

HOUSE OF COMMONS  
SESSION 2006-07

CROSSRAIL

PETITION

Against Amendment of Provisions (November 2006) – 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 WESTMINSTER CITY COUNCIL

SHEWETH as follows :-

1. A Bill (hereinafter called “the Bill”) has been introduced into and is now pending in your honourable House entitled “A Bill to make provision for a railway transport system running from Maidenhead, in the County of Berkshire, and Heathrow Airport, in the London Borough of Hillingdon, through central London to Shenfield, in the County of Essex, and Abbey Wood, in the London Borough of Greenwich; and for connected purposes”.
2. A paper of amendments of provisions (“the Amendments”) was advertised on 8th November 2006, making provision amongst other matters to alter arrangements at of the Royal Oak worksite, Paddington, Bond Street and Tottenham Court Road Stations.
3. Your petitioners are the Westminster City Council. Part of the area for which your petitioners are the local authority will be injuriously affected by the provisions of the Bill as proposed to be amended, and your petitioners accordingly object thereto for the reasons, amongst others, hereinafter appearing.

*Paddington New Yard*

4. At Paddington New Yard it is proposed to relocate the existing concrete batching plant to the west of its current site during the construction of Crossrail. At the completion of the project it is proposed to return it close to its original site, with modifications. Your petitioners are concerned about the adverse impact the temporary batching plant would have on residents as it will be physically closer to them. Given that, your petitioners request that the nominated undertaker should be required to use the best available plant and machinery so that noise, dust and general disturbance are mitigated to the absolute minimum. This requirement should also apply to the permanent batching plant after completion of the project. Your petitioners would wish to be able to impose and enforce appropriate conditions on the operation of the batching plants, under the Bill and as necessary through the normal planning process. Your petitioner's preference remains that approval for the new permanent plant should be controlled entirely through the existing statutory planning process and therefore object to the proposed new clause headed "Reinstatement of discontinued facilities".
  
5. In their interim decisions given in July 2006, the Select Committee of your Honourable House recommended that a ramp be constructed at the southern end of the Westbourne Park passage footbridge in order to facilitate the construction of the required extended sidings at Westbourne Park. This is welcomed by your petitioners. However the impact of the construction of the ramp, during a period of some 4 months, gives rise to concern. Specifically, the closure of the bridge for 6 weeks and the use of the nearby local residents' car park for site servicing are the main impacts. Your petitioners would wish to secure that the period during which the bridge and car park are closed should be shortened further. Assurances are sought that the construction methodology and programme of works are refined to meet your petitioners' concerns and that the bridge works will include satisfactory lighting and CCTV provision in the final design and construction specification.

*Paddington Station*

6. The Amendments put forward by the promoter in respect of Paddington Station are significant and materially affect a broad range of impacts both during construction and thereafter for the operation of Crossrail. Despite past and continued reservations by your petitioners, and the raising of issues in evidence given by your petitioners to the Select Committee in June 2006, your petitioners' concerns have not been fully addressed in the Amendment Provisions. The following issues are of particular concern -

a) Your petitioners are very concerned over the impact of construction and operational activities on the residents of Brewers Court. Given the proposals to demolish 4 – 18 Bishop's Bridge Road and use the site to service Paddington Station in addition to the Crossrail worksite at platform 1A, there will be considerable disturbance to the occupants of some 50 flats. The Amendment Provisions and supporting documents fail to address the scale of potential adverse impacts to ensure that there will be adequate mitigation of the impact during construction, as well as the traffic impact of the proposed alternative servicing facility. Your petitioners seek further information on traffic and other impacts on the residents of Brewers Court and respectfully request that the promoters should be required to bring forward provisions to ensure that the residents will not be injuriously affected. Your petitioners request that the Promoter should be required to provide a full and supportive mitigation strategy for your petitioners' review and approval. The future of any building over the proposed 'raft' for Crossrail or Network Rail purposes on the site of 4 – 18 Bishop's Bridge Road needs to be clarified if it is to be pursued under over site development or normal statutory planning procedures.

b) The proposals to permanently relocate taxis from the Departures Road to the new Red Star deck link to Bishop's Bridge are welcome. Your petitioners seek further details regarding the design and operation of the taxi facilities and the junction of the Red Star Deck with Bishop's Bridge Road. In particular the design should have regard to the Heathrow Express Railway Select Committee undertaking mentioned in your petitioners' original petition against the Bill and to the Heathrow Terminal 5 planning permission. At the very least, your petitioners seek assurances that the junction will be completed prior to any construction activities commencing. It

may also be necessary to provide the junction prior to the diversion of utilities apparatus, should the current operation of the Departures Road and local movement of traffic be adversely affected.

