

5th January 2013

To: **Kevin Richards**
Planning Case Officer
Lake District National Park Authority
Murley Moss
Oxenholme Road
KENDAL
Cumbria
LA9 7RL

Sent by e-mail to: planning@lakedistrict.gov.uk

Y/ref: 7 / 2012 / 2280

Dear Mr. Richards,

COMMENTS ON PLANNING APPLICATION 7 / 2012 / 2280
PROPOSED DEVELOPMENT OF LDNPA DEPOT AT THRELKELD STATION

I have just become aware of this planning application through the weekly lists circulated by e-mail. The list for the week ending 8th December 2012 on which this application was mentioned was only sent to us on the 22nd of December 2012, when most of the time allotted for comment had already passed.

I trust that it is not too late to comment as there are significant policy and practical issues involved.

I am rather surprised and concerned that we had not been contacted earlier, as this planning application directly affects the trackbed of the Keswick to Penrith Railway which we have been working for several years to re-open.

We have so far invested over £400,000 in design and development work on the Railway Re-opening Project, raised entirely from our supporters, many of whom live in the Lake District National Park and along the route of the Railway.

All such planning applications are therefore of great significance to us.

Relevant LDNPA policies and processes

The Lake District National Park Authority (LDNPA) included protection of the trackbed of the Keswick to Penrith Railway in its **Local Development Framework (LDF) core policies** adopted in October 2010.

Paragraph 3.10.3. states:

"The disused railway route from Keswick to Penrith is protected, within the National Park, as a sustainable transport route".

Paragraph 3.12.7. states:

"Keswick will continue to be the main tourist hub and access point for surrounding attractions".

Policy CS04 includes the following sentence:

"We will work with partners to protect the redundant Keswick to Penrith railway line from development that would compromise its future use as a sustainable transport route".

In this case we, CKP Railways plc, are the appropriate partners, as we have undertaken all the design and development work to date towards re-opening the railway.

Re-opening efforts supported and paid for by local residents

The money spent is not ours, but has all been invested by people in the area and far beyond who want to see the Railway re-opened as a public transport service.

No grant funding has been provided by local or national Government for this work.

St John's Parish Council and Keswick Town Council support our efforts to re-open the Railway.

Railway re-opening is feasible and viable

A Business Case analysis undertaken for the Northwest Regional Development Agency had positive conclusions with benefit to cost ratios from over 1 to potentially exceeding 3.

Expected numbers of passengers per annum are between 250,000 and 550,000 (comparable to or exceeding the numbers carried by the Windermere branch).

LDNPA Reports such as "Low Carbon Lake District" (June 2008) recognised the contributions which the re-opened Railway would make to the National Park's communications, economic development, visitor appeal and sustainability.

