

MINUTES OF ORAL EVIDENCE

taken before the

HIGH SPEED RAIL BILL COMMITTEE

on the

HIGH SPEED RAIL (WEST MIDLANDS – CREWE) BILL

Wednesday 25 April 2018 (Morning)

In Committee Room 5

PRESENT:

James Duddridge (Chair)
Sandy Martin
Mrs Sheryll Murray
Bill Wiggin

IN ATTENDANCE:

Timothy Mould QC, Lead Counsel, Department for Transport
Timothy Corner, Counsel, Stone Town Council and Chebsey Parish Council

WITNESSES:

Trevor Gould and Gordon Wilkinson (Stone and Chebsey Councils)

IN PUBLIC SESSION

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(At 9.30 a.m.)

1. THE CHAIR: Welcome. Today we are hearing petitioners from Stone Town Council and Chebsey Parish Council. I am sure I will be corrected if I have pronounced Chebsey incorrectly. Mr Corner, I invite you to start proceedings and just so that the Committee knows, we may very well take a short break in the middle of both the morning and afternoon sessions for 10 minutes. Mr Corner?

Stone Town Council and Chebsey Parish Council

Submissions by Mr Corner

2. MR CORNER: Good morning, sir, and good morning to your Committee. Thank you very much indeed for agreeing to see us and to hear us this morning. We will present our case in a way that I hope helps you because that is the objective of the exercise. Can I just ask you whether you have had the chance to review, however briefly, the list of exhibits that we have?

3. THE CHAIR: This is your opportunity to present and for us to ask you questions, not the other way round.

4. MR CORNER: Right, I am sorry about that. In that case the first document that we have produced is a summary of our case for the petitioners and I was going to ask you whether you have had the chance to read that, because if you have, I won't read it out but if you have not, that will be my opening remarks, which I would just want briefly to read, if that is okay.

5. THE CHAIR: For guidance, you don't need to re-present any evidence that you have already put forward. If you want to do it in summation, what everybody else has done is if there is anything, the lady here will bring it up on the screen.

6. MR CORNER: Thank you very much.

7. THE CHAIR: Hopefully you were given notice to provide some references, and that works rather well because literally beneath the desk are several feet of paperwork, so I don't want you to say again, 'Have you read this? Have you got it easily accessible?' That is what the system is there for.

8. MR CORNER: Very well. I am happy with that. Can I just then summarise, before we go into the evidence, our case, and if you don't find it helpful I hope you will stop me, but I intend to be brief in doing so.

9. THE CHAIR: You can summarise.

10. MR CORNER: As you know, we are Stone Town Council and Chebsey Parish Council. We object to the proposed railhead and IMB-R at Stone. Instead, we propose that it be constructed at Aldersey's Rough. Our objections to Stone can be summarised as follows. To begin with, the facility at Stone would restrict Staffordshire's ability to connect into the national rail network, as Mr Trevor Gould will say in a few minutes. The facility, the railhead IMB-R, is located on the Norton Bridge to Stone railway line and additional services will use that line once HS2 is commissioned including the promised HS2 service to Stoke via Stafford. Maintenance trains accessing the Stone IMB-R would have to use the line during the day and not just at night. This is likely to require diversion of the HS2 service to Stoke on to the Stone to Colwich line, which would in turn cut out Stafford from the HS2 service and that, itself, is likely to have knock-on consequences for the viability of the service to Stoke. So, Trevor Gould will deal with that in just a few minutes.

11. Our second objection is that construction of the facility at Stone will cause unacceptable traffic problems during construction, and Gordon Wilkinson, my second witness, will lead on those issues. Those problems are worsened by the narrow site and the fact that the site is crossed by Yarnfield Lane, the B526 Eccleshall Road and the Norton Bridge to Stone line. Now, we are particularly concerned about the impact of construction HGVs on Yarnfield Lane and on four junctions, which I will briefly list: the A34's junction with Yarnfield Lane; the A34's junction with the A520 and the B526; the A34 junction with the A51 and Brooms Road and finally and fourthly the B5026 Eccleshall Road junction with Pirehill Lane.

12. Yarnfield Lane is the primary means of access for the village of Yarnfield to and from Stone. The carriageway is now open for much of its length. There are no formal footways. It's unsuitable for HGV traffic as is the junction of Yarnfield Lane with the A34. Also, there is already considerable congestion at those four junctions, which will be substantially worsened by the HS2 construction traffic. We say the promoters have

underestimated the impact of HS2 because they've underestimated base flows, in other words flows in the absence of HS2 traffic and because they've considered the various junctions in isolation without taking account of the cumulative impact of traffic flows that will be displaced from junctions operating over capacity. We also have serious safety concerns about the alterations to Yarnfield Lane that will be needed in order to accommodate access for construction vehicles. If the railhead IMB-R is not provided at Stone, then of course there will be activity at that location in order to build the line but construction will be simpler and won't lead to the problems I just talked about.

13. Now, those are our objections to Stone. Fortunately, there is an alternative location, namely Aldersey's Rough. As well as avoiding the dis-benefits of Stone, Aldersey's Rough will, we say, have the following important advantages. To begin with, once Phase 2B is in operation, an IMB-R in this location will have to provide maintenance services in relation to the line for both Phases 2A and 2B, and Aldersey's Rough will be more centrally located than at Stone. Secondly, provision of the Aldersey's Rough railhead and IMB-R will involve reactivating part of the Newcastle to Market Drayton railway line. Now, that work could be the catalyst for reopening the line into Newcastle itself, which is the most populous town in the country not currently linked to the national rail network. Reinstating train services to Newcastle will not only benefit that town but would also enable Stoke and North Staffordshire to take advantage of additional services to, in effect, the North West, Manchester Airport, Liverpool and North Wales but can be provided once, as is planned, new platforms are provided at Crewe Station. Furthermore, construction at Aldersey's Rough will be simpler and will cause less disruption to communities than Stone. It's a more isolated location.

14. Now, just two more points. The promoters have compared Aldersey's Rough with Stone in their document, Phase 2A CA62, Strategic Evaluation. Mr Parkin, my third witness, will present a review of that evaluation and contend that its conclusions are erroneous. We say Aldersey's Rough is preferable for Stone in both engineering and environmental terms. We also dispute the promoter's assertion that a railhead and IMB-R would cost more to build at Aldersey's Rough. That is what they say. We dispute that. Their cost estimates cannot be fully assessed because they've refused to provide details of them but, given that the engineering aspects of construction at Aldersey's Rough are simpler, it's likely to be cheaper or at least no more expensive, and

additionally the promoters are wrong to add cost to Aldersey's Rough on the ground that maintenance loops at Pipe Ridware would be required in association with it, with Aldersey's Rough. Such loops aren't needed – they wouldn't be needed – if we provided the railhead and IMB-R at Aldersey's Rough, so that shouldn't be added as a cost.

15. That is all I wish to say in opening, thank you very much. I was going to call my first witness, if I might.

16. THE CHAIR: Can I just ask one question? It was suggested that the base was going to be Crewe and then it moved to the proposed location. When and who created this option? Was it your campaign group or was it an original option from HS2 that was discounted?

17. MR CORNER: Sir, thank you for the question. My understanding is that it was the people I am calling, the people I represent, who came up with the option of Aldersey's Rough and, as you know, Stone was proposed by the promoters in, I think, 2016 and then we suggested Aldersey's Rough. There were some discussions about it in early 2017 and then in the SIFT analysis, this document, HS2 considered Aldersey's Rough but we say that they didn't consider it properly. Does that help?

18. THE CHAIR: Thank you very much.

19. MR CORNER: If you are content, I will introduce my first witness. He is Trevor Gould. Mr Gould is already sworn in but I shall ask him to introduce himself in just a moment.

Evidence of Mr Gould

20. MR CORNER: Do you have the papers that you need available to you, Mr Gould?

21. MR GOULD: I believe so.

22. MR CORNER: Can you tell us your name, please?

23. MR GOULD: Yes, good morning, everyone. My name is Trevor Gould. I spent most of my working career in the manufacturing industry. For 11 years prior to 2000 I

was operations manager at a large multinational manufacturing organisation and since 2000 I have been working as a self-employed management consultant on behalf of a London-based importer and distributor.

24. MR CORNER: Thank you very much. Over what period have you been interested in the railway industry?

25. MR GOULD: Longer than I can care to remember, probably round about 55 years in common with a lot of small boys at that time, and I have maintained my interest ever since very closely with the industry.

26. MR CORNER: Have you had any involvement concerning HS2 with the Newcastle Borough Council?

27. MR GOULD: Yes, indeed. In fact, ever since the introduction of the project it has interested me. I submitted a detailed report to the working party of Newcastle-under-Lyme Borough Council, the working party that was set up by them in order to try and determine whether or not the borough could gain any benefit from HS2 even though the line was going through the borough and wasn't stopping there. I submitted that report following which I was asked by the then chairman of the group, the leader of the council, Gareth Snell, who is now an MP, to continue my investigations into whether or not there could be any benefits for the borough.

28. MR CORNER: Do you live in the vicinity of the Stone proposal?

29. MR GOULD: No, not at all. In fact, strangely, I live in the vicinity of the area where we are proposing to relocate the railhead, near to Aldersey's Rough.

30. MR CORNER: All right, thank you very much. Now, I want to ask you about four things, basically: first, the current rail network; secondly, the network with HS2 in place, thirdly the logistical and operational impacts of the Stone proposal and fourthly, Aldersey's Rough. Yes?

