

OBJ/36/W10/3

The Proposed Network Rail (Suffolk
Level Crossing Reduction) Order
Department for Transport Reference:
TWA/17/APP/04

**Summary Transport Proof of
Evidence
of John Russell**

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for

The Ramblers' Association

Document Control Sheet

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The Proposed Network Rail (Suffolk Level Crossing Reduction) Order TWA/17/APP/04

OBJ/36/W10/3 The Ramblers' Association

This document has been issued and amended as follows:

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Preamble

- 1.1 My name is John Norman Russell. I am a Chartered Transport Planner, being a Chartered Member of the Institute of Logistics and Transport (CMILT) and a Member of the Institution of Highways and Transportation (MIHT). I have an Honours Degree in Civil Engineering. I have worked in the field of transport planning and highway design for 25 years. I am a Technical Director of Motion Consulting based in Guildford, Surrey which specialises in transport planning, traffic engineering and highway design.
- 1.2 I advise the Ramblers' Association on matters of highway design and safety with respect to the Proposed Network Rail (Suffolk Level Crossing Reduction) Order (hereafter referred to as "the Order") which seeks to close a number of level crossings on footpaths within Suffolk and replace them with alternative pedestrian routes. The Order has been applied for by Network Rail (NR).

General Comments

Use of highway verges

- 1.3 Several of the closures result in diversions which utilise highway verge to prevent pedestrians having to walk in the carriageway. I have assessed the safety of the diversion on the basis of the verges being in place. However I make the following comments in this respect:
- ▶ I have been unable to find evidence submitted by Network Rail (NR) that all the verges utilised in the diversions are part of the part of the highway and maintainable at public expense;
 - ▶ I have been unable to find evidence submitted by NR explaining how NR intends to secure the retention of highway verges utilised in diversion routes as verge for use by pedestrians; and
 - ▶ I have been unable to find evidence submitted by NR explaining how they intend to ensure that grass verges utilised for diverted routes are kept maintained and fit for use.
- 1.4 I would recommend that the Inspector seeks evidence from NR to clarify and confirm that, for all diversions that rely on verge walking to make them acceptable, NR will be able to deliver, secure in the long term and maintain these sections of diversion as grass verge.

Signage

- 1.5 In the absence of clear signage there is a risk that pedestrians will continue walking along a road rather than following the diversion and thereby increase their risk of accident. I have been unable to find evidence submitted by NR explaining how the diversion routes will be signed. I would recommend that the Inspector seeks evidence from NR concerning how they intend to sign diversion routes and ensure the long term maintenance of the signs.

Design Guidance

- 1.6 There is a disproportionate number of pedestrian deaths caused by road collisions on rural roads compared to urban areas. I note the importance of speed and traffic volume in influencing the number and severity of pedestrian accidents as well as the separation distance between pedestrians and traffic. In the case of a rural road this introduces a paradox for pedestrians walking in the carriageway. On a busy rural road there is a higher risk of a collision with a vehicle than on a quieter rural road however a collision on a quieter rural road is more like to result in a killed or seriously injured (KSI) collision.

Network Rail's Road Safety Audit

- 1.7 I have written separately to the Inquiry regarding NR's Stage 1 Road Safety Audit (RSA1) carried out on the pedestrian route diversions raising my concerns that the RSA1 does not meet the requirements of HD 19/03 Road Safety Audit in terms of independence. I advise that the RSA1 reports should not be relied on by the Inspector at all, as they clearly have been checked and approved by people who are members of the design team and therefore not an independent road safety audit.
- 1.8 I note that the RSA1 has been undertaken in the absence of any data regarding vehicle volumes, collision data, NMU flows or observed traffic speeds. This data is apparently to be considered at a later date in the Stage 2 Road Safety Audit. In this context I strongly recommend that the Secretary of State either rejects the Order or else defers any decision until road collision data, traffic flows and NMU flows have been collected, analysed and included in the RSA1 and interested parties had the opportunity to scrutiny the revised RSA1.

Audit and Assessment of Proposed Closures

- 1.9 A summary of my conclusions and recommendations is provides below.

