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Date: 9th November 2016
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By E-mail only

Dear Jason,

Re: Anglia Level Crossings - Diversity Impact Assessment

Thank you for the DIA Scoping Report covering Network Rail's Anglia Level Crossings proposals sent with your email of 7th October. The County Council appreciates this being shared, as this scheme fundamentally affects its highway network, and so the County Council also has a duty to ensure that due regard has been had to the impact on affected communities and users as a result of the scheme.

The County Council's Senior Public Health Manager, Iain Green, and I have reviewed the Assessment, and we have the following comments. References to Network Rail include their contractor, Mott MacDonald.

The County Council has identified three fundamental issues with the DIA, together with a number of other problems which the County Council considers affects the viability of the DIA and need to be addressed. These are outlined in more detail below.

Fundamental Issues

1. The methodology for determining "equality hotspots" is flawed.
2. The data used is not always referenced therefore cannot be verified.
3. The DIA has only assessed the impacts of the crossings as they stand at the moment and their closure; it has not assessed the potential impacts of any diversion routes.

1. Methodology for determining Equality Hotspots

- 1.1 The County Council disagrees with the methodology used in determining the Equality hotspot map for Cambridgeshire. The methodology uses a combined data picture of the population density of the following sections of the population:

- Children (aged under 16)
- Younger people (aged 16-24)
- Older people (aged 65 and over)
- People living with a long term limiting illness
- People who have recently had a child (children aged under 1 year)
- People from Black Asian and Minority Ethnic (BAME) groups
- People from minority faith groups (Buddhist, Hindu, Jewish, Muslim, Sikh, other)

- 1.2 Therefore the assessment is looking at those areas/crossings that have more than one protected characteristic within 5km of the site. An equalities impact should look at each

protected characteristic on its own rather than combining groups to create “a hot spot”. They could be combined at a later stage to see areas more affected than others. With the approach taken, an impact may affect only one group e.g. older people, and would therefore not figure in the hotspot map, and is likely to have been missed as an area/crossing with no impacts.

1.3 We also disagree with the 5km radius chosen. In a rural areas 5km could be classed a short distance due to sparse nature of the settlement patterns. For leisure purposes people may walk/cycle greater than 5km and therefore may fall outside the scope of the DIA. The Department of Health recommends that people walk 10,000 steps per day, which equates to about 8km, significantly more than the radius chosen in this DIA.

2. Referencing of data

2.1 The data used for the mapping in Section 2.3 is not referenced and therefore cannot be verified.

2.2 The data on accidents in section 3.1.1 does not specify if the people struck by trains includes both accidents and suicides (the County Council understands that there is a higher proportion of males committing suicide by train compared to females, which if included in the figure, would partially explain why more males are commonly struck by trains).

2.3 The DIA should, wherever possible, use local data from the Joint Strategic Needs Assessments (JSNA) in order to supplement the Population Profile and to look at other impacts, in particular the Transport and Health JSNA. The JSNAs can be found at: <http://cambridgeshireinsight.org.uk//jsna>. This is particularly important when looking at the impacts in the Fenland area, which tends to have poorer health outcomes and a shortage of networks of public rights of way (PROW).

3. Impact assessment

3.1 In general the DIA is lacking a full assessment of the consequences of the proposed closure/downgrading etc. on each protected characteristic. The assessment only considers the current impacts of the crossing against the hotspots – the assessment has not specified what the potential impact is e.g. community severance, road accidents etc. Therefore in “Table 3.1: Impacts and scoped groups summary table”, the impacts of the proposed alternatives and re-routing should have been scoped in.

3.2 In section 3.1.4 on Community Severance it mentions the barriers which can lead to community severance -

- Physical barriers - such as the introduction of new or removal of existing infrastructure
- Psychological or perceived barriers - such as traffic noise or road safety fears
- Social barriers - such as the disruption of 'neighbourhood lifestyle' or inhibition of social interaction

3.3 In the assessment tables (page 145 onwards) no mention has been made of these barriers and these should have been looked at for each protected characteristic, e.g. a diversion from a footpath to a road may be perceived as a barrier thus creating community severance. In fact, severance as a result of inappropriate infrastructure has been previously raised by the County Council, and has been cited a number of times by public consultations responses (e.g. C25 Clayway, FP11 Littleport, p150). The section acknowledges that some social groups are more vulnerable to the effects of community severance than others, including people with restricted mobility; older people and disabled people, and school children (younger people), and older people are more at risk of social isolation which can be compounded by transport barriers (e.g. Eastrea Cross Drove p152 (FP50 Whittlesey)).

3.4 The effects of community severance also have a disproportionate effect on disabled people who also experience higher rates of social exclusion and existing barriers to transport. Therefore these groups need to be mapped against each crossing.