31. MR GOULD: Yes.

32. MR CORNER: So, can we start with the current rail network, please?

33. MR GOULD: Yes, if we could see the first slide, please.

34. MR CORNER: There is a computer mouse here which I will pass to you, if you don't mind.

35. MR GOULD: Right, thank you.

36. MR CORNER: So, there we are. Let's go to your first slide. It is A37(1). What I want you to do, please, is to place the western leg of HS2 Phase 2A and 2B in terms of the local authorities. So, you are going to tell us what slide 1 shows us.

37. MR GOULD: Yes, the slide is showing all the proposed high-speed lines at the moment. Under the large letter C, which you can see in the circle to the left, are all the local authorities. That lies in the area known as the Constellation Partnership, which is between the Northern Powerhouse and the Midlands hub and it's an area of seven local authorities plus two local enterprise partnerships.

38. MR CORNER: Now, in brief, what is Crewe's place within the railway network?

39. MR GOULD: As to Crewe's place, if we look at slide 3 we can see that Crewe there is recognised as a gateway to the north and the railway capital of the world, in fact, and we can see that it has passenger services and freight services radiating to all points north but unfortunately none of those local passenger services that go into Crewe penetrate south of Crewe and as a result of that there are no Manchester Airport services or through services, from the south through Crewe, for the benefit of Staffordshire.

40. MR CORNER: So, no services through Crewe for the benefit of Staffordshire. I have one or two other questions about the current railway network. Is there a stopping service at the moment between Stafford and Stoke?

41. MR GOULD: There isn't. There was a stopping service, which was the Manchester Piccadilly to Stafford service. That was curtailed and now stops at Stoke. It doesn't go any further than that. The reason for that is because of capacity on the line between Stoke and Stone. That ended in 2004 when the Pendolino services started operating between Manchester and Euston, which was down that line from Stone to College Junction and on to London Euston.

42. MR MARTIN: Mr Gould, this is a crucial part of your evidence. Can you say that again more slowly and slightly louder so that I can actually hear what you are

saying? In particular, when you use the words, 'Stoke' and 'Stone', I need to be able to tell the difference between them because I can't at the moment hear what you are saying.

43. MR GOULD: My apologies. Yes, the service was curtailed between Stoke and Stafford as a stopping service down to the fact that the Virgin Pendolino services increased operational frequency to three an hour between Manchester Piccadilly and London using that direct line through Stoke, Stone and College Junction to London. So, there was no capacity to serve the local stations between Stoke and Stone on to Stafford. That service was withdrawn.

44. MR MARTIN: So, it's the section between Stoke and Stone which is the one where there is a capacity gap?

45. MR GOULD: That is the main capacity gap at the moment, yes, and the difference then between Stone and Norton Bridge is the remainder of what was that service at the time when it has been withdrawn.

46. MR CORNER: Is there a rail connection at all to Newcastle-under Lyne?

47. MR GOULD: No, there isn't. Newcastle-under-Lyne, as Mr Corner has said, is the biggest or most populous town in the country without a rail service at the moment. It's not shown on the map because obviously there isn't a railway line going there. It lies between Crewe and Stoke, effectively in terms of the schematic diagram that we have there.

48. MR CORNER: You've just talked about some restrictions on the present railway service. How important are they in your opinion?

49. MR GOULD: They are extremely important, these restrictions, because at the moment the fact that there is no through service from anywhere in Staffordshire to Manchester Airport is a major disincentive for businesses. It is a transport artery which we need to get access to, and it's a transport artery which, even after the coming of HS2 we still don't have any access to in Staffordshire. Even the West Coast Main Line from Stafford through Crewe up to Manchester, any trains that take that route that come from London don't travel to Manchester Airport. So, there isn't anywhere in Staffordshire

that has access to Manchester Airport at all. In fact, Stoke has had a long-held ambition to have through services to Liverpool but that can't happen, and the reason is that there are conflicts at Crewe whereby local services have to cross the path of express passenger trains and effectively Crewe becomes a dead end because once the local services have to cross the path of express passenger trains, that has a knock-on effect on the timetable and the capacity at Crewe.

50. THE CHAIR: Can I ask that we are more forensically focused on Aldersey's Rough directly and also to some degree the additional benefits of Aldersey's Rough and look at the primary functional benefits to HS2?

51. MR CORNER: Yes.

52. THE CHAIR: I appreciate that your case is that there is other stuff that this enables, but that really is secondary to what we are looking at today.

53. MR CORNER: Very well. The network with HS2 in place, what changes will occur?

54. MR GOULD: Could we look at slide 4? The red line there on the same schematic diagram is HS2. It goes all the way through Staffordshire, as you can see. It doesn't stop anywhere in Staffordshire. It stops at Crewe, goes on to Manchester Airport and to Manchester Piccadilly, but what has been promised for Staffordshire is that there will be a service coming off HS2 and using the Handsacre link down there at the bottom, the dotted line, going to Stafford along the Norton Bridge to Stone line, stopping at Stoke and terminating at Macclesfield. Once HS2 comes along and releases capacity on the main line between Manchester and Stoke and Colwich, that will then free up capacity because there won't be as many express passenger services on that line. It will free up capacity to reinstate the local services between Stoke and Stafford.

55. MR CORNER: What does this have to do with Stone, the proposal that we are objecting to? What's the connection?

56. MR GOULD: The effect of that is that those HS2 classic compatible trains that are calling at Stafford and Stoke and on to Macclesfield will then go along that Norton Bridge to Stone line, and the Norton Bridge to Stone line is where HS2 Ltd are

proposing to locate the access sidings for the railhead and IMB-R, and therefore the freight trains accessing that railhead will conflict with passenger services on HS2 and the local passenger services between Stoke and Stafford and any other passenger services that are introduced. For instance, it is known that CrossCountry Trains have aspirations to increase the number of trains on the Manchester to Stafford to Birmingham corridor.

57. MR CORNER: I want to now ask you, please, if I may, about logistical and operational impacts of the Stone proposal. What do you say are the implications of the railway layout at Stone?

58. MR GOULD: There are a lot of operational constraints at Stone. They have been described by HS2 Ltd themselves.

59. MR MARTIN: Would it be helpful if we had CT06 222 up during this discussion so that we can actually see the layout of the proposed Stone infrastructure base and the rail lines coming into it while you are talking about it? I think that would be very helpful.

60. THE CHAIR: That is very sensible. That will pop up magically in a few seconds.

61. MR MOULD QC (DfT): This the same plan as P41 or indeed, Mr Martin, if you wanted a closer view, P42 might better serve your requirement.

62. MR WIGGIN: Keep focusing.

63. MR MOULD QC (DfT): That is what you wanted?

64. MR MARTIN: Fantastic, yes.

65. MR CORNER: If I dare suggest, I think perhaps even more helpful, given the question, is the slide A43(1) because it shows the various embankments and so forth, I hope helpfully. I hope that helps, sir.

66. MR MOULD QC (DfT): There is only one point I would make about that.

67. THE CHAIR: Mr Mould, shall we leave it to them? If they want to make their evidence in a way that you disagree with, we will come back to it, or go for it.

68. MR MOULD QC (DfT): Can I just make one point?
69. THE CHAIR: Yes.
70. MR MOULD QC (DfT): I am sorry, it is important that we are clear on what we are looking at. In case it matters, this is the construction phase, so effectively in terms of the operation of the railhead, this is up to 2026.
71. THE CHAIR: You have made your point. Let's go back to them because they are on the floor. Thank you for that.
72. MR CORNER: The next one is A43(2).
73. THE CHAIR: I think that is the very next matter. It's helpful but Mr Corner is in charge. He can put up now anything he wants, whether it's an inadequate construction one or something else.
74. MR CORNER: Are you happy with A43(2) in front of you?
75. MR GOULD: I would prefer A37(5), please, if we could do that.
76. MR CORNER: I am sorry.
77. MR GOULD: That relates more directly to what I am talking about.
78. MR CORNER: All right, okay. I want to ask you about the maintenance trains accessing the IMB-R at Stone and how that is going to work. So, what is the maintenance window, to begin with, at Stone for maintenance trains?
79. MR GOULD: First of all, there are a lot of implications with the track layout here at Stone because there are up to four reversals, which is what are indicated by the arrows on our screen there, for trains actually accessing the railhead, which has been described by HS2 Ltd themselves as being 'sub-optimal', amongst other things. There is also shared use of the head shunt, which is indicated with two arrows on the right-hand side, shared use between supply trains from Network Rail and trains accessing HS2 northbound maintenance trains. There is also an extensive track layout there, a much more extensive track layout than would be required at Aldersey's Rough.
80. Now, the maintenance window that HS2 Ltd are working with in order to get the

supply trains in and the maintenance trains out and all the maintenance done, is a five-hour window between 12.00 and midnight and 5.00 am in the morning.

81. MR CORNER: So, it is five hours?

82. MR GOULD: It is, that's correct.

83. MR CORNER: And what's the capacity of that? In other words, how many supply trains can be accommodated during that time?

84. MR GOULD: I calculated that a maximum number of three supply trains would be able to enter during that maintenance window without interfering with any classic compatible trains on the line between Norton Bridge and Stone, so three trains in and three trains out during that window.

85. MR CORNER: All right, fine. Is that enough?

86. MR GOULD: No, it won't be sufficient, certainly, eventually. Obviously, for the future maintenance demands of HS2, as the line gets older, maintenance demands will become higher.

87. MRS MURRAY: Can I ask what evidence you have for your assumption that it won't be enough?

88. MR GOULD: Yes, we have a number of things. First of all, the facts are that the timings that we've got on here are showing the length of time it will take for a maintenance train to actually get into the sidings.

