phase for HS2.

8 Having acquired the Property in March 2012, Your Petitioners' family has invested significant sums in converting a disused warehouse into nine apartments, which is due to complete in the coming weeks. Your Petitioners' Property is the only development in this well established and close knit community and since acquiring the Property, Your Petitioners feel very much part of the community, as will Your Petitioners' prospective tenants and, in the longer term, any purchasers of their flats should the need arise to sell, although that is not Your Petitioners' current aim. As such, it is your Petitioners' intention to remain part of the Wells House Road community, as landlords, throughout the duration of the construction of HS2 and when it comes into operation.

9 The Property sits at the northern end of Wells House Road on Old Oak Common Lane. Construction of the Old Oak Common site which is proposed up to the borders of Wells House Road on all three sides of the street for up to ten years. The tunnel will run 12m from the top of the tunnel beneath the Property and the homes on the northern tip of Wells House Road and the track will emerge from the mouth of the tunnel 70 metres from these homes; the Old Oak Common station and the corresponding construction site will be on the eastern side of Wells House Road; the main haul road will run against the property borders on the southern side of Wells House Road; the Victoria Road Crossover box (240m long x 31m wide) and main compound will border the western side of Wells House Road; and Old Oak Common Lane will be closed for approximately one year with no road or pedestrian access to vital amenities (schools, shops, transport, hospitals, doctors, churches) whilst the road is lowered and widened and the bridges are rebuilt.

- 10 In short, the Property together with the homes on Wells House Road will effectively become an island surrounded by the proposed major HS2 construction works for a 10 year period, with much of the work planned for 24 hours a day, seven days a week.
- 11 When Your Petitioners acquired our Property in March 2012, the fact that it was in the proposed safeguarded area for HS2 was not revealed by property searches. The Property already benefitted from planning permission for redevelopment for residential flats granted in 2008. Your Petitioners applied to extend the time for implementation and the extension permission was granted in July 2012 with no mention of HS2 as part of the planning process. It was not until November 2012 that Your Petitioners were notified by the Nominated Undertaker that their Property was within the proposed safeguarded area and at risk of being compulsorily acquired to enable HS2 to go ahead. Having at that time recently started development at the Property, Your Petitioners contacted the Nominated Undertaker with a view to discussing their proposed works with an engineer, but despite repeated requests there was no meaningful engagement and no meetings or site visits took place. Your Petitioners were granted amendments to their scheme in December 2012 and October 2013, but at no stage in the planning process did the planning authority refer to the development of HS2.
- 12 Subsequent correspondence with the Nominated Undertaker indicated that it was likely that only the subsoil of Your Petitioners' Property would need to be acquired to facilitate tunnelling directly underneath. However, no assurances have been given and the notice Your Petitioners received on 25 November 2013 provides that any part of the Property, including a right to use their Property, remains at risk of being acquired. Regardless of whether or not more than the subsoil of the Property is to be acquired, Your Petitioners have significant and serious concerns about the impact of the major construction works below and surrounding their Property for a decade.

The Community of Wells House Road has exceptional needs

- 13 It is generally recognised that the community of Wells House Road, which includes the Property, will likely suffer the most adverse impacts of any community along the line. Your Petitioners respectfully request that any relevant additional compensation provisions be made available to them given their unique status as owners and, once the Property is let, landlords of a new residential development in the Wells House Road area.

- 14 Your Petitioners submit that because of the widespread impacts over a considerable period of time, the owners and occupiers of properties in the Wells House Road area should be treated as a special case that merits further review and mitigation proposals to better deal with the acknowledged significant impacts. The need for residents to be recognised as 'sensitive receptors' has been stated by Ealing Council in its response to the Environmental Statement consultation, as well as in the Wells House Residents Association response and Your Petitioners' response to the Environment Statement consultation, as well as and in numerous meetings between their local community and the Nominated Undertaker, and by the local MP, Angie Bray.
- 15 The Nominated Undertaker has held a series of community forums and met with the residents of the Wells House Road area, many of which have been attended by Your Petitioners or members of their family. The Nominated Undertaker has not as yet resolved any of the needs of the local community regarding mitigation of impact measures and property compensation as set out in the various responses to the HS2 Environmental Statement consultation, despite verbally recognising Wells House Road as a 'special case' from the outset. Your Petitioners' own experience of trying to engage with the Nominated Undertaker, as well as their attendance at these public meetings has reduced Your Petitioners' confidence in the Nominated Undertaker and in the paragraphs below they request further clarification on a range of issues and request measures to improve communication between the Nominated Undertaker and Your Petitioner, as well as with the wider community.

