

**PUBLIC INQUIRY**

**APPLICATION BY NEWTWORK RAIL UNDER TRANSPORT AND WORKS ACT 1992**

**PROPOSED NETWORK RAIL SUFFOLK LEVEL CROSSING REDUCTION ORDER**

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**OBJ/27-FOREST HEATH DISTRICT COUNCIL**

**SUMMARY  
PROOF OF EVIDENCE – S22 Weatherby**

**SARA NOONAN**

**PRINCIPAL GROWTH OFFICER**

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1. I represent West Suffolk on various groups and projects, which all aim to help support and make the case for investment in railway enhancements to increase rail services for both freight and passenger services.

**S22 – Weatherby (Newmarket)**

2. FHDC is objecting to the closure of S22 Weatherby at this time due to:
  - a. the justification for this closure in relation to the aims and needs of Network Rail's TWAO and the long timescales for service enhancements;
  - b. impact on the community, including community severance;
  - c. conflicts with national, regional and local policies; and,
  - d. the proposed alternative being neither suitable nor convenient.

**AIMS OF TWAO**

3. In Network Rail's Statement of Case (NR 26), it is noted that: *..the justifications for closure relate not only to the safety test as set out in those sections of the Highways Act, but more widely to enable improved efficiency, network reliability, and the potential for capacity or linespeed enhancements'.*
4. In their reasoning for using a TWAO instead of the Highways Act 1980, NR note that Sections 118A and 119B of the Act, *...apply only where it appears to the relevant council to be expedient in the interests of the safety of members of the public using or likely to use such crossings, and not for wider railway purposes.* At the public

consultations to support the TWAO the focus was on alternative routes and safety, there was no consultation on the other aspects of closure, justification or explanation of 'wider railway purposes'. This lack of detail, would limit communities' ability to oppose closure on all relevant factors being considered in the decision to close crossings.

5. Returning to these, 'wider railway purposes', in terms of improved efficiency Network Rail have not itemised their costs on a per crossing basis in either document NR26 or in their consultation materials. The closure of Weatherby has therefore not been justified on efficiency grounds in terms of existing and future maintenance costs and associated savings. At this time the public is not aware of how much the closure of Weatherby level crossing would save Network Rail and how/if these savings are linked to future service enhancements on the Ipswich to Cambridge rail line, particularly the single track line between Chippenham junction and Coldham Lane junction.
6. Regarding the level of risk at this crossing and the associated implications for network reliability it is noted that:
  - a. the crossing is over one, not two lines of rails;
  - b. the line speed is up to 40 mph only and the crossing is located approximately 400 metres from the Station;
  - c. there is no rail freight timetabled on this line; and,
  - d. there are no significant future housing or employment sites located north or south of the railway line. Therefore, there are no expected population increases related to new development sites coming up to 2031.
7. As regards network reliability, NR have provided an ALCRM risk score, but the methodology and calculation of the risk score is not clear. NR have not provided crossing specific details of the impact on rail network reliability beyond the risk score and number of incidents at the crossing.

#### **TIMESCALES FOR SERVICE ENHANCEMENTS**

8. Network Rail have not demonstrated how closing Weatherby will increase performance and efficiency on a single track line with an hourly service and line

speeds restricted by the proximity to the station. No details or timescales were included in the community consultation on these proposed enhancements as regards each crossing.

9. Indicative timescales for relevant enhancement schemes to the line through S22

Weatherby include:

- a. East West Rail (Central Section – Bedford to Cambridge) with trains estimated to operate on the new railway by the early 2030s.
- b. East West Rail (Eastern Section – Cambridge to Ipswich) no timescale has been identified, but the Conditional Output Study commissioned to support the Eastern Section has identified the need for double tracking and signaling upgrades between Cambridge and Chippenham Junction in order to increase services.
- c. The *Anglia Route Study* (NR24) has identified the aspiration to increase passenger service frequency between Ipswich to Cambridge to 2tph under WACO7, but this is an option for funders in Control Period 6 (2019-2024), Control Period 7 (2024-2029) or beyond (post 2029).

10. Whilst Network Rail has aspirations for the schemes listed above, FHDC are not aware of any funded commitments to enhancements linked to the Cambridge to Ipswich line, therefore closing this crossing is premature due to the immediate and significant impact that this will have on the community without guarantees that the benefits of increased or faster services will be deliverable in the near future.

### **Community Impact**

11. Twenty-three of the 62 objections made to the Secretary of State concern S22 Weatherby. Unlike the other crossings in the Suffolk Order which are in rural locations, Newmarket is defined as a market town and is Forest Heath's largest settlement with a population of 17,240.

12. The level of response would likely have been higher had NR's consultation sessions been held in Newmarket rather than Bury St Edmunds, which is 14.3 miles away.

13. A large number of Newmarket's residents use the crossing including 3,597 pedestrians and 442 cyclists during NR's traffic census in June 2016 (NR 25).

Closure of this crossing would be extraordinarily disruptive for residents. Community facilities including four out of the five primary schools, the upper school, all three GP surgeries, the town council offices, library and the town's main retail offers are all north of the railway line. Newmarket Football Club, Ditton Lodge Primary School, Ditton Lodge Community Nursey, the New Cheveley Road Allotments and the Willow Crescent Play Area are all on the south side of the railway line. Residents fear that its closure would "split the town in half" and this has been reflected in numerous press articles, community protests and a petition against closure signed by 410 people.

### **Acceptability of Proposed Diversion (suitability and convenience)**

14. The proposed diversion using existing roads is considered neither suitable nor convenient due to the length and steepness of the route, which disadvantages those with disabilities, the elderly and parents of small children. If residents cannot cross the railway line then the journey will be longer and walking will become significantly less attractive leading to more trips by car and adding to congestion within Newmarket.
15. Network Rail emphasises that all diversions must be completed to the reasonable satisfaction of the highway authority, the proof of evidence of Andrew Woodin from Suffolk County Council speaks to this and the suitability of the route.
16. At the June 2016 public consultation undertaken by Network Rail, 97% of responses disagreed with the proposals and 67% of responses preferred another route. If the route is not deemed convenient by users then many will turn to their cars for short trips. Even a small increase of 5-10 minutes, can, particularly when added to a longer commute, put a walker off. This is particularly so when a route is being used to get to local amenities and as part of daily life, as it is for the Weatherby crossing. This creates a policy conflict with the National Planning Policy Framework and public health strategies which encourage people to make short trips via walking, cycling or public transport.
17. The argument about keeping people out of their car for short trips, is particularly important in the Newmarket area which has previously had an Air Quality Monitoring

Area (AQMA) on the High Street in place since 6 April 2009. The order was amended on 18 April 2017 removing the High Street, but remains in place on Old Station Road. Increased car use for short trips on this road, will likely lead to increased traffic queues, increased engine idling and short trips with cold engines are more polluting. It is not known if the potential for increased car use/impact on the AQMA was considered in the proposal to close S22 Weatherby.

18. FHDC would also raise issues regarding the loss of amenity to residents as they are diverted from a direct path to a more circuitous route, which is up to 870m longer and steeper with a 5% gradient at points which is just within the NR limit of acceptability for diversions. Given the high usage and diversity of users noted in NR's survey, it is not clear what evidence NR have gathered beyond their diversity impact assessment scoping report and if this has been externally validated. FHDC would expect the DIA scoping report, and any relevant diversity impact assessments for individual crossings to be disclosed to the Inquiry and all objectors.