89. MRS MURRAY: So, you've got that evidence?

90. MR GOULD: Yes, we've worked it out as how long it takes for each operation.

91. MRS MURRAY: You have worked it out so it's not independent evidence that would be available?

92. THE CHAIR: It's your calculation?

93. MR GOULD: It's my calculation.

94. MRS MURRAY: It's your calculation. Thank you. That's all I needed to know.

95. MR CORNER: So, capacity for three on your evidence?

96. MR GOULD: Yes.

97. MR CORNER: My next question is: is that going to be enough?

98. MR GOULD: No, it won't be enough eventually. Obviously HS2 Ltd have said, 'Well, there's only going to be one train a night because the line is new. Of course, the line isn't always going to be new and it isn't always going to be Phase 2A. Phase 2B is going to be built on ballast track, and ballast track is a completely different entity altogether. It requires much more maintenance and the facility has to be projected to be able to maintain the line into the future. There's no point in building the facility just for now.

99. MR WIGGIN: Can we just check that that is right, that it is going to be on ballast track?

100. MR MOULD QC (DfT): On ballast track?

101. MR CORNER: Phase 2B, yes.

102. MR MOULD QC (DfT): Yes, that is the one thing that has been said so far that is correct.

103. THE CHAIR: Thank you. Just picking up on that, Mr Gould, can we go back to the first page of your introduction? You clearly have a strong professional career, but am I right in saying you have no professional qualifications whatsoever in the rail industry or any technical engineering qualifications?

104. MR GOULD: I have never worked within the rail industry, no, so I don't have any railway technical qualifications at all, no.

105. THE CHAIR: I would say that these are quite technical arguments that, being candid, neither you nor I are qualified to speak on.

106. MR GOULD: I would say that these calculations were verified by an expert who has had knowledge of signalling and operations and has owned and driven his own

steam locomotive.

107. THE CHAIR: I think if we are looking at expert points – I will come to you in a second, Sandy – it would be better to have expert witnesses. That is not to say it's not legitimate to have people with interests presenting information but I am struggling a little around the credibility of some of this evidence. Sandy?

108. MR MARTIN: Yes, I wouldn't want to make a comment about the credibility of evidence except that what I don't understand is that you are talking about the window of opportunity before the operations of the IMB-R interfere with the working on the Norton Bridge to Stone railway, and I can't see how any workings at the IMB-R, any operation of the IMB-R, interferes with the Norton Bride to Stone railway. That's probably because I have failed to notice something but can you point out to me where the operation of the IMB-R actually would interfere in any way with the operation of the Norton Bridge to Stone railway?

109. MR GOULD: That's because the supply trains to the IMB-R that supply the materials that are required from maintenance will come from Network Rail tracks, so those will approach from either the Stoke direction off the top of the picture or the Stafford direction from the bottom of the picture.

110. MR MARTIN: So, it's not the actual HS2 trains coming in for maintenance themselves which is a problem?

111. MR GOULD: No.

112. MR MARTIN: It's the trains coming in bringing materials for maintenance?

113. MR GOULD: It is. What we are saying is that we don't have any issues with how many maintenance trains will need to access HS2 from within the IMB-R at this point. What we have issues with is how many supply trains are going to need to be provided to the IMB-R in order to maintain the maintenance of the railway. So, those trains will come up the Norton Bridge to Stone line into the sidings at Walton and they have to be away again before the classic compatible trains come along that route, or whatever is the first train along that route in the morning.

114. MR CORNER: I think that Mr Mould wants to intervene.

115. THE CHAIR: I think I should let you intervene, Mr Mould.

116. MR MOULD QC (DfT): I am very conscious of the need not to seek unfairly to curtail the presentation of the petitioner's case, but I am also conscious of assisting the Committee so that we don't spend too much time on a false premise. Our position is very clear on this and Mr Smart can explain this later, if necessary. This part of the case is simply founded on a false factual premise. The false factual premise is this, and Mr Martin is, if I may say, absolutely on the point. The focus of this part of the case is on the operation of the IMB-R, the maintenance depot, in other words following completion and coming into operation of the Phase 2 railway. From the moment at which the Phase 2 railway comes into operation and ever after, the maximum number of trains that will need to run to and from the West Coast Main Line via the Norton Bridge to Stone railway into the maintenance depot is one train in every 24-hour period. So, one train per day. That computes to two train paths required. That is the maximum. What Mr Gould has done is to confuse the substantially larger number of supply trains that need to access the railhead, the construction facility at Stone, between 2021 and 2026, in order to serve the construction of HS2 with the number of trains that are required to run off the existing railway line into the maintenance depot once HS2 Phase 2A becomes operational, and you see that clearly in paragraph 4.4.7 of his proof. A35(7) is the reference. The activities that he refers to there as supporting his assumption that a minimum of three trains per night would need to run are activities that are associated only with the construction facility. They are not activities that are associated with the maintenance base once the railway has come into operation. So, what we are dealing with here is not a question as to whether three, four or eight trains per day, per 24-hour period would conflict with the assumed passenger services on the Norton Bridge to Stone railway from 2026, 2027 onwards but whether one train per 24-hour period would conflict with those services. It is a completely different question. That is the factual position which we, as the promoters of this scheme, are convinced of.

117. THE CHAIR: Thank you very much Mr Mould. Apologies for not allowing you to say that earlier. I wanted to give the petitioner a fair wind but it became very clear, through Sandy's questioning, that you will have a different case.

118. MR MOULD QC (DfT): Absolutely.

119. THE CHAIR: Mr Corner, would you like to have a five-minute recess and review and then come back, given what I've said and what Mr Mould has said, or are you happy to speak now?

120. MR CORNER: Sir, that's very kind of you, thank you very much, but I'm not sure that we need a five-minute recess. If I may say, Mr Mould's intervention as always is very helpful because it enables us to understand HS2's case. Our case is about the number of trains that will need to access the IMB-R, not during construction of the railhead but once it is being maintained and if the full extent of Mr Gould's proof of evidence is read, that becomes clear and I can ask him to explain that so that we are under no misapprehension.

121. THE CHAIR: Sheryll Murray.

122. MRS MURRAY: I thought I heard Mr Mould just confirm that once the railhead was constructed and the railway was constructed, we would only need one train per night.

123. MR MOULD QC (DfT): Per day, per 24-hour period.

124. MRS MURRAY: Yes, per day. Mr Mould, clearly, this is actual fact with your scheme.

125. MR MOULD QC (DfT): That is our position, yes.

126. MRS MURRAY: Mr Corner, why do you say that is incorrect when we have just heard Mr Mould confirm it?

127. MR CORNER: Thank you for the question. I will ask Mr Gould to deal with that, if I may, please.

128. THE CHAIR: Why are you asking Mr Gould? Mr Gould doesn't have any technical expertise. It strikes me you may be right, Mr Mould might be wrong but it's a technical analysis, is it not?

129. MR CORNER: If I may say, sir, it's a matter with which I would hope we are entitled to deal. The reality is, as Mr Gould says in his proof, HS2 have said that when the line is new there will be one maintenance journey, one supply train per night. That

is true and Mr Gould acknowledges that in his proof, but he goes on to give reasons which I would hope the Committee will hear, as to why he disagrees with that, and he was beginning to go into those reasons when Mr Mould made his intervention.

130. THE CHAIR: Shall we do that then, briefly, and with caution?

131. MR MOULD: I would find that helpful.

132. THE CHAIR: I am trying to be helpful; I am not trying to be disruptive. It may be that 30 seconds with Mr Gould will give clarity, I don't know, so let's carry on.

133. MR CORNER: Well, let's ask him.

134. MR GOULD: Yes, if I may carry on, yes, of course. Yes, I can understand why Mr Mould is getting confused. It does read slightly ambiguously, that paragraph 447, but we are referring to the IMB-R, not the railhead. As Mr Corner says, we are talking about supply trains once the line is up and running. Before the line is up and running there can't be any conflicts with HS2 trains because there won't be any, so it must be after the line is up and running.

135. MR CORNER: Can you deal with the point that was raised? Mr Mould says that after the line is up and running there will only be one supply train per night, so tell us your view about that.

136. MR GOULD: Yes, the fact is that as I was saying, ballast trains or ballasted track takes a lot more maintenance than the side track, and the Stone railhead can't handle the length of train in which ballast is delivered. They are 800-metre long trains. That is acknowledged in the SIFT analysis of the Stone and Aldersey's Rough railhead, so every ballast train that comes in is actually two paths into the railhead. So, even though there might only be one train per night for Phase 2A, once you get to Phase 2B, every ballast train is two paths per night, so we can assume, therefore, that there must be a greater number than Mr Mould is claiming there is. We can look at the technical information. If you want some technical background on this, certainly we can look to that.

137. THE CHAIR: You can ask the question, 'If you want', but we do want.

138. MR GOULD: Rather than, ‘If you want’, then, I shouldn’t put it that way. This is a quote from the *Rail Engineer* magazine on 15 December 2016 from a conference organised by the Permanent Way Institution of European Railway Engineers, which is the pre-eminent body for dealing with high-speed track forums and any kind of railway building. What that says is that a key risk associated with ballasted track is the ongoing settlement of the ballast under loading, and the cumulative tonnage that will be applied to HS2 Phase 2 is 62 million gross tonnes per annum. Now, if we compare that with anywhere else in the world, there isn’t anywhere. Nobody has any idea of what the loadings’ effects are going to be on the maintenance requirements. If you compare that to HS1, that is only 14 million gross tonnes per annum, so you are talking of well over four times the stress being put on HS2 that has been put on HS1. The man that gave that speech to the organisation was Niall Fagan, HS2 Ltd’s head of track engineering so they are already aware of that.

