

**TRANSPORT AND WORKS ACT 1992**

**TRANSPORT AND WORKS (INQUIRIES  
PROCEDURE) RULES 2004**

**THE NETWORK RAIL  
(CAMBRIDGESHIRE LEVEL CROSSING  
REDUCTION)  
ORDER**

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**REBUTTAL PROOF OF EVIDENCE**

**-OF-**

**SUSAN TILBROOK**

Document Reference	NR32/4
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# 1 Introduction

1.1 This Rebuttal Proof of Evidence has been prepared on behalf of Network Rail to respond to particular matters raised in the Proofs of Evidence submitted on behalf of the following parties which were received by Network Rail on 02 November 2017. These include the Proofs of Evidence of:

1.1.1 Cambridgeshire County Council (OBJ/12)

- a) Alison Arnold
- b) Andy Lonnen
- c) Anna Bailey
- d) Camilla Rhodes
- e) David Robinson
- f) Geoffrey Fisher
- g) Geoffrey Grimmett
- h) Iain Green
- i) Janet Lockwood
- j) Jenny Thornton
- k) Karen Champion
- l) Laurence Smith
- m) Lynda Warth
- n) Mark Tuck
- o) Peter Gaskin
- p) Peter Taylor
- q) Susan van de Ven
- r) William Hunt

1.1.2 The Ramblers (OBJ/20)

- a) Jill Tuffnell

1.1.3 Cambridgeshire Local Access Forum (OBJ/052)

- b) Roger Buisson

1.1.4 AL Lee (OBJ/32)

1.1.5 Dr Roger James (OBJ/45)

1.2 It is not intended that this rebuttal proof should address matters that have already been addressed in my Proof of Evidence (NR32/1) or of other witnesses for the Promoters; however, cross references to relevant parts of that evidence are given below, where appropriate. The fact that I have not expressly rebutted a point does not mean that it is accepted.

1.3 I believe the facts and opinions stated to be true and that my evidence conforms to the standards and requirements of my professional body.

## 2 General Points

### 2.1 Road Safety Review

- 2.1.1 *At paragraph 5 of his Proof of Evidence (Obj12/23), Peter Taylor states “any recommendations from an external audit, although they may provide useful guidance to the designer, do not carry any authority with CCC until the Audit has been approved.”*
- 2.1.2 *At paragraph 7 of his Proof of Evidence (Obj12/23), Peter Taylor states “CCC’s Review has identified 11 sites that included no problems or recommendations from the Road Safety Audit and several others that failed to address the identified risks. In my opinion, this demonstrates why it is important that such a Review of external RSAs is undertaken.”*
- 2.1.3 In response, Cambridgeshire County Council (CCC) will need to approve the Road Safety Audit Response Report, following which an exception report may need to be prepared in accordance with HD19/15. The exception report should cover the following:
- Any problems and/or recommendations have not been accepted in the final Road Safety Audit Response Report and Cambridgeshire County Council agrees with the response; or
  - Where the Road Safety Audit Response Report accepts a problem and/or recommendation, but Cambridgeshire County Council does not agree with the Road Safety Audit Response Report.
- 2.1.4 At Appendix 1 to his evidence, Mr Taylor includes a Safety Audit Review, which has not previously been provided to Network Rail. The review document does not appear to be an independent RSA in line with the requirements of HD19/15. It would appear that the review undertaken by Cambridgeshire County Council did not take in to consideration the amended proposals that were submitted with the TWAO application and the later removal of 2 crossings, which are categorised as follows:
- Proposals removed from the order: Crossings C06, C08, C13, C18, C19
  - Updated proposals that incorporate RSA recommendations or resolve issues: Crossings C02/C33, C04, C07, C12, C26/27
- 2.1.5 Based on the current proposals and the CCC review I do not believe that an exception report is required for the current RSA as all proposals either take on board the recommendations made in the Stage 1 RSA or have been amended to remove the issues raised. Alternatively, crossings have been removed from the proposals.
- 2.1.6 However, there are a number of crossings where no issues were raised at the Stage 1 RSA but CCC have raised further concerns as part of their review. Some of these points are entirely new and have not been raised by the Council previously. These crossings are C11, C14/15, C16/17, C20, C25, C28, C29, C30. The review comments will be considered as part of the detailed design of the proposals, which be subject to a Stage 2 RSA where appropriate and will be subject to approval by CCC prior to implementation of the diversion route and closure of the crossings.

2.1.7 *At paragraph 6 of his Proof of Evidence (Obj12/23), Peter Taylor states “I have grave concerns that NR in their risk assessments, although they consider multiple parties and levels of exposure, introduce a scoring system that from highways experience, has been found to offer little benefit to the overall assessment and indeed may mask issues of particular relevance to a site. The development of Road Safety Audits since the 1970’s demonstrates the relative benefits of “scoring” has long since been superseded.”*

2.1.8 In response, it is assumed that Mr Taylor is referring to the ALCRM assessments carried out by Network Rail. To clarify, the ALCRM assessments have been carried out for the existing level crossings and do not relate to assessment of the suitability of the proposed diversions. The ALCRM assessments form one part of the risk assessment carried out at level crossings and more detail can be found in the Proof of Evidence of Mark Brunnen. Safety on the diversion routes has been assessed through the Road Safety Audit process and no attempt has been made to compare the assessments.

## 2.2 Relevant Tests

2.2.1 *In Paragraph 14 of his proof of evidence (OBJ/052) Roger Buisson of behalf of the Cambridgeshire Local Access Forum states “It is the considered opinion of Cambs LAF that those two tests of ‘convenient’ and ‘suitable’ have not been met by Network Rail for a number of the proposed level crossing closures. This includes as a result of:*

- *A net increase in safety risk that arises from the diversion of routes onto roads;*
- *Alternatives that increase the length of the journey which will make access more difficult and/or a less attractive proposition for many people; and*
- *An increase in the number of bridges, new flights of steps and diversions through culverts with a potential flood risk that will produce severe access problems for a range of users. “*

2.2.2 In response, the safety risk at level crossings cannot be directly compared to road safety as there is no accepted methodology for comparing the relative risk. The Road Safety Audit process (as set out in the Design Manual for Roads and Bridges, Volume 5, Section 2, HD19/15) is accepted procedure for assessing road safety for highway improvement schemes. Cambridgeshire County Council, in their role as the highway authority, agree that this is the relevant process for assessing road safety on the proposed diversion routes.

2.2.3 Diversion lengths have been considered as part of the overall assessment of the proposals, taking into consideration the nature of usage, wider PROW network and likely impact on overall route lengths and circular routes although origin and destination points will mean that the overall impact will vary for each user. It is considered that the proposals are suitable and convenient when assessed in this context.

2.2.4 The existing conditions and nature of use of the existing routes has been taken into consideration when proposing the new infrastructure required to implement a new route. It is not anticipated that the proposals will introduce severe access problems for existing users.

## 2.3 Book of Reference

- 2.3.1 *In her Proof of evidence Mrs Rhodes at sections 17 to 19 makes references to discrepancies between the Order Plans and Cambridgeshire County Council's (CCC) current rights of way record.*
- 2.3.2 The promoters obtained definitive rights of way mapping and adopted highway status information during 2014, and this was checked against information provided directly by CCC in November 2015. This data was used to populate the design proposal drawings which were discussed with CCC throughout 2016 and in early 2017. Ultimately, it was used to help prepare Order Plans in late 2016 and early 2017. Given that we engaged extensively with CCC during 2016 and 2017 it is surprising that no one on behalf of the Council mentioned that updates were being prepared and that the promoter's information risked being out of date. The Order Plans were based on the information made available to us by CCC and the promoters had no reason to assume that it had been superseded.
- 2.3.3 We have determined that some of the minor discrepancies noted in Tab 32 (Review of Book of Reference and Comparison of Order Plans with CCC Records) in the CCC bundle of documents are the result of changes in the 2016 Consolidated Definitive Map. There are a few instances where, having reviewed the evidence of CCC, Network Rail will be asking the Secretary of State to make some minor amendments to the order schedules and plans, however none of this prejudices and landowners or other interested parties.

