



The Secretary of State for Transport
Transport & Works Act Orders Unit
General Counsel's Office
Department for Transport
Zone 1/18
Great Minster House
33 Horseferry Road
London SW1P 4DR

25th April 2018

Re: **Proposed Rother Valley Railway (Bodiam to Robertsbridge Junction) Order**

Dear Sir,

I am writing to register my objections to the above Rother Valley Railway ("RVR") proposal.

I must first state that I am not intrinsically 'anti' such developments. The UK has some fine heritage steam railways, which are a joy to see and to travel on, and I am a supporter of the Lynton & Barnstaple Railway in Devon. Neither is my position that of a nimby: a steam railway in Robertsbridge might be a delightful idea were it not for the significant and serious problems which it presents.

My objections to the proposal centre on Robertsbridge ("the village"), and are concerning the following issues:

1. The compulsory purchase of land
2. The crossing of the A21
3. The impact on traffic and parking in the village
4. The increased risk of flooding in the village
5. The realistically possible benefits being far outweighed by the severity of the problems

The following expands on and explains each of these issues. It also includes, where relevant, extracts from the recently approved (and very shortly to be 'made') Salehurst & Robertsbridge Neighbourhood Development Plan (SRNDP), which I believe serve to support my views.

1. The compulsory purchase of land

I find CPOs deeply unpalatable in principle. However, I accept that where a development is *significantly* and demonstrably important for the local or national transport infrastructure such

orders may be necessary. In no way is the RVR proposal an important infrastructure development. For example, it can hardly be considered an important transport link between Robertsbridge and Bodiam/Tenterden: even supposing that there is a large body of people who currently commute or otherwise regularly travel over this route, a seasonal and off-peak service – which RVR would be – would hardly be very useful. I therefore believe that the justification for CPOs for this projects is non-existent.

The owners of the land which would be affected by any of the CPOs have resolutely declared that they do not wish to sell – at any price – and their wishes should be strongly respected.

2. **The crossing of the A21**

I find it extraordinary that there could ever be permission granted to install a level crossing across this busy, main road. The particular stretch affected – the Robertsbridge by-pass – carries very high volumes of traffic during peak times, and continuously large volumes at almost all other times. On summer weekends, probably the busiest time for the RVR service, there is an almost constant flow of heavy traffic down to the coast (and back). Traffic on the by-pass is frequently (if not always) very fast, and for north-bound traffic the crossing would not be visible for the first few hundred yards, so that the probability of there being high-speed collisions becomes significant. RVR's assessment of the effect on traffic flows on the A21 is surely flawed; however favourably they calculate it, having the crossing down during busy times will certainly cause additional tail-backs and delays on an already busy and frequently overloaded road.

The SRNDP says:

Policy EC7: Tourism (extract)

"[Business development in the Parish will be encouraged where] 3. It will not cause or exacerbate any traffic problems and will promote sustainable transport"

Policy LE3: New facilities (extract)

"[Proposals for new and/or improved community facilities will be supported subject to the following criteria] 3. The proposal would not have unacceptable impacts on the local road network and will actively promote access by sustainable transport..."

3. **The impact on traffic and parking in the village**

RVR estimate that up to 50,000 visitors to the railway per year will come to Robertsbridge via the main line from London. This is surely a gross over-estimate, and optimistic in the extreme. But even if the numbers were as high as 20% of this, and given that it is highly speculative that *all* of those would come to Robertsbridge via the national rail line, it is inconceivable that the village would not be hugely strained with higher traffic volumes and increased parking, to the great detriment of local residents.

The SRNDP says:

Policy EC5: Tourism (extract)

"3.1.5 It is also extremely important that a balance is kept so that tourism development does not have an adverse effect on local beauty and tranquillity."

Policy IN2: Loss of parking

"Development proposals that would result in the overall net loss of existing on-street and/or off-street parking will not be supported"

Policy IN3: Maintain and improve existing infrastructure (extract)

"[New and/or improved infrastructure..... will be encouraged and supported in order to meet the identified needs of the Parish, subject to the following criteria] 3. The proposal would not have significant impacts on the local road network"

4. **The increased risk of flooding in the village**

RVR's development plan would take the railway across the flood plain. In general terms, for any development, this is a bad idea; but in this particular case it is hard to see how the project could not but increase risks to property and land were there to be another flooding event. Reporting on

their commissioned study, RVR say that the rise in flood water levels caused directly by the new railway would be around 1mm. Firstly, given the minimal flood avoidance measures that they propose (see later) I do not believe that this can possibly be the case. Secondly, whatever their method of calculation, such a degree of resolution in flood heights is not only impossible but also meaningless. In answer to questions about the nature of the flood avoidance that they will adopt, RVR said they would have frequent culverts in the railway embankment. It has been pointed out that at best this would divert the flood waters elsewhere, not discharge them away safely: in other words it would become someone else's problem.

The SRNDP is specific on this point:

Policy IN8: Reducing flood risk (extract)

“Development will not be supported in flood attenuation areas where that development would reduce the ability of these areas to alleviate flooding. Proposals to use culverts simply to pass the potential to flood to elsewhere, i.e. not as part of a viable SuDS strategy, will not be supported.”

5. The realistically possible benefits are far outweighed by the severity of the problems

It is only right that the objections raised above are considered in the context of any benefits that the creation of the RVR railway might have for the village. RVR's estimates for the benefits to tourism I believe are wildly optimistic. In one of their submissions they said that they believed many of the visitors to Robertsbridge would come straight down from London and catch the RVR train to Bodiam and/or Tenterden. This seems likely, since there is not a lot in the village for visitors to see or do. Thus the major part of any money spent would not be to the benefit of the village. RVR also cited the extension of the Bluebell line to East Grinstead as an example of the benefits to the local economy of this type of project. There are significant differences between the two situations because of the vast difference in population and consequent large difference in the provision of infrastructure: the population of East Grinstead is around 24,000, that of Robertsbridge around 2,700. In East Grinstead there are at least 10 inns or pubs and 8 restaurants within walking distance of the railway terminus. In Robertsbridge and Salehurst there are 2 pubs and 3 restaurants. In East Grinstead they have a theatre, cinema, town museum, sports centre with swimming pool, many more shops than Robertsbridge, 9 banks/cashpoints, and a National Trust property. Thus the appeal to, and support of, visitors to East Grinstead on the Bluebell Railway is far greater than would be the case for the Robertsbridge proposal. In summary, the comparison is invalid and unhelpful.

In summary, I submit that whilst the idea of a steam heritage railway in a rural village may have great appeal and much benefit in certain situations, in the case of this proposal the problems are too significant, the negative consequences of the project going ahead too serious, the need for the necessary compulsory purchases unpalatable and the potential benefits to the village and its residents far too small.

I urge you to reject this proposal, or at the very least initiate a public enquiry, where all the issues may be openly and fully debated.

Yours faithfully,

David L. Faithfull MSc, BTech, CEng, MIET