


From: Gordon Crosby
Sent: 04 May 2017 13:48
To: TRANSPORTANDWORKSACT
Subject: Suffolk crossing closure order - objection
Attachments: Comments May 2017.pdf

Please find attached my objection to the details proposed for the closure of crossing S08 in Suffolk.

I would appreciate an acknowledgement of receipt of this submission.

Gordon Crosby

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4 May 2017

Secretary of State for Transport
c/o Transport and Works Act Orders Unit
General Counsel's Office
Department for Transport
Zone 1/18
Great Minster House
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London
SW1P 4DR

Network Rail Suffolk Level Crossing Reduction Order, 2017

I wish to present my comments raising objection to part of the changes proposed within the draft Transport and Works Act Order for the closure of the Suffolk "Stacpool" crossing, identified as "S08" in the draft Order.

While I find the need to close this crossing rather hard to understand given the current level of use, the accident and misuse history, and the geometry of the crossing which allows approaching trains to be seen for about a kilometre in either direction, my objection is limited to a very specific part of the proposed diversion route, about 120 metres long, rather than to the principle of closure of this specific crossing.

Description of location, its surroundings and its relation to the current and future pattern of use

Crossing S08 is set between the fringes of Needham Market and Great Blakenham. The railway runs in the valley of the River Gipping, and is separated from the river by around 270 metres. There is a footpath alongside the river following the route of the towpath laid down when the river was canalised in the late 1790s/early 1800s. The footpath runs from Ipswich to Stowmarket. It is well used by walkers and is promoted by Suffolk County Council,

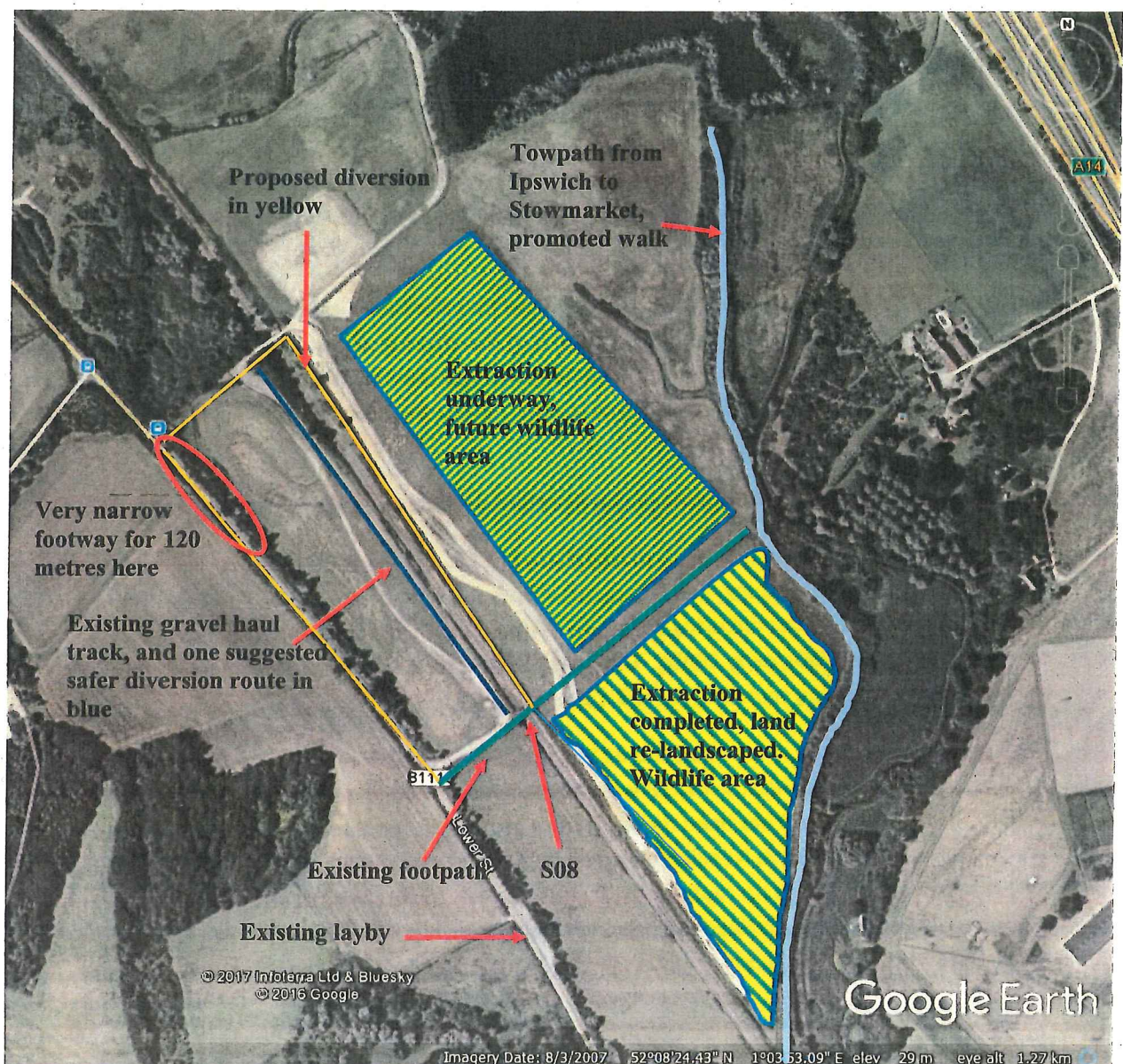
There is also a road in the river valley, the B1113. Until construction of the current A14 dual carriageway in the late 1970s, the B1113 was the main trunk road, the A45, between Ipswich and Cambridge and as such has been modified from its historic, probably Roman, origins to carry "trunk" traffic. Restrictions in Needham Market created by two railway bridges of no more than 2.4 metres height mean there is no route for HGV and large van traffic from the A14 to get into Needham Market, or through Needham Market to places such as the currently expanding Lion Barn Industrial Estate just a few hundred metres NW of the Stacpool crossing, to the Army Airbase at

