

TRANSPORT AND WORKS ACT 1992

TRANSPORT AND WORKS (INQUIRIES PROCEDURE) RULES 2004

THE NETWORK RAIL (TACKLEY LEVEL CROSSING) ORDER

PROOF OF ANDY WILLSON

SCHEME OVERVIEW, NEED, ENGINEERING AND DEVELOPMENT

21 May 2024

1 INTRODUCTION AND STATEMENT OF EXPERIENCE

- 1.1 I, Andy Willson, am currently a Project Delivery Engineering Manager at Network Rail Infrastructure Limited (**Network Rail**). My role at Network Rail initially as a Project Engineer began in 1999 (Railtrack at the time) and consists of specifying and then delivering/assuring complex multi-disciplinary enhancement projects to improve the railway.
- 1.2 I am a Chartered Engineer, a Fellow of the Institution of Mechanical Engineers plus a Fellow of the Institution of Engineering and Technology. I have long experience in optioneering, designing and delivering complex multi-disciplinary enhancement schemes. This has included many proposals to close or enhance level crossings, to reduce safety risk (often associated with proposals to run more or faster trains).

2 INVOLVEMENT WITH THE SCHEME AND STRUCTURE OF THIS STATEMENT

- 2.1 I began work on the Oxford Corridor programme of projects in 2013, acting as the Designated Project Engineer (the lead Engineer for the scheme). This programme of work took individual elements of work in the Oxford area from initial feasibility/optioneering through to design, full funding and delivery in stages. Phase 0 was the introduction of a new train service between Oxford, Bicester, High Wycombe and London Marylebone, completed in 2016. Phase 1 was the track re-modelling and full signalling renewal at Oxford, completed in 2018. Phase 2 is a suite of enhancements with the aim to allow more trains to run and to allow trains to have more flexibility in routing. This scope includes the works at Tackley. I took this phase through to completion of 'Approval in Principle' design and handed it over to colleagues for detail design/delivery in 2020, but due to workload changes I have recently become involved again (in the meantime I had an 'arm's length' involvement). The role of Designated Project Engineer is to lead all the engineering activities for the project/programme and to be the approver of all the designs.

Network Rail proposes the closure of Tackley level crossing, the stopping up of that part of an existing bridleway that crosses the Tackley level crossing, designation of a new bridleway and the re-designation of the existing footpath to the south of Tackley station and the construction of a new footbridge (**Scheme**) as further outlined below.

- 2.2 In this Statement I set out:
- (a) the nature of the Applicant;
 - (b) the Scheme and need for the Scheme, including its benefits; and
 - (c) the development of the Scheme;

3 THE SECRETARY OF STATE'S STATEMENT OF MATTERS

- 3.1 The Statement of Matters issued by the Secretary of State for Transport sets out for the purposes of rule 7(6) of the Transport and Works (Inquiries Procedure) Rules 2004 the matters about which the Secretary of State for Transport particularly wishes to be informed for the purposes of his consideration of this application.
- 3.2 This Proof deals with matters of engineer relevant to the following items in the Statement of Matters:
- a) **Item 2:** The main alternative options considered by NR and the reasons for choosing the preferred option set out in the Order including the consideration of the safety case for extinguishing the bridleway at the level crossing;
 - b) **Item 4(a):** The impact of the scheme as a whole on: (a) the use of agricultural vehicles by local landowners; and
 - c) **Item 6(d):** Whether all the land and rights over land which NR has applied for is necessary to implement the scheme.

