



14 May 2021

Secretary of State for Transport  
c/o Transport Infrastructure Planning Unit  
Department for Transport  
Great Minster House  
33 Horseferry Road  
London SW1P 4DR

Email: [transportinfrastructure@dft.gov.uk](mailto:transportinfrastructure@dft.gov.uk)

By Post & Email

Dear Sirs

**The Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006  
The Network Rail (Huddersfield to Westtown (Dewsbury) Improvements) Order (Draft Order)  
Plots: 21-053, 21-054, 21-056, 21-058, 21-063, 21-065, 21-066 & 21-070.**

We refer to the above Draft Order and the Notice of Application dated 31 March 2021.  
Veolia ES (UK) Limited is the freehold owner and operator of the waste management site located at the north side of Ravensthorpe Road, Dewsbury, WF12 9ED (**the Site**).

The Draft Order proposes the following at the Site:

- Permanent acquisition of land for earthworks and new site access;
- Temporary use of the Site for construction related to the works on Calder Road and a temporary access;
- Temporary use of the Site as construction compound area;
- Temporary use of Site for the earthworks corridor construction and possible utility works; and
- Temporary access across the remainder of the Site.

The Site is used as a commercial waste depot for the parking of 30 refuse collection vehicles, a large workshop, an administration block, welfare facilities, staff parking (40 people) and waste container storage. The Site has been operational for over 40 years and is an integral part of the commercial waste services provided by Veolia to a considerable operating area covering most of West and North Yorkshire. Its location is both strategically and logistically important to the efficient and compliant service offering to approximately two thousand customers.

The proposed works to be carried out pursuant to the Draft Order will take place whilst the Site is occupied and remains operational. The construction period is estimated at 5 years. The Draft Order fails to safeguard and protect Veolia's and our customer's legitimate interests and ignores the vital public function that Veolia provides at the Site and therefore Veolia objects to the Draft Order on the following grounds:

1. Permanent acquisition of part of the Site will cause significant operational and management difficulties for Veolia. The reduction of the Site will mean losing critical parking areas and less capacity to manage the vehicles and storage of waste containers at the Site. The loss of part of the Site will give rise to considerable service continuity issues and will also result in restrictions and impediments to the



configuration and circulation space within the Site. Veolia's view is that acquisition of the Site should not take place unless or until a suitable replacement parking & storage area is made available to Veolia. In order to address the service viability and continuity concerns, any relocation site needs to be within close proximity to the Site and presented in a condition that meets the following minimum requirements so that it is suitable for vehicle parking and compliant with Veolia health and safety obligations:-

- Surfaced - ideally concreted, but suitable for HGV traffic.
  - Drainage - an adequate system for the discharge of rainwater etc
  - Site security i.e. palisade fencing/gates
  - Power for CCTV systems
  - Lighting - for personnel and vehicles to remain safe.
  - A safe access and egress point to and from the site.
  - Meets O-Licence requirements and has planning permission (if applicable);
2. Network Rail seeks temporary access across the Site for the five year construction period, including the creation and use of a construction compound on the Site. This will severely disrupt operations and potentially give rise to site safety, management and security issues. In addition, the continuous and unfettered access to, from and around the Site is critical for the efficient and safe movement of staff and management of the Veolia fleet. Any interference with this way of working will have a significant impact on Veolia's daily operations and its ability to service its' customer network;
3. The proposed closure and associated works to the Calder Road Bridge will result in the diversion of vehicles to and from the Site. HGVs will be required to turn left out of the Site onto Ravensthorpe Road and then onto nearby residential roads, such as Lees Hall Road, which is already heavily utilised by a number of large vehicles from various businesses from the Ravensthorpe Road and Calder Road industrial units. If Veolia is required to direct its vehicles as envisaged, there is the potential for amenity related complaints and concerns being raised with Veolia and for which it will have no control.

Veolia respectfully submits that the Draft Order should not be granted without the abovementioned issues being fully addressed. Veolia reserves the right to make further representations.

Yours faithfully

A handwritten signature in black ink, appearing to read "Joanne Demetrius", written over a horizontal line.

**Joanne Demetrius**  
Counsel