- 3.5 The DIA has not identified severance to users from flooding at obvious locations in flood plain (alternative routes proposed for C21 Newmarket Bridge (FP24 Ely), C22 Wells Engine (FP23 Ely) and C03 West River Bridge (FP7 Little Thetford)).
- 3.6 The DIA does not identify that horse-riders are particularly vulnerable on roads, cf Statements of Action in the County Council's adopted Rights of Way Improvement Plan SOA2 A safer and health-enhancing activity and SOA5 Filling in the Gaps 5/3 'bridleway users currently suffer highest risk on roads and bridleway network is currently most disjointed'
http://www.cambridgeshire.gov.uk/info/20006/travel_roads_and_parking/66/transport_plans_and_policies
- 3.7 The DIA does not acknowledge user rights of equestrians, cyclists, carriage drivers and public vehicles at C30 Westley Road, Brinkley p161 or C27 Willow Row Drove, Littleport p163 despite these being a public road and a public byway respectively. This is particularly surprising in the Westley Road case, where the alternative roads have known accident sites.

Additional problems

The County Council has also identified the following problems which affect the viability of the Assessment.

4. Impact of Development

- 4.1 The assessment has not mentioned the impacts of the local growth of housing. Some sites/crossing are near to proposed areas for new housing, specifically the Waterbeach new town development of up to 10,000 new dwellings (C01 Chittering, FP18 Waterbeach); Ely North (C08 Ely North, FP11 Ely, C09 Second Drove, FP49 Ely, C24 Cross Keys, FP50 Ely and impact on nearby BR25 Ely); at Hauxton (C07 No Name No 37, FP4 Harston); and in Soham there is new housing planned near to C19 Wicken Road, FP106 and C20 Leonards, FP101 Soham, as well as over 500 homes as part of the Soham Eastern Gateway development. Some of the PROW may be used more frequently when these sites are built and the network of PROW surrounding these site may become integral to the development.

5. Assumptions and terminology

- 5.1 The County Council takes issue with some of the terminology used and assumptions made about use of several of the public rights of way affected, which have not been borne out by discussions with the County Council or the public consultations. Some of the crossings are stated as being 'rarely used'. This needs to be understood in the context of a rural environment whereby the crossing may only be used by a few people but they may be the only leisure route in the vicinity and therefore form an important local asset. 'Rarely used' should not be confused with 'unimportant'.
- 5.2 For example, for No Name No 37 (Harston FP4) on p158, the DIA states that the footpath 'serves no apparent purpose'. This is incorrect; the path is a safe off-road route linking the village with a multi-user path in verge towards Newton village, and to a nearby footpath leading to the Wade Memorial, both destination sites.
- 5.3 At C18 Munceys (FP19 Fordham) there is a worn track on the ground, evidencing that the path is used sufficiently frequently to create this, belying the assumption to the contrary. The path is the only off-road public path between the villages of Fordham and Landwade/Exning.
- 5.4 It is unacceptable to state that it is appropriate to divert pedestrians into the road because path is, in the author's view, 'rarely used'. In the case of C19 Wicken Road (FP106 Soham), p158, this means putting pedestrians onto the dangerous and busy A1123, and at C06 Barrington Road to cross the busy A10 at least once. Similarly for C29 Cassells (FP1 Brinkley), p148, and C20 Leonards (FP101 Soham), p155, the statement: 'Despite not having a dedicated pedestrian walkway, the route [road] is tarmacked and flat' does not justify putting pedestrians in the road as suitable mitigation for extinguishing the crossing.

5.5 The DIA's concept of 'facilities' does not take into account that rights of way, common land and other forms of public open space provide important community facilities and opportunities for free physical activity that supports the physical and mental well-being of residents (see for example the rights of way network near the River Ouse at C24 Cross Keys which is not reflected at p151 of the DIA, and around South Horse Fen common land at C19 Wicken Road (p158 of the DIA)).

6. Specific site comments

6.1 The County Council has identified potential problems on two sites which will require further work before a decision can be made as to whether the crossings can be closed.

- a. C28 Black Horse Drove - there is an operating bus stop one side of the crossing for the route 129 bus and the nearest houses are the other side of the railway. An assessment should be made of any impact the closure will have on the bus route and accessibility to the bus stop. The County Council would recommend that Network Rail also consults the bus operating company as to how it will be affected. It may be that a turning circle will need to be created east of the railway.
- b. C25 Clayway (FP11 Littleport) – this crossing is used by a local heartbeat group and therefore this group falls in the definition of a group of "People living with a long term limiting illness". It should therefore require a full DIA.

The County Council appreciates that Mott MacDonald is due to undertake detailed DIAs on certain crossings, as agreed with Network Rail. It requests that its concerns are addressed through these and design process. As ever, the County Council would welcome further engagement to resolve these concerns and to agree mutually acceptable solutions for the crossings concerned.

Yours sincerely,



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