The current situation at Threlkeld station

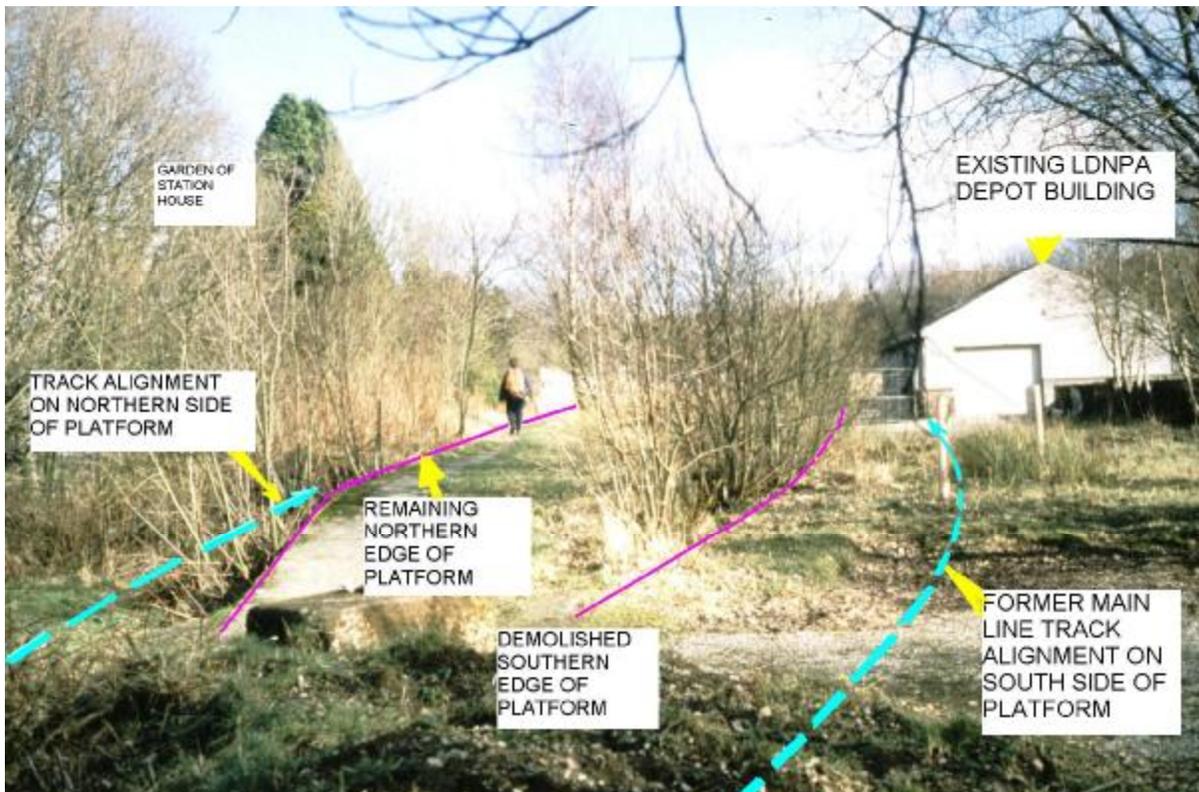
Plans of the proposed development, taken from the LDNPA planning website have been annotated to show how existing and proposed developments affect the railway alignment.

The existing depot building erected by the LDNPA already blocks part of the route through the station site and blocks the original track alignment to the south of the platform. That was the better, faster, track alignment with less sharp curves.

The track alignment on the north side of the platform is still clear, although overgrown – vegetation which can be easily removed and would not impede re-instatement of the Railway.

The northern platform edge is still in place and marks the absolute minimum ground which needs to be left undeveloped to allow the railway to pass through again.

The photograph below shows these features, viewed from the west (Keswick) end of the site.



Future station site could be compromised

Further development of the Threlkeld station site could make it difficult or impossible to re-instate a station for passengers at this location.

Threlkeld would be an important station for local residents travelling to Keswick and Penrith, visitors to the village, Quarry Museum, Business Centre, walkers, cyclists etc.

Not being able to reinstate two tracks at Threlkeld (due to the existing depot buildings and associated features) could also significantly limit the capacity and operational potential of the re-opened Railway.

No alternative route for the Railway

The station site at Threlkeld is constrained on all sides.

To the North, the surrounding ground is much lower with roads and occupied buildings such as the former station house. To divert the Railway to the north of the former station site would require massive earthworks, road diversion and major intrusion on private property.

To the south, the road to the existing houses, Business Centre and Quarry Museum, together with its earthworks would pose a significant obstacle which would entail significant re-arrangement. Diverting the Railway to the south would also cut off road access to the LDNPA depot.

Either diversion, if feasible, would add many millions of pounds to the cost of re-opening the Railway. The practical limits on railway curvature and gradients could mean that any diversion might require slower train speeds and could hamper the ability of the re-opened Railway to offer an adequate service.

Developing on the remaining trackbed would give the wrong impression

It is unfortunate that the LDNPA built its existing depot in such a way that it blocked the best railway alignment through the Threlkeld station site.

We strongly feel that any development of the remaining unimpeded trackbed, which goes to the north side of the platform, would be in-appropriate as the finished works would appear visually as a new "obstacle" - physically blocking a Railway route which is "protected" by LDNPA Policies for re-opening.