4 SCHEME AND NEED FOR THE SCHEME

- 4.1 My Proof focuses on the engineering and constructability aspects of the Scheme. The overall imperative is to permanently close the level crossing because of its unacceptable safety risk, and in doing so provide acceptable alternative access to the railway station plus an acceptable alternative bridleway route for walkers, cyclists and equestrians, whilst respecting the community and land affected.
- 4.2 In summary, the Scheme will involve the following engineering elements:
- (a) the permanent closure of Tackley Level Crossing;
 - (b) works to stopping up of that part of the Existing Bridleway which crosses the railway at Tackley Level Crossing;
 - (c) the creation of a new bridleway (and associated fencing) to the west of the Existing Bridleway (marked with a pink dashed line on the plan on the Land and Rights of Way Plans **[APP7]**) (New Bridleway) which would run adjacent to the railway before joining the existing byway (379/25/10) (Existing Byway) to the south.
 - (d) works to redesignate of part of existing footpath (379/16/20) (**Existing Footpath**) to bridleway status to enable use by horse-riders as well as pedestrians and cyclists;
 - (e) the construction of a new accessible footbridge with lifts over the railway (the Footbridge) to allow the safe crossing from one platform to the other by station users;
 - (f) the temporary stopping up of rights of way to allow for the carrying out of necessary works and upgrades to rights of way; and
 - (g) temporary construction sites and access [etc].

5 DESIGN AND DEVELOPMENT OF THE SCHEME

Development of the Scheme

- 5.1 Tackley level crossing is a high-risk location and has been subject to previous misuse and many near misses, leading to a significant concern that a further fatality incident would occur if not resolved. This led to the level crossing's temporary closure in 2020, to the present time. Further commentary in this regard is provided particularly in the Proof of Ian Aston [NR-W7-1] and Jerry Greenwood [NR-W8-1]. Attempts to close the level crossing/divert the bridleway have been attempted multiple times since 2000, and the current scheme has learnt from those previous proposals.
- 5.2 The Oxford Corridor phase 2 scope's purpose is to allow more trains to run on the 'spine' route north-south through Oxford, both passenger and freight trains. To achieve this the 'headway' between following trains needs to be reduced to allow more trains to run, but this can only be achieved if level crossings on the route (which form a large risk to safe operations) can be closed or improved. For this project we were remitted to ensure that along the 'corridor' the current level crossing risk (in 2014) should be no worse when the project was completed, with more trains running. To do this some level crossings needed to be closed and others improved.
- 5.3 All eleven level crossings in the affected area were assessed and optioneered to consider what was possible and scopes then honed to achieve a plan. The starting point was the existing operational risk assessments for each level crossing and the history of previous attempts at closure/options for diversion/upgrade. This led to an initial optioneering report in 2015, a substantial appraisal/option selection report for Tackley produced in 2017 (with a further version in 2019) and a decision to design a ramped footbridge at the station together with the 'in field' bridleway diversion to the south (on the west side of the line). Following consultation with various stakeholders and open meetings with residents feedback led to a change of footbridge style to one with lifts, rather than ramps. Following further feedback this led to a proposal for a subway to the south (including equestrian provision to avoid the need for a new bridleway on the west side) and then following further difficulties the proposals were then changed to a footbridge with lifts at the station and a bridleway close to the railway line on the west side (current scheme).

Design of the Scheme

- 5.4 The footbridge (with stairs and lifts) at the station is progressing via permitted development powers so is not part of this Inquiry, except in relation to temporary land acquisition for construction which I discuss in section 5.9 below.
- 5.5 See section 5.8 below for alternative options and why each was discounted.

