



Road Layout  
Design

# CD 143

## Designing for walking, cycling and horse-riding

(formerly TA 90/05, TA 91/05, TA 68/96, TD 36/93)

Version 2.0.1

### Summary

This document provides requirements and advice for the design of walking, cycling and horse-riding facilities on and/or adjacent to the motorway and all-purpose trunk road network.

### Application by Overseeing Organisations

Any specific requirements for Overseeing Organisations alternative or supplementary to those given in this document are given in National Application Annexes to this document.

### Feedback and Enquiries

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**This is a controlled document.**

## Latest release notes

Document code	Version number	Date of publication of relevant change	Changes made to	Type of change
CD 143	2.0.1	March 2021	Core document, Scotland NAA	Incremental change to notes and editorial updates

New version of document published solely to resolve revision number issue.

This was caused when an amendment was made to the Scotland National Application Annex document in May 2020 to remove duplicate wording without a new revision number being issued. This meant there were incorrectly two revision 2 documents available on the website with different publication dates of March 2020 and May 2020.

No changes have been made to the core document and England National Application Annex since they were last updated in March 2020. No changes have been made to the Wales and Northern Ireland National Application Annexes since their original publication in November 2019. The Scotland National Application Annex is being re-published with a new revision number 1.0.1 to reflect the change made in May 2020 and no further changes have been made since this time.

## Previous versions

Document code	Version number	Date of publication of relevant change	Changes made to	Type of change
CD 143	2	May 2020		
CD 143	2	March 2020		
CD 143	1	January 2020		
CD 143	0	November 2019		

## **Introduction**

### **Background**

This document provides requirements and advice for the design of walking, cycling and horse-riding facilities on and/or adjacent to the motorway and all-purpose trunk road network.

### **Assumptions made in the preparation of this document**

The assumptions made in GG 101 [Ref 4.N] apply to this document.

## Abbreviations

### Abbreviations

Abbreviation	Definition
km	Kilometre
kph	Kilometres per hour
mm	Millimetre
mph	Miles per hour
NAA	National Application Annex
SSD	Stopping sight distance

## Terms and definitions

### Terms and definitions

Term	Definition
Absolute minimum	The design parameter(s) that can be used where there is an existing physical constraint where a walking, cycling or horse-riding route is proposed, or an existing walking, cycling or horse-riding route is to be improved within the highway boundary.
Desirable minimum	Design parameters that apply where the conditions for use of absolute minimum value criteria are not applicable.
Headroom	The distance above the surface of a walking, cycling or horse-riding route that is generally free from obstructions to allow the safe passage of users.  NOTE: Headroom for subways is separate from the general headroom space.
Separation	The distance between a walking, cycling or horse-riding route and the carriageway.
Shared use	A facility used by more than one type of user - for example pedestrians and cyclists or pedestrians, cyclists and equestrians. This includes segregated or unsegregated facilities.
Stopping sight distance	The distance for a cyclist or equestrian to perceive, react and stop safely in adverse conditions, such as on wet asphalt or where the surfacing is loose.

## 1. Scope

### Aspects covered

- 1.1 This document shall be used for the design of walking, cycling and horse-riding routes on and/or adjacent to the motorway and all-purpose trunk road network.

*NOTE 1 CD 195 [Ref 2.N] provides requirements and advice for the design of cycle traffic infrastructure.*

*NOTE 2 Information on Inclusive Mobility is available in Inclusive Mobility [Ref 3.N].*

*NOTE 3 Information on tactile surfaces is available in Guidance on the use of Tactile Paving Surfaces PPU 1622RB [Ref 1.I].*

- 1.2 The National Application Annexes (NAAs) shall be used for designing for walking, cycling and shared use.

### Implementation

- 1.3 This document shall be implemented forthwith on all schemes involving walking, cycling or horse-riding facilities on the Overseeing Organisations' motorway and all-purpose trunk roads according to the implementation requirements of GG 101 [Ref 4.N].

### Use of GG 101

- 1.4 The requirements contained in GG 101 [Ref 4.N] shall be followed in respect of activities covered by this document.

## 2. General design principles

- 2.1 Walking, cycling and horse-riding routes shall be free from unnecessary diversions, frequent obstacles and fragmented facilities.
- 2.1.1 Where absolute and desirable minimum values are provided within this document, the desirable minimum value should be used unless an existing physical constraint prevents the use of this.
- 2.1.2 Walking, cycling and horse-riding routes should be designed to achieve the best balance of the five core design principles in Table 2.1.2.

