

MICKLEFIELD PARISH COUNCIL

Sole Trustee of Micklefield Recreation Ground Charity



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CLOSING STATEMENTS

Public Inquiry into the Network Rail (Leeds to Micklefield Enhancements) Transport and Works Act Order and the concurrent Public Inquiry into the Listed Building Consents relating thereto

1.0 PECKFIELD LEVEL CROSSING CLOSURE MITIGATION

- 1.1 This entire issue hinges on whether there is *any* appropriate and acceptable diversion of Micklefield Public Bridleway 8 (PB 8), between where it starts at the 'S' Bends on the Great North Road and the point where it connects to Pit Lane just south of Peckfield Level Crossing.
- 1.2 The existing route of PB 8 between these two points (ie. along Lower Peckfield Lane) is stated by Network Rail to be a distance of 640m.
- 1.3 Network Rail is proposing that the de facto diversion for all users of PB 8 originating and continuing beyond these two points would be along the Great North Road north of the railway, under the Great North Road railway bridge and along Pit Lane south of the railway. Network Rail states that this is a distance of 900m.
- 1.4 Although Leeds City Council states lower distances for both the existing route and the diversion route, there does seem to be broadly common ground between Network Rail and the City Council that the extra distance along the diversionary route would be about 260m. Micklefield Parish Council sees no reason to doubt that figure.
- 1.5 Leeds City Council and the Peak and Northern Footpaths Society consider this diversionary route to be unacceptable and that a Bridleway Bridge should be provided as the replacement for Peckfield Level Crossing.
- 1.6 If the inspector determines that a Bridleway Bridge is needed in order for Peckfield Level Crossing to be closed, and recommends that to the Secretary of State, then Micklefield Parish Council would be content with that outcome, even though we did not directly argue for it.

- 1.7 However, whilst it might be that the diversionary route is acceptable and appropriate for horse riders and cyclists, Micklefield Parish Council believes that it is not acceptable and appropriate for pedestrians. In fact, the Parish Council has consistently argued that pedestrian connectivity needs to be maintained via a footbridge.
- 1.8 PB 8 across Peckfield Level Crossing provides a non-vehicular route to access the local school, only local shop, doctors' surgery, sole public house and workplaces from the south of the village (increasingly necessary due to the large housing development being built on Pit Lane) and for residents in the north of the village to access workplaces, including those within Peckfield Business Park, adjacent to the level crossing. The level crossing is well used by pedestrians (an average of 45 pedestrian crossings per weekday and a maximum of 81 pedestrian crossings at the weekend in 2023).
- 1.9 In our view it is unacceptable for the public right of way in its current alignment across the railway line to be completely extinguished. A footbridge is required to maintain the pedestrian link between the southern and northern parts of the village along Lower Peckfield Lane, not least the connectivity with the premises on Lower Peckfield Lane itself in both directions (the *residential* properties at 1-3 and 6-7 Railway Cottages and Micklefield Recreation Ground).

2.0 A PUBLIC BRIDLEWAY THROUGH MICKLEFIELD RECREATION GROUND

- 2.1 The Parish Council maintains its objection-in-high-principle to the creation of a Public Bridleway in Micklefield Recreation Ground, as set out in paras. 2.13 to 2.26 of our main Statement of Case. There is nothing in Network Rail's Statement of Case, nor any of its Proofs of Evidence that would cause the Parish Council to withdraw that objection.
- 2.2 As far as the Parish Council can see, Network Rail has *still* not provided any example of any Public Bridleway having been created *within* a multi-purpose Recreation Ground with functioning sports pitches. There might be full size parks which may well contain Public Bridleways, or where Recreation Grounds have been created in the past around, and thereby including, a Public Bridleway which already existed, but Micklefield Parish Council is not aware of any example of what Network Rail is now proposing.
- 2.3 In any case, if Peckfield Level Crossing is closed and there is no replacement Bridleway Bridge, there is no need to divert PB 8 through the Recreation Ground. PB 8 north of the railway would effectively be redundant, because it is the Great North Road and Pit Lane which would have been accepted as being the diversionary route for horse riders and cyclists between the 'S' bends on the Great North Road and the roundabout on Pit Lane.
- 2.4 The Parish Council set out our rationale for why there is no *need* for a Public Bridleway through the Recreation Ground in paras. 2.9 to 2.12 of our main Statement of Case. When questions were posed to Ms Bedford's Proof of Evidence for Network Rail regarding Public Rights of Way, Ms Bedford, as an expert witness, confirmed that of the two choices of a new Public Right of Way through the Recreation Ground in Option 1, her preference would be for a Public Footpath, not a Public Bridleway.
- 2.5 However, the discussion revealed that the creation of a Public Footpath along the southern edge of the Recreation Ground would result in a legal proscription against use of that new routeway by cyclists. A solution may be to create a Cycle Track, ie. a shared footpath and cycleway, although the Parish Council is unsure as to what legal standing that would need to have, or could have, as a right of way. Micklefield Recreation Ground is always open every day throughout the year and is never closed.