Level Crossing Reference	Recommendation	Reason / Modifications
S23 – Higham	OBJECTION	<p>Lack of continuous verge on the section of the proposed diversion route on Higham Road (contrary to NR's claim).</p> <p>Leading pedestrians to cross at a point in the highway network at which they need to be aware of traffic turning at them from four directions rather than a single direction would be detrimental to pedestrian safety in the absence of mitigation.</p> <p>This crossing closure could be made acceptable in terms of safety were NR to include:</p> <ol style="list-style-type: none"> A continuous off-carriageway pedestrian route between the existing footway between Higham Road and the A14 westbound on-slip (to be closed) and what is known as Aran Service centre where a footway commences on the eastern side of Higham Road; and Measures to improve safety for pedestrians crossing the A14 westbound on-slip / Higham Road at the junction of the A14 westbound on-slip / Higham Road, A14 westbound off-slip and Coalpit Lane.

Level Crossing Reference	Recommendation	Reason / Modifications
S24 - Higham Ground Frame.	OBJECTION	<p>The proposed diversion adds an unreasonable additional distance for pedestrians which is likely to result in pedestrians using Coalpit Lane.</p> <p>Lack of continuous verge on the section of the proposed diversion route on Higham Road (contrary to NR's claim).</p> <p>Leading pedestrians to cross at a point in the highway network at which they need to be aware of traffic turning at them from four directions rather than a single direction would be detrimental to pedestrian safety in the absence of mitigation.</p> <p>This crossing closure could be made acceptable in terms of safety were NR to include:</p> <ol style="list-style-type: none"> A suitable footway or footpath is provided alongside Coalpit Lane between the railway bridge and the A14 to enable pedestrians to continue without walking within the carriageway. A continuous off-carriageway pedestrian route between the existing footway between Higham Road and the A14 westbound on-slip (to be closed) and what is known as Aran Service centre where a footway commences on the eastern side of Higham Road; and Measures to improve safety for pedestrians crossing the A14 westbound on-slip / Higham Road at the junction of the A14 westbound on-slip / Higham Road, A14 westbound off-slip and Coalpit Lane.
S27 - Barrells / S28 - Grove Farm.	OBJECTION	<p>Visibility restrictions at both the Barrells Road railway crossing and the railway crossing of the Unnamed Road to the east of the S27 / S28 diversion and the requirement for diverted pedestrians to walk in the carriageway at these locations</p> <p>This crossing closure could be made acceptable in terms of road safety were NR to include:</p> <ol style="list-style-type: none"> Physical separation of the proposed safe space on Barrells Road railway bridge for example through the inclusion of a kerb to the 1.0m wide safe space to the east of the bridge in order to create a footway that vehicles are less likely to drive onto. Provision of advance signs on the Barrells Road railway bridge crossing warning motorists that it is single way traffic and that there are likely to be pedestrians in the road. Replication of the proposed mitigation for Barrells Road railway bridge with the modifications I recommend above at the railway crossing of the Unnamed Road to the east of the S27 / S28 diversion.

Level Crossing Reference	Recommendation	Reason / Modifications
S31 - Mutton Hall	OBJECTION	<p>The impassability of a section of Footpath 020 Wetherden.</p> <p>Restricted visibility between pedestrians walking in the carriageway at Kates Lane railway bridge and vehicles approaching from the north and the requirement for diverted pedestrians to walk in the carriageway at these locations with the associated risk of collision between these diverted pedestrians and motorists.</p> <p>This crossing closure could be made acceptable in terms of road safety were NR to include:</p> <ul style="list-style-type: none"> a. Physical separation of the proposed safe space on Kates Lane railway bridge for example through the inclusion of a kerb to the 0.85m wide safe space to the west of the bridge in order to create a footway that vehicles are less likely to drive onto. b. Acquisition of access rights to the permissive footpath currently being used between Footpath 020 Wetherden and Kates Lane to establish this as a PROW.
S69 - Bacton	No objection	<p>Carriageway walking along Broad Road.</p> <p>Lack of footway at Pound Hill railway underpass</p> <p>This crossing closure could be made acceptable in terms of road safety were NR to include:</p> <ul style="list-style-type: none"> a. Physical separation of the proposed safe space under the Pounds Hill railway bridge for example through the inclusion of a kerb. b. A suitable footway or footpath is provided alongside Broad Road so that pedestrians do not need to walk in the carriageway.