



Phillips Planning Services Ltd.  
Town Planning and Development Consultants

**Obj153/Document 1.3**

**TRANSPORT AND WORKS ACT 1992: PROPOSED NETWORK RAIL  
(EAST WEST RAIL BICESTER TO BEDFORD IMPROVEMENTS) ORDER**

**TOWN AND COUNTRY PLANNING ACT 1990: REQUEST FOR DEEMED  
PLANNING PERMISSION**

**PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT  
1990: APPLICATIONS FOR LISTED BUILDING CONSENT**

**TRANSPORT AND WORKS (INQUIRIES PROCEDURE) RULES 2004**

# **SUMMARY PROOF OF EVIDENCE**

**OF**

**PAUL WATSON  
BA (HONS) DIPTP MTP MRTPI  
PHILLIPS PLANNING SERVICES LTD**

**On behalf of Cloud Wing UK Limited, Arnold White Estates Limited and Hanson  
Packed Products Limited**

**(January 2018)**

## **Qualifications & Experience**

My name is Paul Watson.

I hold a Bachelor of Arts Honours Degree, a Diploma and a Masters Degree in Town and Country Planning from the University of Newcastle.

I am and have been a Member of the Royal Town Planning Institute since 1997.

I initially gained experience working for a local planning authority as a planning policy officer and then within development control section prior to entering private practice in 1999.

I am a Director of Phillips Planning Services Limited of Kingsbrook House, 7 Kingsway, Bedford, and advise clients in both the public and private sectors on a wide range of planning and development matters throughout England and Wales.

I have visited the area south of Bedford between and around Stewartby and Kempston Hardwick on a number of occasions for the purpose of drafting of this proof of evidence.

The evidence which I have prepared and provide for this Inquiry in this proof of evidence is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

I hereby declare as follows:

- (i) This proof of evidence includes all facts which I regard as being relevant to the opinions that I have expressed and that the Inquiry's attention has been drawn to any matter which would affect the validity of those opinions.
- (ii) I believe the facts that I have stated in this proof of evidence are true and that the opinions expressed are correct.
- (iii) I understand my duty to the Inquiry to help it with matters within my expertise and I have complied with that duty.

## **Summary Proof of Evidence**

- 1.1 My evidence at this inquiry considers the way in which the Network Rail (NR) proposals as set out in its application for an order under the Transport and Works Act 1992 (the TWAO Application) for the 'Bedford' section of east / west rail relate to the key project objectives set out in the 'Statement of Aims' document (NR4) (July 2018). I also consider the proposals in the context of the main 'Matters' upon which the Secretary of State for Transport wishes to be informed as set out in the 'Statement of Matters' (November 2018).
- 1.2 My evidence is provided primarily with reference to the proposed works in the area between Stewartby Railway Station and Kempston Hardwick Railway Station and up to where the line crosses the A421 and passes into Bedford.
- 1.3 Directly relevant to my evidence are two major planning applications which I have submitted to Bedford Borough Council on behalf of Cloud Wing UK Limited (CWUKL). The first comprises land at Broadmead and the former Kempston Hardwick Brickworks. The line runs through and along the western boundary of this site. The second comprises the land and buildings at the Former Stewartby Brickworks through which the railway line runs. The proposals will deliver approximately 1,000 new homes and approximately 780,389 square metres of new business floorspace and envisages the construction of two new bridges across the railway line between Stewartby and Kempston Hardwick Railway Stations facilitating the closure of four level crossings.
- 1.4 The TWAO Application as submitted in July 2018 does not have regard to these applications and so ignores the significant benefits that could be realised through planning comprehensively in close co-operation with CWUKL in this area. The main concerns held are:
  1. The proposals for the section of the line between Stewartby and Bedford are premature to the determination of the next section of the line from Bedford to Cambridge. More precisely, the decision on whether the line should be routed through and to the north of Bedford or to the south of Bedford should be taken before plans are finalised for works around Stewartby and Kempston Hardwick as the routing decision could alter the requirements in this area. Unless and until a final decision is made on the next section of the line from Bedford to Cambridge it is not possible to say now that there is a compelling case in the public interest for

the acquisition of land included in the order. Consent should not therefore be granted for this part of the line as a compelling case in the public interest for the compulsory purchase of the land required to construct it cannot be demonstrated.

2. The proposed new bridge at Manor Road prejudices the delivery of the CWUKL land at the former Kempston Hardwick Brickworks site as it does not provide for appropriate new vehicular access from Manor Road. In response to this concern I understand that NR has discussed with CWUKL the potential to include an access from the raised section of the proposed new Manor Road bridge approach into the CWUKL site. However, this will sterilise a portion of the CWUKL development land due to the convoluted nature of delivering such an access down into the site from a raised section of road.
  3. The EIA cumulative assessment prepared in support of the TWAO Application does not have regard to the impact of the CWUKL proposals and so is deficient in this respect and I understand that it would be unlawful to grant consent without this matter being addressed. (This is a matter for legal submission). It also fails to grasp the opportunities offered by the CWUKL proposals which would facilitate the closure of four level crossings between Stewartby and Kempston Hardwick and provide two new road bridges across the railway line which would in turn draw traffic away from existing residential roads.
  4. The NR proposals fail to have proper regard to the recommendations of the National Infrastructure Commission (NIC) report, Partnering for Prosperity (NR44) which directs that the east / west railway improvements should be designed to facilitate significant additional housing and employment development in the corridor between Oxford and Cambridge. The failure to take account of or co-ordinate with the CWUKL proposals which seek to deliver new homes and employment development in a location consistent with the aims of the NIC and emerging local policy is a material and detrimental omission.
- 1.5 CWUKL seek changes to the order to take account of its proposals based on the key concerns I have summarised. At the time of writing, discussions are ongoing with NR regarding these matters. The discussions are referenced briefly in the Proofs of Evidence which have been submitted to the Inquiry on behalf of NR by Jill Stephenson 'Planning' (paragraph 8.6.6), Martyn Angus 'Need Case' (paragraph 10.4.2-10.4.8) and Jonathan Smith 'Property' (paragraph 9.41.5).

1.6 Unless or until a formal agreement is reached with NR to address these concerns the objections of CWUKL remain.