### 3 C04 No. 20

#### 3.1 Cambridgeshire County Council Road Safety Audit Review

- 3.1.1 *At paragraph 9 of his Proof of Evidence (Obj12/23), Peter Taylor makes reference to the proposed 2.0m wide footpath in the field margin west of Station Road and states “Whilst this offers appropriate mitigation locally it does not a) improve pedestrian capacity across the rail underbridge or deal with potential issues arising from very limited pedestrian provision at the northeast of the route at the Industrial Estate access. Each of these locations present new collision risks for pedestrians from manoeuvring vehicles.”*
- 3.1.2 In response, the proposals for this diversion route have been subject to two Stage 1 Road Safety Audits. The field edge footpath was included in the proposals further to identification of the lack of footway provision in this location as part of the first RSA. The second RSA considered the overall route including the pedestrian route into the Industrial Estate access and found no problems.
- 3.1.3 There were two recorded accidents in the vicinity of the diversion route between the years 2011 - 2015. Both accidents occurred on Station Road at the bend near Fieldgate Nursery and no pedestrians were involved.
- 3.1.4 It is acknowledged that the existing footway on Station Road is narrow, however, usage figures from a 9 day survey carried out from 8<sup>th</sup> to 16<sup>th</sup> October 2016 showed an average of 75 pedestrians per day use the existing footway on Station Road, with a maximum of 93 pedestrians recorded on Tuesday 11<sup>th</sup> October. I am satisfied that Station Road is used currently as a pedestrian route, and that the diversion to Station Road, and use of the footways provided by Cambridgeshire County Council for use by all members of the public is suitable and will not be adversely impacted upon by the number of additional users. It is considered that the proposed field edge footpath provides an improvement for existing users of the footway, who currently have to cross Station Road to access pedestrian facilities to the south of Valley Farm.

#### 3.2 Use of Station Road

- 3.2.1 *Concerns about the use of Station Road are raised at paragraph 13 of the Proof of Evidence (Obj12/9) of David Robinson.*
- 3.2.2 *At paragraph 13 of his Proof of Evidence (OBJ12/12), Geoffrey Grimmett states that “the bridge footpath is too narrow to permit the safe passing of individuals, pushchairs, etc, in such traffic conditions.”*
- 3.2.3 *This issue is also raised in paragraph 16 of the Proof of Evidence (Obj12/26) of Susan van de Ven.*
- 3.2.4 *At section ‘The Local Situation’ of his Proof of Evidence (OBJ/45) Dr Roger James also raises concerns about the pedestrian/traffic hazard from traversing the bridge on Station Road*
- 3.2.5 In response, paragraphs 3.1.2 to 3.1.4 above address these concerns.

#### 3.3 Suitability of Proposed Diversion

- 3.3.1 *At paragraph 9 of his Proof of Evidence (OBJ12/18), Laurence Smith states that “this proposal fails CCC’s formally adopted NMU adoption criteria, is contrary to the provisions contained in*

*the Equalities Act and shows that the proposed route is dangerous where it runs over the railway bridge and passes access points to the industrial estate.”*

- 3.3.2 In response, the NMU adoption criteria is not a relevant assessment process for the diversions proposed as it does not take into consideration the wider benefits delivered as part of this project. In addition, this criteria appears to be applied to public path order applications to be taken forward for implementation by the Council, which is not the case for the TWAO. Furthermore, it is unclear on what basis the scores for the individual routes have been calculated and weighted. The proposals have been assessed for suitability and convenience as set out in Section 2 of my Proof of Evidence NR32/1.
- 3.3.3 *The issue of proposed route passing through at the entrance to the industrial estate is also raised in paragraph 18 of the Proof of Evidence (Obj12/26) of Susan van de Ven.*
- 3.3.4 As stated in my Proof of Evidence (NR32/1) at paragraph 2.3.14, the amended design was subject to a Stage 1 Road Safety Audit in September 2017 (see document **NR32/2 at Tab 11**) and the Audit Team did not identify any safety issues.
- 3.3.5 *At the 4<sup>th</sup> paragraph in the section titled The Local Situation of his Proof of Evidence (OBJ45), Dr Roger James provides an annotated plan for reference and he identifies issues as “BioHazard from passing a working Turkey farm” and “pedestrian hazard from traversing the ‘hard standing’ of a number of busy vehicle repair companies.”*
- 3.3.6 In response, I note that the route of the proposed footpath is incorrectly located on the plan and I suggest this has led to an erroneous assessment of the issues by Dr James. I note that the proposed route is MMD-367516-C04-GEN-005, which can be found in Cambridge Design Guide (**NR12**) submitted with the TWAO deposited in March 2017.
- 3.3.1 I note that design proposals are within fields adjacent to the turkey farm. All of the operations of the turkey farm are contained on their site and subject to statutory regulations on safety. I also note that the proposed route is not located in the area of vehicle repair hardstanding.



## 4 C07 No.37

### 4.1 The need for a Utility Route

- 4.1.1 *At paragraph 51 of her Proof of Evidence (OBJ12/6), Camilla Rhodes states that “It is clear that the problems presented by the lack of a utility route on London Road are a real concern to the local community.”*
- 4.1.2 *At paragraph 52 of her Proof of Evidence (OBJ12/6), Camilla Rhodes states that if the proposed diversion were to go ahead “it would not achieve the utility route aim, because the evidence is that the only solution that would be acceptable to those who seek it is a tarmac route on the road verge for cyclists and pedestrians. There are other mechanisms through the Highway Authority through which cycle routes can be achieved.”*
- 4.1.3 *At paragraph 53 of her Proof of Evidence (OBJ12/6) in respect of crossing C07, Camilla Rhodes contends that “If such a utility route were to be put in place, it would not be a suitable or convenient alternative for those who value the existing path for the enjoyment afforded by its quiet amenities. In reality, the proposal amounts to an extinguishment of public rights for these users”*
- 4.1.4 In response, I note that the existing route is a public footpath and any need for a utility route on London Road is without the level crossing closure project. The suitability of the proposed diversion route has been assessed with regard to the current use and purpose of the existing public footpath.

### 4.2 Steps on the Diversion Route

- 4.2.1 *At paragraph 23 of his Proof of Evidence (obj12/13), Iain Green contends that “the addition of steps may prevent some users from adopting the new diversion route as contained in the DIA”.*
- 4.2.2 *At paragraph 19 of her Proof of Evidence (Obj12/14), Janet Lockwood contends that the inclusion of steps in the proposals “would make it more difficult for people with pushchairs and other disabilities”.*
- 4.2.3 *At Paragraph 13 of her Proof of Evidence (Obj12/15) Jenny Thornton states “I am also concerned that the necessity for the installation of steps with NR's proposed diversion will lead to elderly and disabled users having difficulty traversing, or being put off using, the route. In particular, there is a Respite Care Centre at the top of London Road, and I am concerned that NR's proposals will negatively impact on the residents' mobility in particular. NR's solution should be designed for everyone and so these concerns should be taken into account.*
- 4.2.4 *At paragraph 23 of his Proof of Evidence (Obj12/22), Peter Gaskin states “The proposals put forward by NR would include the erection of steps. In my view, this creates an accessibility issue, especially for disabled or elderly users and those with prams. Therefore, if the proposal has to go forward, CCC would prefer ramps to be installed instead to minimise the impact this would have on less able users.”*
- 4.2.5 *At paragraph 4 of her Proof of Evidence (Obj26), Jill Tuffnell contends that “the proposals for such a footpath link are neither safe nor convenient. In fact, the incorporation of two steep, long flights of steps effectively makes the new route unusable by many walkers with even slight physical disabilities and totally unusable by anyone pushing a buggy”.*

