

Closing statement

In drafting the order being considered by this Inquiry Network Rail have set out plans to close many “at grade” pedestrian crossings in Suffolk and have been quite open that they will seek to close further crossings in years to come. Improving the railway system is something that can benefit both the economy generally and also had attractions for many individuals, particularly regular commuters. These are things I accept as objectives, but in our democratic culture these are things that have to be balanced with the needs of the residents and visitors that use footpaths as part of their daily life, and for leisure such as exercise, relaxation, escape, or as part of other activities such as bird watching. Closing a crossing is a “forever” action and so needs to be carefully considered.

I have chosen not to object in principle to the proposal to close S08.

Whether there is adequate justification for the closure of this crossing is a matter for the Inspector to consider. I am confident that the absence of incidents at the crossing, and the unobstructed sight line will be taken into account. I am also confident that the effect of the proximity of the half barrier road crossing at Baylham will be considered, which I understand will effectively always limit line speed through S08.

I would expect, I think reasonably, to feel, and actually to be, as safe when using the relevant footpaths for legitimate purposes after the crossing closure as I do while the crossing is open. And that is where I have the problem. With the proposals as they stand I do not feel as safe, and do not believe I am, in fact, as safe following the closure. Network Rail may argue that I will be safe enough (my words) but that is not the test I apply when choosing a walking route. If the result of the closure is an unavoidable increase in the risk I experience when conveniently using the public rights of way, then there is something wrong, and something needs to be changed. And that is the situation I feel applies in the S08 case.

I use the crossing every few weeks, sometimes more frequently. I use it to gain access to the riverside towpath beside the Pippis Ford Lock where a group of volunteers I am associated with is carrying out restoration of the old navigation, and to observe the birds on and around the gravel workings. I expect to visit more in the future and so to want to cross the line more frequently as the gravel pit work comes to an end and the re-wilded areas mature, are opened up for public access and as more wildlife is attracted to the area.

The area between the railway and the river is a “destination”, separated from the road by the railway. It is not just somewhere to walk through or past on the way to somewhere else. I normally choose to drive to this area. There is only one local area of public car parking which is in a layby beside the B1113 near S08, and this is where I park. The next nearest public parking area is at Needham Lake some 2Km away which is connected along the old towpath, but which involves a hazardous crossing of Coddensham Road. It is a nice walk, but a walk I often wish to avoid. Sometimes I walk along the towpath from my home, some 3.5Km away, but mostly I park in the layby, which is convenient.

At the moment I feel I am completely safe crossing the railway line. I feel that my safety is for all practical purposes entirely in my own hands, ignoring such diminishingly rare events as derailments and, of course, meteorites.

If the closure is carried out as proposed then to return to my car from, say, the Lock I would feel safe walking along the eastern side of the railway line. In fact it looks like I will, within two or three years, have a choice of the “new” public footpath created under the order or a more sinuous permissive path as detailed in restoration plan included as part of the planning permission granted for the gravel workings. Both will be safe and both will feel safe. Sharing the narrow bridge over the railway tracks with heavy lorries is not ideal, but the lorries will leave the site as the gravel workings come to an end within two or three years after which the bridge will carry only the very occasional vehicle and will feel safe.

The path from the bridge to the B1113 is a perfectly sensible footpath, and feels safe.

But then, to return to my car, I will need to walk beside the B1113 on the existing footway. For the first hundred or so metres I do not, and will not, feel safe on this footway, it is too narrow, too close to fast traffic and there is nowhere to “escape”. In fact I feel so at risk on this part of the route that I will not use it.

This will prevent convenient access for me, and possibly others, by car to the lock and the re-wilded gravel pits.

Beyond the narrow section the footway opens out and is for the most part separated from the carriageway by a grassed area. The footway is wider, it is a fair distance away from the carriageway and there is an area you can step away from the traffic onto if necessary. For me this feels considerably safer.

If the crossing closes I will have no viable option, convenient or not, other than using this section of narrow footway beside a busy road. This road cannot be regarded as “rural”; it was the main A road between Ipswich and Cambridge before construction of what is now the A14. It carries rather more HGVs than may be expected due to effect of 2.4 metre bridges, often hit, under the railway and the weight limits in Needham Market. These prevent connection with the A14 or Stowmarket, making this the only access route to Needham’s industrial estate, the air base at Wattisham, to Needham itself and to many businesses, farms, towns and villages to the west. The narrow footpath is at a point on this road where the national speed limit applies, regularly exceeded, and where drivers’ attention is likely to be drawn to other road hazards such as the crest of Gallows hill, the narrowing carriageways, two bus stops, and the near blind turn to and from Darmsden.

My safety will no longer lie virtually solely in my hands, it will be largely in the hands of drivers passing within a metre or less of me.

It may be thought that I could cross the B1113 use the road to Darmsden and then return to the B1113 layby by means of the existing public footpaths across the fields, but, in addition to the extra distance and the hill to climb, this means crossing the B1113, twice, once at the Darmsden junction which is itself a hazardous place to cross this road.

I will not do this. It is not convenient, it introduces, for me, two road crossings which I do not want to attempt.

I think I am correct in saying that S08 is one of only a few crossings within the Order that places pedestrians in such close proximity a road carrying national speed limit traffic. It may be the only one.

At the moment, when I park in the B1113 layby and use S08 to get to the Lock or gravel pit areas I do not use a path that puts me as close to fast traffic as the section of footway I have described.

If I may be quite personal for a moment, my ability to walk along a "tight" line is deteriorating as I age. Recently my ability is getting rather rapidly worse as a result of recently diagnosed back problems which will only get worse. I occasionally stumble, as yet not dramatically, but enough to cause me to step "off line" from time to time. I am not alone in having such problems, nor am I alone in having some determination to keep accessing the countryside. I do not want to be walking close to fast traffic, particularly with my back to oncoming vehicles.

