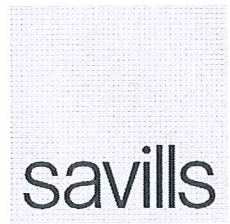


OBJ/128

22 October 2018
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Secretary of State
Department for Transport
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By email and post

Dear Sir

THOMAS WHITE PROPERTIES LTD – HAYFIELD FARM
Proposed Network Rail (East West Rail Bicester to Bedford Improvements) Order
Statement of Case – Land at Aspley Guise and Husborne Crawley

Please find enclosed a Statement of Case on behalf of my client, Thomas White Properties Ltd/

Yours sincerely

A handwritten signature in black ink that reads "K Benbow".

Katie Benbow
Associate Director

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



THE TRANSPORT AND WORKS ACT 1992

IN THE MATTER OF AN APPLICATION FOR THE TRANSPORT AND WORKS
(APPLICATIONS AND OBJECTIONS PROCEDURE)
(ENGLAND AND WALES) RULES 2006

PROPOSED NETWORK RAIL (EAST WEST RAIL BICESTER TO BEDFORD
IMPROVEMENTS) ORDER

OUTLINE REPRESENTATIONS

STATEMENT OF CASE

Introduction

1. These are the Outline Representations of Savills (UK) Ltd ('Savills') in their capacity as agents to Thomas White Properties Ltd ('TWO Ltd') with respect to the application for the proposed Network Rail (East West Rail Bicester to Bedford Improvements) Order.
2. The matters raised in these Outline Representations are of concern to TWO Ltd as the owner of land at Aspley Guise and Husborne Crawley which would be affected by the proposed scheme.

Consultation and Engagement

3. Whilst some correspondence has been held with the Department for Transport and the EWR Alliance there has been no communication from Network Rail's ('NR') agents, Winckworth Sherwood ('WR') and as such the detail required by TWO Ltd has not been forthcoming. There has been no response to the objection submitted on 5th September 2018, therefore it has not been possible to discuss the relevant aspects of the scheme with NR.
4. The Draft Order proposes to acquire land and rights in land compulsorily as part of the wider East West Rail Western Section Phase 2 scheme.
5. Insufficient detail for a scheme of this complexity has been provided. No information has been provided as to the proposed accommodation works. No information has been provided on the following points:
 - We need to know the detail of the bell mouth onto Salford Road and Bedford Road, this needs to be suitable for large agricultural vehicles.

- The material to be used for the track under works 34 & 35 – this is to be used as a farm track and as such we require it to be a concrete track (this has previously been confirmed by Charles Hurst). On the scheme drawing I can see that it says “New All Weather Access Track”- the material needs to be defined.
- Please advise as to the material for the access track (works 36) as my client and the tenant will need to be able to use this.
- Please advise as to the maintenance responsibilities of the track and any other liabilities
- Please advise as to the fencing that will be installed along the side of the railway.
- My client will no longer be able to use the Berry Lane Crossing – this will sever the farm in two and create management issues.
- My clients needs to know the rights that they will have over the proposed access tracks to Salford Road and Bedford Road.
- My client also needs to know who else will have access rights over the tracks that run across their land

6. Network Rail and their agents have failed to provide a response to demonstrate how they have taken account of the objections raised in deciding the final specification of the scheme.

7. No Heads of Term have been issued.

Proposed Areas to be Acquired

8. My client opposes the proposed area of land to be taken within their ownership.

9. We have not been given the opportunity to discuss the design and requirements in any detail whatsoever.

Request to Attend Hearings and Make Representations

10. Savills intend to lodge full Written Representations in due course and request to make oral representations at the Order hearing or any other hearings which may be held.

Katie Benbow MRICS FAAV
 Savills (UK) Ltd
 Wytham Court
 11 West Way
 Oxford
 OX2 0QL

Dated 22 October 2018