139. THE CHAIR: Perhaps we can move on. Sorry, Sandy?

140. MR MARTIN: I am sorry, Chair, but I do have some questions about this.

141. THE CHAIR: Okay.

142. MR MARTIN: I am struggling to understand here. First of all, can I ask Mr Mould whether you agree with 4.5.5 in the petitioner’s evidence that HS2 will be splitting the ballast supply trains into two sections?

143. MR MOULD QC (DfT): Yes, the ballast train is 800 metres long and you would decouple that train in order to service it within the maintenance depot, but the assumption that I have put to you as to the number of trains per 24-hour period, or per night, as it has been put, once the full Phase 2 railway is in operation, is precisely on the basis that we would need to be able to accommodate the maintenance of ballasted track. The figure for Phase 2A alone – that is to say the six years or so between 2027 and 2033 – is a maximum of one train a week. We think we could get by with one train a month but we are saying one train a week to be robust. The principal reason why it’s one train a week during Phase 2A but it goes up to one train a night during Phase 2B is because Phase 2A is a slab track railway and Phase 2B is a ballast railway.

144. MR MARTIN: The point being that you have fully taken into consideration the

fact that Phase 2B is a ballast railway in making your calculations for Stone?

145. MR MOULD QC (DfT): The promoters of this project, with the benefit of the advice of Mr Smart as our chief engineer, who amongst other things was responsible for the production of the Northern Section of the Channel Tunnel Rail Link with the advice of railway engineers WSP, have been working on this for us for, I think, years, certainly for many months. We have considered carefully the case that is being put forward by this witness speaking as a lifelong, amateur railway enthusiast and we have satisfied ourselves that the numbers that I have put to you are robust. The reason I intervened was because, whilst wishing not to be unfair to the petitioners, I did not see it would be to the Committee's advantage to proceed too far down the road, or should I say the railway line, on a false premise. Thank you.

146. MR WIGGIN: I just want to know why they are not building slab tracks for the next phase.

147. MR MOULD QC (DfT): The Manchester section of that railway presents challenges with using slab track. That, of course, is a matter that is under review as well, but in order to be robust in our assumptions as to the frequency of trains that would need to use this depot, in fairness to the petitioners, so we do not present too optimistic a case in response to theirs, we have made the assumption that Phase 2B will be a ballasted railway.

148. MR CORNER: Thank you.

149. MR GOULD: These calculations, I might say, are theoretical calculations made by HS2 Ltd. As I have said, no one knows what the effects of the loadings are going to be on ballasted track. In fact, there is another article from *Rail Technology* magazine.

150. THE CHAIR: Can we move on? I don't want more articles read out on this issue. Mr Corner?

151. MR CORNER: Mr Gould, if I can just ask another question connected to that, our attention was drawn by Mr Martin to your proof of evidence at page A35(7). Can we go back, please, to page A35(6)? I am looking at 4.3.1 of your proof where you say: 'HS2 Ltd has told us that the capacity constraints at Stone aren't a problem because for the

first few years the line will be new and won't require more than one supply train per night.' That is how you have set it out. Have you been told by HS2 that it will be one supply train per night throughout the life of the line or is what you have understood them to tell you that it is for the first few years when the line is new?

152. MR GOULD: No, that was taken from the minutes of our meeting with HS2 Ltd on 20 September last year.

153. MR CORNER: So, can we assume from the position for the first few years when the line is new that the position in terms of the number of supply trains will stay the same throughout the life of the line?

154. MR GOULD: No, we certainly can't. Obviously, as the line gets older, the line will deteriorate and for the first few years that could mean anything.

155. MRS MURRAY: Do you have that in writing from HS2 and if you haven't, Mr Gould, could we ask Mr Mould to define the period of time meant by 'first few years', because 'few' could mean five; 'few' could mean 50 depending on the context in which it is used.

156. THE CHAIR: I am trying to catch Mr Mould's eye to see if he wants to come in, in trying to help.

157. MR MOULD QC (DfT): If I may, I will seek to deal with that point. I have never seen this minute. It is not a minute that we have viewed. I am not saying whether that was said or not. What I am telling you is the position that I have been instructed. I will call Mr Tim Smart later who will speak to you on oath and will explain the position, otherwise this exercise is self-defeating. We're taking more time to explain matters.

158. MRS MURRAY: Absolutely, and was that an official parish council minute?

159. MR GOULD: It was a minute of the Stone Railhead Crisis Group from the meeting with HS2 Ltd and, as I understand it, Mr Mould is correct that HS2 Ltd did not respond to the minutes. In fact, I don't know that we have had any response to any minutes that we have submitted to them.

160. MR WIGGIN: Okay, let's keep going.

161. MR CORNER: All right, thank you very much.

162. MR GOULD: With regard to the question of whether or not it's five years or 10 years, I don't think Mr Mould gave a satisfactory answer.

163. MR MOULD QC (DfT): I said that I would deal with that later.

164. THE CHAIR: You have said you will deal with it later and that's absolutely fine. It makes sense. I gave you the opportunity to come in and you didn't need to take it. I think it makes sense, if possible, to hear from the petitioners but it was helpful, the earlier interventions. I think we want to give you a fair wind, but I am getting a little frustrated at the slow progress that is being made and also the technical detail and evidence being given by a non-technical specialist. I am personally finding it a little frustrating but please do carry on with the evidence here and it may be that it joins up with later people giving evidence. I am sharing my frustration, which is not helping, I think, your case or your client's case.

165. MR CORNER: Thank you, Chair.

166. MR GOULD: Is it more beneficial to the Chair for Mr Mould to come back on?

167. THE CHAIR: He has made it clear what he is going to do. We will hear from the petitioner and the witness and then go back to HS2 unless Mr Mould indicates he wants to come in otherwise with my permission, in which case that is what will happen.

168. MR CORNER: Thank you. Mr Gould, you were going to say something. I am not sure whether you remember what it was, but in any event, just before we leave this topic, just in conclusion, are you aware of any line elsewhere that is subject to the kind of stresses and loadings that this line will be subject to?

169. MR GOULD: No.

170. MR CORNER: No. In those circumstances, in your opinion, is it possible to predict with certainty how many maintenance supply trains there would be to Stone?

171. MR GOULD: It isn't possible to predict with certainty, and the reason for that is because nobody has any experience of this and all of this is empirical measurements that are based on experience.

172. MR CORNER: All right, okay, thank you. Can I move on, please? What happens if there are more supply trains that need to access Stone that can be accommodated at night? What follows?

173. MR GOULD: The upshot of that is that the only option that HS2 Ltd will have in supplying Stone IMB-R, as it would be then, would be to return to supplying the IMB-R during the day, but once HS2 Ltd is up and running, as we've already seen there will be more passenger trains during the day including HS2 trains running along the Norton Bridge to Stone line and it's quite possible there will be up to seven trains per hour running along that route given the aspirations of the operators that are running along there at the moment. In that seven train per hour window, it would not be possible to run supply trains because of how long it would take for those supply trains to cross the tracks into the IMB-R. We're looking at probably an eight-minute window, possibly even longer than that for them to get across the tracks, off the Network Rail tracks into the IMB-R. That wouldn't be possible without disrupting passenger services or having them withdrawn.

174. MR CORNER: So, in short if supply trains need to access the IMB-R during the day, what do you say will be the result?

175. MR GOULD: The likely result would be that the main casualty will be the classic compatible HS2 service that runs from Handsacre Junction through Stafford to Stoke and Macclesfield, and the reason for that, of course, is that that is the one that has the biggest political threat associated with HS2 freight trains interfering with the HS2 timetable and it's also the one that has the most impact further down the line on HS2 if those trains should get disrupted. And, of course, at the moment we know that HS2 Ltd will be forming part of the West Coast Partnership, who will be running those services. So, that will be the service over which they have most control, so that's the one that is likely to be taken off, which means then that our county town of Stafford will lose its HS2 service. Perhaps we can go to the next slide, slide 6?

176. MR CORNER: That is A37(6). So, this is what happens if, as you suggest, the night-time capacity of the maintenance depot at Stone is exceeded and maintenance trains have to run during the day?

177. MR GOULD: That's right.

178. MR CORNER: Tell us with regard to slide 6.

179. MR GOULD: You will see that we have now diverted the dotted line away from Stafford running up the College line, which is the same route as the current Manchester to London, Euston, Pendolino services take, stopping at Stoke and Macclesfield and that would cut Stafford out of the equation altogether. Stafford is a key element in the Constellation Partnership. There is a projected £507 million development around the Stafford Gateway masterplan on the premise of HS2 trains stopping at Stafford, but a secondary consideration is then that without any passenger revenue from Stafford, it's highly likely that the Stoke and Macclesfield service would become unviable and it's quite possible that the entire service could be withdrawn to the severe detriment of Staffordshire altogether.

180. MR CORNER: So, you say HS2 service to Stoke and Macclesfield would have to be rerouted, it would cut out Stafford and you say that that might, indeed, threaten the viability of the HS2 service itself?

181. MR GOULD: Correct.

182. MR CORNER: All right. And how serious a consequence is that in your view?

183. MR GOULD: Well, it's extremely serious because, I mean, Stoke on Trent, you may not be familiar but it's a – it's already a deprived area, it comes regularly top of many lists for things like child poverty, educational achievement, all sorts of things. In fact, earlier this month, on 6 April, it came top of the list for pensioner poverty, would you believe, where pensioners in the area are living on less than anywhere else in the country and we need HS2 coming to places like Stafford and Stoke on Trent in order to give a much higher aspiration for people in order to bring business and investment into the communities. Without HS2, what we're going to be suffering is what the Chamber of Commerce have referred to as business drift from Stoke on Trent and Staffordshire generally into Crewe because of Crewe's much better connectivity.