- c) The new proposal to lower the level of Eastbourne Terrace by some 3 metres in the permanent scheme raises concerns both during construction and for the continuing operation of the existing highway and station. Your petitioners also have concerns about the visual impact on the general townscape and the setting of the Grade 1 listed station building and on the impact of the buildings on the west side of Eastbourne Terrace. Other ancillary impacts are addressed below in terms of the operation of the station. The lowering of Eastbourne Terrace will have significant impacts on the fabric of Chilworth Street and Cleveland Terrace. Additionally, properties in Eastbourne Terrace, namely Numbers 10, 20, 30 and 40 will be adversely affected. Detailed proposals, their methodology and programming remain outstanding for these works. Your petitioners are unable to comment in full without further supportive documentation from the promoter, beyond that submitted so far. To this end your petitioners position remains reserved. The Amendment Provisions and the Supplementary Environmental Statement (3) fail adequately to address actual, real and temporal impacts during construction in any comprehensive detail.
- d) In terms of the operation of the Station during the construction phase, your petitioners retain grave concerns that the Amendment Provisions and supportive documentation still fail to address your petitioners' concerns as set out in their original petition against the Bill. These concerns are particularly acute, given the considerable number of daily users of Paddington Station, including mainline train, underground, bus and taxi usage, together with traffic and pedestrians utilising the local highways network. It remains unclear how all these services and users will interface and operate. Pedestrian and traffic modelling remains incomplete. Your petitioners' position remains that insufficient detail has been provided to inform them and thereby enable them to assess the impacts.
- e) Despite long standing previous, and continuing, requests for a full design with associated evaluation and impact studies fully set out to the satisfaction of the your petitioners and English Heritage, the promoter has

yet to provide sufficient information in support of their request for bill powers over the Grade 1 listed station building.

- f) Your petitioners respectfully request that the promoter should be required to submit all the information requested in your petitioners' draft planning brief for Paddington Station in order to satisfactorily address these issues and provide an appropriate response to the matters raised by your petitioners in relation to architectural and historic interest, transportation and traffic issues and the connections between the station and adjacent sites.

#### *Bond Street Station*

7. The Promoter proposes an additional ticket hall for Bond Street station on the northern side of Oxford Street at Numbers 354 to 358. This is welcomed by your petitioners as it will help relieve congestion and add additional interchanges with the Jubilee and Central LUL lines. However, your petitioners have a number of concerns regarding the impact during construction, and specifically the potential of there being adverse effects on pedestrian and vehicular usage in the environs of the site. Also, the additional ticket hall will be located within the Stratford Place conservation area. Under the terms of the additional provision, the ticket hall is proposed to be a single storey structure. Details of design and oversight development, as well as a commitment to construct new over site development expeditiously, have yet to be addressed by the Promoter. Your petitioners raise the following detailed concerns:

- a) During construction of the new ticket hall the indicative site layout and servicing arrangements give rise to concern. The information provided in the Amendment Provisions is inadequate in so far as assumptions are made without supportive documentation and detailed discussions having taken place with your petitioner. Proposals to place hoardings and other temporary structures on the highway, together with possible footway closures have not been thought out or adequately demonstrated. It is proposed initially to take up 1 metre of the footway on the Oxford Street elevation for a site hoarding. This will extend to 4 metres at stages during construction and will at a further stage involve a total closure of the footway

for unknown periods. The full width of the footway at this location is approximately 8 metres. This is unacceptable given the importance of Oxford Street for retail businesses. Volumes of pedestrians at most times, but particularly during seasonal periods, are extremely high. Diverting pedestrians across a main thoroughfare during any closure periods is not acceptable. Notwithstanding traffic orders that can be put in place, experience shows that many people will simply take the shortest route to avoid any obstructions. In this case it will be the heavily trafficked road. The Promoter must produce a detailed construction methodology for approval by your petitioners in order to address the above concerns.

- b) The use of the western arm of Marylebone Lane during construction again raises serious concerns. As accepted in SES (3) it is heavily trafficked by pedestrians. There appears to be no substantiation in any documents provided as to pedestrian counts on Marylebone Lane and the effect a reduced highway width will have. The comment made that pedestrians will choose to divert to the eastern arm of the Lane is not substantiated. The Promoter's proposals for the management of the highway in Marylebone Lane are not accepted. More detailed appraisals and further documentation are required by your petitioners before any agreement in principle can be forthcoming.
- c) Your petitioners note the comment made in the Amendment Provisions that it may be possible to close permanently the western arm of Marylebone Lane to vehicular traffic at the end of the construction phase. Although this suggestion is not part of the Promoter's requisite, your petitioners point out that they are the highway authority and with the current joint proposals for Oxford Street, between the City Council, TfL and NWEA (New West End Company), this suggestion requires further detailed assessment before any decision is taken. The promoter should co-operate with the other parties to assess the impacts and desirability of this approach.
- d) Your petitioners have already raised at Select Committee the issue of the loss of on-street parking provision, specifically in Hanover Square. The Amendment Provisions for a new ticket hall at Bond Street indicate the further loss of parking places at Stratford Place, Marylebone Lane and Welbeck Street during construction. The incremental effect this (and at other locations within your petitioners domain) is having on the overall

provision of parking places will be serious in so far as the amenity of residents and visitors are concerned. A subsidiary issue is the loss of income to your petitioners. Such income may only be used to administer and enforce the on-street parking regime. Any surpluses in the account are solely used for highway improvements. Your petitioners vehemently oppose any further loss of parking provision. It is extremely difficult to find alternative locations for parking places as the road network is virtually full.