Adding costs and complexity for re-opening the Railway

The works proposed in planning application 7/2012/2280 would add significantly to the scope and cost of re-opening the Railway.

At the time of re-opening, had the work under this planning application been completed, it would be necessary to remove some of the works proposed by this planning application, re-instate earthworks for the Railway and re-arrange parking and access for the LDNPA depot (again).

Allowing the works to go ahead as proposed in application 7/2012/2280 would, we believe, create the impression that the LDNPA had allowed the line to be "blocked", in contradiction of its own Policies.

It might also give the impression that adding to the cost and complexity of re-opening the Railway was not considered a problem by the LDNPA. That would be entirely negative for all parties.

Suggest restrict works so as not to impinge on the northern track alignment

Compliance with LDNPA Policies could be achieved if the works under this planning application were constrained so as NOT to impinge on the trackbed to the north of the platform.

This would only slightly reduce the layout of the depot site and would, we suggest, not cause any significant difficulties for operation of the LDNPA depot.

The land required for the track itself, plus safe clearances to either side should be safeguarded.

This would overlap part of the platform area, whether in use for passengers or not.

The diagram below illustrates the standards that the re-opened Railway would be expected to comply with. Nothing should be sited or come within 2.5 metres of the line of the platform edge, to ensure that the safe operation of trains is not compromised. The railway must, by law, be fenced off from all other activities. It is not allowable to plan for other activities, such as road vehicle turning, to “overlap” into this space.

Uncontrolled When Filled

Railway Group Guidance Note
GNR8573
Issue 1/19
Date: October 2004
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Guidance on Gauging

Part J Development of a structure gauge

J1 A possible structure gauge for Britain

The following model shows the development of a standard structure gauge based upon the parameters discussed in sections J2 and J3.

The 2700 mm gauge width is based upon the operational BR standard gauge defined in ER (Trackbook) and further detailed in European Railway Group Standard GS/ERT2004.

The three vertical and lateral lines used to describe dimensions perpendicular to, and parallel with, the general line axis, respectively, irrespective of track cant.

Figure 4. Model structure gauge requiring minimum associated control measures (applicable only to straight and level tracks)

J2 Basis for lateral clearances

J2.1 Basis for lateral clearances
Lateral clearance is determined according to the widest vehicle, and the clearance is also always required, depending on speed. There are additional requirements at platforms.

J2.2 Assumed width of kinematic envelope
Lateral clearance are based upon a maximum kinematic envelope width of 2020 mm. This is assumed to:

- (i) Wheelbase at centre (2020 mm) plus 200 mm lateral clearance on level
- (ii) Wheelbase (2020 mm) plus 100 mm lateral clearance on level

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We would be more than happy to discuss possible courses of action with any or all parties involved to reach a mutually acceptable solution.
Yours sincerely,