184. MR CORNER: All right, thank you. Now can we just turn please finally to Aldersey's Rough? What do you see as its advantages over Stone as a location for the IMB-R?

185. MR GOULD: Well, first of all, there are many reasons but I'll just list the major ones. First of all, because of its location as you can see on the dotted line there from Madeley chord junction, because of its location, it can be supplied 24 hours a day, seven days a week without any interference at all with any current passenger trains or certainly without any interference with any HS2 classic compatible trains at all. It has capacity to handle the 800 metre ballast trains without them needing to be split, which HS2 Ltd has reported in its SIFT report. There is no need for reversals using our diagrams rather than the HS2 layout and I hope to approach the layout.

186. MR CORNER: To which we will come to later.

187. MR GOULD: Yes. So, therefore it is a much more robust proposal in terms of operation and cost effectiveness. It will be, as Mr Corner has already said, half way, genuinely half way along the line, not this half way along the line that HS2 claim for Phase 2A for Stone. Aldersey's Rough is actually half way along the line between the beginning of Phase 2A and the end of Phase 2B so it's much more centrally located than Stone.

188. MR CORNER: Right. Mr Parkin will deal with that in more detail. Can I just ask you, would there be the same concern that you have in relation to Stone about supply trains to the IMB-R prejudicing passenger services, would that concern exist in relation to Aldersey's Rough?

189. MR GOULD: No, it wouldn't. There would not be any conflicts with the HS2 services because they are not going to be running up the West Coast Main Line.

190. MR CORNER: All right, okay. Now, next in the opening, when we in the introduction –

191. MR MARTIN: Sorry, can I just interject there? Mr Gould, would there be any interruption, would there not be any interruption of the current West Coast Main Line services? I mean, we actually on our fact-finding trip witnessed the West Coast Main Line and the trains on that line are pretty relentless. I mean, there's virtually no gap between them.

192. MR GOULD: Correct. The premise of HS2 is that those express passenger trains

are going to be almost exclusively withdrawn in favour of trains running along the HS2 Main Line. So, instead of running down from Stafford to Crewe along the West Coast Main Line, all those Pendolinos that are now running would be running from Crewe down to Birmingham and London. So, that would create a lot of capacity. That's the whole premise of HS2 as they decrease the capacity so we are then filling the capacity with our proposals and improving the connectivity which we'll come on to.

193. MR MARTIN: But would there not be fairly substantial disruption of the operation of the West Coast Main Line during the five years construction period?

194. MR GOULD: No. There are four tracks on the West Coast Main Line so we have two what are known as slow lines, which are actually 100 mph running and there are two fast lines and the slow lines, there would be the connection from the slow line from the southbound direction so that would enable trains to run into Aldersey's Rough via a bridge over Madeley chord which would then run into Aldersey's Rough without touching the West Coast Main Line fast lines at all and on our plans we have the opportunity to run from the fast lines certainly during construction but we would suggest that that was done during the slacker periods at night when the fast lines are hardly used.

195. MR CORNER: Thank you. Newcastle please. We mentioned this in introduction. You've said that to provide an IMB-R railhead and IMB-R at Aldersey's Rough would involve reactivating part of the Newcastle – Market Drayton line. How does that relate to reconnecting Newcastle?

196. MR GOULD: Well, the route beyond Aldersey's Rough on the map there, all the way to Stoke in fact, is still available as far as Newcastle because effectively it's a mothballed railway so far as Silverdale Colliery, which is beyond Aldersey's Rough, and beyond Silverdale Colliery, into the former Newcastle station site is owned as a walkway and cycleway by the local authority. So, it would be possible to re-lay that line and by re-opening the route to Aldersey's Rough, we create a situation where the cost benefit analysis of then continuing to Newcastle becomes that much more beneficial on account of the fact that a major element of the cost is taken out by building the line as far as Aldersey's Rough and making the connection to the West Coast Main Line. So, Aldersey's Rough could easily become the catalyst for that.

197. MR CORNER: And if Newcastle is reconnected, how does that relate to the

services, to any services, any new services that may be provided once the new platforms are provided at Crewe?

198. MR GOULD: Well, if we have a look at slide A37(8).

199. MR CORNER: A37(8), yes.

200. MR GOULD: What Mr Corner's referring to there is on the Crewe Hub Consultation there are proposals to build new platforms on what are known as the independent lines at Crewe. Now, the independent lines are on the west side of Crewe so they effectively connect into the slow lines, or they are the slow lines through Crewe and, as a result of that, they will not interfere with any HS2 classic compatible services stopping at Crewe. In fact, it's part of HS2 Ltd's Crewe Hub Consultation that the independent lines are provided with platforms in order that trains from Manchester Piccadilly can through Crewe and continue on to South Wales without having to be either be withdrawn or conflict. Now, the reason they do that is because there are tunnels at the north side of Crewe so these platforms will go under tunnels, avoiding all the rest of the lines, and come out on the Manchester or the Liverpool side tracks. Now, as a result of that, that means then that all of those routes that we've coloured in where you've got local services coming into Crewe at the moment, they could use the independent lines, continue down the slow lines of the West Coast Main Line and across the Aldersey's Rough route, through into Newcastle and ultimately to Stoke, serving all those places and increasing the connectivity which, of course, is the government's objective with building HS2 in the first place.

201. MR CORNER: Now, you're talking there about connecting through to Manchester Airport, Liverpool and North Wales. For Newcastle, you mention Stoke. Could Stoke benefit from those connections without Newcastle being connected to the rail network?

202. MR GOULD: Stoke wouldn't be able to benefit from those connections. Stoke, as we've explained before, the route from Stoke into Crewe is effectively a dead end. Because it comes in from the east side of Crewe, it would need to cross the paths of classic compatible trains at Crewe, or any other express trains at Crewe, in order to access Manchester Airport, Liverpool, wherever else, so even after HS2 is built, access from Stoke to Crewe via the Kids Grove route, it wouldn't be possible to go any further whereas accessing Crewe via the Newcastle route gives Stoke the opportunity to attract

business men and women from Manchester Airport and access for the burgeoning logistics industry to Liverpool Docks and to many other destinations, through trains, and that benefits not just Stoke of course but the whole of the Constellation Partnership.

203. MR CORNER: Right, and then just finally please if I may, finally on the benefits of reconnecting Newcastle, between the stretch of the line reactivated by the Aldersey's Rough IMB-R railhead construction and Newcastle, there are other places which used to be connected to the railway line, other local stops, aren't there?

204. MR GOULD: There are, yes. In fact, we're showing a number of stations. This is not an exclusive list of stations and destinations. The Staffordshire Moorlands benefits enormously. All those stations there are former stations that have been closed and it gives a far greater connectivity which then makes the workforce more mobile. It's a highly sedentary workforce in North Staffordshire and this gives the opportunity to raise aspirations, to raise the potential for more earnings and to raise more connectivity.

205. MR MARTIN: I have a question. A lot of this is speculation about what could happen if the line from Stoke through the Madeley junction was reopened so I need to know, before we start speculating about what could happen in the future if, to find out whether or not it's possible. Clearly, at the moment the HS2 proposal is for a viaduct over that junction and there was an alternative put forward which was a tunnel underneath. If the tunnel underneath were to be built then obviously it would not be possible to go for the Aldersey's Rough in any case. If the viaduct, the original proposal is taken, will it be possible to reconfigure the junction at Madeley once the viaduct has been built because it occurs to me that the way that the junction is set up at the moment, the only route from Crewe is towards Market Drayton, which of course goes nowhere, and it is not actually possible using the current setup of the junction to get from Newcastle to Crewe. So, how would the junction be rebuilt underneath an existing HS2 viaduct?

206. MR GOULD: We have the note from the Committee that was given to us earlier this week which is –

207. MR CORNER: You might need to keep your voice up, Mr Gould.

208. MR GOULD: I beg your pardon. With regard to the River Lee viaduct potential

lowering options, you heard evidence from a petitioner earlier this week in respect of that and with regard to the Stoke to Market Drayton railway, under the current proposals for the Lee Valley viaduct, there is plenty of headroom above the bridge over the West Coast Main Line and the underside of the Lee Valley viaduct so there's no problem. Even if the line was electrified, the Market Drayton line was electrified, effectively you have three lines on top of each other: so, the West Coast Main Line and then on top of the West Coast Main Line there is a 5.8 metre clearance to the underside of the Lee Valley viaduct. There were two options of lowering the viaduct, D1 and D2. You get 5.3 metres on D1 or 4 metres on D2 and even with D1, you've still got clearance.

209. MR MARTIN: Yes, but Mr Gould you're not hearing my question which is that if you were travelling westwards, or south westwards from Newcastle-under-Lyme and you cross over the high speed, sorry, the current West Coast Main Line on the existing bridge or on a newly built bridge, because I think the existing bridge is probably not up to it, you are then travelling south westwards. How do you get from travelling south westwards to travelling north westwards without completely rebuilding the junction?

210. MR GOULD: Well, Network Rail have said that they understand that there is a requirement to rebuild that junction then it's likely that the alignment will need to be on a different alignment if Newcastle was to be served and that junction has been taken out of use simply to save on the assets, the maintenance, keep the line speed up. If we build a north to west curve which is the opposite side, sorry, north to east curve on the north east quadrant of Madeley chord junction then trains could access from the fast lines on to the Newcastle route.

211. MR MARTIN: Yes, it would require substantial rebuilding of the junction underneath an existing viaduct which was being built for HS2.

