

HOUSE OF LORDS
SESSION 2007-08

CROSSRAIL

P E T I T I O N

Against the Bill – Praying to be heard by counsel, &c.

TO THE RIGHT HONOURABLE THE LORDS SPIRITUAL AND TEMPORAL 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 Right Honourable House intituled “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. The promoter of the Bill is the Secretary of State for Transport.
3. Clauses 1 to 21 set out the Bill’s objectives in relation to the construction and operation of the railway transport system mentioned in paragraph 1 above. They include provision for compulsory acquisition, planning permission, heritage issues, trees and noise. Clauses 22 to 45 of the Bill

establish a regulatory regime for the railway transport system and clauses 46 to 67 of the Bill deal with miscellaneous and general provisions.

4. The works proposed to be authorised by the Bill are specified in Schedule 1 to the Bill and the scheduled works are defined in the Bill as the works specified in Schedule 1 to the Bill which are works authorised to be constructed by the nominated undertaker (defined in the Bill and hereinafter referred to as "the nominated undertaker").
5. 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, and your petitioners accordingly object thereto for the reasons, amongst others, hereinafter appearing

Introductory

6. The London Government Act 1963, which established your petitioners, conferred important powers and duties upon your petitioners. Numerous enactments since that date have added to your petitioners' statutory powers and duties. Amongst other functions of your petitioners is that of the highway authority for all existing or proposed public highways in their area, except for those which are the responsibility of Transport for London. In addition, your petitioners are the traffic authority for most roads in their City. They are also the local planning authority, and are thus responsible for general planning and the preparation of development plans and local development schemes. Your petitioners have a statutory duty to investigate the existence of, and to control nuisances within their City.
7. Your petitioners support the proposed Bill and welcome the decision to construct Crossrail, so long as the works are carried out so as to ensure that the burdens on your petitioners, and residents and businesses within their City are justified by the provision of a high quality cross London rail service. In particular, your petitioners are pleased to see that it is intended for Crossrail to serve Heathrow Airport. Progress has been made on a number of issues that were raised by your petitioners in the House of Commons. They are satisfied on some issues, and on others there are points of detail which should be perfectly capable of resolution

before your petitioners appear before the select committee of your Right Honourable House. There are, however, very many matters which still cause great concern to your petitioners, arising from the proposals in the Bill. Some of these points apply generally to the whole length of the line within your petitioners' City and some of the points are specific to particular sites. As will be seen later in this petition, Paddington Station is a matter of particular concern to your petitioners, because of the failure of the promoters to come forward with any concrete proposals about what works will actually take place there and therefore what the impact of those works will be.

8. Paragraphs in this petition which deal with issues raised in one of your petitioners' three petitions to House of Commons have been annotated with references to the relevant paragraph number from the Commons' petition.

Heathrow Link

9. Your petitioners are particularly pleased to see that the Bill provides for the construction of an additional direct link to Heathrow Airport. Your petitioners believe that the Heathrow Airport link is a fundamental piece of the scheme, and that Crossrail should not be brought into operation without it. The Heathrow link has been a strategic goal of your petitioners since Crossrail was first mooted. Your petitioners seek an undertaking that the Crossrail scheme should not be open to public traffic until the Heathrow link is constructed and operational, and that the Heathrow link will supplement and not replace the existing services. [HC38]

Paddington Station

General

10. There are many areas of concern, both in principle and in detail, that continue to be held by your petitioners about Paddington Station. Most of these concerns arise because of the fact that the promoter has not come forward with a specific single proposal for the design of the station, the interaction between Crossrail and other transport infrastructure, highway arrangements, construction arrangements and other fundamentally important issues. Although your petitioners have concerns about the

other stations in and adjoining their area (namely Bond Street and Tottenham Court Road), at least your petitioners have some idea of what the promoters actually intend should be constructed and how. At Paddington, they do not and your petitioners are baffled by how this situation could have arisen, given that the Bill was introduced in the House of Commons in February 2005, and before then, the promoter spent a number of years preparing for the introduction of the Bill. Your petitioners consider that for some while they have been having to deal with a moving, and sometimes non-existent target. This was exemplified when, on the day on which your petitioners were due to appear on Paddington issues in the select committee of the House of Commons, they were astonished to find the promoter producing in the committee corridor a three dimensional model of a station design that your petitioners had never seen.

