

TRANSPORT AND WORKS ACT 1992

TRANSPORT AND WORKS (INQUIRIES PROCEDURE) RULES 2004

SUMMARY PROOF OF EVIDENCE OF ANDREW FLEMING

NEED AND PROJECT DEVELOPMENT

13 OCTOBER 2023

1. INTRODUCTION

- 1.1 My name is Andrew Fleming. I am a Project Manager at Colas Rail Limited. I work within the South Rail Systems Alliance (**SRSA**) which consists of Colas Rail, Network Rail and AECOM. My role in the SRSA as Project Manager began in October 2021 and consists of leading the long-term planning for the construction of the railway infrastructure supporting the new station to be built on the Great Western Mainline (**GWML**) on the existing conventional rail network at Old Oak Common.

2. APPLICANT AND PROJECT

- 2.1 My Proof sets out Network Rail's role in the Project, as the owner and operator of the rail infrastructure of Great Britain, whose purpose is to deliver a safe, reliable and efficient railway for Great Britain.
- 2.2 In my Proof I describe the Project, which consists of two separate elements, as follows:
- a. temporary Road-Rail Vehicle (**RRV**) access via a Road-Rail Access Point (**RRAP**) onto the GWML to enable the delivery of the GWML Rail Systems Project; and
 - b. permanent RRV access onto the GWML railway to enable reliable future maintenance to the southern side of the main railway lines.
- 2.3 My Proof explains that the High Speed Rail (London – West Midlands) Act 2017 authorises HS2 Limited to deliver Phase 1 of High Speed 2, which will include construction of a new station, to be known as the **OOC HS2 Station**. It further explains that Network Rail will also be delivering an interconnecting station on the GWML on the existing conventional rail network managed by Network Rail (**OOC GWML Station**), which will be linked to the OOC HS2 Station.
- 2.4 The OOC HS2 Station will be delivered by HS2 Limited. HS2 limited will also construct the new platforms for OOC GWML Station. However, before the OOC GWML Station enters into operation, Network Rail needs to modify the existing track infrastructure to accommodate the new platforms. Works to be undertaken by Network Rail to enable this are collectively known as the GWML Rail Systems Project, which involves the modification of the existing four-track GWML to an eight-track railway.

3. NEED FOR THE PROJECT

RRVs and RRAPs

- 3.1 My Proof explains that the primary method of delivering the GWML Rail Systems Project will be by using RRVs, which are commonly used within the industry to deliver on-track works and which access rail tracks by RRAPs. Therefore, the deployment of RRAPs at key locations is key in ensuring the overall safety of the railway by providing the primary means of safe and easy access for RRVs to allow maintenance and upgrade works to be undertaken on the railway.
- 3.2 In my Proof I explain that Network Rail has considered utilising the existing RRAPs to deliver the GWML Rail Systems Project and/or enable future maintenance of the GWML. However, as set out in my Proof, there are a number of constraints that prevent it. As such, the need for a permanent RRAP was included in the GWML Rail Systems Project requirements and the requirement for a temporary RRAP was identified as part of Network Rail's construction development process.

Construction/Access Compound

- 3.3 My Proof further explains that, in addition to the temporary RRAP, Network Rail will require a temporary access compound, which must be level with the railway infrastructure and allow the RRVs to pass between the compound and track. A number of sites have been explored and considered for the delivery of the construction/access compound necessary for the delivery of the GWML Railway System Project. However, as set out in detail in Mr Ford's Proof of Evidence, Network Rail considers that they are not suitable to accommodate the Project and the Order Land is the most viable location for the Project (and indeed the only practicable option).
- 3.4 My Proof summarises the key objectives and benefits of the Project as follows:
- a. the proposed temporary RRAP enables the delivery of OOC GWML Station conventional rail works without significant rail construction delays;
 - b. the completion of the OOC GWML Station is directly linked to the commencement of service from the OOC HS2 Station and, by extension, the start of service on the whole HS2 network, a scheme of national importance;
 - c. the proposed permanent RRAP is required to enable regular and reactive maintenance, which will provide resilience to the railway network;
 - d. creation of a permanent RRAP at the south side of the GWML will improve efficiency and productivity of the line and will decrease disruption to passengers and freight users during construction of the OOC Station; and
 - e. the proposed permanent RRAP is critical for the safety and reliability of the railway network of the western region as efficient operations for Network Rail, Train Operating Companies and Freight Operating Companies.
- 3.5 In terms of economic and social benefits, the GWML Rail Systems Project will:
- a. enhance the public transportation network providing enhanced and safer public transport provisions;

- b. provide the opportunity for a more sustainable, reliable and rapid alternative form of travel versus private vehicular trips;
 - c. support the promotion of healthy communities by providing an improved rail and pedestrian network encouraging a modal shift change from private vehicular trips.
- 3.6 Another benefit of the GWML Rail Systems Project is that an enhanced network will provide clear benefits in terms of reducing CO2 and emissions associated with private vehicular trips.
- 3.7 Furthermore, it is crucial to note that the OOC HS2 Station cannot open without the prior opening of the OOC GWML station, which will allow those leaving HS2 services to connect to onward services (and vice versa).

4. DEVELOPMENT OF THE PROJECT AND CONSULTATION

- 4.1 My Proof confirms that the Project has been developed through a robust selection process, which is described in detail in Mr Ford's Proof of Evidence.
- 4.2 The Project represents an approach that is considered to meet Network Rail's requirements, is cost effective and results in the least disruptive access required to deliver the Project.

5. CONSULTATION

- 5.1 My Proof summarises the consultation undertaken by Network Rail prior to its application for the Order.
- 5.2 My Proof also provides further information, as requested by the Inspector in relation to parties consulted in relation to the Order.

6. COSTS AND FUNDING

- 6.1 Addressing the matters raised at 4b) of the Statement of Matters, my Proof confirms that the Project is fully funded by HS2 Limited under the Implementation Partnership Agreement dated June 2023 and HS2 Limited will reimburse Network Rail even if the actual cost of the Project exceeds the estimated cost, as confirmed in their letter appended to my Proof.

7. OBJECTIONS

- 7.1 My Proof summarises objections received following Network Rail's application for the Order and addresses two matters raised in objections, being the question of funding and also issues of need confirming that, in my opinion:
 - a. the Project is sufficiently funded and funding does not constitute an impediment to the Project; and
 - b. the Project is required to deliver the GWML Rail Systems Project and to enable the future maintenance of the GWML Main lines.

8. CONCLUSION

- 8.1 In my Proof I conclude that the Project is necessary to ensure the successful completion of the GWML Rail Systems project, which enables the opening of the OOC GWML Station and, by extension, the commencement of services on the whole HS2 network. The Project is also necessary in order to provide resilience to the GWML network, by providing a permanent

RRAP facility that will allow appropriate track maintenance to be undertaken on an ongoing basis.

8.2 The Order will enable these important works to take place in time and cost-effective manner.

8.3 I urge the Inspector to consider my Proof and respectfully request that the Order is made and the relevant powers required by Network Rail to complete the Project are granted.

Dated: 13 October 2023

I believe that the facts stated in this summary are true.

A handwritten signature in black ink, appearing to read 'Andrew Fleming', is written over a horizontal dotted line.

Andrew Fleming