

**TRANSPORT AND WORKS ACT 1992**

**THE NETWORK RAIL (OLD OAK COMMON GREAT WESTERN MAINLINE TRACK  
ACCESS) ORDER**

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**SUMMARY PROOF OF EVIDENCE**

**OF**

**NICHOLAS GALLOP BSc**

**SUBMITTED ON BEHALF OF BELLAVIEW PROPERTIES LTD**

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**DEPARTMENT FOR TRANSPORT REFERENCES:**

**TWA/21/APP/O1/OBJ/8;TWA/23/APP/02**

**DOCUMENT OBJ/08/04/03**

**OCTOBER 2023**

## 1 Introduction

- 1.1 My name is Nicholas Gallop and for the last 33 years I have practiced as a transport planning specialist. I hold a Bachelor of Science (Hons) degree in Transport Management & Planning. I am Director of Intermodality, an independent transport and logistics consultancy specialising in rail and intermodal transport projects. Prior to founding the company in 2002 I was a Senior Consultant at Sinclair Knight Merz, a Senior Logistics Consultant at Deloitte, and Rail & Freight Officer for Kent County Council.
- 1.2 Intermodality has been appointed by Bellaview Properties Ltd (**BPL**) since October 2021 to provide advice on rail-related matters for its proposed redevelopment of 239 Horn Lane. I was appointed by BPL in September 2023 to review the rail access and logistics proposals of Network Rail in relation to the use of 239 Horn Lane.
- 1.3 I have spent 35 years working with the railway industry. I am familiar with the access arrangements to the national rail network, having been involved in projects with the rail industry which have included, adjoined, relocated or closed engineering access points. I am currently working on several projects which will involve relocation or creation of new engineering access points on the national rail network.
- 1.4 I confirm that the opinions expressed are my true and professional opinions.

## 2 Evidence

- 2.1 My evidence relates to rail-related aspects of Matter 2 of the Inquiry Statement of Matters and in particular my evidence reviews and considers:
- (a) An overview of the operations and challenges associated with the main line engineering access, including the use of Road/Rail Vehicles (**RRV**) and associated Road Rail Access Points (**RRAP**);
  - (b) Provision of a temporary RRAP to access the GWML Main Lines, the southernmost of the 4 main running lines forming the GWML through the area of interest, in support of construction of the new station at Old Oak Common (**OOC**);
  - (c) Provision of a permanent RRAP to access the GWML Main Lines.

## 3 Matter 2

### *Engineering access*

- 3.1 Gaining access to the rail network can be challenging, particularly in urban areas close to residential properties. Network Rail is therefore responding with new and innovative means of access, using mobile equipment to deliver personnel, plant and material to site, increasing the range possible from existing access points (see paragraph 4.2 below as to my conclusions in relation to this). In addition, the “possessions” strategy is used to close part of all the main line when required, to provide sufficient time for undertaking the works.

### *Temporary RRAP*

- 3.2 In relation to the main alternatives considered by Network Rail and the reasons for choosing the scheme, my Proof of Evidence considers the suggestion in the TWAO application and associated public consultation materials that the only site available to Network Rail to achieve access to the GWML Main Lines is the 239 Horn Lane site.