11. As local planning authority, your petitioners have an overriding concern in relation to Paddington Station that is of tremendous importance to them. In relation to each of the three areas where Crossrail stations are proposed in your petitioners' city, your petitioners have prepared planning briefs, which despite their title are detailed documents setting out your petitioners' planning aspirations for each area. The existing brief for Paddington is undergoing review and the review is unlikely to be finalised by the time your petitioners appear before the select committee of your Right Honourable House. Nonetheless, the promoter is well aware of the fundamental principles that underlie the brief and your petitioners are concerned to ensure that whatever proposals emerge for the Crossrail works at Paddington, they should be in general conformity with the brief and with your petitioners' unitary development plan.

Impact on Existing Rail Services and Station Capacity

12. Your petitioners are concerned about the impact of the construction of the railway on existing rail services at Paddington Station and the operation of the station itself. Paddington is an important mainline station and interchange with London Underground lines as well as the rail link to Heathrow. Your petitioners seek assurances and undertakings from the promoter about the effect of construction operations on Paddington Station, and in particular wish to ensure that, at the least, existing service

patterns are guaranteed. Your petitioners are very disturbed to note that the Bill makes no provision for direct interchanges between Crossrail and the Hammersmith and City Line. Such a link is needed to ensure that the station concourse itself does not suffer from added congestion caused by interchanging passengers and to provide an effective rail and tube interchange for all passengers. Your petitioners have not seen evidence to justify the promoter's assertion that engineering difficulties have ruled out such a connection, and your petitioners respectfully request your Right Honourable House that the promoter should be put to strict proof of it. The proposed links to Bakerloo and District and Circle Lines are welcome, although the cumulative impact of the various rail operations at Paddington is a growing cause of concern for your petitioners, given the building's Grade 1 listed status. Your petitioners seek guarantees that all connections should be constructed and available for public use before Crossrail is open for public use. [HC39]

13. Your petitioners have more general concerns about the modelling and capacity of all new stations within their City, but particularly as regards Paddington. Your petitioners are particularly concerned to ensure that the nominated undertaker takes the opportunity to make the best possible provision for interchange between Crossrail and other existing lines and that the stations are designed to cater for projected passenger growth in the future. They are also concerned about the impact of pedestrian movements of passengers entering and exiting the stations and would seek assurances that new stations are served by two entrances / exits. Your petitioners require that the station designs should ensure that sufficient provision is made in relation to footway widths, pedestrian crossings and other pedestrian amenities. This must ensure safe transit without impinging on listed buildings and the surrounding environs. [HC40]
14. Your petitioners wish to understand better the way in which Crossrail will link with other railways, including those of Network Rail, London Underground Limited and the Heathrow Express, particularly where existing track layouts require alteration. Your petitioners are also concerned about the effect future developments at Heathrow may have at Paddington, and your petitioners seek an assurance that the promoter

will at the appropriate point commence and continue discussions with your petitioners about the interaction between any such new developments and the Crossrail works. [HC41]

15. Your petitioners are concerned about the impact which the construction works will have on railway services running out of Paddington Station, and in particular mainline services, services to Heathrow and services on the Hammersmith and City Line. Your petitioners note that, understandably, there will be times when the nominated undertaker will need to take possession of the existing tracks. This will inevitably cause disruption to passengers coming in and out of your petitioners' City and they therefore seek assurances and guarantees that such track possessions will be kept to a minimum and suitable compensatory measures employed in conjunction with the City Council's relevant responsibilities for traffic management and local environmental / amenity impacts. [HC42]

Eastbourne Terrace and Departures Road

16. If the proposal to lower the level of Eastbourne Terrace by some 3 metres in one of the proposed permanent schemes is implemented, that would raise concerns both during construction and for the continuing operation of the existing highway and station. Your petitioners 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. 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 while negotiations continue though the revision of your petitioners' draft planning brief for the area. Supplementary Environmental Statement 3 fails adequately to address actual, real and temporal impacts during construction in any comprehensive detail. Any alternative scheme for Eastbourne Terrace is

also likely to raise concerns which may or may not be similar to those listed above. [HC(AP3)6c]