212. MR GOULD: No, it wouldn't be going anywhere near the viaduct. On HS2 Ltd's plans there is Madeley chord which runs underneath the viaduct. Our chord – that one's coming off the slow lines heading south and heading west. In our plans, the junction would come off the fast lines heading south and heading directly east.

213. MR CORNER: Would it be helpful in the context of that question just to look at a plan?

214. MR MARTIN: I'm looking at the plan in front of me.

215. THE CHAIR: I think we'd better get it up for everyone. I think that would be helpful.

216. MR CORNER: Well, yes. I'm looking at A43(7). I don't know whether that would help and also our alternative proposal at A43(8). Is it helpful to look at that plan Mr Gould?

217. MR GOULD: Yes. You can see the Lee Valley viaduct that you're talking about going from the top left hand corner all the way down through the screen is the HS2 viaduct and, as you say, that goes over the top at Madeley chord and also over the top of the Market Drayton line whereas what we're suggesting, on our plan, is the chord on the opposite side of the West Coast Main Line which comes down from the north and sweeps up towards Newcastle eastwards, avoiding the Madeley chord area which is the floodplain and also avoiding the HS2 Main Line.

218. MR CORNER: Can we see that on the following slide on A43(8)?

219. MR GOULD: Yes.

220. MR CORNER: So, I'll be getting Mr Parker in to speak in more detail about this layout but I just thought in the context of your question it might just help to look at it.

221. MR MARTIN: Thank you, that's very helpful.

222. MR CORNER: Yes, thank you. The final point I wanted to ask you in chief please, Mr Gould, was just on Keele University. I just wanted to ask you where is that in relation to Newcastle and, were Newcastle to be reconnected to the rail network, how that would be relevant to Keele, if at all?

223. MR GOULD: Yes, Keele University is about half way between Aldersey's Rough and Newcastle. It's one of our principal seats of learning and there are thousands of students attracted every year. Hundreds of those are international students and it would give Keele a huge shot in the arm to be able to have direct connections from its station to Manchester Airport. There's also a science and technology park there which is key to the joint local plan of Newcastle-under-Lyme and Stoke on Trent for bringing

investment into the area. It's a highly successful science and technology park and it's expected to double between now and 2040 in accordance with that plan and this would be extremely beneficial in being able to bring people in. In fact, it's also recognised that most of the academic staff actually commute into Keele from Cheshire and Shropshire so that would, again, be beneficial for them. But the line also continues on between Keele and Newcastle through an area known as the western urban villages which Newcastle Borough Council has been trying to regenerate since the last pit closed in 1998, largely unsuccessfully but, again, the reopening of two or three stations within those villages which have been closed would again be a major shot in the arm for that regeneration proposal which is also part of the joint local plan.

224. MR CORNER: Okay, thank you very much. So, just in conclusion, how do you see construction of a railhead and IMB-R at Aldersey's Rough in relation to the reconnection potential for Newcastle?

225. MR GOULD: Well, it's going to be a game changer for all of Staffordshire this, for Staffordshire's future economic prosperity being linked into the major HS2 hub at Crewe with lots of different services, the connectivity for the workforce, the access to Manchester Airport and Liverpool Docks and lots of other places and, particularly, that kind of connectivity would eliminate, almost certainly eliminate, the danger of the potential business drift away from Staffordshire into Cheshire which is what Staffordshire's Chamber of Commerce are particularly concerned about and, by removing the obstacle of Stone, the Norbury to Stone line, it also gives our HS2 service that serves Stafford and Stoke on Trent to Macclesfield, a fighting chance of survival.

226. MR CORNER: All right good, thank you very much.

227. THE CHAIR: So, you're now going to call your next witness and, Mr Mould, you're going to come in at the end? Is that your expectation as well?

228. MR MOULD QC (DfT): I was going to ask Mr Smart to respond to the suggestions this witness has made, yes.

229. THE CHAIR: Yes, but we'll do that all at the end, is that your expectation?

230. MR MOULD QC (DfT): Yes, the end is convenient to me.

231. THE CHAIR: Yes, I just wanted to check your expectations were the same as mine.

232. MR CORNER: I was just wondering if there was any cross-examination? If there isn't, I can go straight to my next witness.

233. MR MOULD QC (DfT): No, as I say, I'm inclined to rely on Mr Smart's expert response rather than cross-examine.

234. THE CHAIR: Thank you very much. Mr Corner, if you call your next witness. Thank you very much Mr Gould.

Evidence of Mr Wilkinson

235. MR CORNER: Shall we go to Mr Wilkinson next. Now, for the benefit of the person helping us with the slides, Mr Wilkinson's slides are in the A40 series. They're in the A40 series. Thank you. So, can you give your full name please?

236. MR WILKINSON: Yes, good morning. My name's Gordon Wilkinson.

237. MR CORNER: And do you have professional qualifications?

238. MR WILKINSON: Yes, I do. I'm a retired chartered transportation engineer with a Master's degree in transportation engineering planning.

239. MR CORNER: Thank you. And what about your working background?

240. MR WILKINSON: Yes, my career spanned 41 years of which 35 were spent in local government, the last 15 of those was at Staffordshire County Council where I was head of urban transport projects. The final six years of my life, my career I should say, I was senior consultant a TMS Consultancy developing and delivering training courses to graduate and qualified engineers in junction design, road safety auditing and accident investigation analysis.

241. MR CORNER: All right, thank you very much. So, your evidence is about highways and transport matters. In relation to those matters, do you have, in your opinion, relevant professional expert qualifications?

242. MR WILKINSON: Yes, well as I said, I've got a master's degree in transportation

engineering and planning, I'm a member of various institutes but now retired.

243. MR CORNER: Thank you very much. General views about HS2, do you support or not?

244. MR WILKINSON: Well, yes. Being slightly young still I was one of the first people to be involved in the experimental contra-flows on the M6, blame me for the cones that are now there, and now I find myself watching them say the M6 is being widened. So, certainly I'm aware of the lack of rail capacity and I think more is crucial. I therefore embrace the concept of HS2 and hope it will be the catalyst to re-open a lot of local stations and the creation of some more.

245. MR CORNER: All right, thank you very much. Your initial reaction then please when it was first announced that a railhead and IMB-R was proposed to be at Stone?

246. MR WILKINSON: Yes, this is what got me involved I think really. We accepted that HS2 was coming along and then suddenly were told that Yarnfield Lane, the main access to the village, was going to be shut for three years. This got me rather concerned, not just as a nimbyism but the fact that whoever made that decision appeared to have no local knowledge of the implications that would have, not only the residents of Yarnfield, 2,500 of them, but the implications of that diverted traffic and the implications it would have on the existing junctions further along, and we'll look at that in a minute.

247. MR CORNER: Right, thank you very much. Now, let's come then please to your objections in relation to the provision of the facility at Stone. Just give us an overview, will you please, to begin with of the highway network around Stone.

248. MR WILKINSON: Yes, okay, well I'll deal with it in a hierarchy sort of way. So, if you look at where my cursor is at the minute on the screens, it will probably help you.

249. MR CORNER: You should be looking at slide. Which slide is it?

250. MR WILKINSON: Oh, sorry. Slide 40.

251. MR CORNER: Slide 40(1). Okay, thank you.

252. MR WILKINSON: Okay, so doing it hierarchically, down in the bottom corner here we have junction 14 of the M6 which then traverses all the way up to junction 15, a

crucial junction as regards construction traffic. You'll see the HS2 mainline severs the motorway there just around and if you can see this bow shape which is the location of the proposed railhead at Stone and we have Yarnfield Village here. So, this is the construction route to take you through there, showing Yarnfield Lane down to the A34. If we just look at the A34 actually from junction 14, it sort of parallels the M6 all the way up to the A500 and then joins it. I'll come back to that in a moment. So, if we're at Yarnfield and the A34 junction, a kilometre down we have the crucial A34 Walton Island junction which then feeds into Eccleshall Road and Pirehill Lane which is a residential street into compounds around Yarlet. Another kilometre along, you'll see where this road comes in here. It's the A51. That's a three-armed roundabout that goes into as well as the two primary roads there it goes into the Stone Industrial Estate and you can see just at the edge of the screen there, these are access points into Stone from both ends, there's a junction just about here, that is used as a rat run when there are problems on the A34 itself.

253. MR CORNER: Right, okay. Thank you very much. I want to ask you now please about Yarnfield Lane. Go on, sorry.

254. MR WILKINSON: Sorry, there's just one other thing. The A34 itself is a key corridor. It is, as you can see here quite clearly, the only feasible emergency route between 14 and 15 should there be an incident on the motorway. It is certainly also the only feasible emergency route between Stafford County Hospital and Newcastle's Royal Stoke Hospital which has – a lot of the services have moved up there so it's a vital link between that. It is also used by the emergency services and in Stone the Fire Brigade have their own headquarters there and depot that functions to access the motorway and wherever else. But a key route and one that the county council as highway authority have stipulated both in their petition and in their response that delays, unacceptable or significant delays or closures on the A34 is not acceptable because it plays such a key role in the local hierarchy.

255. MR CORNER: All right, thank you. Yarnfield Lane?

256. MR WILKINSON: Yes.

257. MR CORNER: You can see Yarnfield Lane on slide 1 but you also show it in more detail on your second slide A40(2).

258. MR WILKINSON: Yes, can we have a look at A43(1), I think might be more useful.

259. MR CORNER: A43(1)? Yes, this is one we've seen, we were looking at earlier, yes. I want to ask you, my question is going to be to what extent Yarnfield Lane will be used during construction?

