



Great Fen Project Partnership response to Network Rail closure of East Coast Main Line level crossings and mitigation options Stage Two consultation.

Introduction

This is a further response to Network Rail's proposed closure of East Coast Main Line level crossings and mitigation options, being a response to the Stage Two consultation process.

The response is that of the Great Fen Steering Committee, through which the Great Fen Project Partners act collectively in the interests of the Great Fen.

The Great Fen Project Partners are: Environment Agency, Huntingdonshire District Council, Middle Level Commissioners, Natural England, and the Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire.

The constituent members of the Project Partnership may also, in addition to this response, submitting individual responses from their organization. All such responses, although varying in nuance and emphasis, have the broad support of the Project Partnership.

This is perforce a limited response, and the Project Partners are disappointed that it has still not had the opportunity to examine any technical details, such as scale plans of proposed bridges, profiles of embankments etc., nor an Environmental Impact Assessment.

The Project Partners understand that the phase 2 consultation may result in further refinement of Network Rail's preferred options prior to submission to the Department of Transport, and that, the EIA and technical submission drawings have not been fully prepared yet. This being so, the Steering Committee's views regarding key issues (such as the impact on the natural environment of radius of development around new structures, such as mitigation for protected species) are still not definitive.

Although the Project Partners note that the formal consultation is due to close on 7th February 2015, their strongly held view is that this consultation end date must be extended to allow time for consideration of the technical details and the EIA when they finally become available.

The Project Partners absolutely reserve the right to make further comments once technical information and the EIA becomes available

The Project Partners welcome ongoing and constructive engagement with Network Rail.

The closures

There are 4 level crossings within the Great Fen which will be included in this programme of closures. These are (from north to south):-

Level crossing name	Location	Grid Ref.
Yaxley Lode	500m south of Great Drove,	TL 196 915

	Yaxley.	
Holme Lode	500m north of Short Drove, Holme Fen.	TL 197 888
Holme	50m west of Station Road, Yaxley Road junction, Holme.	TL 198 877
Conington North	Church Lane Conington, adjacent to Conington Brook.	TL 199 861

Yaxley Lode TL196 915

Network Rail's preferred option following stage one consultation

Close the existing level crossing and divert users via the existing rail underpass on Great Drove approximately 680m to the north, with a new footpath link from Great Drove road to Yaxley Lode along the undefined farm access track to east of the ECML.

Travel distance from point (A) to (B) via FP277/14 is approximately 1.2km.
Alternative route via underpass 175 is approximately 1.3km

Crossing will be fenced & secure to prevent any access

Great Fen Project Partners' response to stage two consultation

- The Project Partners are disappointed not to see any provision for small parking area and cycle racks adjacent to existing underpass. Some provision for vehicle parking/cyclists will be desirable if the new footpath link from Great Drove road to Yaxley Lode along the undefined farm access track to east of the ECML is created.
- The Project Partners reiterate that existing FP 277/15 at present terminates short of Froghall Bridge (and thence into the Great Fen's land), the Project Partner's view is that whilst it is indeed desirable that this route be completed (thus giving access from Yaxley to the Great Fen via the north bank of the Yaxley Lode) any route over Froghall Bridge would be permissive.
- We welcome the confirmation that crossing will be fenced & secure to prevent any access.

Holme Lode TL 197 888

Network Rail's Preferred option following stage one consultation

Holme Lode: This unclassified public highway crossing will be closed with all users diverted directed to the new road bridge over the ECML 135m to the south of the existing Holme level crossing, and approximately 1.3km to the south of Holme Lode level crossing.

A new access to Holme Lode and the National Nature Reserve will be provided to the east of the ECML with access taken from the B660, Long Drove, following well defined existing access tracks and new dedicated bridleway & cycle route.

