

**APPLICATION FOR THE PROPOSED NETWORK RAIL
(SUFFOLK LEVEL CROSSING REDUCTION) ORDER**

SUFFOLK COUNTY COUNCIL

PROOF OF EVIDENCE:

ANDREW WOODIN – RIGHTS OF WAY AND ACCESS MANAGER

Bachelor of Sciences Honours degree in Ecology

TOPICS COVERED

OBJECTION TO THE CLOSURE OF S22 (WEATHERBY)

Introduction

1. My name is Andrew Woodin, I am employed by Suffolk County Council (the Council) as the Rights of Way and Access Manager and have held this post since 2003. I hold a Bachelor of Sciences Honours degree in Ecology and am a member of the Institute of Public Rights of Way and Access Management. Before moving to Suffolk I managed the public rights of way service at Northamptonshire County Council, and started my access career as a rights of way officer with Cambridgeshire County Council in 1984 where I was responsible for protection and maintenance of the rights of way network and order making to modify the definitive map.
2. Most of my career has been involved with public rights of way and access rights and I consider I have a very thorough comprehension of public access both from a professional viewpoint and from the perspective of users.
3. I am a confident leisure walker and walk access networks all over the country and abroad. I am very used to walks which are often a mix of public rights of way, open access and public roads.
4. As the Rights of Way & Access Manager I am responsible for the public rights of way and open access network in Suffolk. This includes maintenance of the network and the definitive map; increasing usage of the network in line with local and national policy; policy development and the preparation of the annual business plan. I am responsible for discharging the Council's statutory duties and powers under the Highways Act 1980, the Wildlife & Countryside Act 1980 and other relevant legislation.
5. The ROW & Access service is part of Suffolk Highways' Environmental Management service and comprises four teams – two teams are responsible for the operational management of the physical access network, one team is responsible for the definitive map and one team is responsible for increasing use and enjoyment of Suffolk's Green Access Network and maximising public benefit from it. Mr Kerr, Definitive Map Manager, gives more background to the service in

his evidence.

6. I have been very heavily involved in Network Rail projects for some years now, both individual crossing-specific projects and, more lately, this Transport and Works Act Order (the Order). The Council has committed an immense amount of resource to assisting Network Rail where it considers Network Rail's proposals are in Suffolk's interests and, in this regard, Network Rail has benefitted a great deal from the Council's expertise and local knowledge, free of charge.
7. Where Suffolk County Council has objected to specific level crossing closure proposals in this Order, it is because it believes the negative impact of the proposal is greater than the public benefit to be derived from it. Again, Mr Kerr, Definitive Map Manager, gives more background in his evidence to the overarching concerns the Council has in respect of the Order.

Objection to Closure of Weatherby S22

8. This proposal seeks to close the level crossing and divert users along New Cheveley Road (B1103). The Council's objection letter of 3rd May 2017 states:
9. *"The council objects to this proposal.*

This crossing has the highest usage figures of all the crossings included in the Order. The council also notes the strong local opposition to the crossing's closure. Following a meeting on 25/4/17, attended by NR representatives, County Councillor and Forest Heath District Council Deputy Leader, Robin Millar, Newmarket Town Council members and West Suffolk Council, the council supports the deferral of the future of this crossing to a later phase of the Anglia Level Crossing Reduction Strategy (ALCRS)."

10. The council objects to this proposal due to the high level of usage of the crossing and the circuitous alternative route. According to Network Rail's 9 day census, 3595 pedestrians were recorded to use the crossing during the 9 day census period of whom 285 were accompanied children, 119 were unaccompanied

children, six were elderly, 17 were impaired, one was in a wheelchair, 119 were in pushchairs or prams, five were on mobility scooters and the remainder were unimpaired adults.

