



The Secretary of State for Transport
c/o Transport Infrastructure Planning Unit
Department for Transport
Great Minster House
33 Horseferry Road
London SW1P 4DR
22 September 2022

Dear Secretary of State

**Objection to Proposals for the Meldreth Road Level Crossing, Cambridge
Resignalling, Relock and Recontrol Project**

Shepreth Parish Council wishes to record its objection to the planned conversion of the half barriers at Meldreth Road Level Crossing to full barriers. The proposal will increase congestion in the village through substantially increased downtimes, increase the difficulty of traffic flow and the risk of speeding in one of the most densely populated parts of the village. There will also be a deterioration in air quality. In our opinion, the risks of such change outweigh the minimal safety benefits that will accrue.

Furthermore, the Parish Council is of the opinion that the data underlying the conclusion that the effects on the village will be “minimal” is seriously flawed, being either contradictory, based on averages from other areas or inaccurate. As a minimum, the Parish Council requires consistent data specific to the Meldreth Road and Shepreth crossings be collected, analysed and presented in a transparent and accessible manner before any final decision is made. Our objection is based on the following:

1. Downtime

A reading of a separate document “The Performance Report-Level Crossing Study” of 14 June (which appears not to figure on the list of documents submitted with the planning application) illustrates the data problem. On page 11, we read:

“A set of absolute minimum barrier closure times for each crossing, with the exception of Meldreth where the times are proposed to be in line with the Shepreth crossing.”

Yet on page 12, we are told:

“For the Meldreth level crossing, as no other data is available, the barrier down time has been based on the average time from all of the other level crossings.”

We are further told on page 44 of the Consultation Report of 26th July 2022:

“Network Rail undertook Traffic and Transport modelling for each of the seven no. level crossings”

Another separate document entitled “The Local Model Validation Report” of 11 August (which also appears not to figure on the list of documents submitted with the planning application) contains a cursory one-day study of both the Meldreth Road and Shepreth level crossings. The data derived from this study appears to have been ignored. It is doubtless coincidental that this data points to longer downtimes than forecast and thus undermines the conclusion of a “minimal” impact on traffic. The single point of clarity in this proposal is that its conclusions are based on confusing and conflicting information and there is no detailed site-specific data on which to make a proper evidence-based evaluation.

The current average downtime (based on those figures derived from other sites) quoted in Table 1.6 on page 12 of the Performance Report is 169 seconds. The actual data in the Local Model Validation Report suggests an average downtime of 50 seconds. This difference means that the maximum incremental delay of 65 seconds as quoted in Table 9.1 on page 57 of the Performance Report is severely understated and should on this basis be 184 seconds. This renders much of the modelling of traffic queues inaccurate, underlines the need for site-specific data and certainly undermines the conclusion that the impact of the proposal is “minimal”.

Data for Shepreth LC shown in the Local Model Validation Report suggests an average downtime of 208 seconds, with a maximum of 409 seconds. If the assumption on page 11 is to be used, the incremental downtime would likely be 158 seconds, with a maximum of 359 seconds, which is certainly not “minimal”.

The above again reinforces the need for in-depth (ie more than a single day) accurate, site-specific information for both the Meldreth Road and Shepreth crossings. The failure to do so calls into question the integrity and validity of the proposal’s conclusions.

There is further contradiction in table 8.1 on Page 51 of the Performance Report, where the data suggests that a 30 second delay will trigger a downtime of 12 minutes, which again cannot be described as “minimal”. This could rather pose a serious impediment for emergency services and the Parish Council requests an impact study on fire engine and ambulance routes before a decision is taken.

The Parish Council further notes on page 27 of the Consultation Report that:

“In response to comments from the Highways Authorities (Cambridgeshire and Norfolk County Council) and Highways England, the Project has undertaken traffic surveys and modelling to assess the potential impacts of longer barrier down times at the upgraded level crossing works areas. Further engagement with these authorities has been undertaken to discuss the outcomes and findings of this modelling.”