Route of the New Bridleway and the proposed fencing of the New Bridleway

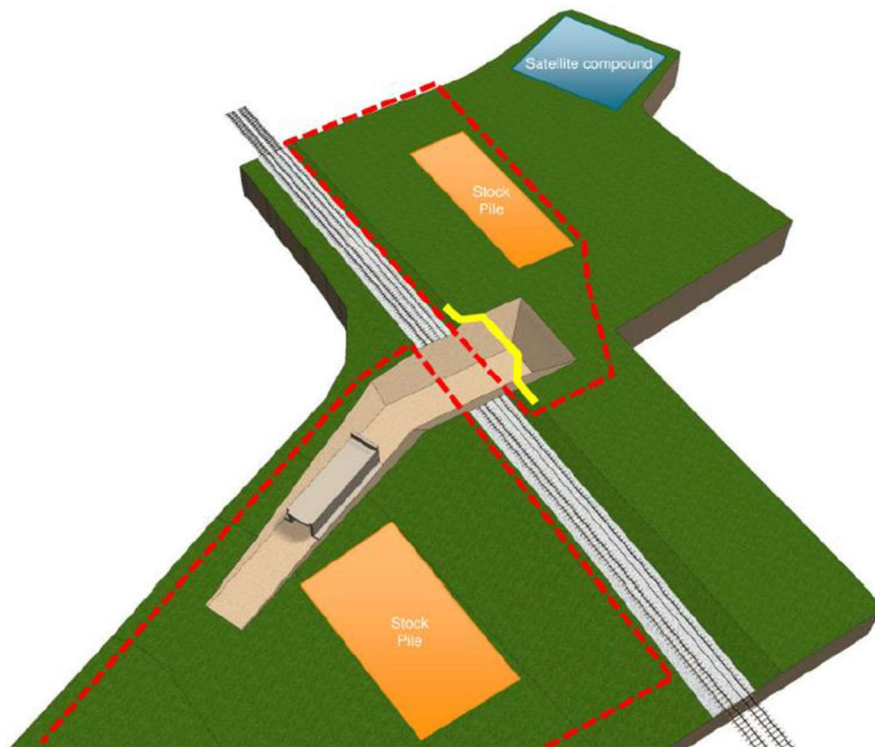
- 5.6 The bridleway proposal has a route on the west side of the railway running relatively tight to the railway boundary, from the end of Nethercote Road (ex-level crossing west side) south to meet the existing bridleway running along Old Whitehill Lane (and through the underbridge to meet the opposite end of the current bridleway). The new bridleway east edge would be circa 5 to 12m away from the closest railway line (5m at the north end then wider to the south).
- 5.7 The design has a 4.0m wide path (4.5m between fences) comprised of type 1 stone material and then a 3mm dusting of stonedust to provide a surface suitable for pedestrians, cyclists and equestrians. The path width has been widened from 3m following stakeholder feedback. The fence to the railway boundary and a second fence to the new field boundary, will be stockproof and around 1.2m tall of post & wire construction. The fence specification to the field/bridleway boundary can be specified to suit Tackley Estates and could be replaced by boundary post markers in place of the fence subject to Tackley Estate's permission, to provide more space (suggest 150mm diameter timber posts 1m tall at 10m centres plus signage at either end or as per Tackley Estate's preference). There is the option of providing the bridleway top surfacing via self-binding gravel (as was originally agreed with PRoW Officer and BHS in 2018) as this

may be more suitable for the three classes of users and because it would probably better withstand occasional encroachment via farm vehicles e.g. at the gateways.

