

**LYNTON & BARNSTAPLE RAILWAY TRUST
RESPONSE TO COMMENTS ON THE EXMOOR NATIONAL PARK
PUBLICATION DRAFT LOCAL PLAN SUBMITTED BY THE GROB FAMILY**

Mr. & Mrs. Grob are owners of some of the former track-bed. Unfortunately despite the best endeavours of the Lynton & Barnstaple Railway Trust over the last four years Mr. And Mrs. Grob have declined to meet to discuss the railway plans. Three meetings were arranged but cancelled by Mrs. Grob and their solicitors Foot Anstey also declined to meet. Opportunities for them to learn about the project and to hear answers to their concerns have been lost. Accordingly these notes respond to topics raised in their objections to the Exmoor National Park Local Plan.

	Comment	Response
1	The railway failed twice historically	<p>After the railway grouping exercise in 1923, the railway was one of very few that remained independent. It was then acquired by the Southern Railway and became the only narrow gauge railway in that grouping.</p> <p>The railway continued to operate for another 12 years until 1935 when the Southern Railway decided to close the line due to falling passenger numbers and competition from road transport.</p> <p>The railway ran successfully for 37 years, and the reasons for its closure were shared with many other lines. Its contemporary reinstatement cannot be reasonably compared to the circumstances of the 1935 closure.</p>
2	It failed because it was unfavourable, unsafe, uncomfortable, unreliable and expensive	<p>The railway was closed because much of the traffic it served transferred to road transport. Freight traffic was more conveniently delivered by road. Passengers transferred to buses because they could make the journey in a shorter time. (The bus company was 50% owned by the Southern Railway).</p> <p>In 1935 tourism traffic was quite limited and did not provide enough income to maintain the railway.</p> <p>Throughout its history, no passenger was ever injured on the railway. When it opened the fare to Barnstaple was reduced to 20% of the previous coach fare.</p> <p>Again, its contemporary reinstatement cannot be reasonably compared to the circumstances of the 1935 closure.</p>
3	It was flawed in construction and cost from the outset	<p>The construction of the railway was sound, and this is evidenced by the remaining structures and formation. A number of the road bridges still carry road traffic which is much heavier than when the original railway operated. Chelfham Viaduct has stood the test of time, and was restored in 2000 to a standard where it can carry trains again.</p> <p>The engineering contractor that constructed the railway did underestimate the cost of construction, but was held to the contract terms and the standard of the railway formation was very high as evidenced by the existing condition of the cuttings and banks that remain in situ one hundred and eighteen years later, and the relatively minor works required in most areas to reinstate the railway.</p>

