

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

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**SUFFOLK COUNTY COUNCIL**

**PROOF OF EVIDENCE:**

**ANNETTE ROBINSON – EAST AREA RIGHTS OF WAY MANAGER**

BSc Hons Ecology  
PGCE and Certificate in Management

**TOPICS COVERED**

S01 SEA WALL (FOOTPATH 13 BRANTHAM)

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## **Introduction**

1. I am employed as an Area Rights of Way Manager by Suffolk County Council (SCC) and have been in this post since 26<sup>th</sup> March 2001.
2. My formal qualifications are a BSc Hons Ecology, PGCE and Certificate in Management. I have worked as the Area Rights of Way Manager with SCC for 16 years, prior to that, 6 yrs. as Countryside Recreation Officer in the Suffolk Coast & Heaths AONB team, 4 years as Heritage Coast Warden in Suffolk and 2 years as a Countryside Ranger in Walsall.
3. The Rights of Way & Access Team are responsible for the maintenance of the public rights of way network across Suffolk and the protection of the public's right to use that network.
4. I lead and direct the Area Rights of Way team in delivering an annual practical work programme including managing tenders, organising capital projects and maintenance schemes, developing processes for better service delivery and protecting the public's right to use the network.
5. 3 of the public footpaths that are subject to the Network Rail TWAO fall under my Area responsibilities: SO1 – Brantham Sea Wall, SO2 – Brantham High Bridge, SO7- Broomfields. SCC has objected to SO1 and SO2 but not SO7.
6. Suffolk County Council objects to the closure of crossings SO1 on the basis that: -
  - (i) The proposed alternative route is not practically viable.
  - (ii) The cul de sac part of FP13 on the sea wall should be retained and not extinguished as is currently proposed.
7. SCC Rights of Way Officers were invited on the 14<sup>th</sup> September 2017 to accompany the NR bridge engineers on their site visits on the 19<sup>th</sup> and 20<sup>th</sup> September to assess the bridge works only 2 working days' notice. For

proposals SO1 and SO2, the engineers relied on the knowledge of the Area Rights of Way Officer to estimate where the NR maps showed the location of the proposed alternative routes and the bridges on the ground. This shows a concerning lack of preparation and a lack of real desire to involve the Highway Authority to achieve successful proposals, as well as a lack of communication and information provision to NR's structural engineers who had to rely on the Area Rights of Way Officer to estimate where the routes and structures would be.

### **In Detail**

#### **SO1 – Brantham Sea Wall**

##### *Flood risk*

8. NR propose a new footpath, 700m in length on the SE side of the railway heading north west across field and then north east following the railway within a field margin, 2m wide and unsurfaced. This proposed path will run from the sea wall on a strip of land between a reedbed and the lowest part of a sloping arable field. Surface water runs down the slope of the field into the area proposed for the new footpath. With the landowners permission, I visited the site on the 11<sup>th</sup> December, and saw that this part of the field was flooded, and a channel had been dug from the field into the reedbed/wetland area to drain the standing water across the proposed location for the footpath. It is unacceptable to provide an alternative route that will be flooded or saturated in wet weather with trip hazards such as the drainage channels cutting across the proposed path. The path will not be suitable, safe or fit for walkers to use, with the specification as currently proposed by NR.
9. These photographs illustrate the condition and hence objection to the proposal for an 'unsurfaced 2m wide footpath within a field margin' as the proposed alternative route. Location of photographs is between points P160 and P161 on the Order Plan – running NW between the reedbed/wetland area and the lowest edge of the arable field.



### *Accessibility*

10. The proposed path then runs up the slope on a field margin. This field margin is currently uncultivated and is largely bare soil (clay) with sparse growth of nettles and large areas of moss. Normally, uncultivated land will vegetate with annual weeds and grass, but this has not happened in this location, suggestive of poor growing conditions for grass. I understand from the landowner that this part of the field suffers from exceptionally heavy rabbit damage. Thus, an unsurfaced

footpath in this location will be slippery, sloping and hazardous and what sparse vegetation has grown, will easily be eroded by footfall. The path will not be suitable or convenient to use with the specification as currently described by NR as an unsurfaced path.

11. The photographs illustrate the condition and hence objection to the proposal for an 'unsurfaced 2m wide footpath within a field margin' as the proposed alternative route. Location of photographs is between points P161 and P162 on the Order Plan – running NE parallel to railway line, illustrating the poor surface condition (growth).







### *Unnecessary extinguishment of FP13*

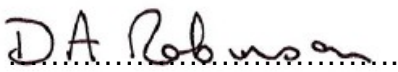
12. SCC object to the proposed extinguishment of the part of FP 13 on the sea wall that will become a cul de sac path if the level crossing closes. In the NR Project team response to consultation feedback, NR stated that “further environmental consultations have indicated that there would be benefits to local wildlife habitats in extinguishing the PROW section to the level crossing”. However, it is not necessary for NR to extinguish this section of PROW to achieve the stated aims of the TWAO. In my experience, estuary walks are highly valued by the public and even cul de sac paths have value, providing views and a quiet path for enjoyment of the scenery and wildlife. Suffolk’s Nature Strategy - A 2020 vision for Suffolk’s Natural Environment (page 37), is in favour of increased, sensitive public access to the countryside and other green spaces as a means of achieving a wider social good – in this case, there is no increased access proposed, merely retention of the existing public right.
13. The Highways Infrastructure Asset Management Strategy “Designing for Maintenance”, section 6.5, notes that good asset management starts at the planning and design phase when decisions can be made that affect the amount of maintenance required, the ease with which the work can be done and the whole life cost of the asset. This practice is reinforced in the Highway Infrastructure Asset Management Plan 2016 which requires all new structures to

follow a technical approval process to ensure that these new assets are designed with durability and whole life costing taken into account. In preparing for the TWAO, NR has not ensured that good management of new assets has been designed in at the design and planning stage, despite repeated requests from SCC.

## **Conclusion**

14. Due to the ongoing concerns as to the suitability of the proposed alternative route, referred to above, SCC submits that the Inspector cannot be satisfied that an alternative route has been provided pursuant to section 5(6) of the Transport and Works Act 1992. SCC, therefore, requests that the Inspector recommends the removal of this level crossing from the order.

15. I confirm that this statement is true to the best of my knowledge and belief.

16. Signed:   
Annette Robinson

Dated: 09 January 2018