Alternatives considered

- 5.8 A number of alternative options to the New Bridleway have been appropriately scoped by Network Rail with a view to properly considering the appropriateness of their (alternative) inclusion in the Scheme. However, these were either not considered suitable for the Scheme, would adversely affect landowners or would adversely affect the local community. The alternative options are set out fully in paragraph 6 of the Statement of Case but by way of summary are repeated here alongside with my additional commentary on them from an engineering perspective.
- a) Full feasibility and optioneering was carried out, leading to an initial options appraisal report in 2015, an option selection report in 2017 and then (following stakeholder challenge and other difficulties) an updated optioneering piece was carried out in 2019 leading to a further report. These exercises included a scoring matrix to weigh the pros/cons of each potential solution and there was significant stakeholder engagement with the recommendations made. Options for level crossings, bridges or subways including an equestrian facility would not require a separate bridleway route, but where the footbridge or subway was specified without equestrian facilities this also included a complementary suite of bridleway diversion options.
 - b) **Level crossing retention.** This is covered in detail in Ian Aston's and Jerry Greenwood's evidence document but is briefly summarised here to allow all the discarded options to be seen together. Tackley Level Crossing is a very unusual level crossing in that it combines footpath and bridleway use (pedestrians, cyclists, and horse riders) but also forms the access to one of the station platforms (known as a 'station barrow crossing') and there are very few similar combined bridleway/station crossings in the whole country. The diverse array of users makes solution to this site very difficult. For the previous 'passive' level crossing type the risk was demonstrated as too high leading to the temporary closure decision (9th highest of 671 crossings on Western Route at that time), so reinstatement to this style of crossing is not tolerable (there is not a 'do nothing' option). The potential lower risk footpath/bridleway level crossing style is a MSL, but as shown in the other Proof documents such a solution is not allowable at this location.
 - c) **Southern equestrian footbridge:** There was also a southern footbridge option which included equestrian provision, but this was deemed unviable because of its position in the landscape and effect on views from the village and other properties. This was learnt from the original circa 2000 planning application and appeal under previous project 'Cross Country Route Modernisation'. This was worsened because of the width required for a horse 'channel' separated from a pedestrian/cycle channel and the long ramps required to provide an acceptable gradient, and the need to have it further south than the houses. Also, by pushing it further south it became an unfeasible route for the station including PRM (Persons of Restricted Mobility) access, requiring a separate footbridge at the station, at extra public cost.
 - d) **Equestrian subway:** This was optioneered both for a location at the station (no equestrian provision) and a location further south. This learnt from the original circa 2002 planning application and appeal under previous project 'Cross Country Route Modernisation'. After being initially considered sub-optimal (mainly due to cost and construction disruption) it was then re-appraised in 2019 when footbridge (with lifts) and in-field bridleway diversion proposals received significant challenge. The pedestrian/cyclist/equestrian subway proposal south of the station was re-visited and then tendered for design/construction but was eventually considered unjustifiable due to high cost to taxpayer (circa £11m and detailed in Anna Holbrook's Proof [NR-W1-1]) and considerable disruption to operation of the railway during construction (5 days, 124 hours closure of the railway).

This option presented significant engineering and environmental challenges due to the amount of material to be excavated and removed from site. which, because of the field's slope from east to west, required a significant excavation in the west field to allow the subway to be constructed off-line and then slid under the railway. In addition, large excavations would be required afterwards to construct the approach ramps on either side of the railway (the below image shows the excavation for subway construction and then the excavation to slide it under the railway but does not show the ramp excavations in a following construction stage). The permanent land take would have been significantly larger than for other options (including the currently proposed bridleway solution).



The depth of the subway was finessed (with BHS agreement) to make its construction depth (and the ramp lengths) as efficient as possible but still required extensive excavation, as well as the need for a drainage scheme to collect rainwater (plus ground seepage) and divert it to either the stream to the west or sewer to the south.

Subway provision would also have ongoing costs for lighting, cleaning, water pumping etc which would not apply to other options.

Tackley Estates permission to take the land for the subway had originally been considered achievable but it was confirmed Tackley Estates would not willingly negotiate so the option fell away.

- e) **In-field route:** This was originally the preferred solution (in conjunction with a ramped footbridge and then later with a footbridge plus lifts). It was agreeable to most stakeholders and was taken forward to 'Approval in Principle' design (signed off in 2018) but Tackley Estates then withdrew their support, due to adverse impact on them as landowner of splitting the agricultural field in two and also their requirement to stop up the Existing Bridleway entirely in order to facilitate this option, which would adversely affect the local community. Towards the south side of the field the proposed route was designed close to the fenceline (to limit the severing of the main crop area) but this led to concerns from the householder at the south end of the field, who didn't want the route tight to their garden fence.

The cost, engineering requirements, constructability and land take for the in-field route and the current proposal closer to the railway are broadly comparable.

- f) **Western In-Field Route:** This is largely based on the current PRoW footpath. At the north edge of the field the route is tight to the fence (inside the hedge/bush/tree line), but is largely overgrown and not used, because users have decided to instead walk to the south side of the hedge/bush/tree line which is easier. The main north-south portion of the PRoW runs close to a watercourse and as such floods on occasions and is generally boggy. As such it is hardly used, and almost all users today use the in-field route. This route was therefore determined to not be appropriate due to engineering constraints related mainly to waterlogging.

