

The Network Rail (Huddersfield to Westtown)
(Dewsbury) Improvements Order

Proof of Evidence of
John Armitage (OBJ/38/1)

TRANSPORT AND WORKS ACT 1992

TRANSPORT AND WORKS (INQUIRIES PROCEDURE) RULES 2004

**THE NETWORK RAIL (HUDDERSFIELD TO WESTTOWN) (DEWSBURY)
IMPROVEMENTS ORDER**

PROOF OF EVIDENCE

-OF-

JOHN ARMITAGE

Document Reference

OBJ/38/1

1. Introduction

- 1.1 My name is John Armitage . I am employed by Huddersfield Town Association Football Club Limited ("HTAFCL") as IT Manager, a position I have held since September 2017. Whilst my job title is IT Manager, I perform a number of duties outside what may be typically expected from such a role. I have been authorised by HTAFCL's Operations Director to give this evidence on HTAFCL's behalf.

2. Scope of Evidence

- 2.1 I Have prepared this Proof of Evidence in support of HTAFCL's objection to the draft Network Rail (Huddersfield to Westtown (Dewsbury) Improvements Order (" the draft Order "). This proof of evidence elaborates further on the matters raised in Gordons LLP's objection letter dated 17 May 2021 and the Statement of Case dated 6 July 2021 including the likely impact of the draft Order on access to HTAFCL's business and on the economic impacts on HTAFCL's business.

3. HTAFCL

- 3.1 HTAFCL is a professional club based in Huddersfield . It was founded in 1908 and entered the Football League in 1910 . It enjoyed Premiership status as recently as 2017/2018 and 2018/2019 and is currently in the Championship , the second tier of English football . It has an important part to play in the area's social culture, recreation , employment and economy .
- 3.2 HTAFCL occupies the Canalside Sports Complex, 509 Leeds Road, Huddersfield, HD2 1YT. Included within this are two playing fields/training pitches. To the north of the canal (between the canal and railway line) is a grass playing field (" the Playing Field"). To the south of the canal is an artificial training pitch (" the Training Pitch "). The Playing Field and the northern part of the Training Pitch can be seen on page 3 of Appendix 1.
- 3.3 Both the Playing Field and the Training Pitch are vital facilities for HTAFCL and are integral to the operation of HTAFCL's business, the club's First Team and the club's Academy . They must be kept accessible and available for use at all times. This is essential for the current and future success of the club.

4. The Playing Field

- 4.1 This is used by the club's Academy. Its security features include high metal fencing, flood lighting and CCTV.
- 4.2 Access to the Playing Field by HTAFCL pedestrians and vehicles is via Field House Bridge. To get to Field House Bridge HTAFCL pedestrians may exit the secure compound to the south of the canal (in which the Training Ground is situated) and climb the steps to the canal path. To get to Field House Bridge by vehicle HTAFCL vehicles (and emergency vehicles) use the track from the top of Old Fieldhouse Lane. This is also used by pedestrians. On the north of Field House Bridge there are two accesses to the Playing Field : one to the north - eastern corner and one which leads to the south - western corner parallel to the canal. These are the only accesses to the Playing Field. Photographs of these taken from the north side of Field House Bridge are at Appendix 2 and are taken from the points marked X and Y on Appendix 3. This also shows the vehicular and pedestrian route from the top of Old Field House Lane to Field House Bridge in red.

5. The Training Pitch

- 5.1 This is used by the Club's First Team. Its security features include high metal fencing, floodlighting, CCTV and biometric access control measures.

- 5.2 Access to the secure compound in which the Training Pitch is situated is from within the complex itself or via the steps down from the canal path to the compound's locked security gate.

6. Notification of the proposals

- 6.1 The first time HTAFCL became aware of the proposals were when it received the notice of the proposed Order dated 31 March 2021.

7. Draft Order

- 7.1 It can be seen from the aerial overlay (Appendix 1 page 3) of Plot 7-032 of the draft Order that Plot 7-032 includes part of the Playing Field ie a part of the Playing Field inside the Playing Field's high security fencing. It also includes the access to the north-eastern corner of the Playing Field.
- 7.2 It can be seen from the aerial overlay of Plot 7-049 (Appendix 1 page 3) that Plot 7-049 includes land within HTAFCL's secure compound to the south of the canal.
- 7.3 It is vital that the security of the Playing Field and Training Pitch (including the secure compound in which the Training Pitch is located) are not compromised . It is also vital that access to the Playing Field from the top of the made -up carriageway of Old Fieldhouse Lane via the track to Field House Bridge and the accesses to both the north-eastern and south-western corners of the Playing Field are kept available for use at all times by HTAFCL pedestrians and vehicles and emergency vehicles. The pedestrian access from HTAFCL's secure compound to the canal path leading to Field House Bridge also needs to be kept available for use at all times by HTAFCL pedestrians.

8. Site Meeting

- 8.1 Following Network Rail's letter dated 5 July 2021 (Appendix 1) to Mark Blackburn (Gordons LLP) I attended a meeting on site with representatives of Network Rail on Thursday 26 August 2021 in order to gain a better understanding of the proposals.
- 8.2 It would appear that in terms of Plot 7-032 a compound area could be accommodated in the northern corner of Plot 7-032 outside the fenced area of the Playing Field and that there is no need for any part of the fenced area of the Playing Field to be included in the draft Order. It would also appear that despite the proposals contained in the draft Order there is no reason why the use of both accesses to the Playing Field cannot continue to be used by HTAFCL pedestrians and vehicles.
- 8.3 In terms of Plot 7-049 it would appear that a compound area could be accommodated alongside the track which runs from the top of the made-up carriageway of Old Fieldhouse Lane to Field House Bridge which does not impinge on HTAFCL's secure compound to the south of the canal. It would also appear that notwithstanding that that track would be used as an access by Network Rail there is no reason why it cannot continue to be used by HTAFCL pedestrians and vehicles.
- 8.4 Since the site meeting further discussions have taken place with Network Rail to see if a solution can be reached . At the date of this proof of evidence they are continuing .

9. Conclusion

In the event that a satisfactory solution cannot be reached between HTAFCL and Network Rail HTAFCL maintains its objections to the proposed Order.

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Witness declaration

I believe the facts that I have stated in this proof of evidence are true and that the opinions expressed are correct.

Signed: *John Armitage*

John Armitage
IT Manager
Huddersfield Town Association Football Club Limited
5 October 2021