Lack of adequate compensation

- 16 Your Petitioners support the Wells House Road Residents Association's petition on the need to widen the property compensation scheme to adequately protect and compensate the members of their community. Specifically Your Petitioners request that the Wells House Road area, including the Property, be treated as sensitive receptors which are subject to a streamlined mechanism of advance compulsory purchase and associated compensation. In particular, given their own particular experience, Your Petitioners consider any such scheme should not exclude those property owners who purchased their properties after 11 March 2010, given HS2 was not revealed by property searches when they acquired the Property in March 2012. Your Petitioners respectfully request that any such discretionary compensation scheme be extended to all landlords in the area.
- 17 Your Petitioners have serious concerns about their ability to let, (or let at a market rate) and re-finance their Property as a consequence of the safeguarding and the proposed

works, thereby putting their Property under a cloud of financial uncertainty for a period of more than ten years. Whilst they do not have any immediate plans to sell the Property, clearly Your Petitioners have concerns about their ability to sell the Property or any individual flats should the need arise. Your Petitioners therefore request that their unique circumstances are recognised in any extension of the compensation scheme applicable to the Wells House Road area. In particular Your Petitioners request that provision is made to ensure they are adequately compensated should they be unable to let flats within the Property, or where any rent received is below market rent as a consequence of the safeguarding and the subsequent HS2 construction works, and related impacts as further detailed below.

Mitigation and compensation

- 18 Currently there are few, if any, provisions in the Environmental Statement for providing any mitigation measures against the impact of the construction.
- 19 Your Petitioner respectfully requests that all properties in the Wells House Road 'island', including the Property, are considered to suffer 'exceptional impact' and should be considered as a special case with measures made available to mitigate the effects of construction, with compensation tailored to address these property owners' and occupiers' specific needs.
- 20 In particular, Your Petitioners believe that the Nominated Undertaker should fund a scheme for the various impact mitigation requirements required. These should include a) sound proofing of homes – triple glazing of doors and windows on all sides of homes, sound proofed structures at the ends of gardens for all homes that will experience increased noise; b) air filters and air conditioning to mitigate against dust and pollutants resulting from the construction vehicles and demolitions – again for all homes affected; and c) house and garden exterior cleaning, control of vermin generated by demolitions, etc.
- 21 Your Petitioners are concerned that construction is likely to increase the crime rate and incidence of break-ins in the area, particularly during the period when Old Oak Common Lane is closed and request that necessary security measures are put in place by the Nominated Undertaker.
- 22 Your Petitioners are also concerned about the damage to their Property as a result of the proposed construction and operation of HS2. It was primarily these concerns that Your Petitioners wished to address with the Nominated Undertaker when they

approached its representatives in late 2012. Likely effects will result, in particular, from the tunnelling beneath their Property, post-operation trains braking and accelerating in and out of Old Oak Common station, demolitions and drilling, and from construction vehicles driven outside the Property. Your Petitioners consider that the impacts of these works and operations will not be adequately covered by the Nominated Undertaker's policy on ground settlement and they would like to see a budget made available for an independent survey before construction begins and to cover the costs of all repairs to properties damaged by any aspects of the construction works, together with a comprehensive review of mitigation measures to ensure there is no compromise to the structural integrity of their Property either as a result of the construction works or the subsequent operation of HS2, and that the risk of any other damage is minimised.

- 23 There may also be times, such as during the construction of the tunnel where Your Petitioners' tenants cannot live or sleep in their homes. The Nominated Undertaker should therefore make provision to cover the cost of suitable temporary accommodation during these periods.
- 24 Residents' health is also likely to be compromised by long-term exposure to airborne pollution resulting from the construction. Your Petitioner submits that the Nominated Undertaker should make provision to monitor the health of effected residents and to put in place appropriate mitigation, such as providing private health insurance to residents exposed to these pollutants and toxins, as well as help in countering any psychological damage due to sleep deprivation.