17. Your petitioners welcomed the proposals in Additional Provision 3 in the House of Commons to relocate taxis permanently from the Departures Road to the new Red Star deck link to Bishop's Bridge. At the time, your petitioners sought further details regarding the design and operation of the taxi facilities and the junction of the Red Star Deck with Bishop's Bridge Road and said that the design should have regard to the undertaking about long term vehicular access arrangements at Paddington secured by your petitioners during the promotion of the Heathrow Express Railway Bill and to the Heathrow Terminal 5 planning permission. Your petitioners sought assurances that the junction will be completed prior to any construction activities commencing. These concerns were addressed in the promoter's petition response document, but have not been followed up with registration in the promoter's Register of Undertakings and Assurances. That should be rectified. [HC(AP3)6b]

Traffic management

18. The promoters have agreed to address many of your petitioners' concerns about traffic management by implementing a traffic management plan for the area in consultation with your petitioners and others, which your petitioners welcome. However, your petitioners will be required themselves to incur significant expenditure in implementing the plan, and believe that they should be reimbursed those costs. Greenwich London Borough Council has secured an undertaking to that effect in relation to traffic management measures in its area, and your petitioners would respectfully submit that they should be treated in the same way in respect of all three stations in or adjacent to their city. [HC54c]
19. Your petitioners are concerned over the impact of the proposed works on the operation of St Mary's Hospital, particularly in respect of the impact from noise and disturbance as well as access for emergency vehicles. Your petitioners wish to ensure that the operation of the hospital is not prejudiced by the Crossrail development and that safe and convenient access for emergency vehicles and patients is maintained at all times. The Promoter has responded to this concern previously by offering

assurances relating to environmental effects on the hospital's office premises in Eastbourne Terrace, rather than anything about the hospital itself, so assurances are awaited in this regard.[54m]

Listed Building Status

20. Your petitioners are responsible for a number of important functions and are under certain duties as respects listed buildings under the Planning (Listed Buildings and Conservation Areas) Act 1990. A number of listed buildings within your petitioners' city are liable to be adversely affected by the proposals under the Bill including Paddington Station which is listed Grade 1. As respects all listed buildings and structures in your petitioners' city except Paddington, your petitioners have entered into agreements with the promoter ("heritage agreements") about the detailed procedures that the nominated undertaker will have to follow when carrying out works that affect the buildings and structures in question. This is not the case with Paddington, because of the fact that the promoters do not yet know what they are going to do there. This is a lamentable state of affairs, and your petitioners respectfully request your Right Honourable House require the promoters to come forward with proposals at the earliest opportunity. Your petitioners will feel particularly aggrieved if, by the time they come to present their case before the select committee of your Right Honourable House, they remain in the dark about the promoter's proposals. If that transpires, then your petitioners will suggest that the promoter should undertake to come forward with her proposals for the station at the earliest opportunity, and then offer your petitioners a heritage agreement rather than pressurising your petitioners into signing one now, knowing that it will become outdated in the near future as the design is developed. [HC47]
21. Proper safeguarding measures should be carried out to Paddington Station, bearing in mind its Grade 1 listed status, having particular regard to its special interest, and special attention should be paid to the desirability of preserving or enhancing the character or appearance of the conservation area in which it sits. [HC47]

Undertakings and Assurances Awaited

22. In a letter from Crossrail to your petitioners dated 15 June 2006, the promoter indicated agreement with your petitioners on a number of matters and that undertakings or assurances would be forthcoming. Unfortunately, in a number of cases they remain outstanding, so your petitioners must reserve their position on them. The subjects in question are described in paragraphs 23 and 26 below.
23. Your petitioners are particularly concerned about the impact of the Crossrail station and associated infrastructure on the continued use of the existing Departures Road which leads from the station onto Eastbourne Terrace. It is used in particular for taxi access and station servicing. Discussions have been taking place for a number of years involving your petitioners, Network Rail and the British Airports Authority about vehicular access to the station. During the passage of the Heathrow Express Act 1991, your petitioners secured undertakings from the promoters of the Bill for that Act and set out in paragraph 24 below, about the long term vehicular access arrangements to Paddington Station, designed to focus station traffic away from the residential area to the south and west of the station and onto the strategic road network. The agreed design for those arrangements is likely to be rendered nugatory by the construction of the Crossrail station. Your petitioners are concerned in particular to ensure that those arrangements are adequately preserved in another form, and seek to be satisfied that the design of the Crossrail station and its layout with Paddington Station adjacent to and under Eastbourne Terrace is consistent with the implementation of satisfactory long-term vehicular access arrangements in the Departures Road at the earliest practical time. This is required immediately after construction of Crossrail, given that there is at present no assurance that the alternative long-term access, as part of the Paddington Station Phase 2 proposals, will be completed before construction of Crossrail start.
- [HC55]

