

TRANSPORT AND WORKS ACT 1992

**Transport and Works (Applications and Objections Procedure)
(England and Wales) Rules 2006**

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

STATEMENT OF CASE FOR THE OBJECTION :

HUDDERSFIELD TOWN ASSOCIATION FOOTBALL CLUB LIMITED

Author : Gordons LLP

Date : 6 July 2021

1. Huddersfield Town Association Football Club Limited (" HTAFCL ") is a professional football club based in Huddersfield . It was founded in 1908 and entered the Football League in 1910 . The club 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 .
2. The notice from Network Rail Infrastructure Limited dated 31 March 2021 for the Proposed Order served on HTAFCL identified the following areas as affecting land occupied by HTAFCL : 7-032 , 7-043 , 7-044 , 7-048 , 7-049 and 8-008 shown on Sheet Nos 7 and 8 .
3. It can be seen from the aerial overlay of Plot 7-032 – Appendix 1 that it not only covers the two accesses to the adjacent playing field but also part of the fenced and gated playing field itself (see Photograph Numbers 5 , 6 and 8 – Appendix 2) .
4. It can be seen from the aerial overlay of Plot 7-049 (Appendix 1) that it lies close to the edge of the playing field to the south.
5. The playing fields are vital facilities for HTAFCL and are integral to the operation of its business and the club's Academy . Accordingly they must be kept available to their full extent at all times.
6. It is essential that access to the playing fields on foot and by vehicles (including emergency vehicles eg ambulance) and by means of their existing accesses , is maintained at all times.
7. The existing well-defined boundary treatments to the playing fields include metal fencing which provides safety and security and woodland /hedges which provide screening and privacy (see the Photographs in Appendix 2). It appears from the aerial overlay of Plots 7-032 and 7-049 that these Plots breach these boundary treatments and HTAFCL is concerned that this will have a severely detrimental effect on the use , safety , security , screening and privacy of the playing fields.

8. Whilst there has been an exchange of recent correspondence with Network Rail's representatives with a view to clarifying matters this has not yet led to a resolution of the issues identified above and therefore the above objections and those other objections contained in the letter of objection dated 17 May 2021 remain.

