

032/86
5th May 2017

Dr Stephen Thompson


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,
33 Horseferry Road, London SW1P 4DR.

re. Network Rail Anglia Level Crossing Reductions TWA Order

Dear Sir,

I am writing to formally object to Network Rail's proposal to close pedestrian level crossings in East Anglia. I have specific objections to two proposed closures in my local area, closure of which would be in direct contradiction of items 5 and 15 of Network Rail's own Statement of Aims, and would harm the safety of current crossing users. I also have a more general objection to the principle of closing pedestrian crossings in preference to vehicular crossings, which is in conflict with the Department for Transport's own Cycling and Walking Investment Strategy. My objections are detailed below.

I am objecting specifically to two closures in my local area, crossings E51 and E52, on the Sudbury branch line. Network Rail have failed to explain how closure of these crossings would meet any of the 5 aims outlined in the consultation documents (item 15 of the Statement of Aims). Apart from potentially saving Network Rail some operational cost it is very difficult to see who would benefit from these proposals, whilst it is clear that current users of these crossings would be diverted onto routes with significantly higher risk.

Both crossings form important parts of a network of public rights of way connecting the communities of Chappel and Wakes Colne, Wakes Colne Green, Golden Square, and Mount Bures. In both cases Network Rail are proposing to close existing rights of way without providing acceptable alternatives. The alternative crossings that Network Rail are suggesting are narrow humped road bridges with poor visibility and are shared with motor and farm traffic. These diversions will put pedestrians and other road users at increased risk due to collision. Network Rail have been made aware of the increased risk to pedestrians at both stages of consultation by local residents, councils, and interest groups, but have failed to address these concerns. They have also been made aware that the proposed diversions are excessively long and will discourage people from walking, but again have failed to address this.

As way of background information, the Sudbury Branch line is a largely straight line, connecting Mark's Tey and Sudbury, along which travel two passenger trains per hour at a speed of up to 50 miles per hour. The fencing along the line is minimal, reflecting the very low level of risk present. These facts are in direct disagreement with item 5 of Network Rail's Statement of Aims. In contrast the local roads suffer poor visibility, especially at the proposed crossing points, have speed limits of 60 mph, and have no pavement. I refer you here to the recently completed Bures Road Footpath Scheme¹, whereby local residents and Essex County Council successfully raised over £9000 pounds to get pedestrians off one the very roads that Network Rail claim is a safe alternative to their existing crossings. Were Essex County Council and residents incorrect in their safety assessments leading to this scheme? The implication from the statement of consultation is that Network Rail are

¹http://www.halsteadgazette.co.uk/news/halstead_news/14282414.Villagers_successful_in_raising_8_000_for_new_footpath/

happy to increase risks to existing crossing users, as long as the risk does not occur at an existing level crossing. I note that in the Statement of Consultation Network Rail responds to several legitimate safety concerns with the following statement:

“Network Rail have prepared a business case for the closure of the level crossings. Safety criteria, while important, is only one of the Promoter’s Objectives and there are other benefits the Promoter seeks to achieve with the level crossing reduction strategy”

This is in contrast to item 15 of the Statement of Aims and the public consultation documents, where Network Rail imply that safety of users is their primary concern. If Network Rail’s primary interest in these closures is not the safety of users then they need to provide absolute clarity on what their interests are. There is no evidence that these closures would provide an improved service on these lines, or facilitate capacity increases, so one can only assume that Network Rail’s primary interest is financial. That being the case, we are entitled to a proper analyses of the benefits that will accrue to Network Rail due to these closures, and a proper analysis of who will bear the costs. My own opinion is that the costs will be predominantly borne by local residents and councils and that these costs will significantly outweigh any saving to Network Rail. I cannot see why these groups should be required to further subsidise Network Rail.

Having made specific representations on these two crossings I also wish to make a more general objection to Network Rail’s proposed program of closures in East Anglia. The majority of these closures affect pedestrian crossings, whilst vehicular crossings are left largely unaffected. Here I refer you to your own Cycling and Walking Investment Strategy (21 April 2017), wherein you make the case very well for the benefits of active travel. In the main these far outweigh the risks posed by pedestrian level crossings. It is difficult to see how the widespread, preferential closure of pedestrian routes across railways is compatible with this strategy. Whilst I have not reviewed all the proposed closures, it is apparent from the disregard for pedestrian safety and amenity shown in Network Rail’s proposals for E51 and E52 that a thorough review should be undertaken before approving any of these closures. Such a review should take into account your stated ambition of making walking and cycling the natural choice for shorter journeys. I appreciate that there may be some level crossings where the risks are high enough to consider closure, however these could be better dealt with on a case by case basis, and preferably by an authority with a less myopic understanding of risk than Network Rail have thus far demonstrated. If you do intend to grant approval to some or all of these closures, please can you provide some evidence based explanation of how this fits with the Cycling and Walking Investment Strategy and the stated aims of your department.

Yours sincerely,

Stephen Thompson.

Caroline O'Neill

From: Stephen Thompson [REDACTED]
Sent: 05 May 2017 13:18
To: TRANSPORTANDWORKSACT
Subject: Network Rail Anglia Level Crossing Reductions TWA Order - Objection
Attachments: LevelCrossingReductionsTWAOrder_ObjectionThompson.pdf

Hello,

please find attached my objections to Network Rail Anglia Level Crossing Reductions TWA Order. Please advise if there are any problems reading the file.

yours sincerely,

Stephen Thompson

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For more information please visit <http://www.symanteccloud.com>