11. 87 bicycles were recorded as being ridden across the crossing and 355 bicycles walked across the crossing. This is as noted in Network Rail's statement of case (NR26 p.82)

12. The Council is not persuaded that Network Rail has explained persuasively why the crossing needs to be closed and why a bridge or other mitigation measures have not been provided. Ms Noonan, Forest Heath District and St Edmundsbury Borough council's' Principal Growth Officer covers the lack of closure justification in more detail in her evidence.

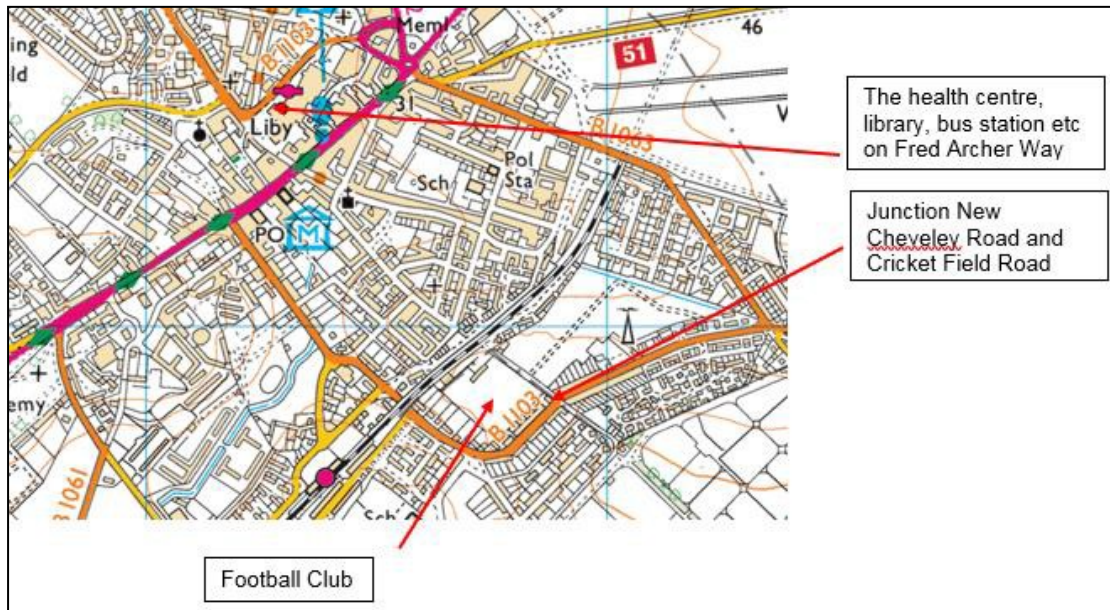
13. I inspected this crossing on 26th June 2016 and then on 12 December 2017. On both occasions I have observed people using the crossing and doing so in a safe manner. The use of the route is primarily as a direct and convenient means of getting to the town centre for residents in the vicinity of The Drift and further afield, and of course to access the football club.

Added Length, Reduced Amenity and Accessibility

14. As Mr Kerr has noted in his proof, the test to be applied to whether an alternative route provided by Network Rail is adequate is whether it is "convenient and suitable for existing users" (TWA Guidance Annex 2, p.105). The 2011 edition of the Concise Oxford English Dictionary defines suitable and convenient in the following way:

suitable meaning right or appropriate for a particular person, purpose, or situation; and convenient meaning fitting in well with a person's needs, activities and plans involving little trouble or effort. The length, amenity and accessibility of a route are all relevant factors when considering if that route is suitable and convenient for existing users.