260. MR WILKINSON: Does that come down any more that slide? I thought it showed a bit more of the...? No?

261. MR CORNER: I don't know, is the answer I'm afraid. Right, are you going to be able to deal with this as we see it?

262. MR WILKINSON: Yes, yes, I think so. We'll get by on that. Yes, the Yarnfield Lane, in terms of construction, is that the question, sorry?

263. MR CORNER: Yes, to what extent will it be used during construction.

264. MR WILKINSON: Sorry, yes. During the first, it was I think nine months but now during the first 15 months of construction, Yarnfield Lane will be the primary and only access really to the compounds around the railhead. This is because HS2's access to the Yarnfield Lane will be via, in the main, motorway slip roads both northbound and southbound and it will take 15 months to construct those. So, in the absence of any other way of getting into the compounds, Yarnfield Lane would be the primary route in.

265. MR CORNER: Right.

266. THE CHAIR: Can I just ask, how long is Yarnfield Lane now?

267. MR WILKINSON: How long? From about here, about two and a half kilometres.

268. THE CHAIR: Right, thank you.

269. MR CORNER: Right, so that's the first 15 months and then after that period, will Yarnfield Lane be used?

270. MR WILKINSON: Yes, well once Yarnfield Lane has got the slip roads that can be seen on this drawing, you can see that they come off to the south of the west side of the roundabout, the motorway. You've got access required to all these compounds

through to the transfer node and that's a distance of about 900 metres where there'll be high levels of construction and particularly HGV traffic to and from the northbound and southbound accesses and trying to interact between the various compounds.

271. MR CORNER: All right, thank you. So, my next question, still on Yarnfield Lane, that part of Yarnfield Lane that is going to be affected by construction traffic, I want you to tell us about it in terms of its suitability for HGVs.

272. MR WILKINSON: Well, following on from the desire to close the lane for three years, that was rescinded and HS2 in their ability to keep Yarnfield Lane open will require to divert Yarnfield Lane down at Moss Lane here at the bottom. The old road goes and overbridges about here somewhere.

273. MR CORNER: Are you wanting to go back?

274. MR WILKINSON: Yes please, go back.

275. MR CORNER: A43(1) is still the one.

276. MR WILKINSON: So, Yarnfield Lane will be diverted and then over a new motorway bridge it will then go down into a cutting under the railhead, come out again into another cutting and then under the HS2 Main Line and then finally re-emerge and blend in to merge in with the existing Yarnfield Lane. It will then, obviously this will still be operational for quite a long time with HGVs and that will require widening and you can see on this drawing here, at the top, the pink is where they start to re-align Yarnfield Lane as it drops down quite steeply to the A34. And if we go to the next slide.

277. MR CORNER: What, the next slide being A43(2) or the next slide of yours?

278. MR WILKINSON: No sorry, A40(2) I think.

279. MR CORNER: So, it's your slide, A40(2), right, okay.

280. MR WILKINSON: Yes.

281. THE CHAIR: Can I ask how many properties there are, residential properties on Yarnfield Lane?

282. MR WILKINSON: On the lane, or accessed?

283. THE CHAIR: Yes, on the lane or off. Well, perhaps divvy it up both ways. I'm just trying to get an idea what type of traffic there is.

284. MR WILKINSON: Okay, Yarnfield village itself has about, well it's nearly 2,500 residents. There's just been a brand-new housing estate of 250 houses been built there. It has a BT, what used to be called the British Telecom Training College. It's called Yarnfield Park now. That has capability of over 400 bedrooms, major conferences every day and at weekends and a football club that has 10 football pitches, 200 car parks and that's very busy on a Saturday morning and the weekend through. Does that help you?

285. THE CHAIR: Very helpful.

286. MR WILKINSON: Yes, it generates over 1,000 trips a day and around about 300 in one direction only certainly, maybe more, in the am/pm peaks.

287. MR CORNER: Thank you. So, I want to ask you to deal with please the width of the carriageway of Yarnfield Lane, the existence of footways.

288. MR WILKINSON: Looking at this drawing here, the green lines there show the dual carriageway which is the A34 and the junction with Yarnfield Lane. If we follow the green line down we can see this particular part here of Yarnfield Lane is only about 5.7 metres wide. It's a very steep curve down, about 1:8 to 1:9, not very popular with cyclists or pedestrians, very narrow, very substandard for visibility and it drops down and you can see that HS2 propose to widen the lane at that point but we don't think they're actually going to change the grade and you can see just at the end of the pink there, they don't need any land because this stretch here is highway, grass verge just before you get to the junction here. So, if we go to the next slide A40(3).

289. MR CORNER: Yes.

290. MR WILKINSON: Yes, this is that white area of highway grass verge and this is looking up Yarnfield Lane, looking to the west coming from the A34 behind us, up here now into a lazy S, a left and a right. The carriageway width here is about 5.6 metres wide.

291. MR CORNER: Is that wide enough for HGVs to pass each other?

292. MR WILKINSON: Absolutely not, no, but we'll come to more on that in a minute. Turning this camera view round to A40(4), hopefully, this is this area of grass verge that you can see. The actual width across just by that tree there is 5.7 metres. HS2 as I am told, after various emails, this will be widened to 6 metres wide which takes these trees and certainly isn't wide enough for what we require, will take a lot of trees all the way up the lane and hedgerows and shrubs as well. So, that's looking towards the A34 junction.

293. MR CORNER: Now, you've just said, 'It won't be wide enough for what we require'. What did you mean by that?

294. MR WILKINSON: Well, we'll come back to it a little bit later but 6 metres does not facilitate the movement of two HGVs. We'll go in a bit more detail on that. Sorry, just to carry on, the lane itself has no footways whatsoever from its curtilage of the village boundary. There are grass verges in parts but the last 500 metres as you can see dropping down on the previous, if we just go back to A40(3), there are no footways and this 500-metre section from round the bend is, to say the least, very perilous for pedestrians. There is a regular bus service but it curtails at about 6.00 pm and there's no service on a Sunday and, invariably, a lot of people later on in the evenings on a Saturday and in the week will walk up this lane and I can assure you it's quite a dangerous manoeuvre. And cyclists usually dismount round that bend because they can't make the 1:8 to 1:9.

295. MR WIGGIN: So, what is the legal width of an HGV?

296. MR WILKINSON: I'll talk to you on that. The legal width is 2.55 metres plus wing mirrors.

297. MR CORNER: Can I make a suggestion, as Mr Wiggin has asked about it? Why don't we deal with it now?

298. THE CHAIR: That's a very good idea.

299. MR WILKINSON: So, we want slide A40(10) to start with, yes. This is one of the vehicle operators, they have various dimensions and this is their six-wheeler,

effectively the standard 20 tonner spoil or aggregate, and you can see the various sizes but the main ones are usually around here. The average is 3.07 metres but the minimum is, or the maximum rather is, 2.55 metres is the maximum width of any vehicle, plus wing mirrors, but with the wing mirrors 3.07 metres so invariably if the vehicle was right up against the kerb, you'd have probably about 2.75 metres would be absolute maximum before they'd kiss on either end so you'd want 5.5 metres and they'd just about kiss, but it wouldn't be the kiss.

300. THE CHAIR: A lovely turn of phrase, kissing rather than crashing. Sheryll?

301. MR WILKINSON: That's just clipping the wing mirrors.

302. MRS MURRAY: Just basically to say that I know, I've seen lots on the roads where I live because they're very narrow roads, but they do bring their wing mirrors in sometimes.

303. MR WILKINSON: Yes, when we're talking about over 1,400 two-way flows on parts of Yarnfield Lane, that might be quite a lot to ask. Bus drivers won't actually be able to reach some of their mirrors on some of the coaches.

304. MR CORNER: 1,400 flows, what do you mean by that?

305. MR WILKINSON: This is the HGV projected peak flows on the Yarnfield Lane during the major embankment and rail construction that would be utilising the western end of Yarnfield Lane. Just to go back to that, if you go to slide 40(11), that's the best option you can get with wing mirrors on coaches. They can't bring them in but they don't protrude quite as far as the standard mirrors on lorries.

306. THE CHAIR: Yesterday, during some debate around traffic flows, we saw a rather nice bar chart from HS2 which took each year and the flows to give an idea of peak. Is it possible to access that for the road?

307. MR MOULD QC (DfT): P41(10).

308. THE CHAIR: I don't know whether you've seen this Mr Corner.

309. MR CORNER: Is this P41(10)?

310. MR MOULD QC (DfT): Yes.

311. MR CORNER: Yes, do you have that?

312. THE CHAIR: It's slightly different to what I was asking and expecting.

313. MR WILKINSON: Yes.

314. MR MOULD QC (DfT): Sorry, what were you expecting?

315. MR WILKINSON: Can I ask a question?

316. THE CHAIR: A much smaller chart over a longer period. It may just be that this is for a shorter period.

317. MR MOULD QC (DfT): Shall I just explain what this does?

318. THE CHAIR: Yes.

319. MR MOULD QC (DfT): This shows you our predicted flows of HGV construction traffic along Yarnfield Lane from the beginning of setup and construction of the slip roads in January 2021 all the way through to the completion of construction of the railway and testing at the end of 2026, you can see at the right-hand side. So, what it's showing you is that whilst the largest flows of traffic are associated with setup, but in particular with the construction of the new slip roads on to the M6, that's the first phase, then the slip roads begin to come into partial operation during the second phase from the beginning of 2022 onwards and you can see traffic flow is reduced markedly during that period, and then by the end of the second phase, where we've completed the works that are set out under that heading, you can see that traffic reduces from late 2023 to really an absolutely residual number. So, the peakiest period is associated with the construction of the M6 slips. Once they've been constructed, they begin to draw away a lot of the traffic off Yarnfield Lane, you get a period of medium use and then for the majority of the construction period –

320. THE CHAIR: That's really helpful. I'll hand over. Sorry for that distraction. It was so useful yesterday to get a perspective.