	Comment	Response
4	The L&B Trust do not operate a railway or transport network	<p>The Lynton & Barnstaple Railway Trust, through its operating subsidiary, operate a railway that has been inspected and approved by the Railway Inspectorate and operates under the authority of the Office of Rail and Road, and in accordance with the Regulations for Railways and other Guided Transport Systems.</p> <p>The railway operates between two stations and currently provides a link to the local footpath network.</p> <p>The extended railway will link transport nodes at Blackmoor Gate and Woody Bay Station and provide access to the footpath network at Wistlandpound and Parracombe.</p> <p>The railway already carries one-way passengers who walk to one end of the line and are conveyed to the other to continue their trek.</p> <p>Further extension of the railway to Lynton and to Barnstaple will further increase connectivity as a valuable part of Northern Devon's integrated transport network.</p> <p>Phase IIA of the railway extension will allow passengers to embark at Blackmoor Gate and journey to Lynton by rail and shuttle bus without increasing the demand for car parking in Lynton.</p> <p>Overall, the L&B Trust clearly do operate a railway which is also part of a wider integrated transport infrastructure.</p>
5	It is an unjustified tourist attraction without plausible potential to become a viable or sustainable transport network	<p>The local plans for North Devon and Exmoor National Park support tourism and the establishment of good quality tourist attractions.</p> <p>The Lynton & Barnstaple Railway is, year on year, attracting an increasing number of visitors, all of whom are adding to the tourism spend in the local area.</p> <p>There is a strong correlation between the length of a heritage railway line and the number of visitors it attracts to an area. Thus further extension of the railway will continue to bring significant added benefits to the local economy.</p> <p>The railway is viable as a business now, and the business plans for the various planned stages of extension of the railway have been tested to ensure that the railway will remain viable at each stage.</p> <p>Heritage railways are a valuable part of local economies wherever they are located and the Railway makes a sizeable contribution to the local economy even in its current, reduced size.</p> <p>As explained above the railway is part of a wider integrated transport infrastructure.</p>
6	It has 'mock copy carriages' with little heritage authenticity	<p>This is simply not true. The carriages on the railway have been carefully reconstructed with substantial parts of the original carriages incorporated during rebuilding. They reflect the very high standard of the original carriages and the railway has received an award from the Heritage Railway Association in recognition of this.</p>
7	As a tourist business it is speculative and out of touch with reality or current trends and tourist requirements	<p>The heritage railway industry is a growing business sector that brings significant benefits to many areas of the country.</p> <p>With visitor numbers growing year on year over the past three years, it seems that the Lynton & Barnstaple Railway is very much in touch with current trends and tourist requirements.</p> <p>The railway attracts visitors to the line and the area from around the world as well as all parts of the UK, many of whom would otherwise not visit North Devon.</p> <p>A report by Bernard Lane (to be submitted with the railway planning application) demonstrates how the project meets modern tourism objectives and trends. It also shows how the project supports Exmoor National Park and North Devon District's approach to tourism.</p>

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8	It is only maintainable for a very few weeks of the year as a ride	The railway's timetable for 2015 included 235 operating days for public services, with only 8 weeks of the year when no trains operated. Once the railway is extended further the timetable will be expanded to at least 250 days per year.
9	It cannot justify its claims to redevelopment and change to rural livelihoods	Extension of the railway to Wistlandpound Reservoir will result in a net gain of 16 directly employed persons on the railway and an assessed increase in other tourism related full time equivalent jobs of 62. Direct income and secondary spend in the local area will increase by £2.2m. per year rising to £3.7m. once the planned passenger numbers of 70,000 are reached. With a 'Keynesian' multiplier of 2.5 applied the overall benefit to the local economy becomes more than £9m. per year This will be on top of the direct benefits that will come from the expenditure with local firms during construction of the railway. The type of jobs associated with the railway will be paid jobs with benefits from increased engineering opportunities and some apprentice places. Full details of these projections are available in the Business Plan for Phase IIA.
10	Conditions with flooding and river crossing would be an impossible access network nor in the "ideals of interest"	It is assumed that this comment relates to the culvert and bank which will carry the railway across the River Heddon. The culvert has been designed to encompass the banks of the river and is many times larger than the culvert underneath the A39 at this point. As a result of this there is no risk of flooding at this point, as the required Flood Risk Assessment underlines. The construction plan for this site adequately demonstrates how the site will be accessed and the manner in which the river and local ecology will be protected during construction. The applications for the reinstatement of the line will be accompanied by an EIA, ensuring that all impacts are rigorously assessed.
11	The A39 follows the route of the railway in part so there is no advantage in a tourist ride which is expensive	The A39 is a relatively fast road which affords limited opportunity to observe and appreciate the special qualities of Exmoor National Park. The railway will provide a slow tourism route through this part of the National Park affording travellers views of the park which are not available in any other way.
12	The route only gets you from car-park to car-park	Lynton, Caffyns Halt, Woody Bay Station, Parracombe Halt, Blackmoor Gate and Wistlandpound are not car parks, they are destinations in their own right for local people and visitors. In addition the proposal includes providing shuttle bus services from Woody Bay Station to Lynton & Lynmouth before the railway is extended there.
13	Division created by the line around Parracombe would make the land unfavourable	Where the railway line crosses agricultural land, arrangements are made (such as accommodation crossings) with the former owners of the track-bed to allow the land to be farmed without hindrance. For 37 years all the farms along the route of the railway operated effectively and this has continued to be the case along the existing re-opened line (Phase I).
14	The existing tourist mile is built on the easy straight without inclines and cross winds	The current railway has a gradient of 1:50 which was the prevailing gradient for most of the original line as it climbed from sea-level in Barnstaple to the summit of 1000 feet at Woody Bay Station. It includes two curves which provide a 90 degree turn from Woody Bay Station to Killington Lane. It is also more exposed to crosswinds than much of the proposed extension.