APPENDIX OF CORE DOCUMENTS

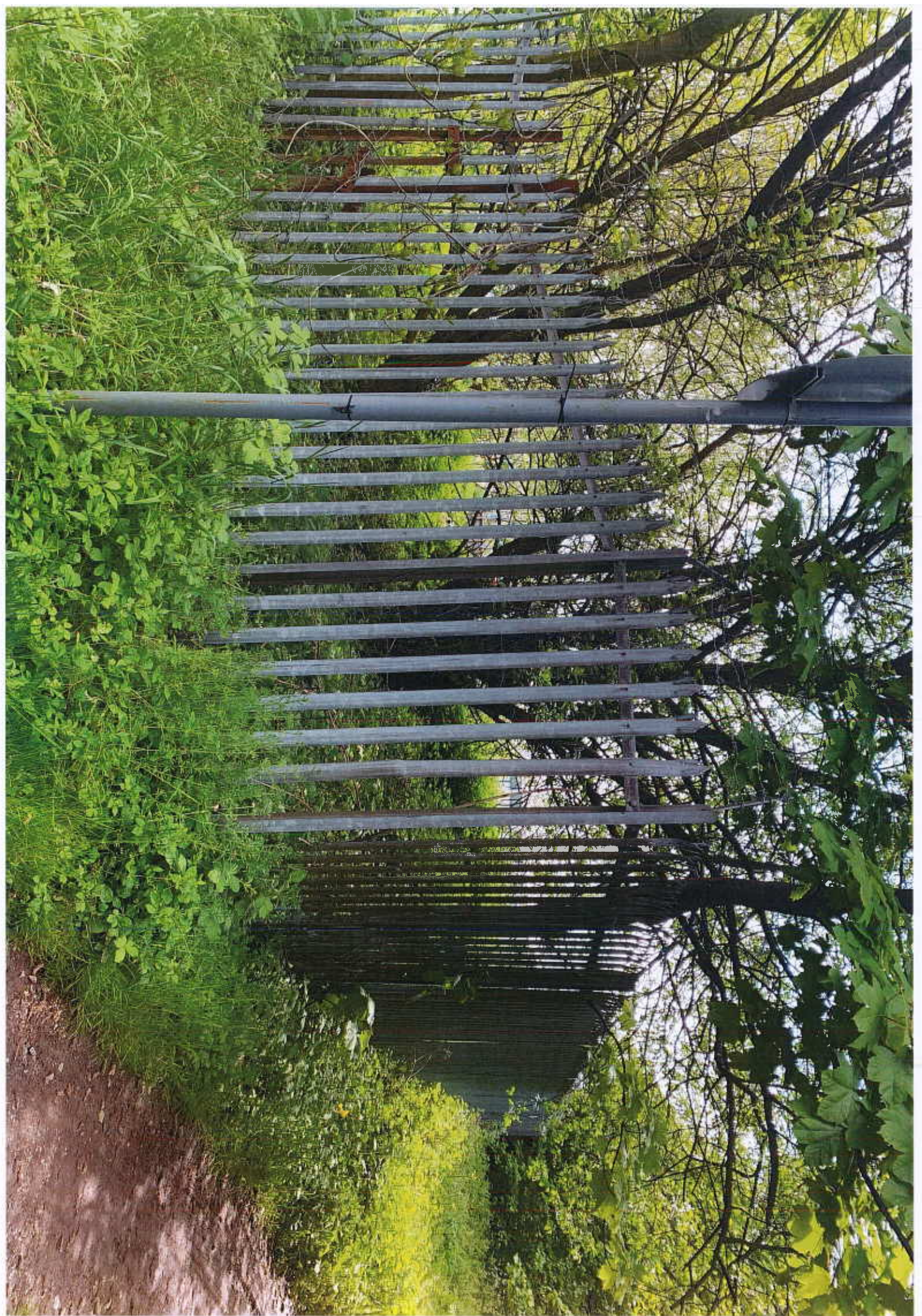
LIST OF DOCUMENTS INTENDED TO BE REFERRED TO OR PUT IN EVIDENCE BY HTAFCL