Great Fen Project Partners' response to stage two consultation

- The Project Partners would oppose any **Right of Way** into the NNR via a new access to Holme Lode and the National Nature Reserve (to the east of the ECML with access taken from the B660, Long Drove); a Permissive Path is more acceptable.
- The land immediately to the east of the proposed new access route is in the ownership of the Wildlife Trust and is under restoration by the Great Fen, these areas are called Park and Home Farm (southern portion) and Summer Standing (northern portion). New habitat areas have been created in both areas; both areas are grazed by cattle. Separation from walkers (especially dog walkers) would be preferred, thus a fence on the eastern side of the new access route would be necessary. The Project Partners query how attractive a walk alongside the railway line between two fences would actually be?
- It is intended that the new access is both a surfaced cycle route and bridleway. Details of surface materials and construction, width of access route, and separation (for safety reasons) of the three types of user (walkers, cyclist and horse riders) have not been provided and therefore the Project Partners cannot comment. All the above unknowns will impact upon the environment and management regimes and the absence of information is a major concern to the Project Partners.
- The Environmental impact of the proposed new access route is unknown at this stage. The Project Partners note Natural England staff view that fragile habitats and interesting botanical species, characteristic of the NNR, in this area, i.e. along the path of the proposed route, are likely to be adversely impacted.
- The Project Partners have concerns regarding the proposed provision of a bridleway along this route as it potentially creates management issues, and therefore issues of environmental protection, for the NNR. The present Open Access to the NNR excludes horses, and the Project Partners consider that this position is likely to be eroded should the new route be opened to horses. Riders using the new route to its northern end will emerge on to the truncated minor road through the NNR into the heart of the NNR.
- The Project Partners understand that Natural England has similar concerns to those relating to horses as to unauthorized mountain bike /off road cycling into the NNR, and the project partners share those concerns.
- The Proposed carpark on the Wildlife Trust's nature reserve (newly restored habitats) at the southern end of new access route is not acceptable. Some sensible and appropriate provision for visitor parking should be made but alternative options with less environmental impact and more sensitivity as to appropriate location and impact on land management should be assessed.
- The Project Partners understand that Yaxley Parish Council may suggest a tunnel under the existing Holme Lode crossing to maintain pedestrian access for Yaxley and Holme residents to Holme Fen NNR in current location. If so, the Project Partners would not oppose, and would find this preferable to proposed new access route as presently suggested.
- No details have been made available on how the closed section of Holme Lode would be maintained, by whom, at whose cost. This is a matter of concern to the Project Partners.

Holme TL 198 877

Network Rail's Preferred option following stage one consultation

Holme: This public highway (B660) crossing will be closed to all public access. Construct a new public highway road bridge over the ECML 135m to the south of the existing Holme level crossing and direct all users of the B660 over the new crossing.

Great Fen Project Partners' response to stage two consultation

- See comments above regarding the Project Partner's views on the proposed new access route to the NNR east of ECML.
- The Project Partners are unable to make informed and detailed comment on the proposed bridge and its environmental impact without sight of the EIA and technical details.
- The Project Partners consider Option One (more southern location) of bridge as being preferred to Option Two.
- The Project Partners have grave concerns regarding the visual impact of (a possibly) 10m high bridge and embankments on the flat fenland. Network Rail would be creating what is essentially a hill within a flat landscape; the Project Partners consider it near impossible to gauge that impact without accurate visuals and scaled technical drawings. Flat East Anglian landscapes are not solely topographical, but also cultural; impact on cultural landscapes as well as natural environment must be considered and mitigated.
- The Project Partners have concerns regarding the future maintenance of the proposed closed section of the B660. There are many unanswered questions such as how would it be maintained, by whom, at whose cost? All adjacent landowners are likely to be impacted.
- The Project Partners ask why cannot the construction compound be designated as a future parking area? (instead of area at southern end of proposed new access route – see above). Imaginative use of all construction compounds, post construction phase, could bring benefits.
- The Project Partners reiterate lighting on the new bridge would be unacceptable, being injurious to the Great Fen's Dark Sky status.
- The Project Partners suggest that the bridge, if built, must be of high architectural design, overall quality, and materials; also, that opportunities for imaginative green solutions, beneficial to wildlife (providing wildlife green bridge over the ECML for example), for community involvement in the design process; and for NR to exhibit best practice in environmental, community engagement and design outcomes, should be actively investigated and pursued.

Conington North TL 199 861

Great Fen Project Partners' response to stage two consultation

- NR's desire to increase the track to 4 track noted. The Project Partners query how far north is 4 track intended? Such work would have major environmental impacts on the land further north, notably on Wildlife Trust nature reserves and the NNR. It is to be hoped that

the impending EIA considers the impacts of 4 track extension and comprehensively evaluates such impact, and that opportunities are made for further comment.

- The Project Partners have grave concerns regarding the visual impact of (a possibly) 9m high bridge and embankments on the flat fenland. Network rail would be creating what is essentially a hill within a flat landscape; the Project Partners consider it near impossible to gauge that impact without accurate visuals and scaled technical drawings. Flat East Anglian landscapes are not solely topographical, but also cultural; impact on cultural landscapes as well as natural environment must be considered and mitigated.
- The Project Partners suggest that the bridge, if built, must be of high architectural design, overall quality, and materials; also, that opportunities for imaginative green solutions, beneficial to wildlife (providing wildlife green bridge over the ECML for example), for community involvement in the design process; and for NR to exhibit best practice in environmental, community engagement and design outcomes, should be actively investigated and pursued.

Conclusions from Stage two consultation

- The Great Fen Project Partners Informed comment has been limited due to lack of technical details and EIA.
- The Project Partners reserve the right to comment further once technical details and EIA are released.

End. 6.2.2015.