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15	It would be unfarmable if divided between the A39 and the river bed	If any area of land is likely to be cut off by the railway in such a manner as to make it unusable, the railway offers to purchase the land or otherwise negotiate a settlement.
16	There is nothing green or sustainable about this proposal	<p>As outlined elsewhere, the project is financially viable, and in line with the objectives held for sustainable tourism by both ENPA and NDC. Regarding environmental impact, the railway has undertaken a full EIA the conclusions of which are submitted in the Environmental Statement and finds the likely impacts of the railway acceptable.</p> <p>It is a widely accepted fact that, once established, the route of a railway provides a protected ribbon of undisturbed land which improves connectivity between species habitats The varying conditions, with damp cuttings and dry embankments, provide for the encouragement of a wide variety of plants and animals and these areas can, as with the West Somerset Railway, be managed to provide the right conditions for specific species.</p>
17	It is totally unjustifiable to move farmers or landowners out in favour of part-time, fine weather recreational tourist ride	<p>This may refer to the re-use of farm buildings at Rowley Moor Farm. The buildings here were acquired by the Trust as part of the whole property and, as owner of the buildings, the Trust is entitled to apply for a change of their use. In this case, the opportunity has been taken to minimise the size of a large new building (the rolling stock shed) by adapting these buildings for railway use.</p> <p>As covered above, the impacts of the reinstatement on the use of farmland will be minimal.</p> <p>It is interesting to note that the railway is not just a fine weather ride. Some of the highest passenger numbers are experienced during inclement weather when visitors stay away from the beach. The passengers continue to visit the railway at all times of the year, with or without 'fine weather'.</p> <p>Outside of the peak month of August the railway enjoys 6 'shoulder months' (April to October) where passenger numbers each month are between 9 and 15% of the annual total.</p>
18	Will disrupt the peace and tranquillity of the area as well as the wildlife habitats of protected species	<p>As outlined above, the ecological impacts of railway will be minimal and often positive.</p> <p>The noise and vibration studies that have been undertaken have demonstrated that the peace and tranquillity of the area will not be noticeably affected, and there is a clear argument that, by reducing the number of vehicles traversing the A39, the extended railway will, in future, reduce traffic noise and disturbance.</p>
19	It cannot be reinstated without significant destruction to wildlife and change of character to the area	<p>Our ecological studies have informed our construction plan so that the methods and timing of construction will minimise disruption to wildlife as the EIA clearly shows.</p> <p>The structures and remaining formation of the original railway already exist in the area, and these together with the overgrown areas around them will be restored to their former appearance.</p> <p>Of the proposed 4.5 mile extension 85% of the original railway track-bed is still visible. The remainder (about 1200 yards) is mainly cuttings that have been in-filled which will be re-excavated.</p> <p>At Blackmoor Gate great care has been taken to ensure that the appearance of the area will be enhanced to create a suitable 'gateway' to Exmoor National Park with additional planting to provide new and improved habitat.</p> <p>The EIA contains a full LVIA which finds the landscape impacts minimal and often positive.</p>