- 4.2.6 In response, it is considered that the existing footpath to the south east of the level crossing is situated in field margins with surfacing that would present difficulties for users with limited mobility or people with pushchairs. This is supported by results from the 9 day census survey (document NR25), which showed no use of the footpath by elderly, impaired, wheelchair or pushchairs.
- 4.2.7 The Diversity Impact Assessment carried out for this crossing considered those with protected characteristics and recommended that any steps incorporated into the diversion route should be as accessible as possible. The detailed design of those steps will take into consideration the guidance given in terms on dimensions and the provision of landings and handrails. It should be noted that new steps will be provided and the existing Network Rail maintenance access steps on the north side of the railway will not be used as part of the route.
- 4.2.8 The provision of ramps was assessed instead of steps, but they were not considered appropriate in this location due to the extent of earthworks, acquisition of private land and the extent of temporary rights that would be required for construction. A technical note detailing the assessment carried out regarding the feasibility of ramps has previously been issued to CCC and is included in Appendix A.
- 4.3 **Use of London Road**
- 4.3.1 *At paragraph 16 of her Proof of Evidence (Obj12/14), Janet Lockwood contends that the use of London Road is “particularly dangerous, with traffic travelling too fast and poor sightlines at key areas, most notably at the crest of the bridge”.*
- 4.3.2 *At paragraph 17 of her Proof of Evidence (Obj12/14), Janet Lockwood contends that “there is no pavement along London Road. The verges to either side are rutted and dangerous and are not suitable for pedestrians”.*
- 4.3.3 *Points pertaining to the use of London Road are also stated in paragraphs 10, 11 and 12 of the Proof of Evidence (Obj12/15) submitted by Jenny Thornton.*
- 4.3.4 *At paragraph 15 of her Proof of Evidence (Obj12/15), Jenny Thornton states that “there would need to be work done to mitigate the speed of traffic along the B1368, were the adjacent footpath to be improved to a standard to accommodate pedestrians. There would need to be a speed limit imposed on the route in order for some of the risks associated with the blind spots to be mitigated. In addition, I think there needs to be work done on traffic calming. Alongside other residents of Harston, I have been campaigning for chevrons to be put into place. The increased number of pedestrian users on the B1368 means that making the road safer is more important than ever, part of this is ensuring that vehicles travel at slower, safer speeds”.*
- 4.3.5 *At paragraph 15 of her Proof of Evidence (Obj12/15), Jenny Thornton states that the “proposals on this south side are for a gravel path. I do not think this would work as vegetation grows up very quickly around that side of the verge and therefore this gravel footpath is likely to become overgrown quickly. In addition, the overgrowth of hedges is a sight obstruction and limits visibility when walking along the route”*
- 4.3.6 *At paragraph 5 of her Proof of Evidence, Jill Tuffnell states that “the Network Rail’s proposals involve crossing London Road which carries significant amounts of traffic travelling at speeds up to (or above) 60 mph.”*

- 4.3.7 In response, I have noted in paragraph 2.4.2 of my Proof of Evidence NR32/1 that the 85% speed (design speed) of London Road is 50.2mph and with an average 2 way flow of 3215 vehicles. This demonstrates that most vehicles are travelling within the posted speed limit.
- 4.3.8 There was one recorded accident in the period 2011-2015 in the vicinity of the diversion route where Shelford Road meets London Road. The collision occurred due to a vehicle trying to overtake a second vehicle that was turning right towards Shelford Road. The weather was fine and the road dry. The accident was of slight severity and no pedestrians were involved. The proposed route was amended during design development to avoid the need for pedestrians to cross London Road close to this junction following a recommendation as part of the road safety audit. These statistics demonstrate that there is not a road safety problem at either of the crossing points on London Road that form part of the diversionary route.
- 4.3.9 The road safety audit also noted that the crest of London Road at the railway bridge provides good visibility in both directions with wide hardstanding on both sides providing a suitable location for pedestrians to cross.
- 4.4 **Cambridgeshire County Council Road Safety Audit Review**
- 4.4.1 *At paragraph 9 of his Proof of Evidence (Obj12/23), Peter Taylor makes reference to the consultation plan that shows the proposed diversion being along the southbound (eastern side) of the B1368 carriageway and he goes on to raise concerns about this proposal.*
- 4.4.2 It should be noted that this point was raised as part of the Road Safety Audit carried out by an independent team during the development of the proposals, and then the design was amended to the proposal submitted with the order (see NR26). The final proposals do not include walking in the verge on the eastern side of the B1368 London Road.
- 4.4.3 *At paragraph 11 of his Proof of Evidence (Obj12/23), Peter Taylor suggests that there has been a failure in the RSA (Stage 1) that appears to leave NR open to additional problems that will need to be addressed at RSA stage 2 regarding the northern crossing point on the B1368.*
- 4.4.4 The crossing point in question was considered as part of the independent RSA and no problems were raised. There is good visibility in both directions at this location and is it considered that there will be sufficient gaps in traffic for the small number of pedestrians that use this route to cross the road safely to access the new field edge footpath on the eastern side of the B1368. The field edge path provides a good off road link to Byway 6 to the south that can only be accessed currently via the highway verge.

## 5 C11 Furlong Drove

### 5.1 Trail Riders

- 5.1.1 *At paragraph 12 of his Proof of Evidence (obj12/3), Andy Lonnen states that “If the proposed bridleway were to be a byway it would help a little bit but you are still removing about a kilometre of the route. It would be a loss to me and my fellow riders of a valuable amenity. I would prefer that the route was kept open.”.*
- 5.1.2 *At paragraph 17 of his Proof of Evidence (Obj12/20), Mark Tuck states “If I had to compromise I would access the proposed upgrade of FP8 Little Downham as a byway but not as a bridleway” and “it isn’t always obvious when you can and can’t use these tracks because they aren’t always well-signed, so people may use them anyway if they find it’s a dead-end”.*
- 5.1.3 In Response, the upgrade of Footpath 8 to a Byway open to all traffic (BOAT) over third party land and in close proximity to a private dwelling is not considered justified given the convenient and safe alternative routes. A BOAT would require the rights acquired to be increased from 3m to 5m in width and would allow motorised vehicles to use the route, which would result in a significant change to the impact on the landowner and their residential amenity.
- 5.1.4 The alternatives routes to the east and west, Main Drove and BOAT 34 respectively, are accessible options and maintain north south linkages, albeit not off road for both alternatives. Appropriate signing will be installed, to the satisfaction of the local Highway Authority, to inform users of the highway and PROW network that each section of existing BOAT on A Furlong Drove (to the north and south of the level crossing) are no through routes.

### 5.2 Equestrian users

- 5.2.1 *At paragraph 14 of her Proof of Evidence (Obj12/2), Alison Arnold states “In addition, the proposed diversion takes users from the south end of Furlong Drove east and then northbound along a busy road which is used by heavy goods vehicles and agricultural traffic. There are lots of arable farms in the area. Being put into contact with this kind of traffic is daunting even for an experienced rider as you are quite often reliant on drivers being considerate of you as a horse-rider. It is my experience that they often are not. The verges along the side of the proposed route are steep and uneven. You could step onto the verges but you have to pick and choose which verges are stable enough for a horse. If you aren’t a confident rider you wouldn’t do it. A thoroughbred isn’t as sure-footed as a cob.”*
- 5.2.2 *At paragraph 51 of her Proof of Evidence (OBJ12/16), Karen Champion states “The verges that NR propose that horse riders use are too narrow and uneven for the proposals.”*
- 5.2.3 *At Section 11, first paragraph, of her Proof of Evidence (Obj12/19), Lynda Warth contends that “The roadside verges proposed are not suitable for horses and not fit for purpose. They are of inconsistent width, in some places very narrow and in others, narrow alongside a deep, water filled ditch. The verges are made up of unsupported, peaty fen soil, easy for a horse’s hoof to penetrate resulting in a trip, pitching both horse and rider into a ditch or the road which is busy with heavy agricultural and transport vehicles. Unlike the existing bridleway, the path*

*narrowness would prevent the rider seeking the best route on soft ground. The use of the verge route would require construction of a new verge path of at least 3 metres in width."*