Old Oak Common Lane Closure

- 25 The Nominated Undertaker plans to close Old Oak Common Lane for a twelve month period.
- 26 Overall, there is no justification within the Environmental Statement as to why the road closure is required as part of the scheme and indeed why it is essential to lower the road. From a discussion with the Nominated Undertaker at Wells House Road on 1st May, 2014, it became apparent that the need for the lowering of Old Oak Common Lane was not for the purpose of delivering HS2 but, in fact, for TFL requirements to run double decker buses towards East Acton. Your Petitioners seek a review of these plans and an exploration of options to retain single decker buses on this route or for the lowering of the road to be carried out in stages to allow for a single lane to be left open.

- 27 The impact of this road closure on Your Petitioners' Property and its future residents will be significant. East Acton is the closest area for amenities to Wells House Road and it is a 5-10 minute walk and well served with the 228 bus that takes residents from outside the road to East Acton to the south and Willesden Junction/Harlesden to the north. Residents are reliant on Old Oak Common Lane to access most, if not all, their local amenities: schools (such as John Perryn), nurseries/child care, Hammersmith Hospital (and others), doctors and dentists, local shops and chemists, places of worship, Wormwood Scrubs (the only local green space for walkers, children and dog owners), major transport (East Acton Central Line and numerous bus routes), etc. are all located in East Acton. Currently it is a 5-10 minute walk or 2-3 minutes via the 228 bus to most of these amenities. From Your Petitioners' discussions with existing residents of the Wells House Road area, they understand that for the elderly or young children, this walk is achievable. For others, particularly those with disabilities, the 228 provides a lifeline to East Acton. If the road closes, there will be no accessible transport and residents will be completely isolated with a need to walk 10 minutes to the 226 bus stop to take them to North Acton and travel one stop to East Acton on the central line. A 5-10 minute walk would take around 45 minutes by foot, bus and train and will add considerable cost to travel. This will cause difficulties for all residents, most particularly school children, elderly and disabled and people traveling to work. A 3.5km diversion of the 228 service would render it useless to most people and the Nominated Undertaker needs to find a viable option for accessing East Acton by public transport and car.
- 28 Similarly, as the Property includes some underground parking, for those of Your Petitioners' tenants who will drive, their journey time would be substantially increased to reach anywhere south of Wells House Road. They would need to drive north on Old Oak Common Lane, west on Victoria Road and come back via Western Avenue. Even without construction, this journey can take over 30 minutes and the journey time is only likely to increase as a result of the congestion and disruption caused by the construction of HS2.
- 29 The Nominated Undertaker has suggested building a temporary footbridge to access East Acton. Your Petitioners do not consider this goes far enough to meet the needs of local residents. The footbridge would still not allow people with disabilities or drivers access to East Acton and would be hard to negotiate for people carrying groceries or with baby carriages. In addition, security would be an issue with people needing to cross a long footbridge in the dark – particularly dangerous for children travelling to and from school in the winter months, for the elderly and vulnerable.

- 30 Your Petitioners submit that the Nominated Undertaker should put in place arrangements to ensure one lane remains open for local access by car and on foot during the lowering of the road and rebuilding of the bridges. This would allow the vital 228 bus service to continue to function during this period and for the current transport options to be maintained.
- 31 If this is not feasible, Your Petitioners request that provision is made for shuttle buses and/or taxis to take local residents to East Acton, schools, childcare, hospitals, pharmacists, places of worship and to other transport and amenity hubs. The Nominated Undertaker should also make provide provision for home deliveries for groceries, medications and other essential purchases.

Localised traffic and public transport impacts

- 32 Throughout the 10-year construction period, there is likely to be significant disruption of traffic and transport services. There is currently a lack of detail on how this will be managed. For example, aside from the Old Oak Common Lane changes, other major planned changes are mentioned, such as the widening and improvements to the A4000 Victoria Road. Your Petitioners are aware that even a minor incident in the area causes a knock-on effect across West London and along the A40 to Oxford. It is not uncommon to see gridlock down to the Earls Court area, up the A40 and around Scrubs Lane and Harlesden for a minor local incident.
- 33 Your Petitioners request that details of works, including schedules and provisions for maintaining access by car and public transport services are clarified. Your Petitioners require advance information about the options for public transport when there are proposed diversions and route closures, which should include any proposed disruption to local overground and underground services.
- 34 In particular, Your Petitioners submit that any disruption to the 228 service from outside Wells House Road is addressed and reasonable alternative provisions are made.
- 35 Similarly, with the widening of Old Oak Common Lane, Your Petitioners request that provision is made for pedestrians and cyclists. Your Petitioners observe that there is currently a lack of information about such alternative provision within the Environmental Statement.