15. The distance from the junction of New Cheveley Road and Cricket Field Road via the level crossing and along Park Lane to the Rookery Health Centre on Fred Archer Way, which is also near to the library, Newmarket Day Centre and the Forest Heath District Council offices is 1000m. I have used this location as a likely destination for many users. At an average walking speed of 2.5 miles per hour (the pace used by Network Rail), this would take just under 15 minutes.
16. It is difficult to know which alternative route walkers and cyclists might take should the level crossing be closed, but the distance to and from the same points via The Avenue is 1400m. (The distances are much the same on any alternative route.) This would take nearly 21 minutes on a less attractive route along The Avenue on a footway immediately abutting the carriageway and involve gradients not present on the existing route. This adds an extra 6 minutes (12 minutes both ways), or 40%, to the journey, which is a significant extra time on a short, utilitarian, journey and I consider enough to deter some sections of the community from walking to and from the town centre, which is close to this crossing. For example, somebody with a lung condition like asthma or the early stages of chronic obstructive pulmonary disease will find an incline that able bodied people find easy to walk, causes them to be breathless and experience discomfort. And this would be when local authorities, planners and the health service are trying to encourage walking as the primary means of transport in urban areas. Physical inactivity is a major issue for public health and this extra walking distance, on a much less desirable route being along a main road, is especially likely to deter the elderly, people with restricted mobility and parents with children, whether in a pram or buggy or walking independently. The map below shows key locations referred to in this proof:



Ordnance Survey Crown Copyright

17. I have attached images representing the different nature of the existing and proposed routes below:



New Cheveley Road Proposed Route Looking North



Existing Park Lane Route Looking North images courtesy Google Earth

18. I believe strongly that especially when walking and cycling people are naturally drawn to use desire lines to get to their destination and will use those lines even in preference to routes in better condition, as the following images from Google Images vividly demonstrate. In other words people will always want to use the most convenient route to walk and cycle from the town centre and may be deterred if they are denied that route.



19. Network Rail commissioned a DIA for the Order from Mott MacDonald. This report is dated August 2016. This has been shared with the Council but it does not appear to have been provided in Network Rail's application documents. I have been informed that, for purposes of considering this scheme, the Secretary of State will need to be satisfied that he has discharged his public sector equality duty under the Equality Act 2010. The Council, therefore, requests that the relevant DIA materials are disclosed to the Inquiry. The DIA Scoping Report is 196 pages long and I have attached the relevant extracts from the report as appendix 3.

20. The purpose of the report is to identify potential issues related to the closures and gather evidence on the potential impacts on people with different protected characteristics in order to make an assessment about which crossings require further consideration through a full DIA (1.4 of report).

21. The report uses a Red-Amber-Green rating for each site (2.3). Red means a level crossing requires a full DIA to proceed and include sites where the following apply:

- An unequally accessible solution is proposed and where no other solutions are available (e.g. removing an accessible level crossing and diverting users to a less accessible crossing point).
- An unequally accessible solution is proposed where other solutions are available (e.g. stepped footbridge which could be a ramped footbridge).
- Proposed changes may result in community severance and/or pedestrian inaccessibility.

22. 3.1.3 of the report (Walking distances) notes:

“walking distances are an important consideration for people with certain protected characteristics, and schemes that can affect existing walking distances may result in disproportionate impacts on some groups – such as disabled people and older people. For example, Inclusive Mobility – a key document to support inclusive design of the pedestrian environment – found that of people with a disability who are able to walk, around 30% can walk no more than 50 metres without stopping or

experiencing severe discomfort and a further 20% can only manage between 50 and 200 metres. Similarly, older people are also more likely to have difficulties walking long distances than the general population.”

23. The study also found that disabled people tend to find standing to rest difficult and/or painful and therefore it is important for the provision of seated resting points where walking distances are increased for users.

24. 3.1.4 of the report (Community severance) notes level crossings provide a means of traversing the rail network and can act as an important point of access for the communities in which they are situated. The removal of level crossings therefore has the potential to cause issues related to community severance. Community severance is generally understood to be comprised of three key dimensions:

- 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.

25. The results of the DIAs for individual crossings across the Anglia region are tabulated and the results for the Weatherby crossing is given on p. 94. It is given a red rating and it is recommended that given the number of users and the location of the crossing further exploration into alternative solutions to the closure is recommended.

26. I would like to know therefore whether Network Rail commissioned a full DIA for this crossing and do not see how the Council can properly consider the impact of this closure without that work being done.