Wattisham, and to the towns and villages such as Hadleigh etc lying to the west of Needham Market other than by using the B1113. It is a road used by commuters to access Ipswich and to get to the A12 heading south, and is used, rather too extensively, by HGVs ignoring the weight restrictions through Needham Market's High Street. The road has long straights, and is generally level except at the Needham Market end where the road rises over some low chalk hills. Between the boundaries of Great Blakenham and Needham Market the road has a "national speed limit" applied, which in this type of single carriageway road is 60mph for most traffic. That limit is regularly exceeded.

The result is a heavily used road, carrying a considerably larger volume of HGV traffic than may be apparent from a "desk study", and with road speeds generally at or regularly above the 60mph limit.

The surface of the road is around "three lanes" wide reflecting its "trunk road" history, though marked only as two lanes. As it passes the S08 crossing area to approach Needham Market the topography of the land causes it to narrow substantially to a tight two lanes where it passes a side road serving the village of Darmsden and passes the Lion Barn Industrial estate.

The plan below highlights the features described in the following paragraphs.



About 120 metres to the South East of the point where the footpath carried by S08 emerges onto the B1113 there is a large layby beside the B1113 separated by a raised island from the main carriageway. There is a footway alongside the B1113 to the east of the carriageway. For most of the length of road in question this footway is just over a metre wide, and is separated from the carriageway by a grassed strip about one metre wide, with a further vegetated strip to the east supporting small trees and the occasional mature oak tree.

Lying immediately to the east of the railway, between the railway and the river, and straddling the footpath serving the S08 crossing is an area of land used for gravel extraction. Extraction from the land to the south east of the path between the river and the railway was completed a few years ago, see photo below. The land has been re-landscaped, the workings are now part flooded, and the area is becoming a wildlife area with the lakes attracting water loving birds, and with reed beds establishing. I understand discussions are well underway to transfer this area to a local wildlife trust with the intention of making an accessible wildlife reserve, which will be separated from the B1113 by the railway.



Gravel extraction from the land between the railway and the river to the north west of the footpath carried by the S08 crossing started a few years ago, and is now well underway, see photo below. Already birds such as sand martins and wheaters are using the areas where extraction has been largely completed. Looking at the progress I form the view that extraction will be completed within a few years and I understand that as for other local areas where gravel has been extracted this land will be re-landscaped with the intent to create a wildlife area that will also be transferred to a local trust. The effect is that an area of some 20 or more hectares of wildlife habitat is being formed with the intention of this being open to the public as a recreational resource.



Details of the section of proposed diversion that is the subject of this objection

The proposed diversion closes the existing level crossing "S08" together with a section of around 90 metres from the crossing to the B1113. A new path will be formed lying to the north east (river side) of the railway track connecting the existing path to a brick bridge over the line, where the new path will join an existing path leading to the B1113.

This is a significant diversion distance, and it means pedestrians and large HGV lorries moving heavy loads of gravel sharing a narrow bridge with high parapets, which has a very sharp 90 degree turn on a hill at each end. This is a difficult manoeuvre for the drivers, and there is little room for pedestrians to take refuge from the large lorries being used to haul material from the workings.



However, I accept that the likely users of this path now and in the future will be able to manage the distance, and that the use of the bridge by large HGVs will end with the conclusion of gravel extraction in the not too distant future. I also look forward to the new path which will be beside the land that is to be landscaped and should give view over the flooded workings with all the bird etc life that will be attracted.

The proposed routing connected the path to other local paths, and at first sight is quite sensible.

But, the proposed routing does not consider or address the current and future needs of people like me that park on the B1113 in the layby and use crossing S08 to access the riverside path and the old lock at Pipp's Ford, and to visit the new and future wildlife areas. Already people are starting to visit to watch birds on the newly landscaped lakes. The only reasonably local places to park are the layby, and, currently, in the entrance area which is used by the gravel extraction lorries. As the wild areas become established, and particularly once the land is taken on by local wildlife groups, it is reasonable to expect a significant increase in the volume of people wanting to visit.