24. The Parliamentary undertaking referred to above stated –

“That the Promoters will within two years of the opening of the Heathrow Express Railway, or as soon thereafter as may be reasonably practicable and provided the traffic works mentioned below can be effected at reasonable cost use their best efforts to effect to the reasonable satisfaction of Westminster City Council permanent, long-term arrangements for the flow of traffic to and from Paddington Station which focus station traffic onto the strategic road network (i. e. Harrow Road, Westway, Marylebone Road and Edgware Road) and away from Praed Street and roads through the residential areas, particularly those to the south and west of the station, and that the costs of the traffic works outside the station for implementing these long term arrangements will be borne on a 50:50 basis by the Promoters and the Council.”. [HC56]

25. Your petitioners are concerned that the construction of the Crossrail Paddington station should interface fully with any proposals that come forward for the Paddington Station Phase 2 “Span 4” development at Paddington Station (including the current refurbishment scheme). The nominated undertaker should consult the developers of the Span 4 scheme fully to ensure that proper coordination is in place. [HC54f]
26. Your petitioners seek to ensure that proposals for the temporary relocation of taxi access to the location of the existing Red Star Parcels Deck, adjacent to Span 4 at Paddington, satisfy all stakeholders in terms of potential impacts on the operation of Paddington Station, the Long Term Vehicular Access, road layout and safety, pedestrian access and the Grade I listed structure. Your petitioners have yet to receive satisfactory assurances in this regard but note from the promoter's register of undertakings and assurances that an undertaking has been given to the British Airports Authority on the issue of taxi arrangements. Your petitioners would be interested in seeing what that is. [HC 54h]

Paddington New Yard (Royal Oak Worksite)

Concrete Batching Plant

27. 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. Although your petitioner's preference would be that approval for the new permanent plant should be controlled entirely through the existing statutory planning process, they would find the alternative procedure contained in clause 58 (Reinstatement of discontinued facilities) of the Bill acceptable if an assurance or undertaking were added to the promoter's register to the effect that the conditions for the reinstatement of the plant that will be imposed under the clause will be similar to those that have been the subject of discussions hitherto between the promoter and your petitioners. [HC 53, 53a][HC(AP3)4]

Great Western Studios

28. Your petitioners have concerns about the loss of Great Western Studios, which house approximately 140 businesses carrying on a wide range of activities, many in the creative sector. The promoter should provide alternative business premises for those businesses which will be lost at the Studios. Your petitioners are particularly concerned that businesses should be relocated in the local vicinity and not be subject to unnecessary or prolonged blight and uncertainty. No assurances or undertakings have been given by the promoter in respect of these businesses and your

petitioners support the owners and occupiers of the Studios in their endeavours to persuade the promoter to assist in providing a suitable alternative site. Your petitioners would respectfully suggest that if the select committee of your Right Honourable House carry out a site visit of the Paddington area, then they should be conducted around the studios, in order to appreciate the special circumstances that pertain. [HC53j]

Westbourne Bus Garage

29. Your petitioners are concerned that the interrelationship between Crossrail and the existing Westbourne Bus Garage, and proposed bus garage extension under the Bill should be properly managed. Although the promoter has indicated that the bus garage may now be relocated outside your petitioners' city, there are still outstanding concerns in the eventuality that it is not. Your petitioners accept that they will have some control in respect of mitigation measures that may be required as a result of the proposed extension to the garage, but they do not accept the stated position of the promoters that no such measures are necessary. [HC53k]

Westbourne Park footbridge

30. Your petitioners continue to have concerns about the new footbridge that will be constructed to replace the existing footbridge over the main line at Paddington New Yard located between Westbourne Park Villas and the site of the Westminster Academy. This issue was raised in the House of Commons by other petitioners and the select committee imposed requirements on the promoter about access across the bridge, in particular that the bridge should be compliant with disability discrimination legislation. Your petitioners have concerns about the detailed design proposals for the southern ramp over which discussions continue. Also, your petitioners respectfully request that the assurance given to your petitioners regarding consultation about the bridge (noted as assurance 330 in the Register of Undertakings and Assurances) should be extended to the Westminster Academy. [HC53n]