	Comment	Response
20	Will crowd roads which struggle to support local traffic	By moving the centre of operations of the railway to Blackmoor Gate, and thereby reducing traffic to the current site at Woody Bay Station, the amount of traffic on the A39 between Blackmoor Gate and Lynton will be reduced. The projected increase in traffic on the A399 is well within the capacity of that road, which is the signposted main route from South Molton to Ilfracombe and Woolacombe.
21	It will make our homes unfavourable	The Trust will seek to acquire the two houses which will be most affected by their proximity to the railway. One of these, because it is on the formation of the railway, will have to be demolished. It is intended that the other will be purchased by, or sold to, a person who is at ease with the close proximity of the railway. The noise and vibration study which has been carried out indicates that there will be no significant effect on any other residential properties.
22	The noise and smell of the train is unacceptable. History describes it as echoing through the combe	Noise and vibration is dealt with above. The smells generated by steam trains are only evident at stations when the train is at the platform. These odours, much loved by many, dissipate swiftly and are scarcely noticeable in open countryside. The quote used here refers to the sound of the whistle echoing through the combe. The train whistle is an essential safety tool which is used to warn others of the approach of the train, or that it is about to move. The railway minimises use of the whistle to those occasions when it is a requirement of railway regulations for it to be used.
23	Describes 'it as which rolls from side to side and derailed at times when in practice formerly'	These comments refer to the original railway and do reflect contemporary reports. The railway has instigated a number of measures which ensure that the ride on the railway is both safe and stable. The carriages and carriage bogies have been modified during construction to improve the ride and to prevent some fouling between components that was likely to occur with the original designs. The original track was built with rail with a nominal weight per yard of 40 lbs. The existing railway is constructed with 50 lb rail and with heavier sleepers. The rail fixing method, outside station areas where The railway have retained authenticity, has been improved with the use of pandrol clips rather than spikes. These improvements ensure that the track remains in gauge and does not move in use as the original may have done.
24	Water was also a problem historically as the ride was prone to water shortage in summer and closed on peak tourist sunshine outings days	The original railway only suffered from lack of a good water supply at Lynton. Since the railway was built, however, there have been advances in methods of obtaining and maintaining a supply of water. At Woody Bay, for instance, where there was no suitable supply for steam engines, the railway now uses a borehole supply which feeds into a water storage tank. The railway does not foresee any difficulty in maintaining an adequate supply of water for its operations.

	Comment	Response
25	The aspirations of the Trust are highly speculative, not anchored or measured with sense, prudence, historic value, sustainability, an understanding of tourism or viable as a stand alone tourist business, or have any viable potential as a transport network between Lynton & Barnstaple	<p>The aspiration of the Trust is to restore as far as practicable the Lynton & Barnstaple Railway.</p> <p>Separate business plans have been prepared for the proposed extensions of the railway firstly to Wistlandpound Reservoir, then to Lynton and finally to Barnstaple. These plans have been reviewed by specialist advisers who have advised that they are realistic and conservative.</p> <p>The railway has received prestigious national awards for</p> <p>a) the construction of the heritage carriages b) the restoration of the station at Woody Bay, and c) the restoration of signalling systems at Woody Bay Station.</p> <p>The current operation of the railway stands alone as a tourism business, with an excess of income over expenditure being transferred to the Trust for further investment in the railway.</p> <p>The viability of the railway as part of the transport network of Northern Devon is outlined above and referred to in Bernard Lane's paper.</p>
26	The West Somerset Railway loses money and fails to attract interest	<p>The West Somerset Railway (WSR) is a major heritage railway which is well supported and well regarded throughout the heritage railway industry. It certainly attracts a lot of interest. It is not for the Lynton & Barnstaple Railway Trust to comment on the financial performance of another railway, however the railway are confident that the W S R is a viable and sustainable business in its own right.</p>
27	The railway is a short term speculative idea which seeks compulsory purchase and will devalue properties	<p>The railway is a long term project to reconstruct the rail link between Barnstaple and Lynton and to maintain it into the future.</p> <p>One of the main aims of the project team has been to acquire the former railway land from the current owners by agreement and, to date, this has been largely successful, with a number of ongoing friendly negotiations currently taking place.</p> <p>The value of the reinstatement of the railway to the local economy, and the benefits that it will bring to the local area, are such that the Trust will continue to seek agreement with the very few people that do not support its' reinstatement, whilst taking such steps as may be necessary to ensure that the project is viable and successful.</p> <p>The railway will only request compulsory purchase powers as a last resort option.</p>
28	There has been no compromise or co-operation with landowners	<p>The Trust has made every effort to meet with landowners and negotiate the terms by which the trust can acquire land and reinstate the railway.</p> <p>The agreements that the railway have with landowners, and the terms that The railway are currently negotiating with others, take account of any concerns that they raise and include provisions for the future operation of land that remains in their ownership.</p> <p>The ongoing relationships with landowners have proved to be almost totally amicable with very few exceptions.</p> <p>For instance the Trust has promoted the sale of one property that has been on the market for some years. Also the Trust has offered to purchase another property above market valuation but there is a difference between this and the owner's expectation.</p> <p>There is only one landowner for Phase IIA who has refused to enter meaningful dialogue with the railway, despite numerous opportunities being offered.</p>

