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Attention of Graham Groome/Joanna Vincent

18 September 2017

Dear Sir/Madam

Proposed Level Crossing Closures – Essex (The Network Rail (Essex and Others Level Crossing Reduction) Order 201X)

I am writing in respect of the proposed closures of level crossings in Essex. I have lived in Essex for all my life (currently in the South East of the County, but previously in the Colchester area) and am a keen walker ; I have used a considerable number of these level crossings over the years. (I would add that I have a reasonable knowledge of the railways - in fact, I hold a Post Graduate Diploma in Rail Studies; as well as knowledge of the workings of highways authorities, having worked in my professional life both as an accountant specifically dealing with the highways responsibilities of a local authority; and a similar role as an internal auditor.)

I have visited many of the crossings recently (and completed the online questionnaire to Network Rail) and would like to make some general comments about the process and also more detailed comments on one specific crossing - for this, I set out the details below (I walked the diversion route recently), showing the dangers.

1. As a general principle, I do not think Network Rail should propose a closure if there is little or no risk. In many of the proposals, in the five year period 2011-2015 there have been no instances of misuse, no near misses and no accidents. Even though NWRail have gauged a risk, the record does not bear this out. However, closure in many cases involves walking along a road, often with no footpath. To me it seems NWRail are transferring the extremely low risk of an accident on a level crossing into a much higher risk of one on the public highways. I don't really think it is responsible for NW Rail to take this attitude! (And I would question some of the risks, particularly "sun glare" which is exaggerated given the aspect of some of these crossings.)

2. In addition, I would question the surveys in one important respect; I understand that the surveys have been carried out on a Monday and to my knowledge, no group of the Ramblers in Essex ever walk on a Monday (save the odd bank holiday). These groups are likely to be heavy users of rural crossings. I am not arguing that crossing should be kept open purely for the benefit of Ramblers groups, merely that the methodology of sampling is flawed.

3. Some of the diversion routes are ridiculously long - in one case, nearly 5km, which would take about an hour to walk. Ignoring the aspects that these require new RoW (which I would question will ever be created) and road walking (with resultant risks), such a diversion is completely unacceptable; NW Rail should provide a bridge/tunnel if they really believe closure is necessary. (My own view is that no crossing diversion should ever be more than 1km and should ideally be less than 500m). Associated with this are the submissions to the public enquiry made by some landowners who want a level crossing and the associated footpath to be closed but are opposed to new footpaths on their land.

4. Also, closure of the level crossing and an associated RoW footpath can have a knock on the RoW network over a wider area - an example of this is HA3, where the footpath was severed by the M25

and other connecting paths have disappeared as a result. The wider aspects of a closure are not mentioned in the proposals. Many of the diversions involve a walk along both sides of a rail line to meet a bridge and I would suggest these would be very low in amenity value. This would be considered if the footpaths were diverted in accordance with the provisions of the Highways Act – which I consider they should have been.

5. I would particularly like to comment on the proposed closures over single track lines. The amount of time a pedestrian crossing at these points is at risk is very short - the time to walk say 5m (compared to say 15m on a twin track). Rail traffic is by its nature on these single lines very much less than multi tracks. Therefore NW Rail needs to make an even stronger case for closure on these lines than multi track lines (in Essex, the Harwich, Walton, Sudbury, Southminster, Braintree and Romford-Upminster and Upminster-Tilbury lines).

6. In respect of the Romford-Upminster line, I do not think NWRail should propose any closures at all given its status. This line is separate from the rest of the system, is worked by one train and is part of the Overground (TfL) system. TfL should deal with this.

7. Much is made by Network Rail of the danger of foot crossings (the vast majority of closures relate to these) however, the danger to rail staff and passengers is much higher on road crossings and abuse of them (mainly failing to stop at the lights and/or zig-zagging around barriers). For example the report in the Thurrock Gazette of 23 August 2017 ("Purfleet level crossing damaged as learner ignores warning and drives through barriers"); and a different incident reported on "YourThurrock.com" on 21 August 2017 ("Man sentenced for dangerous driving on East Tilbury Level Crossing"). Network Rail should concentrate on dealing with these. Also, problems on level crossings are not solely caused by users but on occasions staff ("Near miss between a train and a level crossing user at Dock Lane, Melton, Suffolk 14 June 2016" Rail Accident Investigation Branch Report 08/2017 May 2017).

I am attaching a paper (Appendix 1) I have prepared on the HA4 Eves Crossing diversion route setting out the issues. This shows the danger of the diversion route (no footpath, dangerous bends, traffic noise obscured by noise on nearby M25, dangerous hump back bridge without footpath). I am sure this is not unique by any means. Network Rail has responded to my comments stating that they would be prepared to purchase land, by compulsory purchase if necessary, to provide a footpath. Apart from the high cost of this, it would do nothing to deal with the risk at Ockenden Road bridge (and I would suggest that the cost of all these works would cover the cost of a footbridge at HA4 – although this would not be justified).

I would conclude by saying I do not take a Luddite attitude of opposing all level crossing closures. Some of the proposals are perfectly sensible, for example, where there is a footbridge adjoining it (eg E23, E24) or a safe crossing in a very short distance (an example of this is E15). Others have been severed by the road network (eg HA3) where the DoT should have provided alternatives, but for these, one has to face the realities on the ground. But the majority of these closures are not justified when balanced against the losses. In appendix 2, I set out a list of the crossings I regard as unjustified and therefore opposed to.

