

Enclosure 1 – Summary of documents likely or known to exist and not yet disclosed by Network Rail

	Document	NRF request	Network Rail's response
1	GRIP 3 report	We have seen the GRIP 4 report (i.e., see Appendix L to Nick Gallop Proof). We understand from the discussion on 1 February 2024 that a GRIP 3 report exists. Please disclose the GRIP 3 report.	
2	GRIP 5 report	We are unclear whether a GRIP 5 report was produced by Network Rail. We have been provided with pages 27-28 of an extract the document entitled " <i>Construction Methodology Report</i> " and the reference number 152270-ARC-REP-EMF-000005-P05 and it is not clear whether this is an extract from Network Rail's GRIP 5 report. We note that the document extract provided has the same document reference number as the GRIP 4 report, but has a later revision number. Please disclose the GRIP 5 report.	
3	The remainder of the document entitled " <i>Construction Methodology Report</i> " and the reference number 152270-ARC-REP-EMF-000005-P05	Please disclose the full document as we have only been provided with pages numbered 27 and 28. It is not conceivable that pages 1-26 do not exist.	
4	53 individual documents including appendices said to be relevant to BPL's FOIA request	The existence of these 53 individual documents was confirmed in Network Rail's FOIA Response dated 12 December 2022. Please provide copies of these documents to the extent not already disclosed.	

5	Document titled 'NR Western Route Engineering Access Statement' (see reference on page 6 and quotation in Figure 5 Old Oak Common Lineside Logistics Compound Strategy (the Strategy Document))	<p>Document titled 'NR Western Route Engineering Access Statement' is referred to on page 6 and in the quotation in Figure 5 of the Strategy Document.</p> <p>The Strategy Document was disclosed as part of Network Rail's FOIA Response dated 12 December 2022 and can be found at Appendix ARR1i to Adam Rhead Rebuttal evidence.</p> <p>Please disclose the document titled "NR Western Route Engineering Access Statement".</p>	
7	Documents/communications with Agility/Hitachi and/or with the Department for Transport, which evidence their views.	<p>We refer to the penultimate paragraph on page 10 of the Strategy Document: "<i>The DfT and depot operators Agility/Hitachi will not entertain a lineside logistics compound at North Pole Depot as they consider this will be disruptive to depot operations and performance KPIs under the Agility/Hitachi contract.</i>"</p> <p>Please disclose any documents / communications with Agility/Hitachi and/or with the Department for Transport which evidence the view expressed above.</p>	
8	Documentation that provides the basis for the assessment of available locations for the lineside logistics compound as shown at Figure 8, page 11 of the Strategy Document	<p>We refer to Figure 8 (page 11) of the Strategy Document: "<i>Figure 8 – Assessment of available locations for the lineside logistics compound</i>".</p> <p>Please disclose the documentation that forms the basis of the assessment of available locations.</p>	
9	Reports (plural) including an option selection report (finished not draft) held	We refer to Network Rail's FOIA Response dated 28 February 2023 which provides as follows: " <i>I can confirm that we hold reports relevant to your request,</i>	

	within Network Rail's central folder	<p><i>including an option selection report, within the central folder referenced in response to FOI2022/01512.” [emphasis added]</i></p> <p>Please provide all such reports. We note that there are both “reports” in the plural, including an “option selection report” that the Response goes on to state is in final form.</p>	
10	<p>a) Discussions with North Pole Depot stakeholders, including a refusal to provide access</p> <p>b) Copies of the minutes of meetings, notes, emails, and similar documents between Network Rail and Hitachi/the Department for Transport regarding access to the Hitachi lease area at the North Pole Depot (by HS2 or Network Rail and/or contractors)</p> <p>c) The identity of the ‘stakeholders’ engaged with at North Pole Depot and evidence as to the engagement with them</p>	<p>We refer to the following:</p> <p><u>a) Refusal to provide access - copies of the minutes of meetings, notes, emails and similar documents that evidence the following:</u></p> <ul style="list-style-type: none"> • See Chris Ford Rebuttal, page 7: “<i>Appendix Q outlines a potential compound within North Pole Depot—<u>Network Rail has discussed gaining access</u> to this area and ownership of the area including turning circle and access road. <u>This access has been refused by the North Pole depot operator.</u>” [emphasis added]</i> <p><u>b) Copies of the minutes of meetings, notes, emails and similar documents between Network Rail its contractors and agents (including Colas Rail) and Hitachi/the Department for Transport regarding access to the Hitachi lease area at the North Pole Depot (by HS2 or Network Rail and/or contractors)</u></p> <ul style="list-style-type: none"> • See reference, e.g. in Chris Ford Rebuttal, page 14: “<i>Network Rail has been working out of an existing RRAP in North Pole Depot from 2020. In that time, <u>despite regular meetings with Great Western Railway (GWR) on access</u>, it has not been possible to include the RRAP within a</i> 	