**Table 2.1.2 Core design principles for walking, cycling and horse-riding**

Coherence	Link trip origins and destinations, including public transport access points. Routes are continuous and easy to navigate.
Directness	Serve all the main destinations and seek to offer an advantage in terms of distance and journey time.
Comfort	Infrastructure meets design standards and caters for all types of user, including children and disabled persons.
Attractiveness	Aesthetics, noise reduction and integration with surrounding areas are important.
Safety	Dedicated networks and facilities not only improve pedestrian, cyclist and equestrian safety, but also their feeling of how safe the environment is. This includes access to adjacent areas, sightlines, fencing, lighting, landscaping and surveillance. It also includes avoiding opportunities for assailants to conceal themselves.

## E/1. Walking routes

### Geometry

E/1.1 For crossfall and gradients on walking routes Inclusive Mobility [Ref 5.N] shall be used.

E/1.1.1 Adverse crossfall on bends should be avoided on walking routes.

### Cross-sections

E/1.2 Widths for walking routes shall be in accordance with Table E/1.2.

**Table E/1.2 Widths for walking routes**

	No vertical features present either side	Vertical feature on one side and < 1.2 metres height	Vertical feature on one side and ≥ 1.2 metres height	Vertical features on both sides (distance per side)
<b>Desirable minimum width</b>	2.6 metres	+ 0.25 metres	+ 0.5 metres	0.25 metres for < 1.2 metres height 0.5 metres for ≥ 1.2 metres height
<b>Absolute minimum width</b>	2.0 metres			

**NOTE** *Walking routes include footways and footpaths.*

E/1.2.1 On walking routes, the separation from the carriageway should be at least 1.5 metres or 0.5 metres on roads with speed limits of 40 mph or less.

**NOTE** *Where a hard strip is provided on the carriageway, it can be considered as part of the separation distance for walking routes.*

### Headroom on walking routes

E/1.3 Headroom for walking routes where obstructions are present shall be in accordance with Table E/1.3.

**Table E/1.3 Headroom on walking routes**

Length of obstruction	Headroom
Longer than 23.0 metres in length	2.6 metres
Up to and including 23.0 metres in length	2.3 metres

**NOTE 1** *Table E/1.3 applies to general headroom such as clearance from overgrowth and other obstructions along a walking route.*

**NOTE 2** *For headroom requirements at subways, see crossings.*



# **Report to the Secretary of State for Transport**

**by Heidi Cruickshank BSc (Hons), MSc, MIPROW**

**an Inspector appointed by the Secretary of State for Transport**

**Date: 9 July 2019**

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## **TRANSPORT AND WORKS ACT 1992**

### **THE NETWORK RAIL (CAMBRIDGESHIRE LEVEL CROSSING REDUCTION) ORDER [20--]**

Inquiry opened on: 28 November 2017

Ref: DPI/Z1585/17/11

## **7.11 C21, Newmarket Bridge and C22, Wells Engine**

### **Description of the Crossings and Surrounding Area**

- 7.11.1 The River Great Ouse runs past the eastern side of the City of Ely and the two footpaths concerned run on the eastern and western banks of the river, the western route off-set from the river in this location.
- 7.11.2 The routes begin on Station Road, the A142, running south-east from the City of Ely, which has footway providing access to the footpaths. The western route is Footpath 23 ("FP23"). It is part of the Cawdle Fen Walk<sup>245</sup>, a circular route from either Ely or Little Thetford, and the Ouse Valley Way and Fen Rivers Way, which are long distance paths.
- 7.11.3 Footpath 24 ("FP24") starts at a point almost directly opposite Queen Adelaide Way, which has a footpath running parallel to it providing wider links. This route is also part of a national cycle network route. The proposed route in this location is already available and in use as part of the cycle route.
- 7.11.4 A short distance to the south of Ely, and Ely Railway Station, the railway line splits with the eastern Ely to Bury St Edmunds railway line (SOB2) crossing the river by way of a railway bridge. Both footpaths cross the railway on this bridge with the crossing of FP24 referred to as Newmarket Bridge, C21, and FP23 Wells Engine, C22. There are existing private vehicular rights at both crossings.
- 7.11.5 FP24 is a passive (footpath) level crossing with wicket gates in the railway boundary fence and SLL. FP23 is a passive user worked crossing with a telephone and kissing gates in the railway boundary fence with SLL. The railway line is single track, carrying passenger and freight trains, with a line speed of up to 40 mph on the western route and up to 60 mph on the eastern, furthest from the station.
- 7.11.6 The ALCRM score for Newmarket Bridge is C10, with a 9-day camera census showing use by 152 pedestrians. For Wells Engine the ALCRM score is C4 and the census recorded 69 pedestrians using the crossing. Users have been observed trespassing on the railway bridge to create a circular walk using both crossings.
- 7.11.7 The crossings are close to the City of Ely, with the large village of Soham to the south-east. The general surrounding area appears to be ditched and fenced farmed fenland with several villages situated around the City. A number of main roads and the railway line provide connectivity.