In the course of the Inquiry Network Rail have argued that the footway beside the B1113 has been checked by the independent audit team who have said that no problems were identified, but it is not clear, at least to me, what metrics were used as the basis for this assessment.

There has been discussion and debate about "standards" for footways carrying pedestrians beside a national speed limit road. Network Rail argue that there are none, and seem to assert that as this is the case an existing footway built probably 50 years (my estimate as the current A14 was built in the early 70s) ago can be used. My view is that guidance on the current "best practice" for keeping pedestrians safe when beside fast moving traffic such as can be found in the Design Manual for Roads and Bridges or the Street Works Regulations should apply. Both are very similar in their guidance, both requiring a significant separation between a path used by pedestrians and the edge of the carriageway. Network Rail appear to dismiss these sources. I think it is worth mentioning that where there is a grassed separation strip between the footway and the carriageway beside the B1113 I feel far safer. Not completely safe, but far safer, for me adequately safe.

In their own realm Network Rail have to meet standards keeping people standing and walking on platforms away from fast moving trains, marking the danger area with a "yellow line" behind which space has to be provided for pedestrians to stand when trains pass. Network Rail responded to this observation by citing an example of a station where this standard was not met. I recognise that a railway system as old as ours, with its fascinating history, will always have examples where modern standards are not met, and cannot be met, but these will be the exceptions. I trust that the Inspector will consider whether Network Rail's example of an exception to the width of the danger zone at a station is a rare case or whether it is rather more of the norm.

Network Rail even have a standard for the separation between the pedestrian "stop" point at crossings such as S08 and running trains, designed to keep pedestrians adequately clear of fast moving trains. Trains, of course, have a large "suction" effect from the mass of air they have to displace, but so do large lorries travelling at 50mph. Not as great, but enough to disturb someone's balance potentially causing them to stumble into the path of a following vehicle.

The narrow section of footpath beside the B1113 cannot provide a pedestrian with a similar level of separation from fast moving vehicles, vehicles which, of course, unlike trains, are not constrained to tracks and can swerve.

Frankly, I would have hoped a body with the safety focus of Network Rail would always seek out the best and safest practice when their actions affect public safety, but it seems I am being rather over optimistic.

Network Rail prefer to rely on guidance given in the Inclusive Mobility document, guidance which as far as I can see applies to environments inside and around buildings, and on built up streets, and not intended for the environment beside fast roads. The guidance may show the minimum width that allows a person to pass unimpeded, but makes no mention of a safety zone between the person and fast moving traffic. Interestingly that guidance does suggest "physical segregation" between pedestrians and cyclists where their paths run beside each other, but as far as I have been able to see is silent on any discussion of pedestrians close to high speed traffic. Personally I would rather be hit by a cyclist than an HGV.

In my view greater weight should be given to more relevant documents such as the Design Manual for Roads and Bridges, the Streetworks Regulations and the Railways standards for platforms and crossings when looking at the putting pedestrians in close proximity to traffic moving at 60mph and more. These documents and standards may not directly apply to the B1113 footway situation, but the safety considerations that drive the standards are the very same issues that I would face. Fast vehicles close to pedestrians in a limited space. The assessment of any footway beside such traffic needs to take into account that this is a new use of the footway, someone walking along the road for whatever reason may have a different set of expectations to someone that is used to walking on a path away from any threat of injury from traffic but has been diverted as a result of a crossing closure.

In the absence of standards for the minimum width of footways beside national speed limit roads it is interesting to ponder how the path beside the B1113 has been reviewed as having no problems. What was this route being assessed against? The answer seems to be that the footway was safe when it was built so it remains safe today.

The independent audit team and declared that no problems were identified and explained:

"This is because it utilises an existing footway that pedestrians would already be walking along, an existing footpath and provides a new off-carriageway footpath." (NR-INQ-64)

I would not be walking along this footway. When this footway was built I did not need to walk along it, and until this order was published I had not walked along it in the 40 years I have lived in the area. The closure of S08 as proposed in the Order will leave me no viable, convenient option but to use the footway. The path may not be new, but I am a new path user and my needs should be considered when looking at the future of crossing S08, particularly as the closure is proceeding on safety grounds.

But I am not seeking to resist the closure of S08.

There are obvious options to keep people like me that use the crossing to move between the B1113 layby and the lock, river and re-wilded area away from the narrow section of B1113 footway. For me the most obvious is to use the existing haulage track to the west of the railway, or to walk beside it. There are gravel lorries using the track at the moment, but their use will come to an end in the next two or three years. They are in any case slow, and noisy, and are highly unlikely to encountering other road vehicles, or cyclists, or deer, or any of a number of typical hazards causing them to swerve unexpectedly. Visibility is good, and there is room for pedestrians to “escape” by stepping aside if needed. But there are other options for safer routes open to Network Rail on the west side of the rails to carry pedestrians back to the existing footpath. I would go further, and suggest Network Rail considers delaying the closure until the gravel workings have been reinstated, and the haulage traffic has ended, and then use the permissive path to the east and the track to the west of the railway to save on construction etc costs.

It is now a matter for the Inspector to consider the justification for the closure, and to consider the convenience and suitability of the proposals for footpath and crossing users like me.

I await the outcome with interest, but am perfectly clear that should the proposal go ahead unchanged I will not be using the narrow section of footway beside the B1113. The effect is I will no longer access the river or re-wilded area from the B1113. I will no longer be able to use the right I currently have and the right I currently enjoy to get to the river side of the railway conveniently and safely from the B1113 layby.

But if changes were made to the proposal and a convenient path that avoided the narrow B1113 footway were to be provided I could continue to enjoy the rights I currently use to visit the places I want to visit.