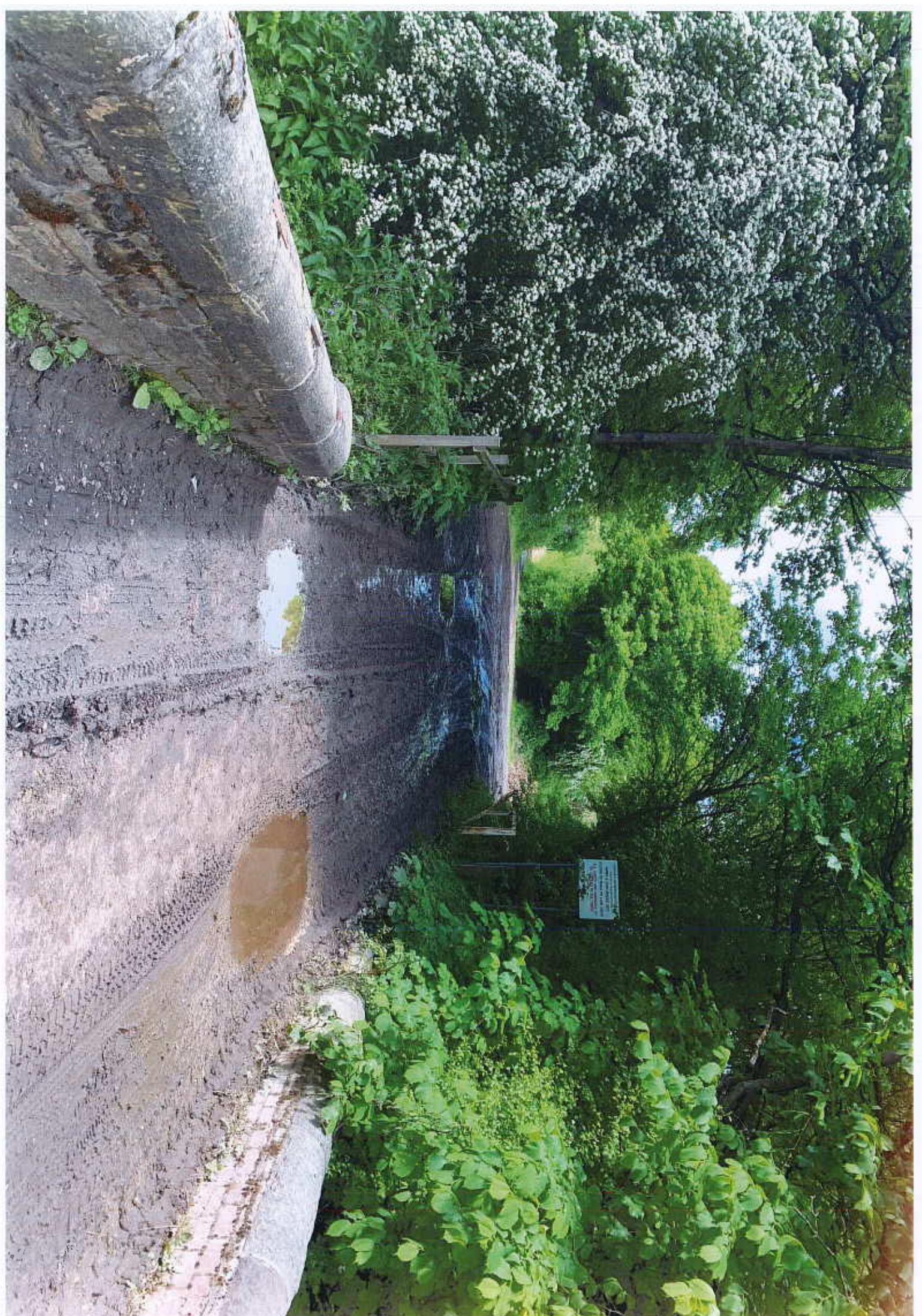
1. Aerial overlay of Plots by WSP
2. Photographs of existing accesses and boundary treatments (1-20)