Cedric Martindale
Director
CKP Railways plc

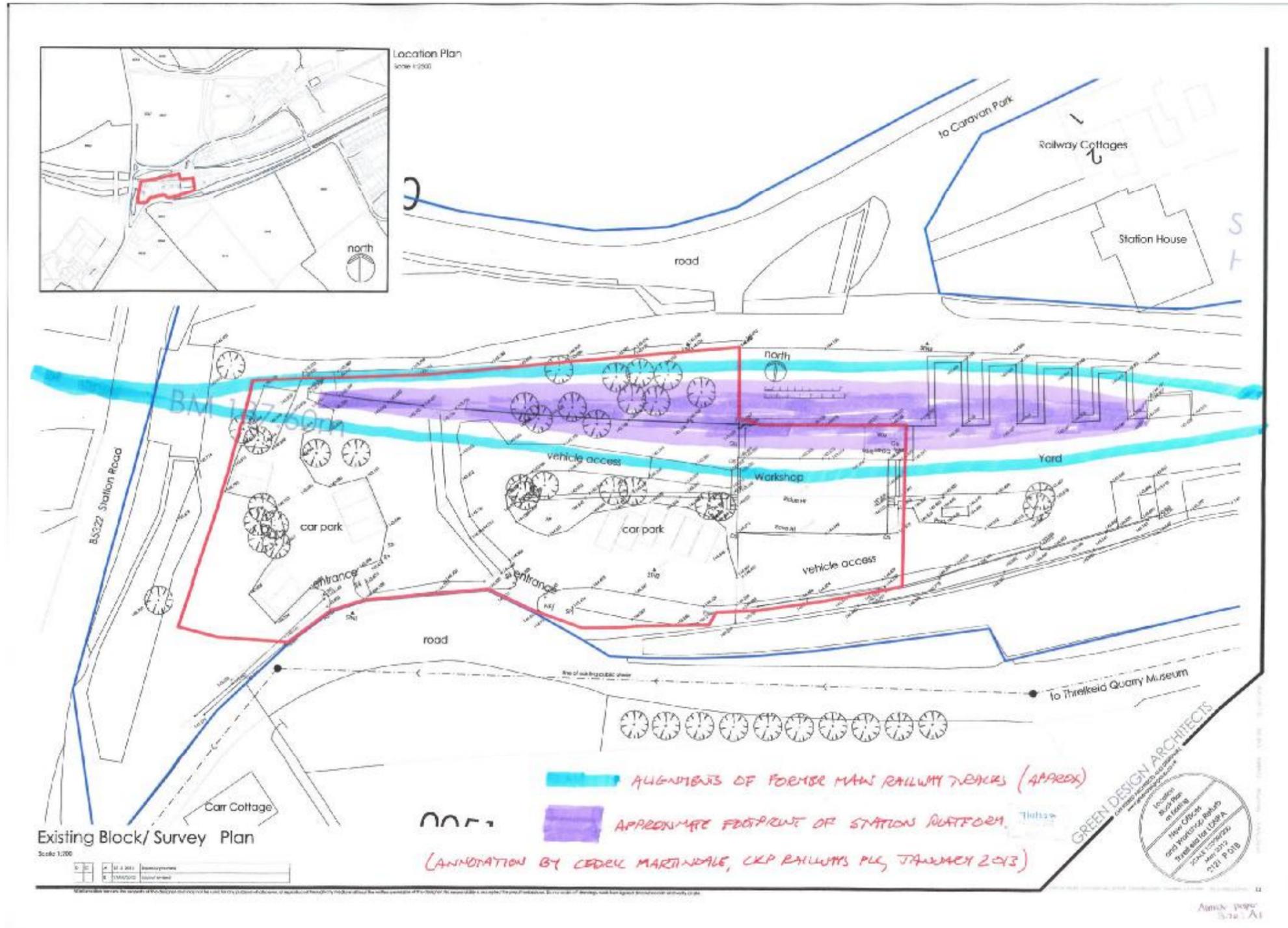
E-mail: ckp@martindale.f9.co.uk

Reference documents: “Low carbon Lake District” report LDNPA June 2008
 Lake District Transport Framework April 2009
 LDNPA Sustainable Transport five point plan Dec 2009
 LDNPA Core Strategies adopted October 2010

Attachments:

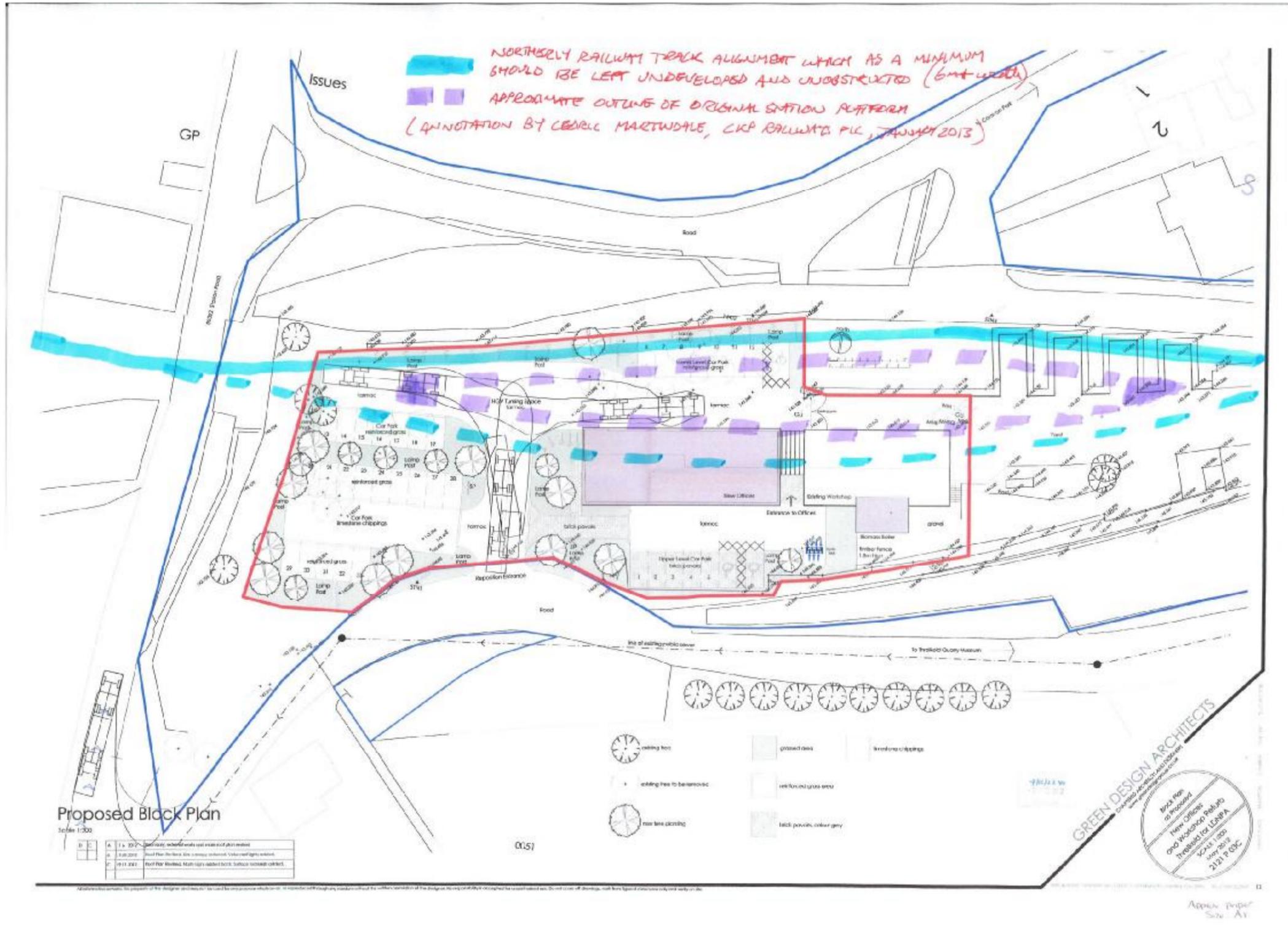
Annotated site plans as existing and proposed, taken from the LDNPA planning website.

EXISTING THRELKELD STATION AND LDNPA DEPOT SITE PLAN WITH FORMER RAILWAY LAYOUT (MAIN RUNNING LINES ONLY) SUPERIMPOSED
Threlkeld station had two platform faces so that trains could pass in opposite directions.



SITE PLAN AS PUBLISHED ON LDNPA PLANNING WEBSITE FOR APPLICATION 7 / 2012 / 2280. ANNOTATED BY C. MARTINDALE FOR CKP RAILWAYS PLC JANUARY 2013

PROPOSED THRELKELD STATION AND LDNPA DEPOT SITE PLAN WITH MINIMUM LAND SAFEGUARDING REQUIRED FOR RAILWAY RE-OPENING SINGLE TRACK ONLY - LIMITATION DUE TO EXISTING DEVELOPMENT ON THE SITE



SITE PLAN AS PUBLISHED ON LDNPA PLANNING WEBSITE FOR APPLICATION 7 / 2012 / 2280. ANNOTATED BY C. MARTINDALE FOR CKP RAILWAYS PLC JANUARY 2013