Tottenham Court Road Station – Eastern Ticket Hall

31. Highly significant road closures, including sections of Charing Cross Road and Tottenham Court Road, are planned during the construction period. There will inevitably be major effects on vehicular and pedestrian flows in the area as it forms part of one of the main routes in central London. Your petitioners' preferred option would be for Charing Cross Road to remain open during the construction period, but if it is necessary to close it in order to accommodate the proposed worksite, then access must be maintained to properties in the surrounding area and alternative traffic arrangements must take account of public safety. [HC64a]
[HC(AP3) 9]
32. Your petitioners are yet to be convinced that the proposed station entrances for the Crossrail station at Tottenham Court Road (East) will be adequate for the demands placed upon them and your petitioners consider that there may be a need for additional station entrances to be provided and that adjoining footways and carriageways are improved to meet the demands of Crossrail. [HC64c]
33. Your petitioners are concerned about the impact that construction traffic may have on the use of Soho Square Gardens and the effect this may have on the level of enjoyment currently afforded by the environment. Your petitioners seek an undertaking from the promoters that Soho Square Gardens will not be used a worksite. The promoters have given assurances about the use of the square, which your petitioners welcome but believe could be strengthened. No assurances have been given specifically about the use of the gardens in the centre of the square. [HC64f]

Groundborne Noise and Vibration/Track Design

34. Your petitioners respectfully submit that the nominated undertaker should be required to ensure that groundborne noise and vibration during the construction period is kept to a practicable minimum by the use of the most advanced tunnelling technology and machinery. Your petitioners are concerned that noise and vibration, while meeting design standards put

forward by the promoter, may still be radiated into buildings to an unacceptable extent. In your petitioners' submission the nominated undertaker should be subjected to precautionary design standards and where the railway passes near to noise sensitive buildings, the nominated undertaker should be required to apply additional appropriate mitigation measures to inhibit the transmission of noise and vibration into such buildings. Those standards should adopt your petitioners' own approach in relation to these matters. In your petitioners' submission, the Bill should also provide that the nominated undertaker should put in place a comprehensive consultation exercise with regard to noise and vibration monitoring.

35. The Select Committee in the House of Commons required the promoter to install floating slab track throughout Soho and imposed requirements on the promoter as regards the provision of floating slab track in tunnels where such tunnels are in close proximity to residential properties. Whilst your petitioners welcome these requirements, your petitioners respectfully submit that the requirements should be based upon numerical noise targets rather than a simple tunnel depth test. In other words, if the noise from the operational railway were expected to exceed a given trigger level, then appropriate mitigation measures (including where appropriate floating slab track) should be provided. Your petitioners and the promoter disagree about what trigger level should be used if that approach were to be taken in respect of dwellings, and your petitioners would respectfully submit that their standard is the appropriate one. Your petitioners are also concerned to ensure that high standards are met in terms of the lifespan and maintenance of the running tracks and the wheels of the rolling stock. Appropriate standards should be incorporated in the contracts between the Secretary of State and the nominated undertaker to ensure that the nominated undertaker prevents any unacceptable degradation in the tracks and rolling stock wheels which might otherwise lead to a gradual increase in groundborne noise and vibration over time. These issues are likely to be raised on a generic basis by the Council of the London Borough of Camden on behalf of other local authorities when they address the select committee of your Right Honourable House.

Noise from fixed Sources

36. Your petitioners have concerns about the design standards that the promoter is proposing to adopt in relation to the level of noise generated by fixed installations including electrical track side equipment, power supply equipment, and other building services equipment (other than ventilation shafts, as to which see below. Like many other local authorities, your petitioners adopt stringent noise controls for such installations by way of planning conditions. To prevent a gradual deterioration in the noise climate, these standards require, in general terms, the noise from a new fixed source to be lower than the existing background noise. These standards are now well established in your petitioners' own planning policies and fall squarely in line with the Mayor's published noise strategies and with the policies adopted by other major London based railway projects. The design standard that Crossrail is proposing goes entirely against the grain by setting a design standard that would enable noise from fixed sources to be higher than the existing background levels, thus seriously undermining the objectives set-out in the local planning authorities' policies. Your petitioners fail to see why Crossrail should be treated any differently from other developers or other major railway promoters and respectfully submit that the promoter should be required to comply with your petitioners' preferred standard for fixed noise sources. Your petitioners fully support the Council of the London Borough of Havering who intend to present a generic case on this issue to the select committee of your Right Honourable House.