Old Oak Common Station

- 36 Currently, the designs of the Old Oak Common station have not been shared with the local community. Your Petitioners therefore seek greater detail, specifically: a) the proposed height of the station structure in relation to the height of the Property and other homes in Wells House Road and what is the visual, sound and vibration impact on residents; b) mitigation of visual sound and vibration impacts, given the track is in close proximity to the Property and other properties in Wells House Road, Your Petitioners propose that both the track and station are covered to reduce noise impact on their prospective tenants, current residents and occupiers of any new homes to be delivered in the area; and c) how sound and light from the station will be mitigated, including the noise caused by trains accelerating and decelerating, as well as platform noise.

Construction of haul road and reconstruction of retaining wall

- 37 There are no detailed plans within the Environmental Statement for the haul route, which appears to run in close proximity to Your Petitioners' Property. This road will be used to transport material and waste to and from the various compounds and will be used by large vehicles throughout the ten year construction period. This will have a significant visual impact, but will also cause noise, vibrations, air pollution and dust. The Nominated Undertaker has not provided details of the level of traffic or operational hours.
- 38 Your Petitioners submit that a number of actions will be required to mitigate the effects of the haul route: a) the construction of a wall or barrier at the ends of gardens on the southern side of Wells House Road that will shield properties from visual impact, noise and dust; b) the haul route should sufficiently deep to ensure that vehicles travel below the level of gardens and property entrances; c) restrictions should be placed on operational hours, e.g. vehicles only have access during working hours, d) vehicles should be covered to reduce the impact from dust and pollutants or the haul road itself should be covered and sound-proofed where adjacent to gardens; e) and construction vehicles must be designed to have lower CO2 omissions.
- 39 Your Petitioners also request greater clarity around the scope of work for the reconstruction of the retaining wall and the extent to which these works are likely to impact on their Property and any related mitigation and compensation measures.

Conveyor Belts

- 40 Waste will be taken from the site via conveyor belts and this is planned for 24/7 use. Your Petitioners request that these belts are covered to reduce the risk of air pollution from dust. Your Petitioners have heard anecdotal evidence of people living along the Crossrail route and in Kings Cross where conveyor belts were used, where residents reported that these conveyor belts caused considerable noise. Your Petitioners therefore ask for sound-proofing measures to be implemented and that the belts are restricted from operating outside working hours.
- 41 Much of the work is planned for 24 hours a day seven days a week. The Environmental Statement specifies that the work on the Victoria Road Crossover box, Old Oak Common tunnel and the conveyor belt will be 24/7 over a five-year period. This is not acceptable Your Petitioners' prospective tenants or existing residents, including those that work on night shifts, to withstand this level of impact over an extended period of many years. Your Petitioners request that the Nominated Undertaker restricts the working hours to reasonable working hours, e.g. 7am - 6pm on weekdays only.
- 42 No working hours have been specified for other compounds, the Old Oak Common station, the redevelopment of Old Oak Common Lane and the construction and operation of the haul route. Your Petitioners therefore request that similar, restrictions are placed on the hours of operation.
- 43 Your Petitioners also request that the permitted hours of operation are widely publicised together with contact details for the Nominated Undertaker and any relevant contractors so that breaches of these hours can be reported by local residents and addressed.

The use of the canal for transporting waste

- 44 Your Petitioners have significant concerns about the operation of the conveyor belts and the impact on any people living in their Property, as well as their impact on the future marketability of the flats in Property for rent. The Environmental Statement gives a detailed explanation of the logistics of HS2's construction including the use of conveyors raised 3 metres above the canal. Despite this, no consideration has been given to the potential of canal freight, despite the development's canal-side advantage (particularly the Atlas Road site where conveyors will run from other construction sites).
- 45 Your Petitioners consider that canal freight deserves a fair assessment as it has the scope to greatly alleviate some of the concerns of local people around the air pollution,

congestion and noise from the conveyor. As a major public funded project, HS2 provides an opportunity to use more sustainable transport options.

- 46 Your Petitioners therefore request that the Nominated Undertakers carries out a thorough, open book assessment of canal freight feasibility which can be ratified by bodies such as the Freight Group of the Waterways Commission.

Air quality

- 47 It is clear from the preceding paragraphs that the construction of HS2 will cause substantial adverse air quality impacts from demolition, construction and traffic impacts.
- 48 Your Petitioners requests that the Nominated Undertaker provides full details of its plans to mitigate these effects.