- 5.2.4 *At paragraph 37 of her proof of Evidence (Obj 12/4) Anna Bailey states "The proposed diversion route is unacceptably long, narrow, unattractive and is used by HGVs which do not mix well with equestrian use."*
- 5.2.5 *At paragraph 52 of her Proof of Evidence (OBJ12/16), Karen Champion states "due to the proximity of the proposed diversion routes to busy roads, which are used by traffic including heavy goods vehicles, and farm traffic there is an added safety concern of diverting horse riders along these routes. Horses can startle and the rider needs an adequate area to bring a horse back under control and the proposed bridleway is not of a sufficient width to mitigate this"*
- 5.2.6 *At section 11, third paragraph, of her Proof of Evidence (Obj12/19), Lynda Warth suggests that "The creation of a new bridleway link to Byway No. 34 Downham of at least 5 metres width but preferably 10 metres would be acceptable. This would leave the southern section of Byway No. 33 as a cul-de-sac 'orphan' route. A further link from the extension to Byway No. 34 to Byway No. 33 would be advantageous."*
- 5.2.7 In response, it is considered that the verges on the proposed routes are of a similar nature to those currently used to provide access to BOAT 33, A Furlong Drove. Furthermore, it is most likely that these verges are currently used to access BOAT 33. It is anticipated that when using the public highway sections of the diversion routes, many users are likely to walk/ride in the carriageway as this provides the easiest walking and riding surface. There are, however, adequate verges along the majority of the route to step into or use if traffic is approaching. The verge availability varies on each side of the carriageway but the nature of this rural highway is such that crossing between each verge is not an issue.
- 5.2.8 Users are able to select their preferred route, and it is considered likely that equestrian users will divert to BOAT 34 to the west based on comments received about traffic free routes. They will be able to use the new bridleway link to access O Furlong Drove to the south. The bridleway link is proposed at 3m wide, which is considered suitable given the open aspect of this proposed field edge PROW.
- 5.2.9 A bridleway link to BOAT 33 south of the level crossing would require the construction of a large bridleway bridge over Thirty Foot Drain, but this could not be justified when it was considered that the proposed route to the south provides better access to ongoing PROW routes (Footpath 22 and BOAT 36).
- 5.2.10 It should be noted that the public highways that form part of the proposed diversion routes are lightly trafficked (Main Drove and O Furlong Drove average 2 way daily traffic flows are 238 and 308 vehicles respectively, with 85<sup>th</sup> percentile speeds of 38.3mph and 36.2mph respectively). However, it is recognised that on 2 days of the survey period a higher than average percentage of heavy goods vehicles was recorded on Main Drove. There were no recorded injury accidents on the proposed routes in the period 2011 to 2015 and a road safety audit carried out by an independent team did not identify any road safety issues with the proposals. Based on these traffic flow figures and the outcome of the RSA, it is considered that the use of the public highway sections of the route by equestrians is manageable and safe, and has not presented problems in its current usage.
- 5.2.11 In addition, under the Highway Code it is a legal requirement that all drivers MUST NOT
- drive dangerously

- drive without due care and attention
- drive without reasonable consideration for other road users.

It is therefore considered that all diverted users will be able safely use the alternative routes.

## 6 C14 Eastrea Cross Drove

### 6.1 Suitability of the Route

- 6.1.1 *At paragraph 56 of her Proof of Evidence (OBJ12/16), Karen Champion states “Along the proposed route of the diversion, all of the agricultural land slopes down to the two drainage ditches to the north of the track, so although the north-south ditches stop short of the proposed route, it is unclear what provision has been made for the proposed footpath replacement route. It is also unclear whether there is a flooding problem on the land on which the replacement route would run when the water table is high. During October 2017 when I undertook a site visit, crops at this point carried a high weed burden and the natural vegetation was reed, rush and burdock, which would make it difficult and expensive to maintain an unobstructed route. Bearing this in mind, it is likely that a properly engineered track would be necessary to sustain both tractor and pedestrian access to the fields.*
- 6.1.2 In response, it is noted that there is sufficient existing space from the edge of the field margin to the drainage ditch to accommodate an unsurfaced footpath and no extraordinary provisions are required. Field edge footpaths would be cleared of vegetation as necessary prior to implementation of the diversion route. Farm traffic currently uses the land without issue and would continue to do so after the unsurfaced footpath route is provided. It is not considered necessary to provide any additional form of track to accommodate farm vehicles and pedestrians.
- 6.1.3 It is considered that the issues raised are not insurmountable and are commonly dealt with in the maintenance of existing field edge footpaths.
- 6.1.4 I note that Environment Agency flood mapping record shows the proposed footpath location is at no greater flood risk than that presently experienced by the existing footpaths, roads and fields in the area. The IDB are not aware of any flooding issues resulting from their ditches in the area.
- 6.1.5 *At paragraphs 57 and 58 of her Proof of Evidence (OBJ12/16), Karen Champion raises concerns about road safety and suggests that an additional section of footpath should be provided between points P008 and P009 as it will remove pedestrians from the traffic on Wype Road.*
- 6.1.6 In response, a stage 1 RSA was carried out and did not identify any problems with the proposals. There are clearly marked pedestrian spaces on the east and west side of the Eastrea level crossing on Wype Road. There is good visibility in both directions from the crossing position at the level crossing which is in excess the desirable minimum stopping sight distances for a design speed of 100kph as stated in TD9/93. I am content that the scenario presented is a very low risk and this is reflected in the RSA which did not identify any issues.
- 6.1.7 I note that the provision of the bridge to provide access to Wype Road at the crossing was included in the design proposals to provide a shortcut link to the Wype Road close to Eastrea level crossing, a “pop out”, to reduce road walking at the request of Cambridgeshire County Council. Fenland District Council were content with the proposals if the “pop out” was provided. The provision of a footpath between points P008 and P009 would appear to be unnecessary given the footpath link between P007 and P009, and the provision of the “pop out”. The proposals will be subject to a Stage 2 RSA at detailed design stage.

- 6.1.8 I also note that currently users of Footpath 50, byway 49 and bridleway 60 currently provided by CCC are required to make use of Wype Road where these public rights of way currently join the road. The proposals will use Wype Road in the same manner as deemed suitable by CCC for instance to allow the user to reach byway 49 from footpath 50.



## 7 C15 Brickyard Drove

### 7.1 Suitability of the route

- 7.1.1 *At paragraph 62 of her Proof of Evidence (OBJ12/16) C15 Karen Champion makes reference to the need for a “badger survey to be undertaken on the proposed route to ascertain whether this will have an impact on future maintenance.”*
- 7.1.2 In response, the proposed diversion route for this crossing was amended to the route shown on plan MMD-367516-C15-GEN-005 (Appendix F of document **NR26**) following the completion of ecology surveys that identified the potential for badgers on a previous route. A preconstruction badger survey will be completed prior to any works taking place on site.
- 7.1.3 *At paragraph 64 of her Proof of Evidence (OBJ12/16) Karen Champion comments about the suitability of the verges on the B1096 Benwick Road to Footpath No. 41 as replacement route*
- 7.1.4 In response, I note that this section of highway verge does not form part of the proposed diversion route. The proposed diversion route south of the railway running eastwards and linking to Wype Road was included in the proposals to avoid the need for pedestrians to use Benwick Road. At consultation stage, CCC had no objections to the proposals on the basis that this link to the east was provided. See minutes of the meetings held with CCC officers included at Tab 5 in document NR32/2. It should also be noted that pedestrians can only currently access the southern end of Footpath 48 via the verges or carriageway on Benwick Road.
- 7.1.5 *At paragraph 65 of her Proof of Evidence (OBJ12/16) Karen Champion states that the “verge on Wype Road between points P003 and P004 is also not suitable to offer to pedestrians”.*
- 7.1.6 In response, users of Footpath 48 will be able cross Wype Road at Eastrea level crossing to access the diverted Footpath 50 on the east side of Wype Road. I note that currently users of Footpath 50, Byway 49 and Bridleway 60 currently provided by CCC are required to make use of Wype Road where these public rights of way current join the road. The proposals will use Wype Road in the same manner as deemed suitable by CCC.