As proposed it will be possible to park in the layby and then walk alongside the B1113 heading north west using the B1113 footway to the point where the proposed diversion route joins the B1113. However, the section of approximately 120 metres at the north west end of this footway is, I strongly believe, **very hazardous for pedestrians**. Whereas most of the footway is over a metres wide, and is separated from the carriageway by a grass strip about a metre wide, and has a generally

fairly level, sparsely treed area on the other side, the 120 metre section of B1113 footway at the north west end is only a metre wide, lacks any strip separating it from the carriageway and has a high, steep bank on the other side. To make this worse, this is the exact area where the road narrows considerably, where there is a vision limiting hill and where there is a minor road joining the B1113 all creating traffic hazards.

Walking to the north west on this section facing oncoming traffic is "unpleasant", but walking south east in the direction of the adjacent traffic is frightening. Even more so if young children are being led, or if the walker has any kind of balance issues. It is really frightening, in my view an unacceptable hazard. Traffic here is "putting its foot down" having left the 30 mph zone of Needham Market, crested a low hill and seeing a long straight ahead, inviting overtaking manoeuvres. Just a week ago a serious injury accident occurred just a few hundred metres further on involving a motorbike and a car.

As a pedestrian on this 120 metre section of footway you have nowhere to take refuge, even if you were aware of an approaching vehicle, the bank makes moving over impossible.

Please see the attached photo taken on this section just a few days ago. It took just minutes to take this photo where you can see three vehicles. Notice just how close the lorry is to the pedestrian, and look at the impact of the lorry slipstream on the pedestrian as shown by her hair. The lorry was travelling at an estimated 50mph, not exceptional for this road. Note the lorry approaching from the other direction also at 50mph, with cars at 60+ mph typically. Note the high, steep bank to the left, and how narrow the path is. Note that the lorry has moved over as far as possible to the white line, and note the solid white line indicating a hazard for oncoming traffic. The lorry would not have been able to move over as far if the lorry approaching has been nearer. With children this would be even more hazardous.



I accept that this is an existing footway. But it is a footway that would not normally be used by pedestrians at the moment – there are no properties to access, no paths to get to, no reason to walk on it for most people. The closure of S08 changes this. Suddenly this footway is a route connecting

the wildlife areas and the river path with the only local parking area. There is no public access across the river near here, and even if there were there is no parking on the east side of the river. The path will see additional use, and it is reasonable to expect use to increase considerably, and to expect use to include children as the wildlife areas become established.

Looking at the footway it seems to me to be highly likely that when the road was a trunk road the carriageway was widened and a wide footway was added, but at the north west end of the section in question the local topography with a chalk/flint pit lying immediately to the east of the road and a hill to the west caused the carriageway to reduce in width and the footway to narrow to an absolute minimum. This is not acceptable for the proposed diversion given the use that will be made of the path as explained above.

The photo below is looking north west towards the hazardous section of path. Note how on this section the footway is separated from the carriageway and there is further verge. Note the traffic level and how the carriageway narrows towards the hill. The hazardous section is just visible over the roof of the white van, from the T junction sign to almost the crest of the hill. Note how drivers are having to deal with a blind hill with a small side turning to the left while drivers approaching the camera may have to pull out to avoid pedestrians, potentially children, adding to the traffic hazards.



Other options that could be taken

This is not a justification to argue that the crossing should be retained, however. There are three obvious options, each relatively straightforward to implement and there may be others.

Option 1

Provide a wider footway for the first 120 metres, separated from the carriageway, by widening the existing footway.

Option 2

Provide a new footpath just to the east of the current hedgerow beside the B1113 so pedestrians stay "inside" the field lying to the east of the B1113.

Option 3

Provide a footpath alongside the railway track. Note that there is already a gravel haul track along this length just as there is on the other side of the tracks. The draft Order includes providing access to this track for construction works.

Of these three Option 1 is likely to be quite difficult to implement. Option 2 or 3 would make the diversion much safer, particularly for pedestrians with children. Option 2 would perhaps be the more pleasant to walk being away from the tracks, and initially away from lorries, but safety has to be the main concern. Option 3 is likely to be the easiest to implement as there is already a strip of land likely to be suitable that is "trapped" between the existing gravel haul track and the railway track.

Other options may be possible, but something has to be done to remove the risk of pedestrians being hit by fast vehicles on that 120 metres section of the diversion for people that are visiting the area as has been outlined.

Conclusion

- The proposed diversion route has focused on connectivity with other footpaths but has not considered the likely patterns of use for some pedestrians wanting to park nearby to access the towpath, the old lock at Pippys Ford and to visit the emerging wildlife areas.
- The 120 metres of diversion route to the north west beside the B1113 present an unacceptable hazard to pedestrians, particularly with children.
- The proposed path sharing the bridge with HGVs is far from ideal, but this is a problem that will end when gravel extraction is completed in the not too distant future.
- The diversion along the east side of the railway offers the prospect of an interesting walk as the pits become a nature reserve.
- There are options available to simply provide a safe diversion path, without great expense.
- The needs of Network Rail have to be balanced with the needs of others.

The details of the works forming the proposed closure of crossing S08 need to be re-examined and modified to remove the hazards of the diversion route as currently proposed.

Gordon Crosby