Visual impact, light pollution and loss of open spaces

- 49 The construction of HS2 will lead to temporary and permanent loss of open spaces such as the western and eastern side of Victoria Gardens. Access to Wormwood Scrubs will also be lost for at least a year during the Old Oak Common Lane work. In addition, there are no provisions in the current plans for the creation of any new green space around the Old Oak Common station. The loss of open space during construction and failure to make adequate provision as part of the station design will negatively impact on the amenity of local residents, including Your Petitioners' tenants.
- 50 Your Petitioner requests that the Nominated Undertaker undertakes a review to identify opportunities for the creation of both temporary and permanent open space for walkers, children's play areas and dog walkers.
- 51 There is also a lack of sufficient identified mitigation measures to combat landscape and visual impacts both during and post construction. Your Petitioners seek further details of the temporary barriers that will be erected around the compounds and their effect on visual impact for their Property.
- 52 Since these structures will be in place for up to 10 years, Your Petitioners consider that these barriers should be designed sensitively to mitigate visual impact and minimise any reduction in natural light to the Property, as well as acting as a barrier for the dust, noise and light from the construction works.

- 53 The Environmental Statement also fails to address mitigation of light pollution. Such measures could include lighting at night to be invisible to windows overlooking the compounds lights being switched off at night and only down-lighting to be used.
- 54 Currently, the designs of the Old Oak Common station have not been shared with the local community. Your Petitioners therefore seek greater detail, specifically: a) the proposed height of the station structure in relation to the height of the Property and other homes in Wells House Road and what is the visual, sound and vibration impact on residents; b) mitigation of visual sound and vibration impacts, given the track is in close proximity to the Property and other properties in Wells House Road, Your Petitioners propose that both the track and station are covered to reduce noise impact on their prospective tenants, current residents and occupiers of any new homes to be delivered in the area; and c) how sound and light from the station will be mitigated, including the noise caused by trains accelerating and decelerating, as well as platform noise.

Alternative access for emergency vehicles and to mitigate traffic volumes

- 55 Concerns have been raised at local meetings with the Nominated Undertaker regarding Old Oak Common Lane being the sole access both during construction and after operation.
- 56 The provision of an eastern access road would both help mitigate the construction volumes and impact and also provide alternative access for emergency vehicles. If there should be any emergency around the Old Oak Common Area, Your Petitioners' tenants and other residents of Wells House Road area would be isolated and cut off from emergency services, and in particular from Hammersmith Hospital. HS2, as a high profile development, could be vulnerable to acts of terrorism.
- 57 Within the Mayor's London Plan, Old Oak Common has been identified as an Opportunity Area and is earmarked for up to 24,000 homes and 55 new jobs to share the space with the HS2/Crossrail interchange between Old Oak Common Lane and Scrubs Lane.
- 58 Your Petitioners therefore ask the Nominated Undertaker to consider the station entrance being in the middle of this opportunity area, facing to the east. This would mean that it would be easily accessible to all people moving into the area.

Impact on local amenity

59 Your Petitioners are concerned about these impacts identified in the preceding paragraphs both in terms of the amenity of any future tenants of their Property and the amenity of the wider community in which they will live, but also in terms of Your Petitioners' ability to market and let their flats. Your Petitioners have been welcomed by the Wells House Road community, who see Your Petitioners' high quality development as an improvement to the area which adds to its vibrancy and diversity. However, residential accommodation that remains vacant for lengthy periods is likely to have the opposite effect and increase the community's sense of isolation.

Overseeing the process and policing mitigation measures

60 Your Petitioners support the Wells House Road Residents Association's request for the establishment of an independent organisation, funded by the Nominated Undertaker, to act as the main liaison between the community and the Nominated Undertaker. In addition, Your Petitioners would also welcome the Nominated Undertaker identifying a specific individual to act as their point of contact throughout the passage of the Bill and thereafter for the duration of the works.

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

62 There are other clauses and provisions in the Bill which, if passed into law as they now stand will prejudicially affect your Petitioners and their rights, (including their human rights) interests and property and for which no provision is made to protect 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 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 Petitioner in the premises as your Honourable House shall deem meet.

AND your Petitioners will ever pray, &c.

Agent for the Petitioner



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High Speed Rail (London – West Midlands) Bill
PETITION OF KEVIN TIMOTHY MORAN AND MICHAEL PATRICK MORAN

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