



Phillips Planning Services Ltd.
Town Planning and Development Consultants

Obj153/Document 1.4

**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

SUPPLEMENTAL 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**

(February 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 supplementary 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.

1. In my first proof of evidence I set out my opinion on the way in which the proposals by Network Rail (NR) contained in the 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 considered 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).

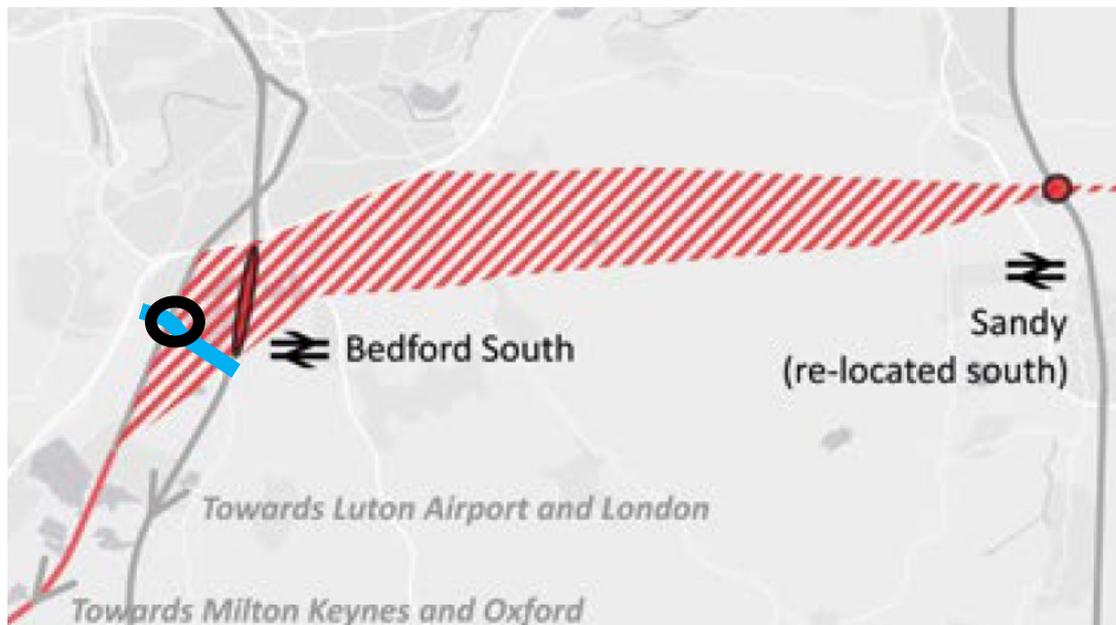
Bedford to Cambridge, East / West Rail

2. At paragraphs 4.1 to 4.10 of that evidence I explain that the proposals for the section of the line between Stewartby and Bedford, including the works to create a bridge crossing of the railway at Manor Road are premature to the determination of the route of the next section of the line from Bedford to Cambridge. This is because the decision on whether the line is to be routed through and to the north or to the south of Bedford before it then swings east toward Cambridge could, depending on which route option is chosen, have implications for the works set out in the order and what land is necessary. Until this decision is taken it is not possible to say now that there is a compelling case in the public interest for the acquisition of the land sought in the proposed Order¹.
3. Following the submission of my proof of evidence NR and the East West Railway Company launched a formal consultation on the potential route options for the central section of east / west rail. The consultation runs from 28 January 2019 until 11 March 2019. Attached as Appendix 1 to this supplemental proof is a copy of the consultation document and at Appendix 2 is a copy of the supporting technical report.
4. The consultation document (pages 15 – 19) describes the five route options A-E. As I noted in my original evidence, three of these are routed to the south and two run through and to the north of Bedford. In Section 4 of my original evidence I set out my understanding that if a southern route was favoured a new station was likely to be delivered south of Bedford. The consultation document confirms my understanding and explains that as part of the three southern options (A-C), a new 'Bedford South' station will be provided.

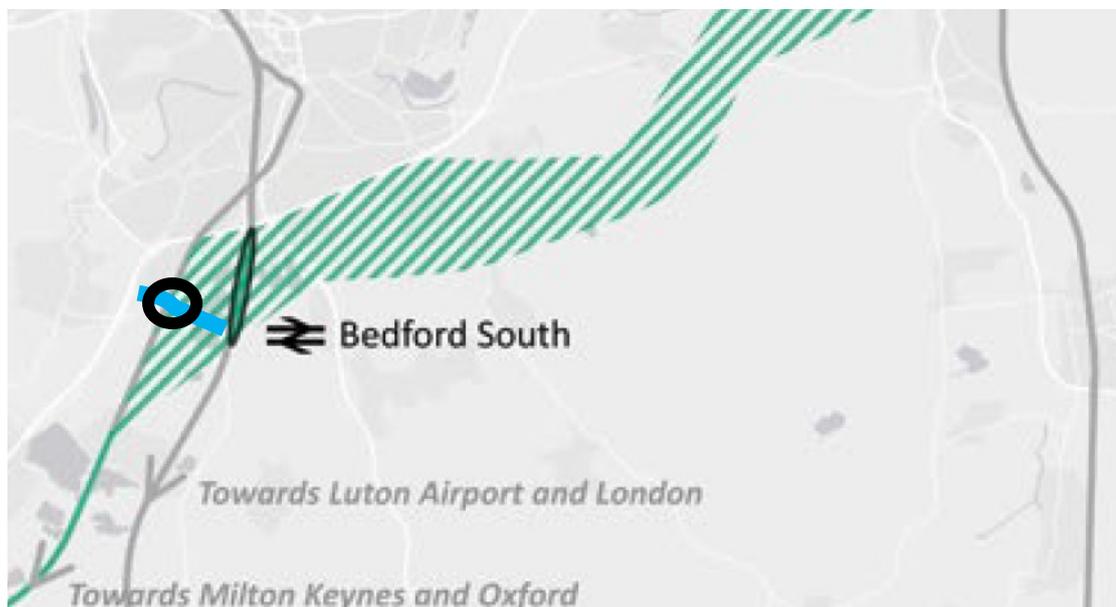
¹ See by way of example the decision letter of the secretary of state decision on the application for a Development Consent Order for North Killingholme Power Project dated 11 September 2014 and the report of the Examining Authority <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010038/EN010038-001485-Examining%20Authority's%20Report%20of%20Findings%20and%20Conclusions%20for%20the%20North%20Killingholme%20Power%20Project,%20dated%2011%20June%202014.pdf>