		<p><i>possession for the duration of a 29hr Mains possession due to the impact this has on GWR maintaining a minimum level service pattern during Sunday day. As such, it is simply not a viable alternative.”)</i> <i>[emphasis added]</i></p> <p>c) <u>The identity of the ‘stakeholders’ engaged with at North Pole Depot and evidence as to the engagement with them</u></p> <ul style="list-style-type: none"> See Chris Ford Rebuttal page 18: “<u>The stakeholders relating to the access points through North Pole Depot have been engaged with for an extended duration without a viable solution being obtained.</u>” <i>[emphasis added]</i> <p>Please disclose documentation relating to a) to c) above.</p>	
11	Documents referred to in the ‘ <i>Old Oak Common Lineside Logistics Compound Options Report</i> ’ (the Options Report) disclosed by Network Rail on 18 January 2023:	<p>The below documents are specifically referred to in the Options Report:</p> <ul style="list-style-type: none"> i. 152270-ARC-REP-ECV-000026 (Options Report) [it is unclear if this is the same document as the Options Report disclosed by Network Rail on 18 January 2024. References on the last page of the Options Report suggest that this is a different version as the last page refers to paragraph ‘2.3’ of the Options report but not such paragraph exists in the copy provided to us.] 	

	<p>i. 152270-ARC-REP-ECV-000026 (Options Report)</p> <p>ii. Email chain: FW: SW Access point – North Pole Depot requirements, alternative options, timeline of engagement sent 05/02/21</p> <p>iii. Email chain: RE: Jewsons alternatives [decision re FOI report] sent 03/02/23</p> <p>iv. Email from Peter Thomas Project Manager [RE: Jewson’s Statement of Aims Q&A] dated 08/02/2023 07:56</p>	<p>ii. Email chain: FW: SW Access point – North Pole Depot requirements, alternative options, timeline of engagement sent 05/02/21 (see references at pp. 4 and 5 of the Options Report)</p> <p>iii. Email chain: RE: Jewsons alternatives [decision re FOI report] sent 03/02/23 (see references at pp. 4 and 7 of the Options Report)</p> <p>iv. Email from Peter Thomas Project Manager [RE: Jewson’s Statement of Aims Q&A] dated 08/02/2023 07:56 (see references at pp. 4 and 6 of the Options Report)</p> <p>v. Email from Stuart Witts Senior Construction Manager [2TT Sunday Limits] sent 06/02/23 14:37 (see reference at p. 5 of the Options Report)</p> <p>vi. Evidence of request made that BBVS “<i>accelerate their programme of works to align the programmed timelines</i>” (see para 3.8: <i>Old Oak Common Lane (existing Hitachi Depot)</i> of the Options Report)</p> <p>vii. 152270-ARC-REP -ECV-000025 A01 North Pole RRAP (Old Oak Common Lineside Road Rail Access Point (RRAP) South West Access – North Pole Depot Feasibility Report (see reference in the final page of the Options Report)</p> <p>Please provide copies of each of these documents.</p>	
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	<p>(see references at pp. 4 and 6 of the Options Report)</p> <p>v. Email from Stuart Witts Senior Construction Manager [2TT Sunday Limits] sent 06/02/23 14:37</p> <p>vi. Evidence of request made that BBVS <i>“accelerate their programme of works to align the programmed timelines”</i></p> <p>vii. 152270-ARC-REP - ECV-000025 A01 North Pole RRAP (Old Oak Common Lineside Road Rail Access Point (RRAP) South West</p>		
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	Access – North Pole Depot Feasibility Report		
12	<p>Full email correspondence between the Department for Transport and Network Rail which pre-dates and follows after the email correspondence disclosed before the Inquiry dated 25 January 2021 (see Inquiry Document INQ-04)</p>	<p>For example, we refer to Inquiry Document INQ-4 (the Dft Email) and provide an extract below:</p> <p><i>“Naturally I would ask the question, what is NR’s alternative option?</i></p> <p><i>When you say you have a way forward with lighting and car parking, do you mean one that does not require running lighting along the North Pole boundary? Is this lighting only going to be to the west of Scrubs Lane bridge?”</i></p> <p>We note that the DfT email sent from James Slater (Department for Transport) to Jonathan Sinclair (Network Rail) dated 25 January 2021 (sent at 15:11) raises a number of questions. We believe that there must be correspondence following after this email exchange e.g to answer the questions raised, as well as correspondence predating this exchange.</p> <p>Please provide the full correspondence.</p>	