321. MR WILKINSON: I suspect that's totally misleading because this is Yarnfield

Lane, I presume more at the bottom end beyond the transfer node. I'm talking about the part of Yarnfield Road, the 900 metres that's serviced by the motorway where this does not show that. Am I correct in saying that, Mr Mould?

322. MR MOULD QC (DfT): Well, I'll provide the answer because it's obviously important. This is Yarnfield Lane between the junction with the A34 and the railhead.

323. THE CHAIR: Right, we're going to come back to Mr Corner and try to be a bit more orderly. I didn't draw Mr Mould up because I think a bit of fluidity sometimes helps but I'll come back to you then Mr Corner.

324. MR CORNER: Sir, I make no complaint about that at all. Of course, it's helpful. I wonder, certainly Mr Parkin, I know, considers that this does not tell the true picture and it may be that Mr Wilkinson is of the same view. Can he explain?

325. THE CHAIR: Well, Mr Mould can come back at the end to put his points.

326. MR CORNER: Indeed.

327. THE CHAIR: Thank you very much everyone.

328. MR CORNER: Since it's been raised, do you mind if Mr Wilkinson tells you why he thinks that 41(10) doesn't provide a full picture?

329. THE CHAIR: I'm going to allow that but I'm not going to allow Mr Mould to come back to go through it again until the end.

330. MR MOULD QC (DfT): I don't ask you to.

331. MR WILKINSON: Given that HS2's own figures show that for the transfer node alone there'd be, I think, forgive me if I get this slightly wrong, up to 1,125 HGVs a day for a 12 month period that are coming off the motorway and will come across from the southbound and northbound into but not beyond the transfer node, i.e. not beyond the transfer node and not on to Yarnfield Lane, this histogram is totally, and I mean totally, misleading. Unless suddenly these 1,100 two-way trips are not now occurring and then why would are they going to build the motorway slips? And, if that was the case, you would just, why build all the motorway slips, you'd just have this amount of traffic going up the Yarnfield Lane if you could so I feel that is totally misleading to the

Committee.

332. MR CORNER: Thank you very much. Right, so two concluding questions on Yarnfield Lane if I can. Is it suitable for HGVs now?

333. MR WILKINSON: No, in view of the poor, very poor substandard width, you're looking at potential accidents without a doubt. That's before we get to vulnerable road users and cyclists. Absolutely unacceptable.

334. MR CORNER: And once altered in the way that we know it will be altered, will it be suitable for HGVs then?

335. MR WILKINSON: Six metres. You've seen the actual dimensions of the actual vehicles. Six metres would be acceptable on a local distributor but with a bus route, it would be 6.75 metres, we're talking about serious levels of HGVs and some buses. 6.75 metres would be my starting point but six metres, you've only got to look at the thing to see that. We had six metres on Cheadle High Street and we had one had on and at least three pedestrian fatalities from being hit by wing mirrors. So, this is the sort of thing, we wouldn't go below 6.75 metres, so a real departure from any standard that I would accept.

336. MR CORNER: There is, I think, a tonne limit, isn't there, on Yarnfield Lane at the moment?

337. MR WILKINSON: Yes, there is. There's several reasons: the width.

338. MR CORNER: How many tonnes? I'm trying not to lead you but I'm also trying not to waste time.

339. MR WILKINSON: It's a 7.5 tonne weight limit, (a) to stop HGVs going through there because of the width, the gradient, pedestrian and vulnerable user conflict and also because the A34 junction will not accommodate, the priority junction will not accommodate it.

340. MR CORNER: Right, okay, thank you. Next, I want to move on now from Yarnfield Lane please. I want to talk about these junctions I mentioned when I started.

341. THE CHAIR: Can I just ask you one question before we move on from Yarnfield

Lane? If the Stone depot goes ahead, i.e. your main assertion from the petitioner that it should be somewhere completely different, how could you mitigate against Yarnfield Lane? Could you have a second road alongside and make it one way? Is there a proposal that's better than that if the Stone went ahead?

342. MR WILKINSON: You can mitigate anything but this is a C-class road, it's a totally rural environment, it's very popular with club cyclists, not so good for pedestrians, just to make it something that's more like a district distributor or a small primary road seems totally, well, it would cost a lot of money. Anything is possible in width but in terms of what we're trying to do here, I think it would be way, way – well, you can do anything but I would say to achieve 6.75 metres would take a lot more devastation of hedgerows and trees to achieve it.

343. THE CHAIR: Is there any other solution?

344. MR WILKINSON: There is another solution but it doesn't involve the railhead being at Stone. Did you expect another answer?

345. THE CHAIR: Just, joking apart, I was hoping for another answer because clearly, we know what you want. You don't want Stone but there is a possibility that it does go ahead in Stone and, if that does happen, we need to be aware of mitigation. There are other opportunities to mitigate, but it would be good to do it here.

346. MR WILKINSON: The only way to get to Yarnfield, except for the motorway, is via the other end of Yarnfield Lane, again another C-class road. If you were to put a wider road down to the A34 from the thing, then you're into serious junction design at the A34 as well which has a few limitations as we've seen.

347. THE CHAIR: Thank you.

348. MR CORNER: Thank you very much. Shall we go on then to the junctions please. So, I want to ask you first about the Yarnfield Lane A34 junction. So, I'm on, I think, slide 5.

349. MR WILKINSON: Yes, A40(5).

350. MR CORNER: Right. So, to begin with, I want to ask you about two things in

relation to this junction. I want to ask you first about the geometry of it and, secondly, I want to ask you about HS2 junction analysis and your views about it.

351. MR WILKINSON: Sure.

352. MR CORNER: So, deal first please with the junction and my short question is this, is the layout of that junction suitable for HGVs?

353. MR WILKINSON: No, it's not.

354. MR CORNER: Why?

355. MR WILKINSON: You can see from the junction here it's what we call a left-right minor road to primary road give way situation. You have Yarnfield Lane that meets the dual carriageway and a lot of traffic, because of the queues that you'll find along at the Walton island in the mornings will use this back to back right turn lanes to go into Trent Lane, but the key geometric decisions really are all around DMRB 4295 major/minor priority junctions.

356. MR CORNER: Well, hang on, that's a little technical. Can you just unscramble that a little, at least for me?

357. MR WILKINSON: *Design Manual for Road and Bridges*, technical design note 4295 gives all the parameters for the design of deceleration lanes, visibility splays etc. for such junctions. The first thing is that the deceleration lane and storage lane there is about half what it should be for the design speed of 85 kph so that's substandard anyway and, similarly, in this direction there is no effective diverge there. For an HGV, that should be at least, it could be over 45/50 metres long but it has to be, at the end of a 15 metre diverge, it has to be at least three metres wide so that the HGV is off the actual running lane and, similarly, there is no merge for that amount of vehicles if they were to turn left, which not many are proposed to do. So, without going into too much detail, the killer blow for HGVs in this particular one is the actual depth of the central reserve. That has to be at least capable of absorbing a right-turning vehicle that will do that in two moves, the length of that vehicle, and given that 20 tonners are just under 10 metres at 5.3 to 5.5 metres, that is totally unacceptable in safety terms. The rear end of the vehicle would be out in the running lane. This junction here has had nine injury

accidents in five years. Every one includes a right-turning vehicle out of there and we've had three this year.

358. THE CHAIR: A question from Sheryll.

359. MR WILKINSON: Yes, go on.

360. MRS MURRAY: Yes, just to say you keep saying that's not suitable for HGVs; are you saying no HGVs use that junction at the moment?

361. MR WILKINSON: The 7.5 tonne does allow for access to Yarnfield Lane for the odd delivery vehicle but it is totally unacceptable. It is used by vehicles and I have to admit that there are vehicles that will come out that are too long. Some do rat run from Cold Meece and come down there illegally and they do sit there and straddle the junction quite alarmingly.

362. MRS MURRAY: Just another supplementary if I may, Chair, through you. The A34, is that under the control of the local highways authority or is it Highways England?

363. MR WILKINSON: No, Staffordshire County Council are the highway authority who maintain it now, I think, throwing my memory back. In the late 90s, early 2000s it was drafted over to them. A lot of trunk roads were pushed back to the county highways to maintain and they have planning permission over them as well now.

364. MRS MURRAY: Thank you very much

365. MR WILKINSON: Thank you.

366. MR CORNER: So, just in terms of HGVs using this junction now, it's right, is it, that some illegally use it, despite the 7.5 tonne limit?

367. MR WILKINSON: Yes, it is almost self-enforcing. The police aren't sat there 24 hours a day. Because of the nature of the narrowness of the lane and the gradient, very few vehicles seem to do that.

368. MR CORNER: So, in conclusion on this, you've set out a lot of detail on it in your proof of evidence, is this junction suitable for adding the HGV traffic which it is

proposed to add with the construction at Stone?

369. MR WILKINSON: Purely on safety alone, regardless of capacity, it's totally unsafe and anybody visiting that site would come to that conclusion very quickly.

370. MR CORNER: All right, thank you very much. Next, I want to go to the junction analysis please. So, I wonder if I can just say I'm conscious, I gather that we were told that you would rise at 11.25 a.m., I'm changing topic. Obviously, we're in your hands.

371. THE CHAIR: I think you're indicating it might be convenient to have a break, which seems very – is that what you're suggesting?

372. MR CORNER: I was just wondering.

373. THE CHAIR: That's very convenient and thank you very much for the suggestion. We'll come back in eight minutes at 11.30.