

02 November 2018

To: **Planning Services**
Lake District National Park Authority
Murley Moss
Oxenholme Road
KENDAL
LA9 7RL

Sent via e-mail to planning@lakedistrict.gov.uk

Dear Sir / Madam

OBJECTION TO PLANNING APPLICATION 7/2018/3087
INSERTION OF MULTIPLATE ARCH UNDER BRIDGE 94 AT GILLSROW

Thank you for your letter of 15th October 2018 inviting our comments on this application. CKP Railways plc strongly objects to this application because:

- (a) It would create a permanent obstruction to the operation of trains on the re-opened Keswick to Penrith Railway which we have been working towards for the past 20 years, including a design package funded by our supporters' investments
- (b) Such obstruction would contravene Lake District National Park Core Authority (LDNPA) Core Policy CS14, adopted in 2010, which protects the route for future sustainable transport use including as a railway
- (c) A Planning Inspector upheld refusal of application 7/2013/2090 to infill Bridge 91 because "it would only add to existing obstacles and further reduce the medium to longer term prospects of a sustainable transport route reopening" (i.e. the railway) – thereby endorsing policy CS14 to facilitate the railway re-opening.

IMPORTANCE OF LEAVING THE BRIDGE UNOBSTRUCTED

The bridge crosses what was formerly a double track railway. Reinstatement of a double track railway is essential to provide a fully flexible railway able to provide frequent services of modern passenger trains to connect Keswick and the North Lakes directly with other parts of the UK using modern trains.

The clearance under the bridge was already restricted by modern standards, leaving no margin for reduction.

Reducing the line to single track width would allow only an hourly service between Keswick and Penrith - no extra services at peak times, to serve special events or to carry freight. Cumbria LEP has also recognised the potential value of a line through the North Lakes able to serve freight needs on the Cumbrian coast including the Port of Workington (operated by Cumbria County Council).

Any reduction in height clearance under the bridge would make it impossible to operate modern mainline trains on the route.

Specially sized trains, light rail or narrow gauge operation would not be viable as the key advantage of through operation to and from other parts of the national network would be lost and additional costs to provide interchanges at Penrith.

The LDNPA Management has a strategic vision for a rail link extending further east and west as part of its drive to increase the proportion of visitors arriving by public transport from less than 10% now to over 40%.

That vision was launched in the 2008 report "Low Carbon Lake District" which envisaged Keswick as a transport hub for the northern Lake District.

Such a hub will only be possible with a fast modern rail link to the national network – similar to, or better than, that currently serving Windermere and the southern Lake District. .

Every obstruction along the route adds costs to the reopening and threatens future carrying capacity (and thus revenue of the route – as recognised by the Planning Inspectorate.

APPLICATION NOT TECHNICALLY JUSTIFIED

The work actually needed is to replace the bridge deck which has become weak. For a structure of such age, designed for lighter traffic replacement now should not be unexpected.

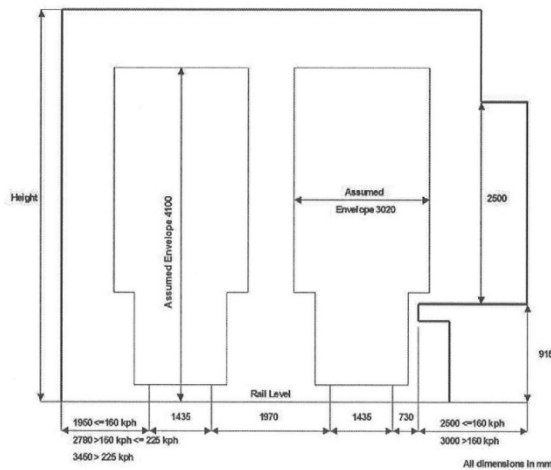
The Applicant has not demonstrated that the proposed method is the most cost effective or has more long term benefits than simply replacing the deck with a modern fabricated items designed to carry modern road vehicles.

CKP Railways plc believes that the method proposed would require more work on site, and be more disruptive to neighbours but not guarantee the long term future of the bridge.

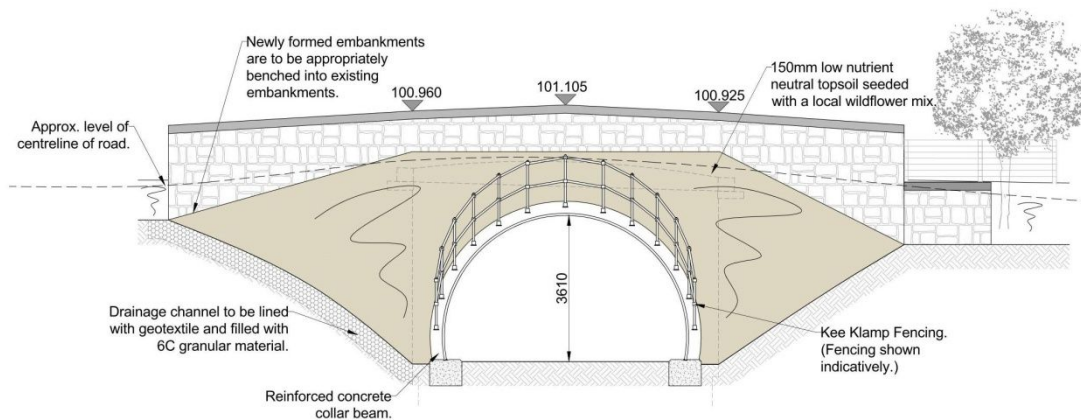
IMPOSSIBLE TO OPERATE TRAINS UNDER THE MODIFIED BRIDGE

The diagrams below indicate the clearance required by the current Railway Group Standards applicable to modern main line railways to carry passenger and freight trains, against the clearances which the Applicants' work would provide.

Clearly it will be impossible to operate modern trains through the bridge as modified by the Applicants' proposed work.



CLEARANCES REQUIRED BY RAILWAY GROUP STANDARD GE GN 8573



NORTH ELEVATION
SCALE 1:100

CLEARANCES WHICH WOULD BE LEFT BY THE APPLICANTS' PROPOSAL

Modern trains require a clear height of more than 5 metres below a bridge deck with a flat top profile (rectangular space) to allow for train + track + ballast above formation level.

Clear width required for double track through structures minimum 7.2 metres (vertical wall).
Clear width required for double track through structures minimum 3.8 metres (vertical wall).

If approved, the work proposed by the Applicants would load more costs onto the future railway reopening. The future railway operator would have to:

- Undo the Applicants' work
- Remove foundations, re-compact ground and realign drainage
- Repair damage to the abutments caused by adhered concrete
- Replace the bridge deck and dispose of the concrete infill

Clearly this would be much more expensive than simply replacing the deck now.

The Applicants are therefore unfairly proposing to load costs onto the future railway, while failing to demonstrate that their preferred solution is actually the most cost effective today. This contravenes LDNPA core policy CS14.

To comply with its own policies, the LDNPA should refuse this application.

The LDNPA has already been supported by the Planning Inspectorate in refusing an application which would similarly obstruct the railway re-opening and so should have full confidence in its stance based on related planning history.

Yours sincerely,

Cedric Martindale
Director
CKP Railways plc