To make such a proposal feasible would require raising of the path above the flood level and ground improvement to make it durable. This was not explored in detail but would require drainage provisions and probably alterations to the bank of the adjacent stream, which would require further permissions and environmental mitigations.

- g) For all the field routes we also considered separate north end options to try and avoid the 'tight' section between the field north end and Nethercote Road. These included routes via Lime Kiln Road or Harborne Road or St Johns Road or Chaundry Road, all dismissed because of access difficulties/owner disagreements and/or on the recommendations of the PRoW Officer.
- h) **Barwood Bridge:** Plan of route included in James Audley's evidence. Considered inappropriate due to the distance the proposed location would be from Tackley station which would necessitate the construction of two bridges, significantly increasing costs to the taxpayer. Non-provision of the second footbridge would require station users to use Nethercote Road to access one platform and at the other end of their journey to use the Barwood bridge, leading to confusion, significant walks and for e.g. car or cycle users a long walk round at either the beginning or the end of their trip to get back to their car/bike. Part of the footpath route through the Barwood development was also planned to be steeper than is allowable under the Persons or Reduced Mobility Regulations. There was an alternative consideration for a separate ramped slope from the Barwood bridge to each platform (to avoid the second footbridge need), but this would have led to extensive tree loss, environmental and aesthetic dis-benefits plus difficult construction in the large rock cutting north of the station. The Barwood bridge option would also put horses close to trains on the east side of the railway. The length and vertical height difference of the ramps would also be non-compliant to the standards for Persons of Reduced Mobility (as greater than 4m total vertical travel distance), and it would not be possible to provide lifts instead of ramps, due to the rock cutting topography.

Note Table 3 (Options considered for the Scheme) of Network Rail's Statement of Case talks of a 1:13 gradient of the ramps would require 5m long rest areas at intervals. However, the reference to '5m' should be read as '1.5m'.

- i) **Northern Route:** Plan of route included in James Audley's evidence. Considered inappropriate due to the length of the alternative bridleway route and the potential need to utilise compulsory purchase powers with two separate landowners to obtain the necessary rights in land, the case for which may not have been made. There was also a particular consideration at a pinch-point on the east side of the railway where the river bend is tight to a steep embankment slope tight to the railway boundary which would be challenging to engineer to achieve a full width bridleway whilst providing embankment slope gradients etc able to mitigate against future scour/slips. This option would also put horses close to trains on the east side of the railway. This solution would have not been suitable for station users, so a separate bridge or subway would also be required, adding further to the cost.

Construction compounds, worksites and access

- 5.9 For the bridleway construction a small compound is proposed at the south end of the field (temporary acquisition plot 009), which will be used for staff welfare huts, parking and a storage compound for materials. The new bridleway route would be temporarily fenced from the rest of the field to give a slightly larger working area than the final path (temporary acquisition plot 007, 008 and also entrance area plot 012) and then the formal bridleway will be constructed within land parcel 005 plus 006. This would include the permanent fencing, bridleway route construction, gates, signage etc. During this construction period a small area of vegetation to the south of the bridleway (plot 010) would be separated from the field by the construction compound, so not generally accessible during that time.
- 5.10 Construction of this route would be expected to have minimal impact on Tackley Estate's normal business, with just occasional construction vehicles using the Old Whitehill byway to access the compound/worksites. Any such impact would be managed by close liaison with Tackley Estates. The construction vehicles would also take care to allow continued use of the Byway and its bridleway by other lawful users. At the very north end temporary acquisition plot 004 would be used intermittently to aid construction at plot 005.
- 5.11 For the station footbridge construction a much larger compound is proposed at the north end of the existing east bridleway, near the 'closed' level crossing on the east side of the railway (temporary acquisition plot 001), which will be used for staff welfare huts, parking and a storage compound for materials/lay down area and giving access to the north end of the station for the footbridge site location. Construction of the footbridge will be partly achieved from this compound but will also be achieved by bringing specialist 'road-rail plant' and large materials in by rail.
- 5.12 Because of the rock ground conditions at the footbridge location bridge foundations are likely to be by rock anchors and relatively shallow concrete foundations. The rigs necessary to install the rock anchors should be able to access the site compound. Because of the low bridge at Old Whitehill ready-mixed concrete may be delivered to site by lorry, or if this is not possible it may be necessary to site mix.
- 5.13 Access to the footbridge construction area would be via the existing east bridleway (temporary acquisition plots 003, 003a, 003b and 011). This would be expected to have minimal impact on Tackley Estates normal work, with construction vehicles using the Old Whitehill byway and then the east bridleway to access the northern site compound. Tackley Estates would be able to use the same route to continue to access fields adjacent the east bridleway (which would be expected to largely be seasonal harvesting work) and any such impact would be managed by close liaison with Tackley Estates. The construction vehicles would also take care to allow continued use of the Byway and its bridleway at the south end by other lawful users (but they would not be able to use the eastern bridleway during the footbridge construction period).
- 5.14 Network Rail has attempted to minimise the temporary land take for construction (both in terms of footprint and duration) and to minimise the effect on other users, particularly Tackley Estates. The exact durations of access and the full range of plant/vehicles to use the accesses will be determined once the construction contracts have been tendered/awarded, but will comply with the terms of the Order plus the license agreement.