Gordons LLP
Riverside West
Whitehall Road
Leeds
LS1 4AW

Ref: MSB/HUD89/35





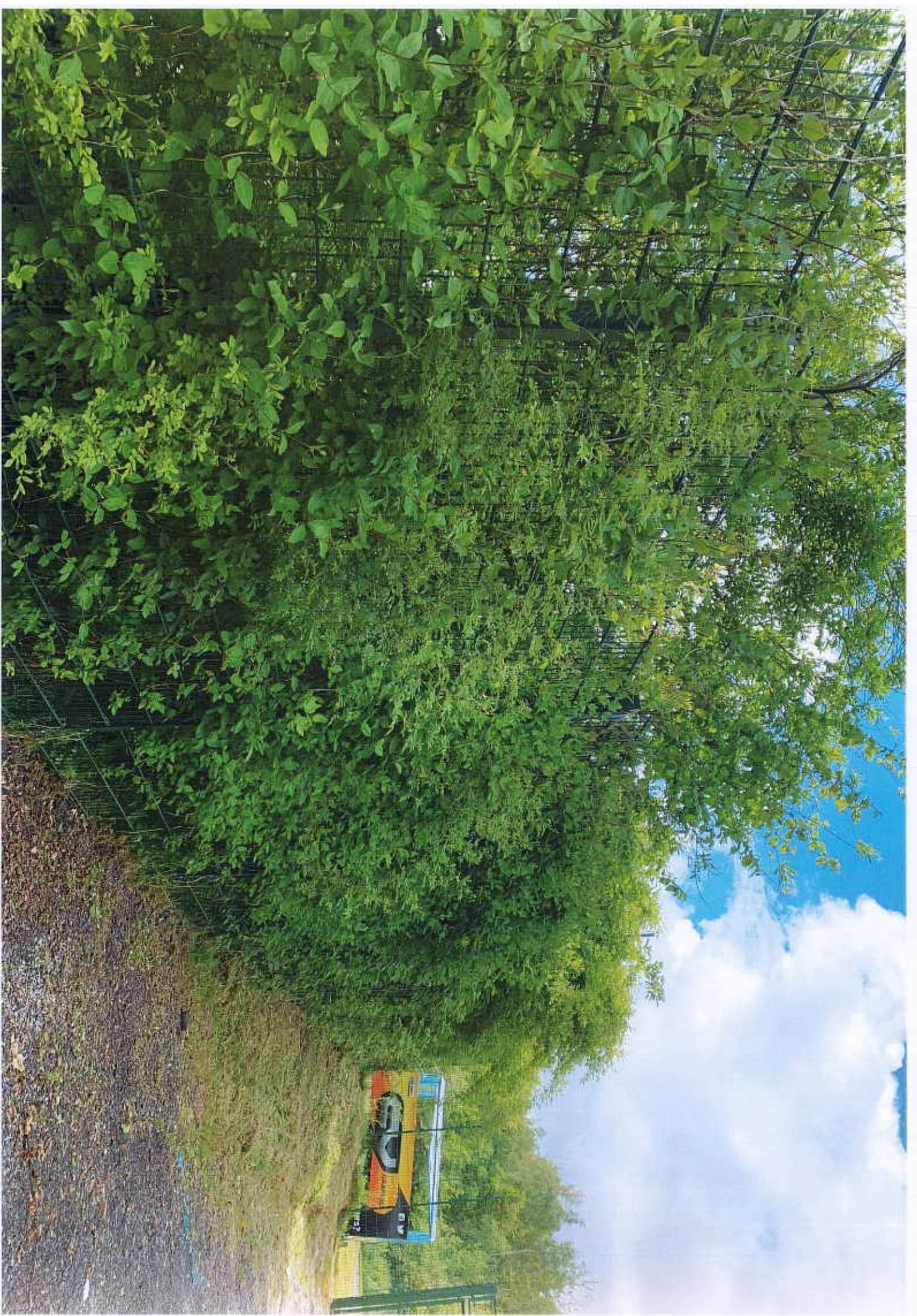








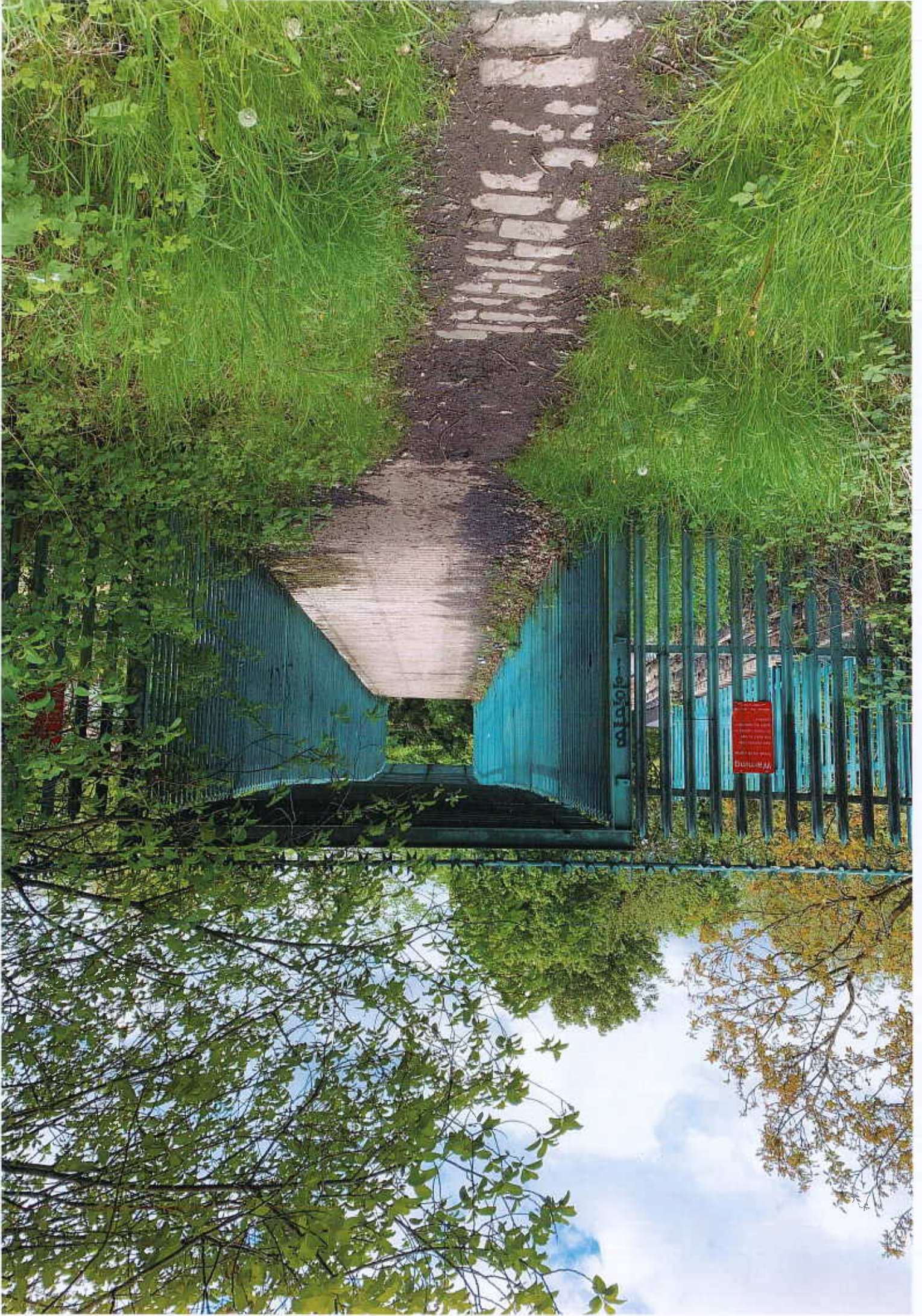