5. Page 13 of the consultation document notes that this could either be located at the Wixams new settlement as an interchange with the station that is already planned there or as a separate stand-alone station north of Wixams but south of the A421. The route corridors are defined in the consultation document with the potential locations for the station also highlighted. I have taken extracts from the corridors A-C below and added to them, (approximately), the location of Manor Road (blue line) and the proposed Manor Road Bridge Works (black circle). As is readily apparent these works lie within route corridors in each of the three options.

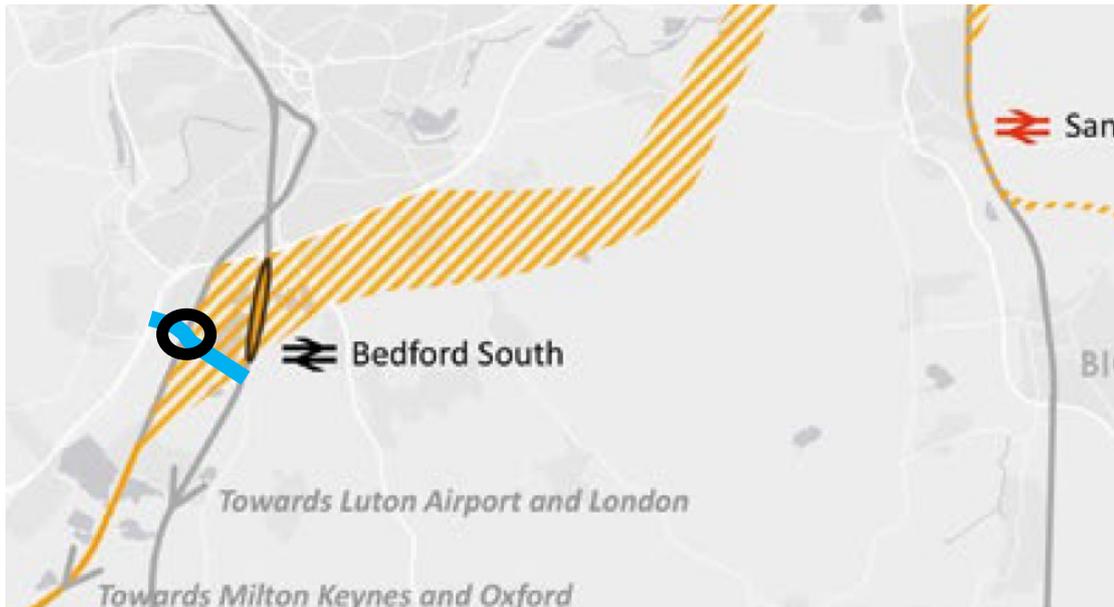
Option A



Option B



Option C



6. These option corridors state that the railway line could branch eastward “around Stewartby” (see paragraphs 8.3, 8.9 and 8.15 of the technical report at appendix 2). The exact route of course remains fluid and will not be determined until one of the corridors is chosen and work on the detailed alignment can begin. The consultation document suggests that the detailed design will take place in 2020 and will be subject to refinement as part of an application for a development consent order under the Planning Act 2008 (it is anticipated that consent will be secured in 2023).
7. I consider that this consultation exercise demonstrates that proposals for works in 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. The final decision on the routing of the line and the location of the proposed new Bedford South Station could significantly alter the requirements in this area. In those circumstances, it is unclear whether the land sought as part of the proposed order would be needed either wholly or in part.
8. Until a final decision is made on the next section of the line and particularly in the Manor Road/Kempston Hardwick and Stewartby areas, it is not possible to say that there is a compelling case in the public interest for the acquisition of land now. What is required may well change subject to the final routing of the line and the final position of the Bedford South Station (if one of options A-C are chosen).

9. These matters do not of course impact proposed works south of and up to Stewartby Station. No objection is raised to the proposals south of Stewartby.

NR response letter dated 23 January 2019

10. Also following the submission of my initial evidence, I have been passed a copy of a letter from NR dated 23 January 2019 responding to the original objection lodged by Town Legal on behalf of Cloud Wing UK limited.

11. At the foot of page 1 running over onto the top of page 2, the letter states that NR is aware that Cloud Wing is in the process of preparing an outline application to develop its land around Kempston Hardwick Station. This is not correct. As I set out in My initial evidence (paragraph 2.1), the outline application was actually lodged on 14 November 2018. NR is a statutory consultee in respect of the application and as noted at paragraph 5.2.1(vi) of Mr Angus's proof of evidence NR has been in close consultation with Cloud Wing.

12. A formal Service Agreement to ensure ongoing consultation was completed between Cloud Wing UK Limited and NR on 4 June 2018. The agreement confirms Cloud Wings intention to submit the planning applications at Stewartby and at Kempston Hardwick. As the agreement was completed in June, prior to the TWAO application being made in July NR was aware of these proposals.