### **Description of the Proposal**

- 7.11.8 It is proposed to close the public footpaths with users to the west, C21, using the existing metalled route under the bridge, a diversion of approximately 50m. Users to the east, C22, would be diverted onto a new route under the bridge resulting in a diversion of around 190m.

<sup>245</sup> Core Documents, CCC, 46

- 7.11.9 Pedestrian crossing infrastructure would be removed, and fencing installed to prevent trespass on the railway. New signage would be provided. The private rights would be maintained.

### **The Case for the Applicant, Network Rail**

- 7.11.10 The principal issue at these crossings relates to flood risk. They are, otherwise, very convenient diversionary routes since the user simply passes under, rather than over, the railway. It is accepted that the alternative routes lie in the floodplain, but there is no evidence of anything other than occasional flooding. NR has not engaged in extensive hydraulic modelling to quantify the risk, but it is neither necessary nor appropriate to do so given that footpaths are, in any event, water compatible developments in the sense that they may (and regularly do) pass through flood plains.
- 7.11.11 The evidence of Cllr Bailey was that the area would not be flooded every year and so for the vast majority of the time, the routes would be passable. NR has suggested that the occasional issue is mitigated by the presence of signage to indicate that the route may be impassable in times of flood. It would be very obvious to those in the area when the River Great Ouse is in flood.
- 7.11.12 It is not accepted that a user could in times of flood simply divert over the railway. It is a criminal offence to trespass on the railway, and that would displace any arguable common law rule about deviation to avoid obstacles.
- 7.11.13 At C21, the proposed route is a well-used cycleway which forms part of a national network. It does not appear that the presence of that cycleway in the flood plain has presented practical problems.
- 7.11.14 There were concerns about vandalism under the railway bridge, but this would not be a good reason to resist the proposals, not least because anti-social behaviour equally affects level crossings. In this location there is a history of misuse by pedestrians using the level crossing accesses to get onto the bridge across the River, and then cross the river in the empty track bed. This factor points towards making the Order, rather than the other way.
- 7.11.15 The occasional obstruction of the alternative routes in times of flood is not a good reason to reject the Order proposals which are plainly sensible solutions in these locations.

## The Cases in Objection

### Cambridgeshire County Council (O12)

- 7.11.16 These crossings should not be closed. It is common ground between NR and CCC that the alternative routes fall within high risk flood plains; when flooded substantial diversions are required. It is CCC's view that these diversions would cause significant inconvenience to users. One path is a promoted route and the other is also a cycle path.
- 7.11.17 NR have not provided any flood data to assist the Secretary of State when considering these crossings. It is not for those opposing the closure to prove that flooding will be problematic, but for those proposing the Order to prove that it will not. CCC say that NR has failed to discharge its burden of proof; without the data no objective assessment of the impact of the closures can be made.
- 7.11.18 NR have, quite rightly, stated that there is no restriction or reason why, from the EA's point of view, a path cannot exist within a flood plain. However, the existing path runs along the flood bank and is not subject to flooding; the proposed path on the flood plain would cause potential problems for users, having a significant impact on the use of the local path network.
- 7.11.19 NR suggested there would be no right to deviate from the proposed footpath during flood periods. CCC submit that the common law right to deviate<sup>246</sup> may apply. It was clarified that the whole of the proposed new route would run on land owned by NR.
- 7.11.20 The law relating to the common law right to deviate is equivocal but in *Taylor v Whitehead (1781)*<sup>247</sup> Lord Mansfield said "[Highways].... are for the public service, and if the usual track is impassable, it is for the general good that people should be entitled to pass onto another line". Later case law suggests that the right to deviate may only apply when a landowner has caused the obstruction or foundrous conditions. Whilst NR could not be said to be responsible for the flooding, they would be responsible for the path being moved into the area that is known (in advance) to be liable to flooding, and therefore they are the creators of the situation. If the common law right to deviate is considered to apply, then if the proposed new path becomes flooded or foundrous the public may use other land in the same ownership (namely cross the railway line) to continue their journey.
- 7.11.21 This issue creates ambiguity, which the Secretary of State must take into consideration as part of the decision-making process.
- 7.11.22 With regard to the Wells Engine crossing (C22) the CCC's PROW Officer, Karen Champion, raised concerns regarding the suitability of the proposed route in respect of crime, fear of crime, anti-social behaviour and future maintenance liability. These factors may all have a negative impact on the use of this promoted route.