- 3.3 My Proof of Evidence identifies that it has not been evidenced that the storage and access functions and associated office facilities need to be co-located, Network Rail's contractor and advisers confirming that these functions can be split across multiple sites.
- 3.4 Three large areas of railway land are available surrounding the OOC site, which could support the materials storage and/or component pre-assembly. Of these, the North Pole Depot and surrounding land, owned by the Secretary of State, can provide direct access to the south side of the railway, on either side of the OOC site. There is a recommendation in the Arcadis report referred to in my Proof of Evidence that agreement should be sought with the tenant operating the "Hitachi North Pole Depot" regarding provision of access. The other two sites are leased by Network Rail to a rail freight operator, who already subleases one (Willesden Euroterminal) to the Secretary of State specifically for HS2-related construction logistics. The freight operator has indicated a willingness to work with the relevant parties to provide access to the second site (Acton Goods Yard) for OOC construction works.
- 3.5 The process undertaken to assess alternative sites for temporary or permanent access has not followed Network Rail's own best practice guidance, in terms of both design and the overall comparative, costed assessment between alternatives. Through Freedom of Information Act (**FOI**) requests, Network Rail has provided documentation on previously identified additional sites not set out in the Statement of Case or Statement of Aims. In addition, in the ongoing site sharing discussions between BPL and Network Rail and their contractor, Colas Rail, Colas Rail has confirmed the ability to provide offsite storage space, with delivery of materials and plant on a Just in Time basis to a RRAP.
- 3.6 In relation to the temporary RRAP, I consider the sites identified by Network Rail, which demonstrate opportunities to use an existing RRAP and compound at the eastern end of the North Pole Depot site, together with one or both of the two RRAP locations identified by Network Rail within the North Pole Depot site itself. These have good onward links to/from the highway network at either end. These would provide secure and accessible locations, wholly within existing railway operational land, for storage, pre-assembly and access to the south side of the railway. In comparison, the 239 Horn Lane site's ability to provide a RRAP is constrained by access to the railway as well as the highway (the latter detailed in Mr Gent's evidence). I also consider the suitability of other alternative sites, including Acton Goods Yard and Willesden Euroterminal.

#### *Permanent RRAP*

- 3.7 Having established the ability to separate storage and access components between different sites, my Proof of Evidence considers the majority of sites assessed for the temporary RRAP as to their ability to provide permanent RRAP, plus additional sites identified by Network Rail. Four of these sites would be capable of providing access, with storage provided either alongside or from other sites in the area.
- 3.8 The 239 Horn Lane site would not provide a suitable access point for similar reasons that would affect a temporary RRAP. At best, the 239 Horn Lane site could allow vehicular access to the disused plot of land owned by The Crown Estate (the **Triangle Site**) to the west of 239 Horn Lane site, the Triangle Site having less constraints than the Horn Lane site on gaining access to the south side of the main line.

## 4 Conclusions

- 4.1 In terms of temporary access to the main line, Network Rail's contractor has confirmed that materials can be moved from an off-site location to a RRAP. Network Rail's advisers have confirmed that offices could be provided across multiple sites, and recommended that agreement should be sought for access to the North Pole Depot complex in the event that the Horn Lane site cannot be procured. The railway is already well-provided with land in the immediate vicinity of the OOC site, along with a series of RRAPs, all owned by Network Rail and/or the Secretary of State. Other sites identified are constrained by various combinations of space, topography, accessibility and residential proximity.
- 4.2 Turning to the permanent access, it is unclear the extent to which, in the absence of the OOC works, maintenance of the main line could not continue as at present from the existing RRAP, in combination with other emerging mobile techniques and technologies. Other more suitable locations for a permanent RRAP are or could be made available to Network Rail, outside of the Horn Lane site.
- 4.3 To better inform and justify the case for temporary possession of, and compulsory purchase of rights over a third-party site, and additional disruption to the local residential population, further evidence would be required:
- a) Operational and financial justification why/whether compounds and RRAP should be co-located;
  - b) Application of Network Rail's Best Practice guidance, to identify and compare sites to a similar level of detail, from which to score and identify the preferred solution(s);
  - c) Engagement with relevant stakeholders to agree preferred solution(s).
- 4.4 At this stage such evidence is not available. The evidence presented shows that alternative sites are available, which do not require the acquisition of private land at Horn Lane, or at least the extent of land being sought.
- 4.5 At best, it may be possible to reach agreement to achieve vehicular access through the Horn Lane site to a RRAP on disused land owned by The Crown Estate (the route already agreed as part of BPL's planning application). This would allow Network Rail periodic main line access, with material delivered as and when required. The balance of rail-related activities would then remain focussed on using the substantial amount of existing railway lands available in the vicinity.