Effect on existing landowner access

- 5.15 For temporary access during construction please see section 5.9 above, with Network Rail and our contractor making best endeavours to accommodate shared use of the temporary access routes with Tackley Estates.
- 5.16 For the permanent bridleway the intention (subject to detail design and subject to Tackley Estates detailed requirements) would be to provide a new bridleway gateway at both the north and south end immediately adjacent the existing (adjusted) field gateways, so that there is a separate entrance to the fields for farm plant.

6 OBJECTIONS

- 6.1 In this section I summarise and respond to objections lodged in relation to the proposed Order, so far as those objections relate to matters within my expertise and remain outstanding at the date of this Statement.
- 6.2 None of the objections dispute the need for the closure of the Tackley level crossing. However, a number of objections were raised on the ground that:-

(a) Concern that the Existing Bridleway is to be removed and replaced by the New Bridleway;

The existing bridleway relies on access via the level crossing, which is no longer considered tenable from a safety risk perspective. Options which would have allowed the existing bridleway to remain could have included level crossing upgrades, the Barwood bridge, the northern bridge and new equestrian subway or footbridge to the south of the station. As all of these options suffered from significant engineering and constructability dis-benefits and/or difficulties they were dropped (as per section 5.8 above) and therefore a new bridleway is required on the west side of the railway. Retention of the existing bridleway as a 'dead end' will however still allow its use for horse riders if they wish (as a cul-de-sac route) and will (via the permissive path over the station footbridge) allow an alternative route for pedestrians and cyclists, including circular walk possibilities.

(b) Errors and inefficiencies in consultation, including lack of consultation with Oxfordshire County Council Public Rights of Way officer; lack of consultation with local community and community groups; and inaccuracies in public consultation documents

This is covered by James Audley's evidence document [NR-W2-1], but I was present at a number of community engagement meetings and discussions for the optioneering work which was carried out in advance of the formal TWAO arrangements commencing.

(c) Alternative options to the New Bridleway and closure of the Tackley Level Crossing have not been adequately consulted on or have not been fully considered by Network Rail;

This is answered by Ian Aston's evidence document, but I was heavily involved with the large number of alternatives which were considered by Network Rail and each has been ruled out for legitimate reasons. Extensive consultation was carried out and (as stated above) and we listened carefully to feedback.

This resulted in learning lessons from the previous proposals in around 2000, dismissal of southern equestrian footbridge options, introduction of the Barwood and northern options, change from ramped footbridge to lift footbridge then change to equestrian subway and the optioneering of multiple field bridleway routes to avoid waterlogging concerns and to mitigate horse 'spooking' concerns from the route closest to the railway (later confirmed as less of an issue than originally stated). We have also now removed barbed wire from the fencing specification.