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<sup>246</sup> OBJ-12-INQ-08 (attached)

<sup>247</sup> [1781] 2 Doug 745, 99 ER 475

**David Robinson (O17)**

- 7.11.23 Mr Robinson was an interested person in his own right but gave evidence to the Inquiry as part of CCC's case.
- 7.11.24 Mr Robinson has lived in Grantchester since 2007 and is retired from employment in an electrical wholesaler. He has been a keen train and railway observer and photographer for over 30 years and, on average, does this 3 or 4 times a week, sometimes more depending on the weather and time of the year. He often uses PROW to visit good observation spots.
- 7.11.25 Mr Robinson was unable to attend any of the consultation sessions that NR undertook as there were none scheduled near where he lives. He believes this to be a weakness in NR's consultation process as some people who would be impacted by the TWAO Application would have had to travel unreasonable distances just to attend consultation processes, even if they knew about them.
- 7.11.26 The notices left at crossings, purportedly to inform the public about the TWAO process, were not sufficient and were generally unhelpful. They were left in illogical and non-prominent places and it was not obvious to the casual passer-by what they referred to. The notices were too long and Mr Robinson does not believe that many users would have bothered to read them. As the notices were not crossing specific, referring to the TWAO as a whole, they did not bring the attention to users that the works would affect that specific crossing.
- 7.11.27 Mr Robinson has used the path with crossing C22 for 20 years at least twice a week. He walks south along the river bank, then, with permission, west after the crossing to the farmer's private crossing. He enjoys the walk, which provides an opportunity for his hobby of train observation.
- 7.11.28 NR's proposals would send users down the bank under the bridge. This is not a suitable diversion due to the area being a flood risk. Mr Robinson has seen it flooded during winter months and users would not be able to walk the route then. This would be a loss of convenience and enjoyment of the route, but more importantly also a safety issue if people are put at risk of falling into the river.
- 7.11.29 The crossing has good sightlines on either side and the trains do not run quickly through the area, because of the tight curve into Ely station. NR are proposing to divert users from what seems to be a relatively safe crossing onto a flood plain.

**Ely Group of Drainage Boards (O29)**

- 7.11.30 The Ely Group of IDBs is a consortium of ten Drainage Boards covering 47,000 hectares of the Fens, providing water level management via 29 Pumping Stations. Board consent is required for works on watercourses within the Boards District and for any works within nine metres of a Main Drain. The Pumping Stations have limited capacity

and so unattenuated surface water discharge is not allowed, with new discharges requiring Board consent.

- 7.11.31 C22, Wells Bridge, is used for access to flood risk assets and the Board would require the access right to remain.

**Anthony Bebbington, Environment Agency (O31)**

- 7.11.32 The Environment Agency is an affected landowner in relation to C22, Newmarket Bridge. The EA is in principle supportive of the closure, although detail is lacking. Further information is required on the extent, type and duration of work to assess the impact on statutory and operational duties, assets and tenants.
- 7.11.33 Where the Order affects land in, over or under a Main River<sup>248</sup> these would be regulated by environmental permits. Schedule 16 of the Order removes the requirement for NR to obtain an environmental permit and would not provide an equivalent opportunity for the EA to consider the proposal and ensure unacceptable impacts on the Main River were avoided.
- 7.11.34 The EA would normally respond to planning consultations in Flood Zone 2, Flood Zone 3 and within 20 metres of a Main River. Some works are proposed within floodplains and may affect flood flow rates or result in the loss of a floodplain. Schedule 16 should provide the EA with an equivalent opportunity to influence the proposals.