- e) 354 - 358 Oxford Street flanks the entrance to Stratford Place, which terminates at Stratford House, a Grade I listed town mansion built between 1771 - 73 by Richard Edwin. There are Grade II listed townhouses at 2 - 10, 12, 13, 16 and 17 - 20 Stratford Place, a Grade II listed building at 360 - 366 Oxford Street and a Grade II listed Porters Lodge on the corner of Oxford Street and Stratford Place. Stratford Place is of significant value both in terms of individual buildings and as a townscape composition. 354 - 358 Oxford Street is located within the Stratford Place Conservation Area. Your petitioners welcome the proposal to demolish 354 - 358 Oxford Street as the design of the existing building does not relate well to the townscape qualities of both Stratford Place and Oxford Street. The City Council will expect the design of the LUL entrance and any over site development at this site to be of high architectural and townscape quality. It should also respond appropriately to the composition of Stratford Place and 360 - 366 Oxford Street when viewed from Davies Street and South Molton Street in relation to proportions, materials and solid to void ratios.
- f) Your petitioners note the proposal to construct a grout shaft in the northern end of Stratford Place and are concerned about the visual impact on the setting of the surrounding listed buildings and the proposed removal of an existing willow tree necessitated by the construction of the grout shaft. Other locations for this grout shaft should be considered in consultation with the City Council. Should the grout shaft be eventually constructed in this location then every effort should be made to retain the willow tree, if this is not possible the City Council will expect that a mature replacement tree is planted at the conclusion of the works to the satisfaction of your petitioners.
- g) Owing to the sensitivity of the site and the existence of other initiatives of your petitioners and Transport for London in this area, your petitioners will expect to be consulted at an early stage in the preparation of any

development proposals and be asked to provide input into the design of the ground entrance and ticket hall and the over site development. Your petitioners are preparing amendments to the Bond Street Station (Western Ticket Hall) draft planning brief concerning this 'new' site which will contain the relevant and other policies applicable to the over site development and list the associated townscape works (paving etc.) will would be required to accommodate the public realm around the site. The promoter should be required to adopt the City Council's planning brief for the over site development, following consultation and revision.

- h) *Noise and vibration impacts. Noise insulation / temporary re-housing.* In the absence of further details in the additional amendments and supporting documentations, your petitioners reiterate the concerns raised in the original petition particularly as regards the cumulative effect of the revised works and the Davies Street works on the residents of the social housing blocks in and around Gilbert Street.

#### *Tottenham Court Road*

8. The Amendment of Provisions proposes an extension of the Newman Street worksite into the carriageway of Newman Street. Your petitioners are concerned about the impact of this extension and the resultant loss of on-street parking spaces, in addition to the concerns already raised in the original petition.
9. Your petitioners welcome the early demolition 138 to 148 Charing Cross Road as this will enable a clear site for storage and servicing arrangements at the Tottenham Court Road Station worksite, thus alleviating pressures on the highway. Your petitioners remain concerned about the construction methodology at Tottenham Court Road Station in so far as its impact on highway users can be assessed. Concerns raised some 18 months to 2 years ago remain valid with regard to proposals to close Charing Cross Road for up to 3 years. The safety of the public is at the forefront in these concerns and the Promoter still has to demonstrate how the public will be protected given the various stages of construction phasing. Particularly this relates to site hoardings and how pedestrians will be routed to the immediate environs around the site. Your petitioners require detailed traffic and pedestrian safety audits to be undertaken for our review and comment.

10. There are other clauses and provisions in the Bill as proposed to be amended by the Amendments which, if passed into law as they now stand, will prejudicially affect the rights and interests of your petitioners and other clauses and provisions necessary for their protection and benefit are omitted therefrom.

YOUR PETITIONERS THEREFORE

HUMBLY PRAY

your Honourable House that the Amendments of Provisions may not be made and that they be heard by themselves, their counsel, agents and witnesses in support of the allegations of this petition, against so much of the Amendments of Provisions as affects the property, rights, and interests of your petitioners and in support of such other clauses and amendments as may be necessary and proper for their protection and benefit.

AND YOUR PETITIONERS will ever pray,  
&c.

SHARPE PRITCHARD

Agents for Westminster City Council.