- (d) An equestrian subway should be constructed or if not feasible the station footbridge to be moved further south (closer to the platform);

The equestrian subway has been discounted for reasons listed above, but Network Rail has relocated the proposed station footbridge (not part of this Order) closer to the platforms, as requested.

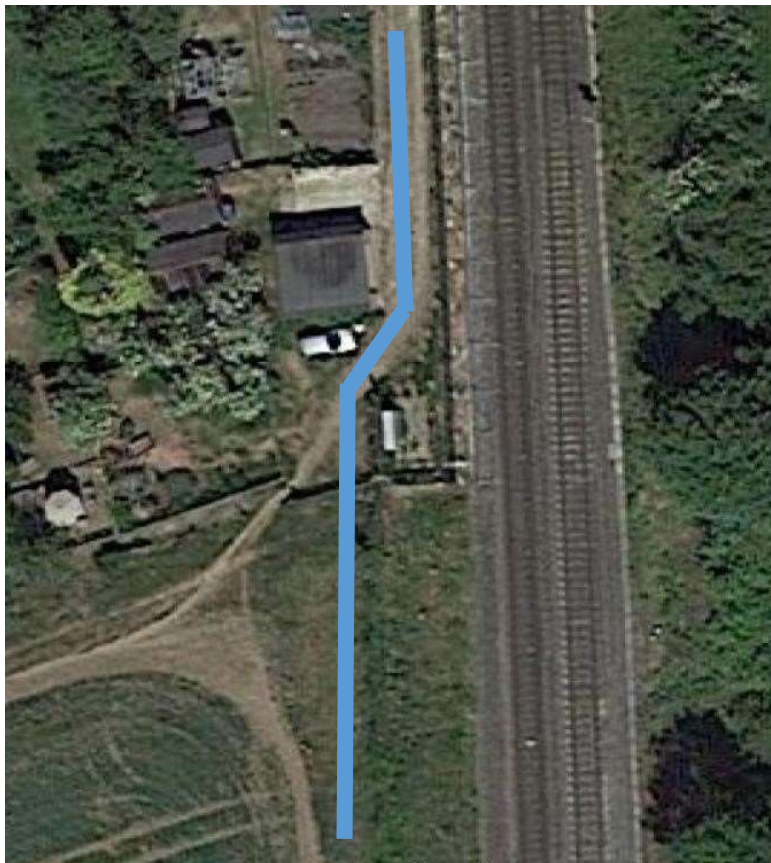
- (e) Unacceptability of 'brutalist' fencing;

There is no intention of providing fencing styles such as palisade type, due to the rural nature of the locality and the lack of trespass/vandalism concerns, so post & wire type fencing is proposed, which should be in keeping with the area.

- (f) Proposal to move the existing signal control box further south to increase the space available and intention for Network Rail to take landowner land to avoid signal control box;

Because the power supply cabinet/compound is providing electrical power to the railway any relocation would require the provision of the new facility first and then a quick/managed changeover between the old and new, to limit disruption to the operational railway. This would require the new installation to be provided on a new footprint, with new cabling, switchgear etc and then the old discarded. It would also require the utility provider (Distribution Network Operator) to be granted a new wayleave for an amended incoming cable route and location for their switchgear plus a second contract arrangement for the meter operator. The changeover would then need to be managed as a complex three-way exercise to a very tight timescale. This is considered unreasonable expenditure and disruption for public funds, with a very small benefit achieved to the bridleway route alignment. The cabinet/compound are not an

impediment to the proposed bridleway route, as demonstrated by the image below.



- (g) Unacceptability of potted, rough and often flooded connection through Old Whitehill underbridge

Whilst recognising that the route through the existing underbridge is a byway and a bridleway today (so should be maintained accordingly) we recognise that Network Rail will be using it as a temporary construction access to complete the new footbridge works. At the end of that construction period Network Rail will reinstate the surface to a compacted level stone surface, removing the potholes under the bridge. Going forward maintenance will then revert to the existing obligations for the byway/bridleway owner.