## 8 C20 Leonards

### 8.1 Suitability of Diversion Route

- 8.1.1 *At paragraph 11 of his Proof of Evidence (OBJ12/11) in respect of crossing C20, Geoffrey Fisher contends that the diversion is an “unnecessarily long diversion” and that users are “much more likely to continue down Mill Drove itself and then turn south-west down Byway 113 after Mill Drove Farm.”*
- 8.1.2 In response, I have noted that Mr Fisher describes the route he takes in section 9 of his Proof of Evidence. In section 2.15.16 of my Proof of Evidence (NR32/1) I have stated that the additional distance of the diversion is approximately 255m over the original distance of approximately 2500m (from western end of byway 113 to the end of College Road). I note that it is possible to continue further on footpath 114 to the village of Wicken, adding another 1100m to such a journey which totals 3600m, and in addition there are circular walking route options in the locality which would still be available to walkers. The diversion length will depend on the users origin and destination points.
- 8.1.3 Guidance on calculations of walking pace on the publicly available Ramblers website suggests an average walking speed of 2.5 miles an hour with a proviso on level of fitness increasing this pace and that ground conditions may reduce this rate. Therefore to cross the railway via the diversion route would introduce an additional walking distance for the north/south connectivity of would take approximately 3.8 minutes longer to undertake than the current route. The additional time is unlikely to deter people from using the route when considered in the context of the longer walking routes that are used for leisure purposes.
- 8.1.4 I note that the diversion does not preclude the use of Mill Drove and users would be free to choose to use this route as they do safely at present. The diversion presents another opportunity for an off road footpath should users wish to take it.
- 8.1.5 *At paragraph 11 of his Proof of Evidence (OBJ12/11) in respect of crossing C20, Geoffrey Fisher contends “The proposals would amount to an extinguishment of a circular route that runs north along Mill Drove and then south towards C20 Leonards.*
- 8.1.6 In response I note that an examination of the public rights of way in the area to the north and south of the C20 level crossing shows that the diversion maintains a longer circular walk in the manner described by Mr Fisher via Cherrytree Lane and would actually introduce a new circular walk due to the reopening of footpath 114 (via byway 113 and Mill Drove) as part of the proposals.
- 8.1.7 *At paragraph 24 of his Proof of Evidence (obj12/13) in respect of crossing C20, Iain Green notes that the level crossing is used by the Heartbeat group and that a full DIA should have been undertaken.*
- 8.1.8 In response, I note that I have covered the reasoning on why a DIA was not considered necessary in paragraph 2.15.10 of my Proof of Evidence (NR32/1). The proposed alternative is fully accessible to this groups' members.

### 8.2 Consent Issues

- 8.2.1 *At paragraph 77 of her Proof of Evidence (Obj12/16) in respect of crossing C20, Karen Champion notes that “point G and the proposed bridge is on common land, which will require appropriate consent from the Secretary of State. As far as I am aware, this has not been identified and covered in the TWAO.”*
- 8.2.2 In response, I have assumed that this refers to plans provided at Tab 28 of the documents supplied by CCC which show the verge areas to both sides of Mill Drove north of the railway to be Common Land. These verges link to larger areas of Common Land to the north. Plans previously provided by Cambridgeshire County Council show these verge areas to form part of the adopted highway (see Appendix B of this rebuttal). The drainage ditch is adjacent to the highway and separated from the adjacent field by a minimum of 10m of vegetation and a track – given its historic association with the Common Land and now highway, the ditch is assumed to be a highway drainage feature and part of the adopted highway. These plots have been correctly referenced within the Book of Reference as adopted highway. The status of this land as adopted highway ‘overrides’ any Common Land status, and because the works are within the highway, protective measures and consents are not required.

## 9 C21 Newmarket Bridge

### 9.1 Flood Zone

- 9.1.1 *In paragraph 85 and 86 of her Proof of Evidence (OBJ12/16), Karen Champion raises concerns about flooding on the proposed diversion route*
- 9.1.2 The Environment Agency has been consulted as part of the feasibility works undertaken for the level crossing and confirmed that their historic flood maps outlining flood events between 1946-2007 do not show flood events that affect this crossing. The Environment Agency (EA) note that PRoWs are classed as 'Water Compatible' and are therefore acceptable within Flood Zone 3b – the functional floodplain. If a PRoW could be affected by flooding then public safety notices are an option to consider.
- 9.1.3 Newmarket Bridge level crossing lies approximately 1.1km south of Bridge Road in Ely. The river path (Fen Rivers Way) in Ely is at a low level and it is considered that if river levels were to affect the route in Ely, it is likely to deter users approaching the Wells Engine diversion from the north. Appropriate signing could warn walkers of risk of the full route being unavailable in the event of high water levels.
- 9.1.4 Users of the Fen Rivers Way approaching from the south could potentially have walked for some distance before encountering the diversion route at Newmarket Bridge in times of flood. However, appropriate signing at suitable locations would be an effective means of warning users of the potential for the route being unavailable in times of flood.

## 10 C22 Wells Engine

### 10.1 Suitability of diversion route

- 10.1.1 *At paragraph 91 of her Proof of Evidence (OBJ12/16), Karen Champion contends that the diversion is “196m around the abutment of the railway bridge and up the flood bank on the northern side. This is four times longer than the existing route of 43m.” and states that the diversion is a “hazardous area of trips and slips, as one is unable to properly check one’s footfall”.*
- 10.1.2 In response, I have noted in paragraph 2.17.7 of my Proof of Evidence (NR32/1) that the additional length is approximately 170m. Taken in context, the additional 170m or 2.5 minutes of additional journey time is not inconvenient when considered as part of the long distance path that this route lies on.
- 10.1.3 Ms Champion fails to recognise that the design proposals call for the installation of a new footpath which would be designed to an appropriate standard to remove issues such as slips and trips.
- 10.1.4 *In paragraph 93 of her Proof of Evidence (OBJ12/16), Karen Champion describes the perceived issues with the use of the proposed footpath passing under the railway bridge.*
- 10.1.5 In response I note that this is a common practice to employ such underpasses for walking routes and note that such a path is already provided on the opposite bank of the river at C21 level crossing. I note that in her Proof of Evidence for C21 Karen Champion does not highlight similar concerns about perceptions of users safety at C21, the principles of which are the same as C22. I am satisfied that the suggested risks are acceptably low and perceived scenario raised by the Objector are not likely to adversely affect the suitability of the proposed diversion.

### 10.2 Flood Zone

- 10.2.1 *In paragraph 94 of her Proof of Evidence (OBJ12/16) in respect of crossing C22, Karen Champion states that the “same hazardous flood plain issues that I have set out at paragraph 72 above also apply to this location.”*
- 10.2.2 *The issue of flooding and flood zones is also referred to at paragraph 29 of the Proof of Evidence (obj12/9) of David Robinson and at paragraph 18 of the Proof of Evidence (obj12/26) of William Hunt.*
- 10.2.3 In response, I am unable to determine references to flooding issues from an examination of the paragraph 72 referred to by Ms Champion, however, I assume that she has similar concerns to those stated in paragraph 85 of her proof of evidence where she discusses her concerns at C21 Newmarket Bridge
- 10.2.4 The Environment Agency has been consulted as part of the feasibility works undertaken for the level crossing and confirmed that their historic flood maps outlining flood events between 1946-2007 do not show flood events that affect this crossing. The Environment Agency (EA) note that PRoWs are classed as ‘Water Compatible’ and are therefore acceptable within Flood Zone 3b – the functional floodplain. If a PRoW could be affected by flooding then public safety notices are an option to consider.

- 10.2.5 It should be noted that the proposed diversion routes pedestrians through the first span of the bridge structure to keep users as high and far from the water's edge as possible.
- 10.2.6 Wells Engine level crossing lies approximately 1.15km south of Bridge Road in Ely. The river path (Fen Rivers Way/Ouse Valley Way) in Ely is at a low level and it is considered that if river levels were to affect the route in Ely, it is likely to deter users approaching the Wells Engine diversion from the north. Appropriate signing could warn walkers of risk of the full route being unavailable in the event of high water levels.
- 10.2.7 Users of the Fen Rivers Way/Ouse Valley Way approaching from the south could potentially have walked for some distance before encountering the diversion route at Wells Engine in times of flood. However, it is considered that the route drops to low levels at the Fish and Duck marina and to the west of the marina under the railway bridge. Walkers would therefore encounter restrictions in other locations on the route that would affect their ability to access the route further north.
- 10.2.8 Users approaching from Little Thetford approximately 2.5 km to the south could, however, approach Wells Engine without experiencing flooding on the existing PROW routes. It is considered that users heading south from Little Thetford are likely to experience similar problems in times of flood when travelling south at present. However, appropriate signing at suitable locations would be an effective means of warning users of the potential for the route being unavailable in times of flood.

