

THE KINGDOM HALL TRUST

1 KINGDOM WAY, WEST HANNINGFIELD, CHELMSFORD CM2 8FW
Telephone 020 8906 2211

LEC:LEN 14 May 2021

Secretary of State for Transport c/o Transport Infrastructure Planning Unit
Department for Transport
Great Minister House
33 Horseferry Road
LONDON
SW19 4DR

Sent by Post and E-Mail

Dear Sirs:

Re: Response to Rule 14(4A) Notice: The Network Rail (Huddersfield to Westtown (Dewsbury) Improvements) Order (Order)

Objection/Representations by: The Kingdom Hall Trust (KHT) (Charity Registration Number: 275946) (Address: 1 Kingdom Way, West Hanningfield, Chelmsford, CM2 8FW; Email: InboxLGLProp.GB@jw.org)

KHT is a registered charity and the registered proprietor of the property known as Kingdom Hall, Newgate, Mirfield, WF14 8DD (Kingdom Hall). KHT has received Notice of the above Order, including the Schedule of Land belonging to KHT which will be affected by the proposed compulsory powers under the Order, including the Kingdom Hall car park and hard standing, scrubland area adjacent to the Kingdom Hall and access road to the Kingdom Hall car park.

KHT objects to and wishes to make representations concerning the proposed interference with the use of the Kingdom Hall property in accordance with the Order.

The Kingdom Hall property is a registered place of worship which is used by the Dewsbury, South Congregation of Jehovah's Witnesses (Congregation). Public religious meetings are normally held at the Kingdom Hall each week on Thursday and Sunday, although additional meetings and events are often held at other times each week throughout the year. The Congregation has approximately 128 congregants who attend meetings at the Kingdom Hall, in addition to other visitors and members of the public who often attend these meetings. The Kingdom Hall is also normally used for wedding ceremonies, funerals and memorial services throughout the year. The Congregation is comprised of families with young children as well as many elderly and infirm congregants who require unrestricted access to the Kingdom Hall.

Attending congregation meetings and other services at the Kingdom Hall is an integral part of the rights of Jehovah's Witnesses to worship and manifest their religious beliefs. These rights are enshrined by Article 9 of the European Convention on Human Rights (ECHR), as protected by the Human Rights Act (HRA) 1998. The proposed Order would substantially interfere with the rights of local Jehovah's Witnesses and others to attend religious meetings at the Kingdom Hall where use of the Kingdom Hall car park and access road by congregants, visitors and other members of the public will be restricted and impinged as a result of the compulsory powers afforded to Network Rail under the Order.

Registered Office: 1 Kingdom Way, West Hanningfield, Chelmsford CM2 8FW

A Company limited by guarantee registered in England No. 355443.

Charity Registration for England and Wales: 275946

Charity Registration for Scotland: SC046541

As noted above, access to the Kingdom Hall for religious meetings and services is required throughout the week and at all times during the year. It is therefore vital that the access road to the Kingdom Hall and Kingdom Hall car park remain unrestricted and available to Kingdom Hall users at all material times. This is of particular importance for elderly and infirm congregants as well as those with small children. It is of utmost concern to KHT that the Kingdom Hall, including its access road and car park, remains a safe environment for all attendees and that their health and safety is treated with the greatest importance.

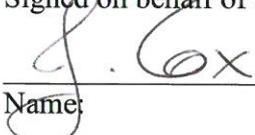
To prevent, restrict and/or create substantial difficulties for congregants and visitors attending the Kingdom Hall as part of their personal and public worship in accordance with their religious beliefs would amount to a fundamental breach of their rights under Article 9 ECHR, as enshrined by the HRA 1998, and would be an unnecessary and disproportionate interference with those rights.

KHT therefore invites the Secretary of State for Transport to uphold KHT's objections to the proposed interference by Network Rail with the use of the Kingdom Hall property, as set out in their Notice for the proposed Order.

Yours sincerely,

The Kingdom Hall Trust

Signed on behalf of KHT by two of its Directors/Trustees:

 J. COX JONATHAN COX

Name:

 ALAN CLINTON

Name: