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**Public Inquiry on the Network Rail (London to Corby) (Land
Acquisition, Level Crossing and Bridge Works) Order**

Proofs of Evidence

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Cycling Campaign for North Bedfordshire

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CCNB Proofs of Evidence

- 1 Cycling Campaign for North Bedfordshire (CCNB) for its 'Proof of Evidence' has taken in order the matters to be raised given in the Department for Transport's Statement of Matters published by the TWA Orders Unit in November 2018 [**GI02**].

- 2 **The aims and the need for the proposed Network Rail London to Corby (Land Acquisition, Level Crossing & Bridge Works) Order Scheme ("the scheme").**
 - 2.1 CCNB has no comments to make.

- 3 **The main alternative options considered by Network Rail and the reasons for choosing the proposals comprised in the scheme.**
 - 3.1 CCNB has not been party to any of the alternative options considered.
 - 3.2 Proposals for a dual use cycle/pedestrian path across the bridge and an underpass into the station car park were first discussed with Bedfordshire County Council (BCC) and Railtrack, the precursor to Network Rail in the late 1990s.
 - 3.3 Bedford Borough Council, who replaced BCC in April 2009, took these proposals on board and discussed them with Network Rail in initial discussions (in 2013/14) when the need to raise the bridge was found necessary to allow for the electrification of the Midland Main Line.
 - 3.4 No information had been given out at any of the quarterly Cycle Strategy Group meetings attended by CCNB with Bedford Borough Council between 2014 and 2018 as to what Network Rail was designing and it was not until immediately prior to a short notice public consultation on Friday 20 April 2018 that a plan, dated March 2017, was first seen.

4 The extent to which the proposals in the TWA Order are consistent with the National Planning Policy Framework, national transport policy and local planning, transport and environmental policies.

4.1 CCNB has examined the following policies;

The National Planning Policy Framework
National Policy Statement
Cycling and Walking Investment Strategy
Bedford Development Framework
Core Strategy and Rural Issues Plan
Allocations & Designations Local Plan
Town Centre Area Action Plan
Local Transport Plan
Local Plan 2030

4.2 All the policies indicate that sustainable transport, cycling and walking, must be considered and incorporated in all new or modified transport schemes.

4.3 Taking each relevant policy in turn:

4.4 The National Planning Policy Framework (NPPF)

4.4.1 At the heart of the NPPF [NR32] revised in July 2018 is a presumption in favour of sustainable development and one promising aspect of the document, unlike the previous NPPF is a section (Section 9) on Promoting Sustainable Transport.

4.4.2 The policy on assessing the transport impact of proposals now refers to highway safety as well as capacity and congestion in order to make it clear that designs are expected to prioritise pedestrian and cycle movements, followed by access to high quality public transport (so far as possible) as well as to reflect the importance of creating well-designed places.

4.4.3 *Paragraph 102* states that “transport issues should be considered from the earliest stages of plan making and development proposals, so that opportunities to promote walking, cycling and

public transport use are identified and pursued”.

4.4.4 **Paragraph 104** goes on to say that planning policies should ... provide for high quality walking and cycling networks and supporting facilities such as cycle parking – drawing on Local Cycling and Walking Infrastructure Plans”.

4.4.5 **Paragraph 106** states that “... In town centres, ... measures should be taken to promote accessibility for pedestrians and cyclists”.

4.4.6 It continues under **Paragraph 110** to say that applications for development should “(a) give priority first to pedestrian and cycle movements, ; (b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport and (c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, ”.

4.5 National Policy Statement (NPS)

4.5.1 The NPS [NR33] was adopted in December 2014. CCNB has no issue with the need for the development to increase capacity on the national rail network but the NPS also states the need to reduce congestion, etc ... through the use of sustainable transport - buses, cycling and walking. Although the policy refers to strategic rail and road networks and the proposed scheme falls out of the Government's set threshold, the policy has been used by Network Rail in its 'Statement of Case'.

4.5.2 Under **Paragraph 2.16** it states traffic congestion constrains the economy and impacts negatively on quality of life.

4.5.3 **Paragraph 2.21** states across Government, policies are being implemented and considered which encourage sustainable transport modes including public transport, significant improvements to rail capacity and quality, cycling and walking.

4.5.4 **Paragraph 3.2** says the Government recognises that for development of the national road and rail networks to be sustainable these should be designed to minimise social and environmental impacts and improve quality of life. - air quality - safety.

- 4.5.5 There is a large section on Sustainable Transport starting at **Paragraph 3.15** stating that the Government is committed to providing people with options to choose sustainable modes and making door-to-door journeys by sustainable means an attractive and convenient option. This is essential to reducing carbon emissions from transport.
- 4.5.6 **Paragraph 3.16** talks about the Government's commitment to sustainable travel it is investing in developing a high-quality cycling and walking environment to bring about a step change in cycling and walking across the country.
- 4.5.7 The Government in **Paragraph 3.17** expects applicants to use reasonable endeavours to address the needs of cyclists and pedestrians in the design of new schemes and to correct historic problems where has been barrier and retrofitting the latest solutions to make routes more easy and safe for cyclists.
- 4.5.8 On the rail network, **Paragraph 3.18**, Station Travel Plans are a means of engaging with station users and community organisations to facilitate improvements that will encourage them to change the way they travel to the station.

4.6 Cycling and Walking Investment Strategy (CWIS)

- 4.6.1 The government published the CWIS [NR85] in 2017 which outlined the government's ambition to make cycling and walking a natural choice for shorter journeys, or part of a longer journey (for example by train). Without the provision of safe cycling infrastructure across the bridge this will be harder to achieve.
- 4.6.2 If levels of walking and cycling are increased, the benefits are substantial. For people, it means cheaper travel and better health, for businesses, increased productivity and increased footfall in shops and for society as a whole, lower congestion, better air quality, and vibrant, attractive places and communities.
- 4.6.3 **Paragraph 1.16** shows, there is significant potential for change in travel behaviour. Two out of every three personal trips are within five miles - an achievable distance to cycle for most people, with many shorter journeys also suitable for walking. For school children, the opportunities are even greater. Three quarters of children live within a 15 minute cycle ride of

a secondary school, while more than 90% live within a 15 minute walk or bus journey from a primary school.

4.6.4 *Paragraphs 1.6, 1.7, 1.8 and 1.19* give the many economic, physical and health (including mental health) benefits of walking and cycling and state that they should be seen as transport modes in their own right and an integral part of the transport network, rather than as niche interests or town-planning afterthoughts.

4.7 Bedford Development Framework

4.7.1 Bedford's Development Framework is made up of a series of Local Development Documents; the Core Strategy and Rural Issues Plan, the Allocations & Designations Local Plan and the Bedford Town Centre Area Action Plan.

4.8 Bedford Core Strategy and Rural Issues Plan

4.8.1 Bedford Borough's Core Strategy and Rural Issues Plan [NR52] was adopted in 2008 and provides the overall strategy for the borough up to 2021.

4.8.2 One of the key objectives of the plan in *Paragraph 3.10* point 8 is:

Support the delivery of coordinated transport improvements with the emphasis on non-car modes, improving east-west communications and achieving greater transport interchange.

4.9 Bedford Allocations & Designations Local Plan

4.9.1 Bedford Borough's Allocations & Designations Local Plan [NR53] was adopted in July 2013 and provides detailed proposals to meet the borough's development requirements up to 2021.

4.9.2 4.8.2 is repeated in *Paragraph 1.14*

4.9.3 Chapter 12 - Cycling Network states in *Paragraph 12.1*:

The Council aims to achieve a comprehensive cycle network including radial routes into

Bedford and Kempston centres, routes across the urban area north-south and east-west in order to encourage a greater number of cycle trips. Links between the main urban area and the surrounding villages will help this become more achievable.

4.9.4 Policy AD39 Cycling

The Council will require the protection, enhancement and promotion of cycle routes and facilities including those shown on the Policies Map, and seek the provision of new routes and facilities for cyclists which are safe, convenient and attractive, particularly in association with major development and transportation proposals. River and rail crossings will include provision for cyclists where appropriate.

4.9.5 In the Allocations & Designations background paper 'Cycle Network' [NR87] adopted in March 2012 No 4 in the required improvements to the Cycle Network was given as:

Bromham Road railway bridge. This is cited as a major barrier for children cycling from Brickhill to Biddenham Upper School. Possible links with Bedford Rail Station redevelopment (possible underpass Spenser Road to station) and dropped kerb to Spencer Road (Toucan crossing planned as part of Land North of Bromham Rd. development at Ashburnham / Shakespeare Road).

4.10 Bedford Town Centre Area Action Plan

4.10.1 Bedford Borough's Town Centre Area Action Plan [NR69] was adopted in 2008.

4.10.2 In **Paragraph 3.2** it states for a better connected centre:

To improve access to the town centre through the provision of new public transport interchanges, new highway infrastructure, public transport priority when feasible, the use of park and ride facilities and improved facilities for pedestrians, cyclists, taxis and private hire vehicles. Where and when highway capacity can be increased, priority should be given to modes other than private cars.

4.11 Bedford Local Transport Plan

4.11.1 The LTP3 [NR35] was adopted in 2008 and sets out the borough's long term transport strategy supported by eight strategies; active travel, freight, network management, parking, passenger transport, road safety, sustainable modes of travel to school and transport asset management.

4.11.2 *Paragraph 1.1.2* gives a vision for Transport in Bedford Borough:

To create a transport system in which walking, cycling and public transport are the natural choices of travel for the majority of journeys because they are affordable, healthy, convenient and safe alternatives to the private car.

4.11.3 Bedford's Goals under the LTP include the development of a strong low carbon network, which encourages modal shift away from single vehicle use, into and within the town and between key facilities, the reduction of the number of children travelling to and from school by car, the increase in accessibility by non car mode to key services such as education and employment and to include non car travel considerations in investment and service planning decisions.

4.12 Bedford Local Plan 2030

The Local Plan 2030 draft [NR54] for submission September 2018 states under 4 Objectives point 7:

Improve the borough's transport infrastructure in order to support growth in the local economy and to make the borough more attractive as a place to live and do business. Reduce congestion in the borough, particularly into and around the town centre and by making journeys by public transport, walking and cycling more attractive to encourage an increase in more sustainable and healthy modes of transport.

5 The likely impact of the exercise of the powers in the proposed TWA Order on land owners, tenants and statutory undertakers, including any adverse impact on their ability to carry on their business and undertakings effectively and safely and to comply with any statutory obligations applying to their operations during construction and operation of the scheme.

5.1 CCNB has no comments.

6 In relation to the reconstruction of the bridge carrying Bromham Road over the Midland Main Line:

6.1 the possible provision of a dedicated cycleway and segregated pedestrian footway;

6.1.1 CCNB is grateful to the Mayor of Bedford for proposing to build a separate cycle/ pedestrian bridge on the north side at an estimated cost of £3 million, the scheme being added to the Borough's 2019/2020 Capital Programme. For this to be installed it will require a strip of land parallel to the existing bridge estimated by CCNB at around 5.5 metres wide (4.5 metres for the bridge to give a 4.0 metres minimum width for the cycleway with a 1 metre separation from the main bridge).

6.1.2 Extra permanent land would be required and the nearby presence of five protected London Plane trees within a community garden may be a problem for planning approval.

6.2 adequacy of the design of the bridge for all users including wheelchair users and cyclists;

6.2.1 CCNB has no objection to the rebuild of the bridge only to the absence of a dual use cycle/pedestrian path across the bridge on the north side.

6.2.2 **Present Bridge** - The present bridge has a south footpath width of 1.579 metres, a carriageway width of around 7.1 metres and a north footpath width of 1.96 metres.

6.2.3 **Proposed Bridge** - Network Rail's proposed bridge [**Document NR10 - Drawing Number 143058-JMS-DRG-ECV-140201 Revision A02 of 19 April 2017**] is approximately 600 mm wider than the current bridge obtained by using narrower 430 mm wide parapets. The proposed deck profile is a 2.0 metres south footpath, 7.2 metres carriageway and 2.0 metres north footpath, to give a total width of 11.2 metres between parapets. The height of the parapets is 1.85 metres minimum. The overall height of the bridge will be increased by approximately 320mm.

6.2.4 The north footpath is therefore almost the same width as at present which is insufficient for a dual use cycle/pedestrian path.

- 6.2.5 For a two way dual use cycle/pedestrian path on the north side, Department for Transport Shared Use Routes for Pedestrians and Cyclists (LTN 1/12) [**OBJ/15.2c**] under paragraph 7.34 recommends a preferred minimum effective width of 3.0 metres where the route is not bounded by a vertical feature. As the parapet height of the proposed bridge is 1.85 metres minimum, under paragraph 7.46 of the same document 0.50 metres must be added to give a total minimum width of 3.5 metres.
- 6.2.6 For the gradient, Department for Transport Cycle Infrastructure Design (LTN 2/08) [**OBJ/15.2d**] under paragraph 8.7.2 recommends a maximum gradient of 3 per cent but this can rise to 5 per cent over a distance of up to 100 metres. Note - A gradient of 5 per cent is usually taken as the standard for the design of footpaths for manual wheelchair users.
- 6.2.7 Network Rail has put forward a number of reasons for not being able to increase the width further:
- 6.2.7.1 **The budget for the bridge rebuild is extremely tight and the brief is to build only like for like.**
- 6.2.7.1.1 CCNB has not seen the cost allocated to the bridge rebuild or the initial brief although national and local policies (see Paragraph 4 above) on sustainable transport state that the provision of cycling and walking must be considered in all new and improved schemes.
- 6.2.7.2 **It is planned to demolish the existing piers only halfway. A wider bridge would require full demolition and rebuild from the ground upwards with a significant increase in costs to the tax payer.**
- 6.2.7.2.1 CCNB has not seen the estimated cost increase for a wider bridge. It disputes the necessity of having to completely demolish the bridge piers to achieve the extra 1.0 to 1.5 metres width required. A number of options should be possible:

- 6.2.7.2.2 (a) re-assignment of the proposed road bed from 2.0/7.2/2.0 metres to 1.5/6.3/3.5 metres with a 20mph speed limit and HGV ban except for access [**OBJ/15.2e**];
- 6.2.7.2.3 (b) building a 1.0 metre wide cantilever on the north side of each pier to give, for example, a road bed width of 2.0/6.7/3.5 metres;
- 6.2.7.2.4 (c) building a 0.50-0.75 metre wide cantilever on both the north and south sides of each pier to give, for example, a road bed width of 2.0/6.7-7.2/3.5 metres.

6.2.7.3 Amendments would have to be made to the existing approach road alignment to cater for a wider road profile.

6.2.7.3.1 The extra width in (b) above is only required on the north side and would not affect the existing approach road alignment.

6.2.7.3.2 Only a slight road alignment is required to give the extra width in (c) above.

6.2.7.4 A wider road would require the acquisition of additional land which would impact on nearby residential properties. It has also been stated that some houses close to the bridge would have to be compulsory purchased [OBJ/15.2b].

6.2.7.4.1 The extra width required on the north side would be less than that required for a separate cycle bridge and would not impact on nearby properties.

6.2.7.4.2 Plans of the proposed bridge show there is adequate room for extra width on each side of the bridge.

6.2.7.5 There was a priority to minimise disruption to Bedford residents. A new bridge would take much longer to build and increase disruption to road and rail users.

6.2.7.5.1 CCNB believes a few days extra construction time on top of the expected construction time of 13 months (including 6 months bridge closure) is insignificant when building a 'fit for all users' bridge which would be expected to last at least 100 years.

6.2.7.6 The provision of a new dedicated cycleway and segregated pedestrian footway would be an enhancement and sits outside the current scope and funding for this scheme, particularly as this structure is not in Network Rail's ownership. No feasibility studies have been undertaken to determine whether this option is workable.

6.2.7.6.1 There have been two previous attempts over the last 19 years to build a separate cycle bridge but funding and, in one case, planning permission has not been available (see paragraphs 6.1.1 and 6.1.2). This is why the proposed rebuild of the bridge is a 'once in a lifetime' opportunity to have a cycle path included for the reasons cited in this document.

6.3 impact on community gardens facilities and mature trees;

6.3.1 CCNB's proposals to slightly increase the width of the bridge over that proposed by Network Rail will have significantly less impact than the construction of a separate bridge (see paragraph 6.1).

6.4 impacts on Bedford station and future rail development;

6.4.1 The provision of a dual use cycle/pedestrian path across the bridge would have no more impact than the initially proposed bridge rebuild.

6.5 impact of construction work and temporary alternative route on nearby residents and users of the Bromham Road bridge;

6.5.1 There are concerns of the access of cyclists across the temporary bridge - will tricycles, tandems and bikes with child trailers, etc be able to cross. No details have been given apart from the fact that cyclists will have to walk across with their bicycles.

6.6 environmental impacts including daylight to residential buildings, noise, vibration and dust.

6.6.1 CCNB has no comments. Impacts should be covered by planning conditions mentioned in 6.8.

6.7 CCNB has no comments to make on the DfT's (November 2018) Statement of Matters numbers 6 to 8.

6.8 The conditions proposed to be attached to the deemed planning permission for the scheme, if given, and in particular whether those conditions satisfy the six tests referred to in Paragraph 206 of the National Policy Framework. [Note Paragraph 55 in 2018 revision NR32]

6.8.1 CCNB has no comments.

6.9 Network Rail's proposals for funding the scheme.

6.9.1 CCNB has no knowledge on the scheme's funding.

6.10 Whether the statutory procedural requirements have been complied with.

6.10.1 CCNB has no comments

6.11 Any other matters which may be raised at the inquiry.

6.11.1 CCNB has no further matters to raise.