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29	There is no merit, legality etc. for robbing the long term residence (sic) of the area of their livelihoods and homes of generations	<p>The one bungalow which the Trust has offered to purchase has been let out by its owners since they acquired it in 2002.</p> <p>The other property which the Trust expects to purchase, together with a railway enthusiast, has been on the market for a considerable time. The construction and operation of the railway is, in fact, likely to create a number of job opportunities in the area and thereby assist in the retention of young persons in employment within the National Park and its' immediate surrounds.</p> <p>As noted above the railway will be a source of direct employment including apprenticeships.</p>
30	It would destroy the area, disrupting wildlife habitats and the tranquillity of the area	<p>As outlined above, the railway will in fact often make a positive contribution to the wildlife habitats of protected species.</p> <p>The noise and vibration studies that have been undertaken have demonstrated that the peace and tranquillity of the area will not be overly affected, and there is a clear argument that, by reducing the number of vehicles traversing the A39, the extended railway will reduce traffic noise and disturbance.</p>
31	Landowners have not been properly consulted about the change of use of their farmland to recreational use, and the additional buildings to be commissioned for railway use, as maintenance, access and groundworks	<p>The Trust has consulted directly with landowners during the ongoing negotiations for the purchase of the railway formation.</p> <p>In addition the Trust has held a number of consultation events to which the general public have been invited.</p> <p>It is an inherent part of the planning system that all landowners, and indeed anyone else, has opportunity to make representation on proposals and for these representations to be taken into account insofar as they are material.</p> <p>One landowner has, by choice, not met with our representatives, having on three occasions cancelled at short notice the meetings that had been arranged. The railway has endeavoured to inform this landowner of our proposals by post, and, at their request, through their solicitor who similarly has declined to meet with us to discuss the project.</p>
32	It is a gross misinterpretation of what a National Park should be and provide	<p>The Purposes of National Parks are to conserve and enhance the natural beauty, wildlife and cultural heritage, and promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public.</p> <p>The reinstatement of the railway directly supports both purposes, especially through conservation and enhancement of the cultural heritage of the Park (of which the railway itself is a key part) and directly promoting understanding and enjoyment of this aspect of the Park's heritage and the wider Park the line runs through.</p> <p>When national parks carry out these purposes they also have the duty to seek to foster the economic and social well-being of local communities within the national parks. The railway will also directly contribute to this duty through providing local employment and wider economic benefit.</p> <p>Far from being a gross misinterpretation of what should happen in a National Park the proposals are exactly the sort of thing which should happen in a National Park as reflected in the reinstatement of the railway being included in the Exmoor National Park Partnership Plan 2012-2017.</p>

