



Supplementary Objection on behalf of Veolia
OBJ 42/1
16 November 2021

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

1. On 14 May 2021, Veolia submitted an objection (**Objector 42**) to the (Huddersfield to Westtown (Dewsbury) Improvements) Order (**the Scheme**). Amongst others, the following points were raised in that objection. For ease, these are set out below:
 - a. *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.*
 - b. *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.*
2. The Statement of Case (NR28), Property (NRPoENB5.2); Traffic & Transport (NRPoEGF7.2); and Highways (NRPoECW11.2) evidence submitted on behalf of Network Rail fails to adequately address and/or robustly mitigate the impacts identified above by Veolia. This Supplementary objection seeks to further explain those impacts and how critical it is that the Scheme design and its proposed implementation is amended to take account of those impacts.

3. Key concerns

- a. The proposed works (Route Section 6) will see the closure of Calder Road Bridge (which is located near to the Veolia site - circled green on the map below) for significant periods of time during the five year construction phase. The Veolia fleet and other vehicles which use the site will not have access to this bridge or highway during those periods. This will mean that HGVs and other vehicles will need to turn left out of the Veolia site and travel along Ravensthorpe Road, Forge Lane, Lees Hall Road and Ingham Road.
- b. To avoid the narrower parts of Lees Hall Road which has on street parking, the preferred route would be Forge Lane. However, the majority of the Veolia fleet (due to their size - 32 tonnes vehicles) will be unable to take this route due to a low railway bridge (circled red on the map below) and so will have no choice but to travel along Lees Hall Road and Ingham Road which are populated residential roads.
- c. The majority of our fleet operations start from circa 4am during the week and also during peak traffic times. Veolia is extremely concerned about the proposed diversion of our vehicles onto these residential routes. Historically we have avoided these wherever possible, in the interests of public safety and amenity (to avoid excessive traffic congestion and traffic delay; potential incidents involving LGV contact with residential cars parked on narrow roads) and to maintain our reputation as a good and considerate local neighbour. The Scheme proposal is contrary to this.
- d. We have raised concerns with Network Rail about its proposed use of the site as a construction compound for the Scheme whilst Veolia continues to occupy the site. It also intends to temporarily relocate part of our operation to an area of land adjacent (shown circled yellow on the map below) for the 5-6 year construction phase. Not only will this create severe disruption to our services, operations and business planning but also when required to move back to the site. It is an impracticable and unworkable option. Veolia's view remains and has been communicated to Network Rail on several occasions that in order to address these concerns properly and fairly, an alternative relocation site for all of Veolia's operations at Ravensthorpe Road should be secured. This would be a permanent solution and therefore negate the need to disrupt our business on more than one occasion as well as avoid the other consequential effects already identified.



Veolia respectfully submits that the Scheme should not be granted without the abovementioned issues being fully addressed.

Veolia
16.11.21