6.3 Additional and specific grounds of objection raised by objectors who also submitted statements of case are set out in the table below.

Reference	Party Details	Grounds of Objection
OBJ/70 and SOC-OBJ-70	Andrew Charles Peake	<u>Location/safety of the proposed new bridleway, specifically lack of tree/shrub screen</u>
OBJ/51 and SOC-OBJ-51	Byways and Bridleways Trust	This would apply to any of the west field bridleway diversion proposals but is understood to be perceived as more concerning for the route close to the railway boundary. Towards the south end of the proposed route the new route becomes lower in relation to the railway so it is considered that tree screening will not block the view between the bridleway and trains. Vegetation may act as a visual screen over time but will not act as a noise screen, so vegetation growth would not help in that regard.
OBJ/60 and SOC-OBJ-60	British Horse Society	

OBJ/63 and SOC-OBJ-63	Tackley Parish Council	
OBJ/52 and SOC-OBJ-52	Alexandra Machin (Bicester and Warden Hill Pony Club)	
OBJ/1 and SOC-OBJ-01	Malcolm Ridout	
OBJ/51 and SOC-OBJ-51	Byways and Bridleways Trust	<u>Alternative routes suggested – not sufficiently addressed by Network Rail</u>
OBJ/60 and SOC-OBJ-60	British Horse Society	The 2017 and 2019 optioneering reports plus the large consultation piece which accompanied them put significant effort into producing multiple options, listening to community feedback and weighing all of them, to give a balanced and pragmatic view of the feasible proposal(s) to take forward.
OBJ/63 and SOC-OBJ-63	Tackley Parish Council	<u>Preferred route across Tackley Estate – minimal works required and would be public bridleway</u>
OBJ/52 and SOC-OBJ-52	Alexandra Machin (Bicester and Warden Hill Pony Club)	The 'in-field' route was our originally favoured option and if permission can be gained to formalise it as a bridleway this potentially may be the optimum way forward.
OBJ/1 and SOC-OBJ-01	Malcolm Ridout	<u>Network Rail not engaged in discussions re alternative options</u> As above, significant consultation and engagement was carried out between 2017 and 2020. <u>Memorandum of Understanding between Network Rail and IPRO not followed</u> We have followed the intent of the MoU, but from the objections/comments received it is clear that consultees feel that information provision and follow-up answers have been lacking on occasions.
OBJ/70 and SOC-OBJ-70	Andrew Charles Peake	<u>Application's effects on the Old Whitehill underpass</u> Network Rail will reinstate the Old Whitehill underbridge surfacing to existing condition (as agreed by a 'pre-start dilapidation record') after de-mobilisation of the compound used for the permanent footbridge

		construction. Current condition is similar to that shown below, from a 2018 bridge inspection report.  Photo 1: Downside Elevation (14/08/18)
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7 CONCLUSION

- 7.1 I conclude that the powers in the Order are necessary to allow for the closure of Tackley Level Crossing and construction of the associated elements of the Scheme.
- 7.2. There are significant engineering difficulties with the other subway or bridge alternatives that have been proposed by objectors which render them unviable from a safety, compliance, deliverability, programme or cost point of view.
- 7.3 The powers we are seeking for temporary worksites, construction compounds and access are no more than is necessary for the construction of the Scheme.
- 7.4 The Order will enable the works to take place in a timely and cost-effective manner.

8 WITNESS DECLARATION

- 8.1 This proof of evidence includes all facts which I regard as being relevant to the opinions that I have expressed and that the Inquiry's attention has been drawn to any matter which would affect the validity of that opinion.
- 8.2 I believe the facts that I have stated in this proof of evidence are true and that the opinions expressed are correct.
- 8.3 I understand my duty to the Inquiry to help it with the matters within my expertise, and I have complied with that duty.



Andy Willson

NR-W5-1 Proof of Evidence of Andy Willson

Dated: 21st May 2024