# 11 C24 Cross Keys

## 11.1 Suitability of diversion route

11.1.1 *At paragraph 6 of his Proof of Evidence (OBJ32), Christopher Purllant (Brown and Co Alexanders) on behalf of Mr Anthony Leonard Lee contends that the route of the proposed diversion is likely to cause a conflict with arable farming operations, such as spraying, and pedestrian movements.*

11.1.2 In response I note that it is common practice to have footpaths on arable land and that this is a manageable use of the land and would not preclude the installation and safe operation of the proposed footpath.

## 12 C25 Clayway

### 12.1 Suitability of diversion route

12.1.1 *In paragraph 93 of her Proof of Evidence (OBJ12/16), Karen Champion states “the proposals would require users to walk along the side of Padnal Road. Not only is this a route that is currently available, making this an extinguishment, but it is not enjoyable in comparison with the existing off-road route. Three sides of a rectangle is also nowhere near as direct as the current route.*

12.1.2 In response, Padnal Road is a pleasant lightly trafficked suburban street of a similar nature to many of the roads in Littleport, through which residents will walk on approach to the alternative crossing point on Victoria Street. Use of Padnal Road will depend on the origin point of pedestrians wishing to access the riverside path.



## 13 C26 Poplar Drove and C27 Willow Row Drove

### 13.1 Trail Riders

- 13.1.1 *At paragraph 14 of his Proof of Evidence (Obj12/3), Andy Lonnen states “If the proposed bridleway link was made as a byway it would lessen the impact of the proposed closure on motorcyclists as we could go along it and re-join our network. If not, we would have to use Poplar Drove or go back to the A10 and go up Mow Fen Drove, or the next one which goes up Camel Road. I don't see any reason why motorcyclists shouldn't be able to use the proposed link as well.”*
- 13.1.2 *At paragraph 21 of his Proof of Evidence (Obj 12/20) Mark Tuck states that the proposal would take out a large section of the trail riders' network.*
- 13.1.3 In response, the proposed bridleway link requires rights to be taken over private land. A BOAT would require the rights acquired to be increased from 3m to 5m in width and would allow motorised vehicles to use the route, which would result in additional impact on the landowner.
- 13.1.4 It is considered that Poplar Drove provides a suitable alternative route, which following the changes to the rights at the crossing will restrict usage over the crossing to private users, 2 wheeled motorised vehicles and bridleway users only. New locked vehicle gates and the installation of bridleway gates will facilitate this change. The change in rights at this crossing will reduce use of Poplar Drove as a through route by 4 wheeled public vehicles.
- 13.1.5 The proposal will extinguish approximately 180m of byway and downgrade a further 50m to bridleway. A further 500m (approx) on Willow Row will become a dead end. The total extent of byways (BOATS 30, 31, and 32) in the local vicinity of this route is 3.77km. Therefore 6% will be lost to the local byway network and 14% of the remaining network will become a no through route. This local network of byways is accessed and connected by local rural roads at present and the diversion to these lightly trafficked routes will enable trail riders to complete journeys of a similar overall distance to those currently ridden, albeit with sections of the routes being on metalled roads.

## 14 C29 Cassells

- 14.1 *At paragraph 31 of his Proof of Evidence (Obj12/22), Peter Gaskin states that “ I am concerned that NR's proposals create the potential for two new road crossing points on Brinkley Road for users. The First of these crossing points is situated to the north-west of the railway line and the second is situated just to the north after the car park where users need to cross back onto the western side of Brinkley Road.*
- 14.2 *At paragraph 32 of his Proof of Evidence (Obj12/22), Peter Gaskin states that “Earlier NR plans showed just one crossing of Brinkley Road just after the car park. This has been changed in order to make the route shorter for users travelling along the footpath parallel to the railway line. However, the introduction of an additional crossing point makes the proposal substantially less safe for users.”*
- 14.3 In response, it should be noted that there are currently 2 crossing points on Brinkley Road. One situated just to the north after the car park and one where Footpath 1 meets Brinkley Road.
- 14.4 It is expected that users wishing to continue onwards to Footpath 11 to the south of Brinkley Road will use the new section of footpath just to the north of Brinkley Road Level Crossing. This crossing point was assessed by the Road Safety Audit team who considered the crossing location to provide improved visibility for pedestrians.
- 14.5 *At paragraph 32 of his Proof of Evidence (Obj12/23), Peter Taylor comments that any restrictions both on forward visibility and the uneven verge that may introduce problems to be tackled in the design prior to Stage 2 Audit have not been recorded.*
- 14.6 In response, two stage 1 RSAs have been carried out in this location with changes made to the design to mitigate problems raised by the audit team in the first RSA. The Audit team have commented that updated proposals improve the design and did not consider that any further problems needed to be raised.

# Appendices

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## **A. Technical Note on Ramp Feasibility**

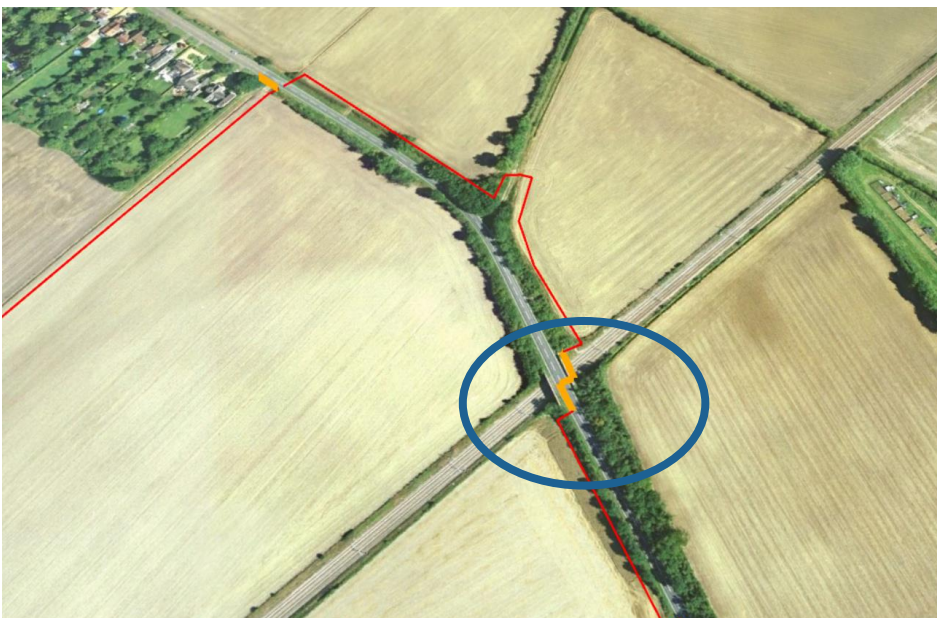
<b>Project:</b>	Anglia Level Crossing Reduction Strategy		
<b>Our reference:</b>	367516/TN25	<b>Your reference:</b>	
<b>Prepared by:</b>	J Nicholson	<b>Date:</b>	31/10/17
<b>Approved by:</b>	S Tilbrook	<b>Checked by:</b>	N Huntley
<b>Subject:</b>	C07 Ramp Feasibility		

## 1 Introduction

During the development of the outline design proposals for closure of this level crossing, the need for a field edge path to the north and south of the road bridge on London Road was identified in order to reduce the extent of road walking on the new route. The height difference between road level at the bridge and field level was considered and steps were proposed instead of a ramp, due to the length of ramp that would be required together with the associated earthworks and vegetation clearance necessary.