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33	It is a huge expense of public money which would be better spent on tourist attractions	Whilst the Trust will apply for grants from bodies such as the Heritage Lottery Fund, and others, a significant element of the funding will come from private sources. As stated above the proposals are a tourist initiative to enhance the experience of visitors to the National Park.
34	There is no parking provision in Churchtown	There is no intention for the public to access the railway by car at Parracombe Halt. The Halt will be a point where passengers can join or leave the train with pedestrian access to and from the village and the local network of footpaths. With some trains able to carry bicycles, it is possible that a small number of cyclists may join or leave the train at this point.
35	There is no consideration within L&BR plans for access and parking, or for consideration of St Petroc's ancient church and the privately owned spring water in Churchtown	As above in respect of access and parking. The railway have investigated the historical records in respect of St Petroc's church and are reassured that there were no adverse effects on the church from the operation of the original railway, nor will be in future. In addition the results of our noise and vibration surveys indicate that there will be no adverse effects as a result of the reconstruction and operation of the railway. Should protective action be required for a private water supply suitable measures will be taken during construction of the railway.
36	Assumption that requires a complete rebuild of the area??	Whilst the Trust is happy to replace the bungalow to be demolished with one or two residential properties in a suitable location, this will not in any way entail a "complete rebuild of the area".
37	Do not believe that aspirations beyond Calvert Trust are real or achievable	The plans to extend the railway to Barnstaple are realistic and achievable. The Trust and associated companies already own 25% of the railway formation beyond Wistlandpound including Chelfham Station and Snapper Halt, and is in current negotiations in respect of the major structure on the route, Chelfham Viaduct. In addition, the railway route, and the proposed terminus site in Barnstaple have been protected from development and for reinstatement of the railway within the emerging local plan for North Devon.
38	It is not deliverable financially	The Trust has had a financial feasibility study undertaken and is following the guidance that was included in the report. This has led to the formation of a funding advisory panel with a number of influential individuals who can help with the necessary introductions to funding sources. The members of this panel are very confident of availability of suitable funding. Significant sums have already been raised through our own efforts and projects that have been completed already have served to reduce the remaining sums required by £1.75 million.
39	It is short term, speculative and unsupported by finance or business sense	As outlined above, the project is a long term project to rebuild and operate the railway and maintain it into the future. There are substantial business plans for the operation of all phases of the railway which have been ratified by independent advisors.

	Comment	Response
40	The future plans are a total fabrication with a delusion expectation and has not addressed the landowners and businesses beyond Blackmoor Gate	The realism behind the future plans has been outlined above. The Trust and associated companies already own 25% of the formation between Wistlandpound and Barnstaple including Chelfham Station and Snapper Halt. There have been discussions with some other landowners, and some stretches of track-bed beyond Wistlandpound Reservoir and towards Lynton are subject to active negotiations. As our plans for the further extension of the railway progress contact with the relevant landowners is being made.
41	There has been no consultation by the L&BR to take over buildings currently owned by landowners and used for agriculture and for the entitlement of owners own development aspirations	There is no requirement for any buildings currently owned by landowners, and used for agriculture, to be taken over by the railway. The only buildings, other than station buildings, which will be used for the railway are either in the ownership of the Trust, or to be built on land owned by the Trust. All development aspirations, whether of the railway or other landowners, are regulated by the planning system.
42	Current road links from major towns could not support access to the L&B attraction	The current road links from major towns to Blackmoor Gate are perfectly adequate for the level of traffic that will access the railway. As indicated above, the level of traffic on the A39 is likely to reduce once the centre of operations of the railway relocates to Blackmoor Gate.
43	There has been no co-operation or consultation to take over sheds and store barns – and large areas for development works	The only sheds and barns which are intended to be used by the railway are owned by the Trust. The only large areas of development are at Blackmoor Gate. With the exception of the public car park owned by Exmoor National Park, the development sites are owned by the Trust or under offer following negotiation with the current owners. There have been a number of consultation events at which the railway's development plans have been presented to members of the public. Feedback from these public events has shaped the final proposals and has shown widespread support for the proposals. It is an inherent part of the planning system that all landowners, and indeed anyone else, has opportunity to make representation on proposals and for these representations to be taken into account insofar as they are material.
44	It is impossible to build a bridge that meets any of the criteria or sensitivities. It would be dangerous to traffic on the adjacent A39 (presumed to refer to Parracombe Bank site)	The former Parracombe Bank will not be replaced by a bridge, it will be a replacement of the culvert and embankment crossing the River Heddon as addressed above. The construction plan outlines proposals to ensure that the ecology of the site is protected and re-established after construction is complete. Access to the site from the A39 will be via a temporary access point and temporary road, with traffic light control which will ensure safety as vehicles enter and leave the site.