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<sup>248</sup> Note that the EA did not provide further evidence to the Inquiry. The EA did not identify which six sites should be regulated under environmental permits as they were in, over or under a Main River. These crossings are alongside the River Great Ouse and, therefore, would meet this requirement.

## Inspector's Conclusions

*Bearing in mind the submissions reported above, I have reached the following conclusions, reference being given in square brackets [] to earlier paragraphs where appropriate.*

### **SOM 4(a) The likely impacts on land owners, tenants, local businesses, the public, utility providers and statutory undertakers, including any adverse impact on their ability to carry on their business or undertaking or access their properties**

- 7.11.35 The private rights would be unaffected by the proposals [7.11.9 and 7.11.31]. There would be no impact in relation to such existing access and use.

### **SOM 4(b) Impacts on other users**

- 7.11.36 In addition to the pedestrian use C21 – on the proposed route – is available for use by cyclists. The closure of C21 would result in greater pedestrian use of the route underneath the bridge. Unfortunately, no surveys of that route were provided and so the existing levels of use are unknown.
- 7.11.37 It should be noted that there was at least some use of C21 by cyclists, but this has been included in the pedestrian use<sup>249</sup>. The dated photograph shows a cyclist on this crossing on Sunday 19 June 2016<sup>250</sup>.
- 7.11.38 There may be some potential for conflict between users. However, the route of FP24 north and south of the railway is already shared by these users and this section of the route involves changes of direction likely to slow users and so assist in minimising the possibility of incidents. As a result, I consider that the impact of this additional shared area would not be significant for either walkers or cyclists.
- 7.11.39 Additional issues relating to the user impacts would relate to matters under SOM 4(e).
- 7.11.40 The strategic case sets out the way in which rail users would benefit from the proposed alterations to the network.

### **SOM 4(c) Impacts on flood risk and drainage**

- 7.11.41 The IDB made a general representation [7.11.30] and the EA similarly commented [7.11.32 – 7.11.34]. The private access required by these bodies would not be affected [7.11.9] and so there would be no impact on inspection and maintenance in connection with flood risk.
- 7.11.42 No flood risk assessment was made by NR despite the fact that the proposed routes would be moved from the top of the flood banks onto land adjacent to the main river, part of the functional flood plain for the River Ouse [7.11.17]. This was due to rights of way being water compatible developments [7.11.10 and 7.11.18]. Witness evidence referred to flooding in this area [7.11.11, 7.11.28].

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<sup>249</sup> NR25, C21, Footnote page 6

<sup>250</sup> NR25, C21, Footnote page 5

- 7.11.43 The proposal would result in chain link fencing to BS1772, height 1.8m, on both routes, use of the existing tarmac surfaced route on C21, Newmarket Bridge and for C22, Wells Engine, a gravel/stone surface footpath<sup>251</sup>. Fencing within the flood plain could affect the volumetric flow rate of water in or flowing to or from any drainage work<sup>252</sup>. Schedule 16 to the Order would apply such that the EA would be required to approve plans prior to construction of the works.
- 7.11.44 Taking these matters into account I consider that there is a potential effect on flood risk and drainage. This is particularly the case for C22, where there is no existing structure and the proposal would affect a greater proportion of the flood plain [7.11.13], even taking account that the route would run alongside the railway bridge for most of the length, which will itself impact on the floodplain. It does not appear that the development would be appropriate in what appears to be the functional floodplain, where water has to flow and be stored in times of flood.
- 7.11.45 The proposed Order would provide protection with the appropriate authority, the EA, able to comment on the proposal provided they did so within 2 months of plans being submitted to them [7.11.34].

**SOM 4(d) Any other environmental impacts**

- 7.11.46 No issues were raised in relation to this matter.