This is curious as we are told above that data for Meldreth has not been collected. The data that has in fact been collected seems to have been discarded. We would like confirmation that the views of the various Transport Officers at District and County Council level have been sought as part of this consultation.

2. Safety

The Consultation Report states on page 7 that the outcomes of the All Level Crossing Risk Model are shown in Appendix A. This is indeed true in that Meldreth Road LC is assigned a "D2" rating. There is however no explanation of how this evaluation is reached and no safety history of the crossing. Furthermore, we are told on Page 42 that:

"Information based on the findings of the ALCRM for each of the seven no. level crossing was made available on request and could be viewed via Network Rails Level Crossing Safety page on their website"

Other than the vague and unsupported rating described above, this is simply not the case and there is no source of, for example, historic incidents at Meldreth Road. The Parish Council is however grateful to a determined resident who has, under Freedom of Information legislation, winkled out some safety data on the Meldreth Road LC from Network Rail. Somewhat inevitably, this is poorly presented, poorly compiled and misleading.

The spreadsheet provided suggests there have been 46 incidents on the level crossing since March 1997. A rather painstaking analysis gives a completely different picture, suggesting that of these 46:

19 were attributable to other crossings in the area;
17 involved equipment failure; and
4 were not relevant to the size of the barrier.

On this basis, there have been six relevant incidents since 2002. Four involved individuals on the track (of which one was recorded as a near miss), though the narrative is inexact and it might be argued that at least three (including the near miss) may not have been prevented by a full barrier. The fifth was a marginal obstruction, and the sixth was an incident of a car zigzagging the crossing in 2018.

Thus there has, in the last 25 years, been only one incident that could definitively have been prevented by a full barrier and this was not classified as a near miss. The Parish Council does not believe that this proposal can be justified on the grounds of a poor safety record at the Meldreth Road level crossing. It would be good to know whether or not the "D2" rating was derived from this inaccurate information.

3. Road Safety

The Meldreth Road level crossing is barely 200m from John Breay Close and the most densely populated area of Shepreth. The Parish Council does not accept the downtime modelling of the Performance Report-Level Crossing Study of 14 June for the reasons outlined above, believing these to be materially understated. We believe typical downtimes will be similar to Shepreth, where delays of up to 7 minutes are common, and a 10 minute wait is by no means unusual. This will lead to much longer queues

than those forecast in the model and chaos as long lines of traffic try to negotiate a narrow residential street with many parked cars.

Furthermore, we believe that is inevitable, once drivers are aware of the new extended downtimes, that a minority will accelerate rapidly to try and beat the barrier descent and enter the residential area at high speeds. The proposal is thus designing in a severe risk that does not currently exist.

4. Environment


The Parish Council has no confidence in the traffic model and believes that the derived maximum queue length of 51m is woefully understated. Queues at Shepreth crossing have on occasion exceeded 300m. Yet again the absence of relevant data is potentially leading to a misinformed decision.

The Council further notes that the proposal is adjacent to a residential area on one side and a Site of Special Scientific Interest on the other. The reality of significantly longer queues than anticipated in the model means there will be increased pollution and deteriorating air quality. There does not appear to be an assessment of the impact of this on the surrounding environment. We would like to see the views of the relevant Environment Officers.

Conclusion

The Parish Council finds that this proposal is under-researched and misleading and that a conclusion that will have a wide-ranging impact on the village is based on flawed data barely relevant to the Meldreth Road Level Crossing. It believes that the risks occasioned by the proposal, notably those involving road safety, emergency access and air quality, far outweigh any benefits that may accrue. The Council objects in the strongest possible terms and calls for a transparent and proper analysis of site specific information for both Meldreth Road and Shepreth level crossings before any final decision is taken.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Nicholas Downer', written in a cursive style.

Nicholas Downer
Chairman, Shepreth Parish Council