Further Support for Objection

27. Suffolk County Council's Public Health department has submitted evidence to the inquiry to support the objection to the closure of this crossing and giving expert

public health-based evidence. This evidence is attached as appendix 1.

28. Cambridgeshire County Council also object to the closure of this crossing, because of the impact on residents in the communities of Cheveley and Woodditton, supported by their county councillor Mathew Shuter. This objection is attached as appendix 2.

Conflict with Relevant Policies

29. In his evidence, Mr Kerr highlighted those local and national policies which relate to encouraging and promoting walking. I am not an expert in all aspects of relevant evidence but consider the proposal at Weatherby is contrary to:

- (i) Suffolk's **Local Transport Plan 2011-2031**, where a priority for Suffolk is safe, healthy and inclusive communities, and where providing safe continuous routes for cycling and walking and reducing carbon emissions are seen as important means of reducing the £25.4 billion per annum cost of physical inactivity and poor air quality. I believe this proposal loses a more continuous route than the alternative.
- (ii) The Department for Transport's **Cycling and Walking Investment Strategy 2017**, which states the Government wants cycling and walking to be the natural choices for shorter journeys in every urban and rural community in England. For cycling or walking to be normalised in this way, they need to be safer, and be perceived to be safe, normal and enjoyable ways to travel. It is particularly worth noting the reference to shorter journeys having regard to this proposal, which significantly lengthens the route from the south side of Newmarket to the town centre.
- (iii) The **Suffolk Walking Strategy 2015-2020**, whose vision is for people in Suffolk to walk more often and for walking to be seen as beneficial, easy, inclusive, accessible, pleasant and safe; and for walking to be the 'default' choice for journeys of 20 minutes walking time or less. The proposal at Weatherby will make walking less easy by lengthening the walking route. The walking time for the journey described above increases from well under, to over, 20 minutes.

and the Council believes this proposal is contrary to the objectives of its walking strategy. More people walking more often will improve the physical and mental health of the people of Suffolk and make a significant contribution towards Suffolk's ambition of being the most active county in England. I believe the additional length of the proposed alternative route will put people off walking or cycling their journey.

- (iv) The **Rights of Way Improvement Plan 2006 to 2016** (and still the policy document the Council works to until it is replaced), which places a very high priority on improving non motorised access to local services. Example objective headings include on p.28 B.6 Improve access to shops and other services and B.7 Increase the number and promotion of easy access routes, including access for wheelchair users. This proposal worsens accessibility.
- (v) The draft **ROWIP II 'Policies and Action Plan'**, which under the heading of connectivity includes the draft policy for the Council to use "every opportunity to improve, and even create, public rights of way as healthy and sustainable links between communities and services. Opportunities will come through development, transport planning funding, external grants and partnership working." Under severance, a draft policy notes the Council will oppose those proposals which do not meet the needs of local communities in accessing public rights of way. Again this proposal worsens accessibility, especially for those with impaired mobility, be it wheelchair users, those pushing prams or those in poor health.

Conclusion

- 30. To conclude, in my professional opinion, this proposal is neither suitable nor convenient, and will have a significant negative impact on people's enjoyment of the rights of way network. The Inspector cannot, therefore, be satisfied that an alternative route has been provided pursuant to section 5(6) of the Transport and Works Act 1992. Furthermore, the proposal goes against both local and national policies that are meant to encourage walking and cycling.
- 31. The Council is not persuaded that Network Rail has explained persuasively why the

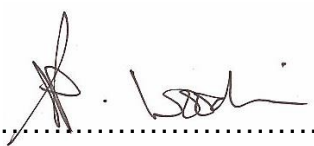
crossing needs to be closed and why a bridge or other mitigation measures have not been provided

32. Furthermore, the absence of any evidence from Network Rail to counter the DIA red rating given to the crossing urgently needs further explanation.

33. On this basis, I ask that the Inspector recommends the removal of this level crossing from the order.

END

Signed:



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Dated: 11 January 2018

Date: 11th January 2018 Signed:

Andrew Woodin