

8 November 2023

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By email only:

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Attention: Tatiana Volodina, Marnix Elsenaar

Dear Sirs,

THE NETWORK RAIL (OLD OAK COMMON GREAT WESTERN MAINLINE TRACK ACCESS) ORDER 202[] (the draft Order)

We refer to previous correspondence relating to requests to information and requests for replies to enquiries made to Network Rail directly via FOIA/EIR requests, or to yourselves. With respect to correspondence with you, we refer in particular to our letters of 5, 12 and 26 October 2023.

We note that these requests remain unfulfilled by Network Rail and yourselves. We would request again, that those requests are fulfilled this week, and before the commencement of the Inquiry. We repeat again that we will, if necessary, seek an order for disclosure from the Inspector.


Having reviewed the latest rebuttal evidence of Network Rail, we would be grateful of Network Rail's / your replies to the following additional enquiries and information requests. We would also request, that those requests are fulfilled this week, and before the commencement of the Inquiry:

1. Please provide a CAD version of the drawing prepared by HS2 which is attached to Mr Ford's rebuttal.
2. Please provide the dimensions for the widest RRV's proposed to be delivered by low loader.
3. Please provide the dimensions for all low loaders proposed to be used.
4. Please provide the dimensions for any other MEWPs or other vehicles to be delivered by low loader.
5. Are Network Rail planning on using 18m trailers under Construction and Use (C&U) regulations, or Special Types General Order (STGO) regulations?
6. Please provide minutes of meetings between Network Rail and Hitachi / Department for Transport regarding access to the Hitachi lease area at the North Pole Depot (by HS2 or Network Rail and/or contractors).
7. Please provide a copy of the agreement in place between Network Rail and/or Hitachi, and/or Agility trains to use the compounds within the North Pole Depot referred to in Mr Ford's rebuttal evidence.
8. Please provide confirmation of the current status of Network Change procedure regarding the proposed abandonment of the Jacobs Ladder RRAP.
9. Please provide the dimensions of a Superbug tracked vehicle, and a drawing preferably.
10. Please provide the dimensions of the Doosan Crane, and a drawing preferably.
11. Please confirm the dimensions of the low loader to be used that is referred to at page 8 of Mr Ford's rebuttal.
12. With reference to Mr Ford's rebuttal (page 7), we note that Mr Ford writes that '*...Network Rail's plan does include utilisation of all three compounds as part of our logistics / parking hub. These are*

accessed via Mitre Way'. Please provide a specific map location for each of the compounds mentioned which Network Rail intends to use (i.e., the SRSA compound, the maintenance compound and signalling compound).

13. Please advise what vehicles are proposed to be used in and out of these compounds and the dimensions thereof including any loads.
14. Please confirm the procedures in place for taking access over any level crossing within the North Pole site to enter / exit the said compounds.
15. Please provide evidence of the "refusal" and "discussions" with the North Pole Depot operator referred to (Mr Ford's rebuttal page 7), and the "regular meetings" (including notes taken etc) (Mr Ford's rebuttal page 14).
16. Who are the "stakeholders" who have been engaged with at North Pole Depot (Mr Ford's rebuttal page 18)? Please provide evidence of the "engagement" referred to.
17. Please confirm whether the GWML Rail Systems Project is a project consented under the HS2 Act.
18. Please advise where the 12 HGVs a day restriction can be found, and provide a copy of the relevant document (Mr Ford's rebuttal page 22).
19. Please provide a copy of the GRIP 3 and GRIP 4 reports, alternatively the equivalent PACE 3 and PACE 4 reports relating to the proposed RRAPs at 239 Horn Lane and the triangle site (plot 1).
20. What vehicles are proposed to be used to transport "materials" from the North Pole Depot to the Order Lands (Mr Fleming's rebuttal page 3)?
21. Please provide the outcome of the "review" referred to in Mr Fleming's rebuttal page 9.
22. Please provide a copy of the Council's agreement to planning conditions (to be clear we have been provided the conditions said to be agreed, but not with evidence of the Council's agreement).
23. Please provide a copy of the "Construction Logistics Plan agreement" (page 2 Mr Douch's rebuttal).
24. Please advise where the 24 HGVs movements a day restriction can be found, and provide a copy of the relevant document (Mr Douch's rebuttal page 4).

Yours sincerely



Sarah Fitzpatrick