Yours sincerely

David J Atkins

Appendix 1 – Eve’s Crossing, HA4 – proposed closure

I visited at 11.30am on 6 October 2016

Existing crossing



As I reached the crossing, a train approached from the south. The driver clearly saw me and sounded his horn. This view is looking south and the track is straight at this point. Trains could be seen several hundred metres away and as the track is single, can be easily crossed in a few seconds. The Network Rail report mentions “sun glare”, the driver would not be affected by it travelling north. Pedestrians would not in my view be affected at most times and the trees would also prevent it by shielding the sun if it was low in the sky. Trains travelling south pass under the M25 just north of this point but there is still good visibility. (In any case, hopefully drivers are keeping a look out for track workers or animals such as deer!)

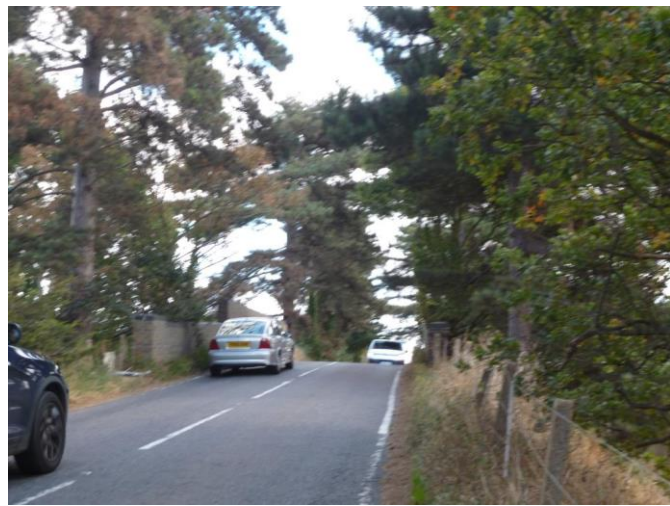
New route

Proposed new route passes initially along Pea Lane. This is a road with a number of bends (some blind), an unrestricted limit (i.e. in theory 60mph) and no footway. It is fairly well used by cars but also, when I visited, agricultural vehicles. Despite what Network Rail state, in my view there is **absolutely no possibility** of L B Havering constructing a footway. This would require purchase of land (verge is too narrow in most places) and as there are few houses (except at the south end) little justification. An additional problem is that because the M25 is close (with resulting traffic noise), pedestrians cannot hear approaching vehicles. There was evidence of accidents on this road.





Alternative route then passes along Ockenden Road. No footway for much of the route until M25 bridge, 40 mph limit. Road is particularly narrow over the railway bridge, walls both sides so cannot be widened. Bridge is hump back – cannot see approaching vehicles. For much of this part of the road, verge is narrow. Road is well used, classified (B1421), a bus route (every 15 minutes each direction) and a cut through from Ockenden to Upminster if trouble on M25, so used by commercial vehicles as well.



Left photo is looking east over bridge; right photo is looking west over bridge (and shows bridge wall).

The alternative route is unsafe, unpleasant and unnecessary!

Appendix 2 – List of Level Crossing Closures opposed

Crossings on Single Tracks

Reference	Name	Location
E35	Cranes no 1	CM77 8NU
E36	Cranes no 2	CM81 1RN
E37	Essex Way	CM77 8PD
E38	Battlesbridge	SS117RL
E47	Bluehouse	CO13 0EP
E48	Wheatsheaf	CO11 2TQ
E49	Maria Street	CO12 3HU
E51	Thornfield Wood	CO6 2AU
E52	Golden Square	CO6 2AR
E53	Josselyns	CO8 5AT
E54	Bures	CO8 5DF
HA01	Butts Lane	RM11 3NA
HA02	Woodhall Crescent	RM11 3ST
HA04	Eves	RM14 2XH

Crossings on Multiple Track

Reference	Name	Location
E02	Camps	CM19 5DY
E05	Fullers End	CM22 6EB
E08	Hanham	CB11 3XP
E09	Elephant	CB11 3PE
E10	Dixies	CB11 3TP
E11	Windmills	CM11 4JR
E13	Littlebury Gate House	CB11 4TX
E15	Parsonage Gate Margaretting	CM4 9JJ
E19	Potters	CM8 3HR
E20	Snivellers	CO5 9AY
E21	Hill House 1	CO5 9EN
E22	Great Domsey	CO5 9EP
E25	Church 2	CO3 8NB
E26	Barbara Close	SS4 1NQ
E28	Whipps Farmers	RM14 3PJ
E29	Brown and Tawse	CM13 3HG
E30	Ferry	SS7 1NR
E31	Brickyard Farm	SS8 0QT
E32	Woodgrange	SS1 3EA
E33	Motorbike	SS16 4XJ
E41	Paget	CO7 9QT
E42	Sand pit	CO7 8AJ
E43	High Elm	CO7 8AD
E45	Great Bentley Station	CO13 0PE
E46	Lords No 1	CO7 8NX
E56	Abbotts	CO7 7RS
H04	Tednambury	CM23 4BD
H05	Pattens	CM23 4AT
H06	Gliston	CM23 4AS
T01	No 131	RM19 1SX
T04	Jeffries	SS17 8BA
T05	Howells Farm	SS17 9EY