The purpose of this technical note is to demonstrate in more detail the works that would be necessary to install ramps in this location. It should be noted that this note considers ramps at 1 in 12, which show a best case in terms of ramp lengths. However, to meet Equality Act requirements and design guidance, landings or rest areas would need to be included in the final design. This would increase the extent of works required.

**Figure 1: Current proposed location for stairs, on each side of the road bridge**



Source: Google Earth with Mott MacDonald design freeze layer added

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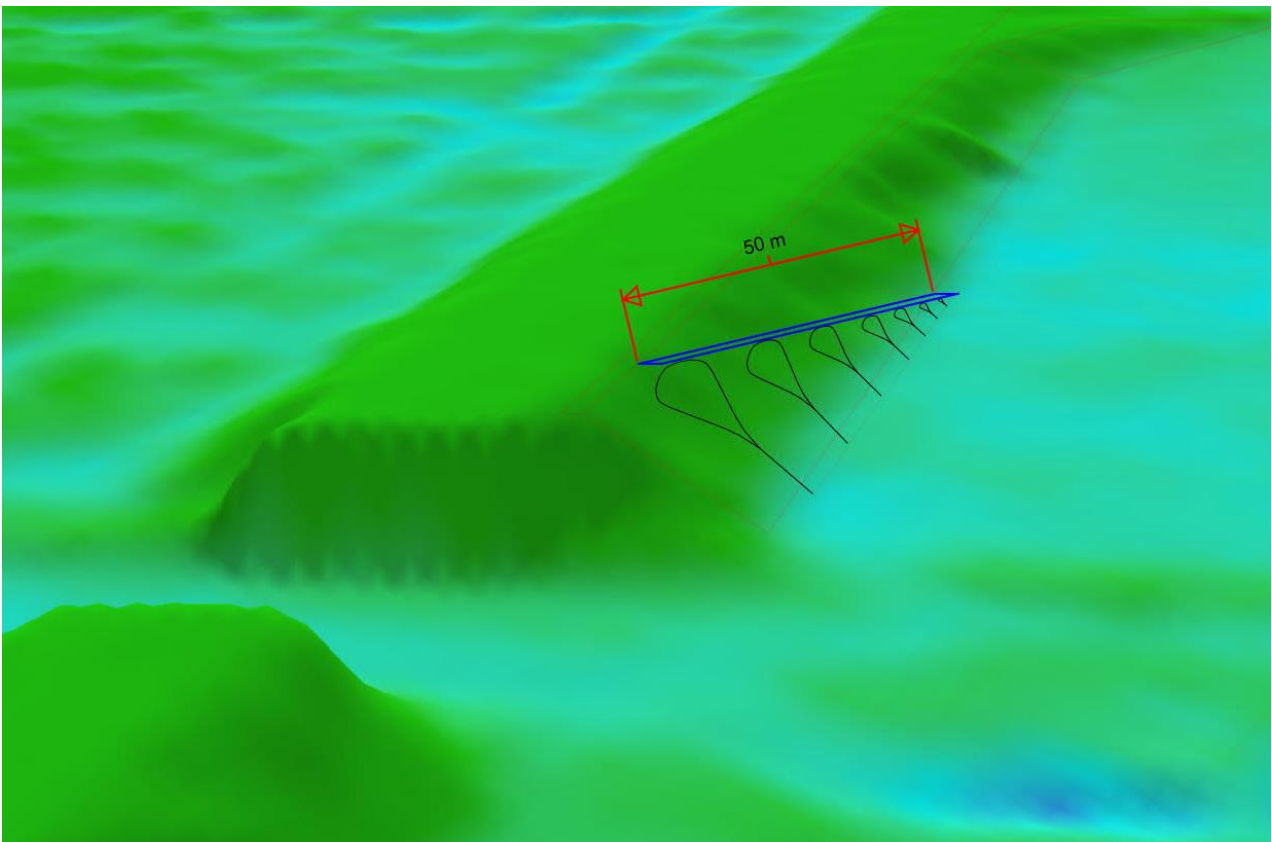
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## 2 Example sketch of ramp configuration

The sketch shown in Figure 2 shows how a ramp may be arranged on the north eastern approach embankment to London Road bridge, using LIDAR data to show the existing ground profile. It is assumed that a 2m wide path would be built out from the existing embankment slope. The sketch below shows this arrangement, with the tadpoles indicating where new earthworks and vegetation clearance would be required.

A ramp on the south western side of the bridge has not been included in this note, due to the likely similarity.

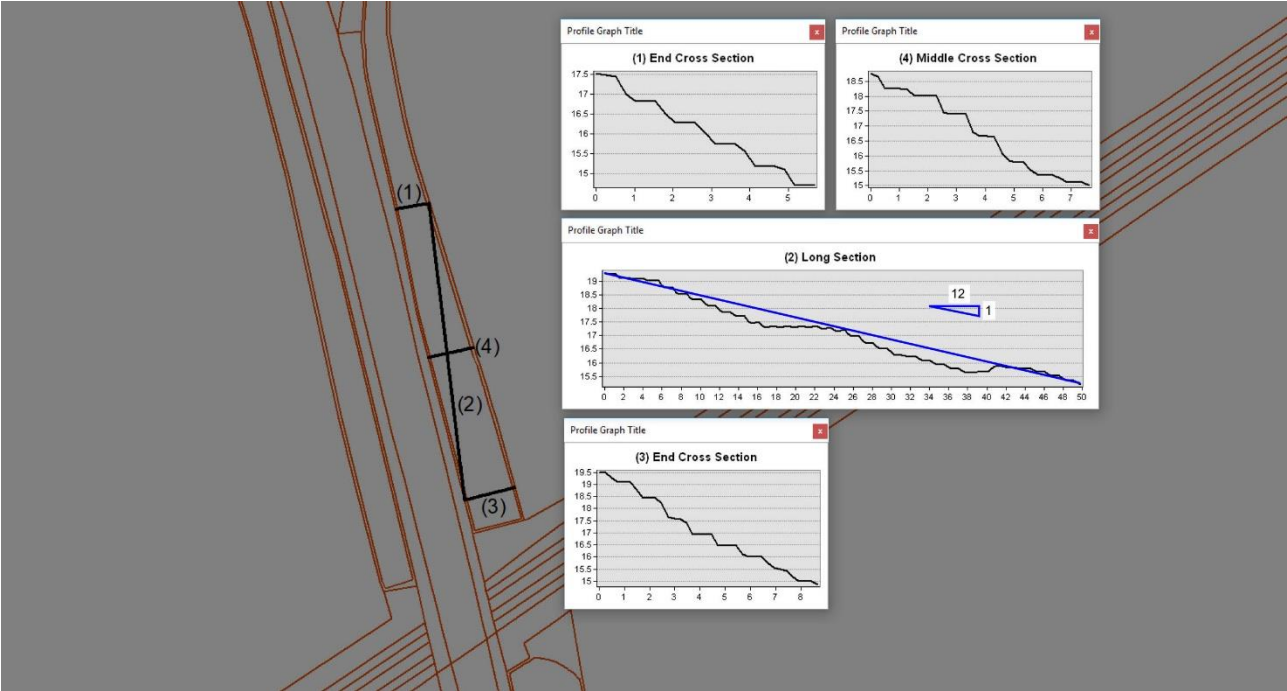
**Figure 2: Marked up 3D image, showing expected ramp placement on the northern side of the railway (grey outlines are indicative only)**



Source: Mott MacDonald

### 3 Northern side

Figure 3: Plan view of sections through the embankment on the northern side of the railway



Source: Mott MacDonald

From Figure 3, the following values have been obtained:

Table 1: Northern side distances

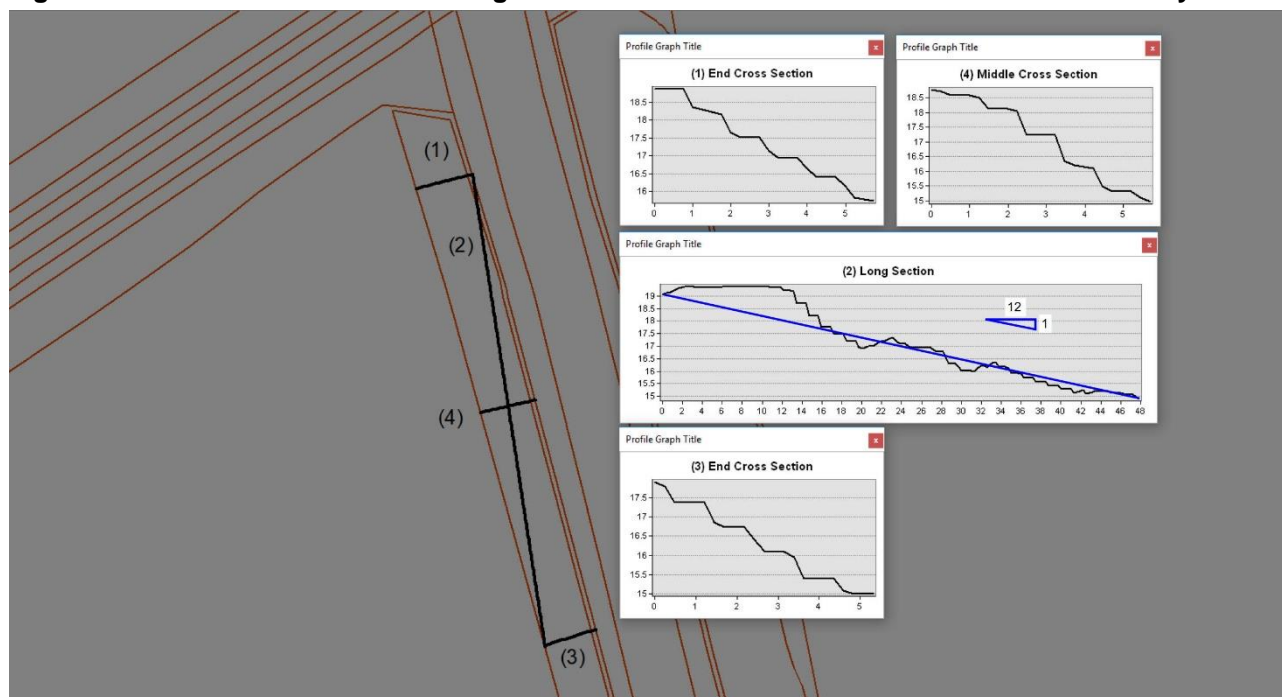
Section	Height difference (m)	Length (m)
(1) End Cross Section	2.8	5.7
(2) Long Section	4.1	50
(3) End Cross Section	4.6	8.7
(4) Middle Cross Section	3.8	7.6

Source: Mott MacDonald

From the values in Table 1, the gradient of a ramp installed along the line of (2) long section would be approximately 1 in 12.

## 4 Southern side

**Figure 4: Aerial view of sections through the embankment on the southern side of the railway**



Source: Mott MacDonald

From Figure 4, the following values have been obtained:

**Table 2: Southern side distances**

Section	Height difference (m)	Length (m)
(1) End Cross Section	3.2	5.7
(2) Long Section	4.1	47.9
(3) End Cross Section	2.9	5.3
(4) Middle Cross Section	3.8	5.7

Source: Mott MacDonald

From the values in Table 2, the gradient of a ramp installed along the line of (2) long section would be approximately 1 in 12.

## 5 Conclusion

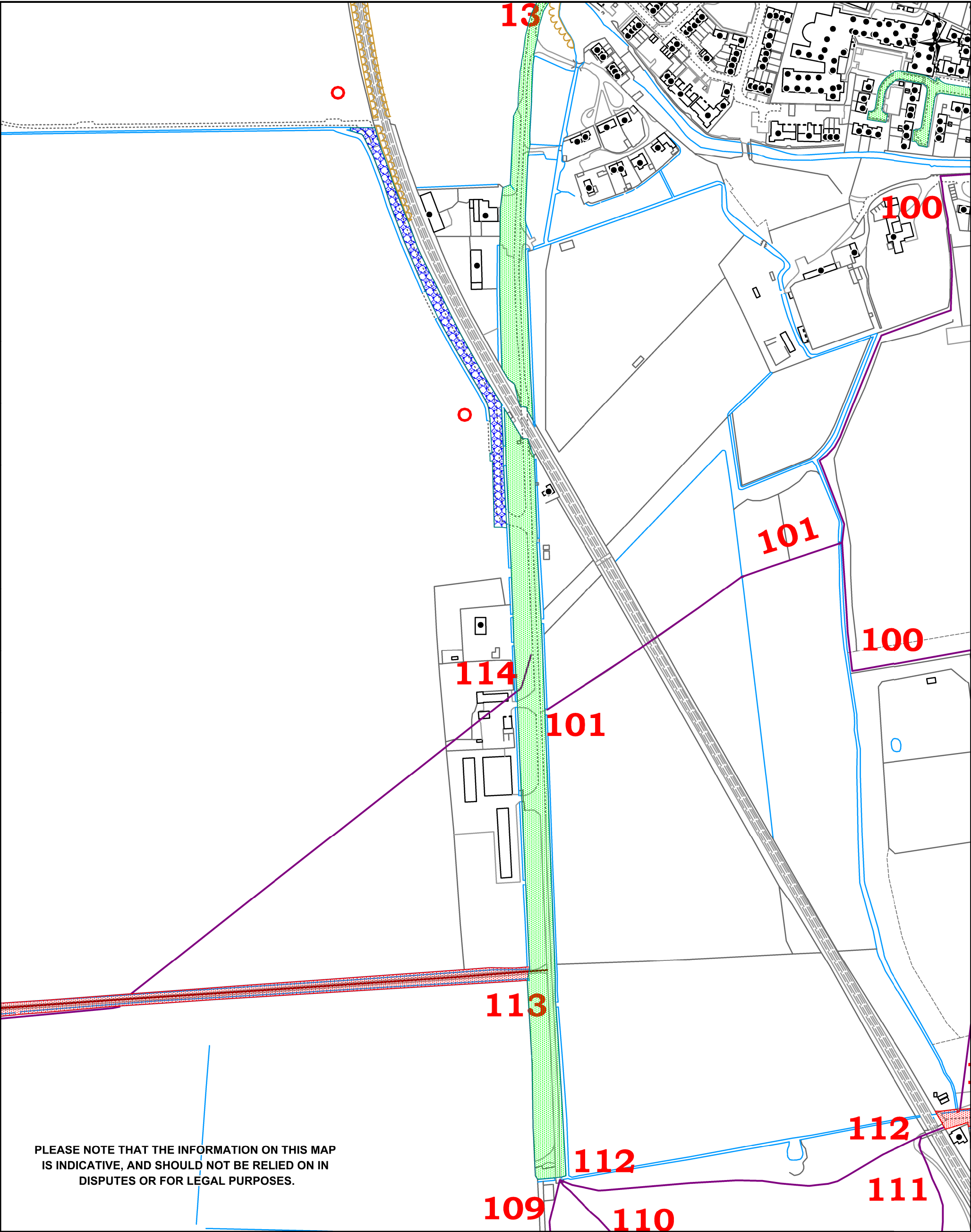
To install ramps on the north east and south west approach embankments to London Road bridge would require substantial earthworks and vegetation clearance. Permanent land acquisition would be required to extend the embankments out to accommodate the ramps and significantly more temporary access rights would be required for the earthworks activities.

The ramp dimensions included in this note are based on a 1 in 12 gradient, however, at detailed design stage it would be necessary to incorporate landings into the proposals and this would extend the length of






the works along each embankment. The full assessment of the extent of the ramps (including landings/resting places) has not been carried out as it is considered that the outline details provided demonstrate that provision of ramps in this location cannot be justified, and that the introduction of steps at this location are appropriate.

## **B. C20 Extent of Highway Adoption**



Scale: 1:3000  
Date: 07/02/2017  
By: MD

Legend		
Public highway (green)		CCC Rural Asset
Unclassified Soft Road (red)		CCC Urban Asset
		CCC Highway land
		
		Public Rights of Way
		Public Footpath (purple)
		Public Bridleway (green)
		Public Byway (brown)