Ventilation shaft noise

37. It is proposed that there will be ventilation shafts and equipment at various locations in your petitioners' city. Your petitioners should, in their respectful submission, be entitled to prescribe requirements for the design and appearance of the ventilation buildings and their relationship to existing and proposed buildings, and the extent to which noise and vibration from the shafts should be reduced to an acceptable level. Whilst your Petitioners recognise the arguments for treating ventilation shaft sites differently from other fixed noise sources, they have yet to be convinced that the provisions propounded by the promoter are appropriate.

Local Employment

38. Your petitioners recognise and warmly welcome the fact that the Crossrail proposals will provide a large number of employment opportunities during both the construction and operation phase. Your petitioners are keen to ensure that the nominated undertaker takes steps to seek to promote employment of local residents both temporarily and permanently. They would also wish to advocate and promote contact with local businesses to provide goods and services. More information and assistance needs to be given to affected businesses to help them understand the impact of constructing and operating Crossrail, both through the process of obtaining consent, its construction and operation. This should also be extended to community facilities throughout the area such as medical centres, churches, education centres, community centres and the Territorial Army which will be affected and details should be provided of how the users of these facilities will be catered for during construction and the character of the communities retained. Your petitioners note that assurances have been given to Newham London Borough Council about local employment and your petitioners would respectfully submit that those assurances should be extended to them. [HC49]

General

39. Many of the issues raised in the three petitions that were deposited by your petitioners in the House of Commons have not been repeated in detail in the preceding paragraphs of this petition. In some cases, negotiations have been ongoing between the parties, and your petitioners have every reason to believe that those negotiations will continue and lead to a resolution before your petitioners appear before the select committee of your Right Honourable House. In other cases, more detailed information has been promised by the promoters and remains outstanding. Your petitioners reserve their position on all these issues and may wish to address the select committee of your Right Honourable House on them. They are as follows, referring to the original House of Commons petition numbers —

- paragraph 14 — working hours (assurances awaited as part of the environmental minimum requirements or code of construction practice)
- paragraph 15 — reimbursement of your petitioners' expenses in implementing the Bill — the level of reimbursement is yet to be agreed
- paragraph 16 — compliance with future changes to industry standards required (assurances awaited as part of the environmental minimum requirements or code of construction practice)
- paragraph 18 — detailed plans, methods and work programmes required (assurances awaited as part of the environmental minimum requirements or code of construction practice)
- paragraph 19 — tree loss mitigation strategy awaited and assurances awaited as part of the environmental minimum requirements or code of construction practice
- paragraph 21 — relationship with congestion charge boundary at Paddington (consultants' report awaited from TfL along with promoters proposal)
- paragraph 22 — impact of construction activities on public realm (assurances awaited as part of the environmental minimum requirements or code of construction practice)
- paragraph 25 — routeing of construction traffic — awaiting histograms indicating numbers and types of vehicles and assurances awaited as part of the environmental minimum requirements or code of construction practice
- paragraph 26 — impact of road closures, etc (assurances awaited as part of the environmental minimum requirements or code of construction practice)

- paragraphs 27 and 28 — consultation on highway works (assurances awaited as part of the environmental minimum requirements or code of construction practice)
- paragraph 29 — proper highway management (assurances awaited as part of the environmental minimum requirements or code of construction practice)
- paragraph 30 — carrying out and funding of highway remedial works (assurances awaited as part of the environmental minimum requirements or code of construction practice)
- paragraph 32 — acquisition of council land (assurances awaited as part of the environmental minimum requirements or code of construction practice)
- paragraph 33 — impact of ground settlement (assurances awaited as part of the environmental minimum requirements or code of construction practice)
- paragraph 34 — hours of tunnelling and spoil removal — details of on-site stockpiling capacity awaited (assurances awaited as part of the environmental minimum requirements or code of construction practice)
- paragraph 37 — economic effect of groundborne noise — details awaited of affected properties
- paragraph 50 — public relations strategy — a Paddington Liaison Group has been established and a comprehensive strategy should be developed for the remaining areas of the whole line within your petitioners' city
- paragraph 53b — use of Alfred Road by HGVs — detailed wording of assurance number 330 in the register of undertakings and assurances to be settled.

40. There are other clauses and provisions in the Bill which, if passed into law as they now stand, will prejudicially affect the rights and interest of

your petitioners and other clauses and provisions necessary for their protection and benefit are omitted therefrom.

YOUR PETITIONERS THEREFORE
HUMBLY PRAY

your Right Honourable House
that the Bill may not pass into law
as it now stands 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
Bill 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