3.0 DEMOLITION AND REPLACEMENT OF THE GRADE II LISTED A656 RIDGE ROAD BRIDGE

- 3.1 Micklefield Parish Council objected to the complete demolition of this Grade II Listed railway overbridge, which Network Rail itself acknowledges is rare and unique as there are few other examples. The Parish Council had argued in our Statement of Case that jacking up the basket arch was the correct thing to do, and that if this costs considerably more money than demolition and replacement, then so be it.
- 3.2 Whilst the Parish Council's objection still stands, it is clear from Mr Harrison's Proof of Evidence for Network Rail that jacking *this* bridge in *this* location on *this* railway line is not a reasonable proposition. Nobody has ever jacked up a stone arch bridge, never mind a stone basket arch bridge, and to attempt to do so over an intensively used operational railway would be manifestly inappropriate.
- 3.3 Although Micklefield Parish Council had not advocated lowering the track bed or slewing the two existing tracks into the centre of the arch, these are physically viable solutions that would enable Ridge Road Bridge to be retained in its current form. That said, each of those two solutions has its own significant problems, both in terms of disruption to track access and their overall cost.
- 3.4 Nevertheless, the whole point of granting Listed Building status to the bridge is for the state to have a greater control as to what happens to it. Altering or otherwise developing listed buildings in such a way as to retain their visual integrity is almost always a more costly exercise than completely demolishing them and re-developing the site.
- 3.5 The question is still as simple as it was: how much is it worth to retain Ridge Road Bridge (one of only a very small number of this sub-set of basket arch bridges in the group which remains unadulterated), and to what extent should the state seek to ensure that Network Rail retains it?
- 3.6 In paras. 3.7 to 3.12 of our Statement of Case to the Listed Buildings Inquiry, the Parish Council described a golden opportunity to incorporate a north-south Public Bridleway within a replacement bridge, if Ridge Road Bridge is ultimately demolished as part of an approved TWAO.
- 3.7 To be clear, the Parish Council was not advocating that option instead of a bridleway bridge or a footbridge at Peckfield Level Crossing, only that it *could* have been a good fall-back option if the Inspector felt that neither type of bridge at Peckfield Level Crossing was justified and could not be recommended to the Secretary of State. It is the fact that the Inspector has not been presented with a technical assessment of this option which is regrettable.
- 3.8 In paras. 3.13 to 3.16 of our Statement of Case to the Listed Buildings Inquiry, the Parish Council flagged up the problems it foresees with any extended closure of Ridge Road. If the road closure is going to be of a solid 9 month duration, then those problems are going to be writ large.
- 3.9 It is not just about how the prescribed diversions for through traffic away from the A656 Ridge Road will be lengthy (all the way round the southern and northern edges of Garforth), and that a multitude of people will driving straight through Micklefield as their own ad hoc diversions, it is also about the dislocation that the residents of Micklefield will suffer in regard to the trip journeys that they need to make.

4.0 CONCLUSIONS

- 4.1 Micklefield Parish Council respectfully asks that the Inspector recommends to the Secretary of State that mitigation measures for the closure of Peckfield Level Crossing should include the provision of a stepped footbridge to replace the level crossing (if the provision of a bridleway bridge cannot be justified); and that this be achieved either by modifying this TWAO, or that the closure of Peckfield Level Crossing be removed from this TWAO and be subject to its own bespoke TWAO.
- 4.2 Micklefield Parish Council respectfully asks that the Inspector recommends to the Secretary of State that any mitigation measures for the closure of Peckfield Level Crossing do not need to include, and should not include, the creation of a Public Bridleway through Micklefield Recreation Ground.
- 4.3 Micklefield Parish Council respectfully asks that the Inspector recommends to the Secretary of State that, notwithstanding the support of Historic England to Network Rail's proposal, the full visual image of the basket arch of Ridge Road Bridge should be maintained on both faces, either in situ unaltered, or by careful dismantling and recladding the original stone to a new metal arched supporting structure.

Cllr Jon A Crossley
Chairman
Micklefield Parish Council

11th March 2024