**SOM 4(e) The suitability (including length, safety, maintenance and accessibility) of diversionary routes proposed for each right of way proposed to be closed**

- 7.11.47 With regard to safety the routes would be fenced and so there would not appear to be a risk from walking near the river itself [7.11.28]. In relation to vandalism under the railway bridge [7.11.22] I noted graffiti on the bridge to the proposed route in connection with C21, Newmarket Bridge; it is likely that similar issues would arise in relation to C22, once it became more accessible.
- 7.11.48 I do not consider that misuse of the existing routes [7.11.14] is relevant to whether current – legitimate – users would find using a more enclosed area, with evidence of anti-social behaviour evident, discouraged their use. However, as discussed at the Inquiry most use is likely to be in daylight, as these do not appear to be part of commuting routes<sup>253</sup>. The nuisance of anti-social behaviour would not be likely to significantly reduce the use of the routes.
- 7.11.49 Neither route adds significantly to the length of the existing rights of way as they stand. However, if a flood event meant that the proposed route was unavailable then the required diversion could be substantial

<sup>251</sup> NR12, Design Guide

<sup>252</sup> "drainage work" means any watercourse and includes any land which provides or is expected to provide flood storage capacity for any watercourse and any bank, wall, embankment or other structure, or any appliance, constructed or used for land drainage, flood defence or tidal monitoring.

<sup>253</sup> NR32-1, 2.16.4 & 2.17.4



[7.11.16] as is evident from the wider Ordnance Survey mapping<sup>254</sup>. I agree with the point made at the Inquiry that users travelling from Ely, to the north, would quickly realise there was an issue and be able to turn back. However, those travelling south to north may travel some distance, despite the suggestion from a NR witness that they may have already found the route blocked earlier in their journey.

- 7.11.50 Whilst I consider that CCC are theoretically correct in their analysis that common law would allow users to divert across the railway line to continue journeys in times of flood [7.11.19 and 7.11.20]. However, as NR point out, the effect of the criminal offence in relation to crossing the railway would override the common law defence [7.11.12]. Nonetheless, whether or not there is legal ambiguity [7.11.21], the practical situation on the ground may lead to users continuing over the railway crossing at such times, particularly if existing users do not perceive the crossing to be a risk for them [7.11.27 and 7.11.29].
- 7.11.51 Although suggested that the events would be occasional [7.11.15] the lack of evidence on the likelihood and duration of flooding is unhelpful in clarifying the likely impact of the proposal [7.11.17]. The suggestion of mitigation by signage [7.11.11], other than generalised warnings of the possibility of flood, would be impractical for the highway authority to manage, regardless of the frequency, or infrequency, of the event.
- 7.11.52 The information that is available points to the importance of these routes currently, with both being part of promoted routes [7.11.2 and 7.11.3] and falling in the top third of the routes affected by the Order in relation to the pedestrian use as recorded by the census [7.11.6]. It was said at the Inquiry that the Ely local plan includes 3,000 new dwellings in north Ely, with part of the rationale relating to access to the countryside, which is important for mental and physical health. It was also indicated that the District Council were working on district wide tourism strategy depending on walking routes.
- 7.11.53 Whilst the proposal would not result in reduction of routes available, the potential effect of flooding may reduce their convenience and suitability overall. However, in relation to C21, Newmarket Bridge, the proposed route would follow the existing cycle route, which is already part of a national route. The provision and promotion of this route suggests that it is a suitable alternative to the route over the crossing.
- 7.11.54 In relation to C22, however, there is no existing route on this western floodplain and the area is greater than the eastern area.
- 7.11.55 In relation to C21, Newmarket Bridge I consider that the Secretary of State can be satisfied that the proposed route would be suitable and convenient for the proposed use. However, for C22 the lack of information on the likely flooding events, does not assist in determining that the route would be suitable and convenient for users.

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<sup>254</sup> NR32-2, Appendix 9

**Other matters – consultation/statutory notices**

- 7.11.56 There were concerns in relation to consultation process [7.11.25]. Concerns were also raised about the effectiveness of the notices posted regarding the Order [7.11.26]. NR were satisfied that they had complied with the requirements of consultation and the 2006 Rules<sup>255</sup>.

**Conclusions**

- 7.11.57 In balancing all the relevant matters, I consider that the Secretary of State should include C21 within the Order but that C22, Wells Engine, should not be included.
- 7.11.58 However, should the Secretary of State be satisfied that detailed design and the oversight that would be provided by the EA would be sufficient to deal with the flood risk issues then C22 could also be included.

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<sup>255</sup> NR05, Statement of Consultation