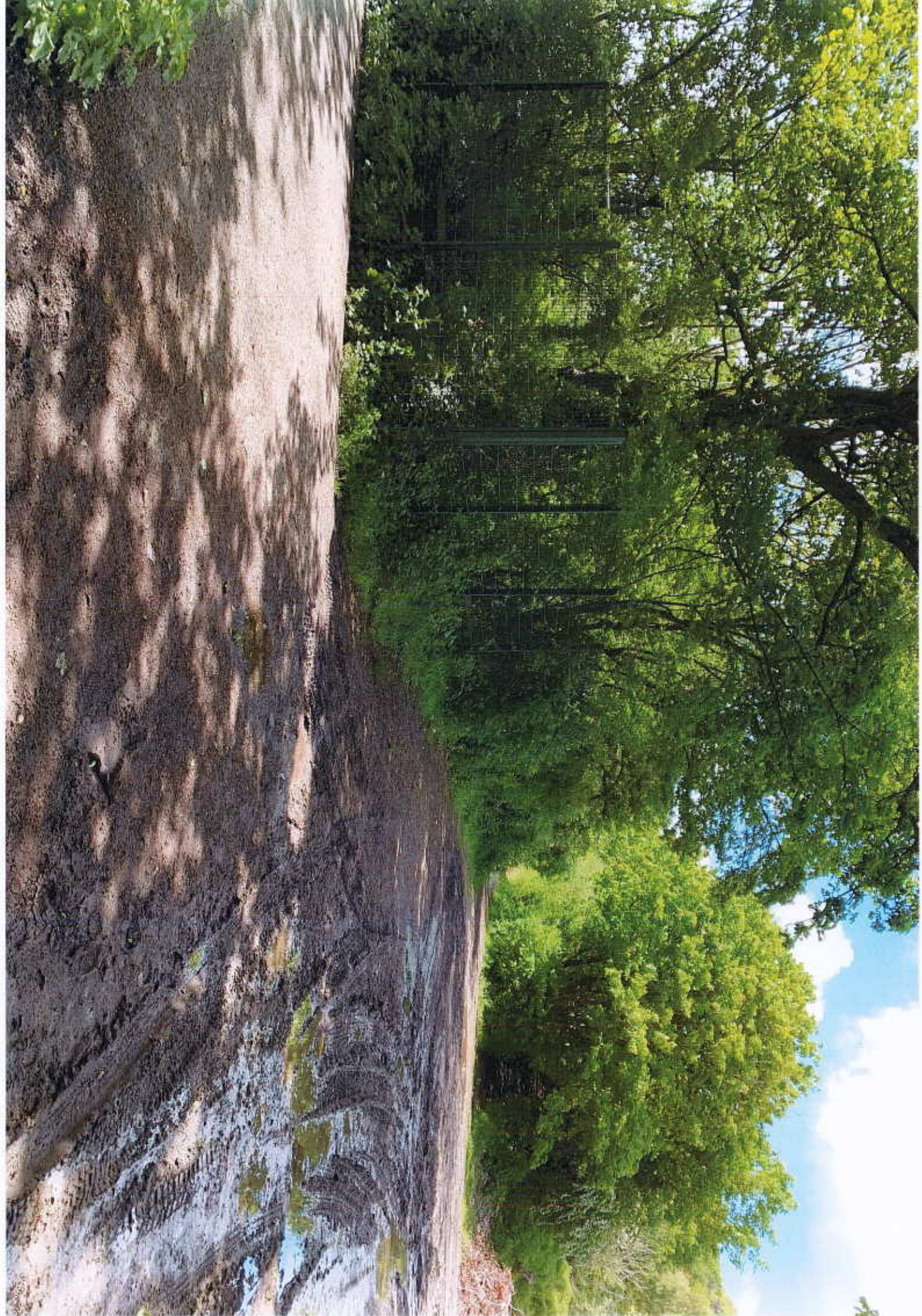






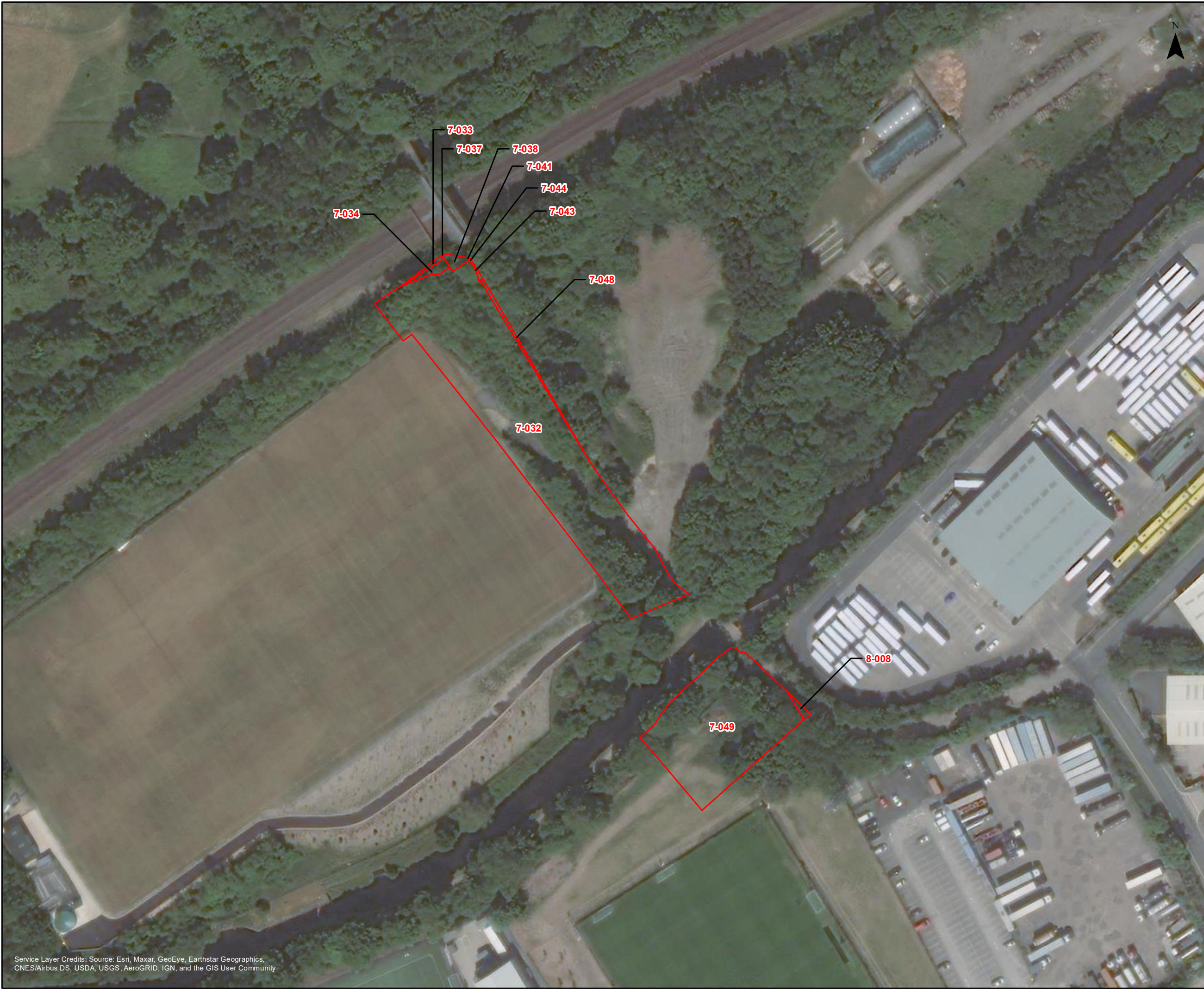












THE NETWORK RAIL (HUDDERSFIELD
TO WESTTOWN (DEWSBURY)
IMPROVEMENTS) ORDER

OBJ38 Huddersfield Town FC
Land Plots

Plots within LOD (permanent acquisition):
Plots 7-033, 7-034, 7-037, 7-038 and
7-041

Plots of which temporary possession may
be taken: Plots 7-032, 7-043, 7-044,
7-048, 7-049 and 8-008