

From: [Lisa Bullock](#)
To: [Planning Policy](#); [Angela King](#)
Subject: Broadclyst Neighbourhood Plan Regulation 16 Consultation
Date: 07 September 2022 17:28:44
Attachments: [image005.png](#)
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Dear Angela

Thank you for re-consulting us on the Broadclyst Neighbourhood Plan. We provided comments on the plan on 19 January 2021 and are very happy to note that you have withdrawn Policy EM2 but we still have concerns with Policy EC2; I will set out the reasons for this below.

The policy now includes a requirement (item 3) for details of how the development will impact on the railway infrastructure (railway crossing and barriers) to be included in the Transport Assessment. This is what we would expect to be included and we welcome this additional requirement, however we do not agree with the further justification of this policy.

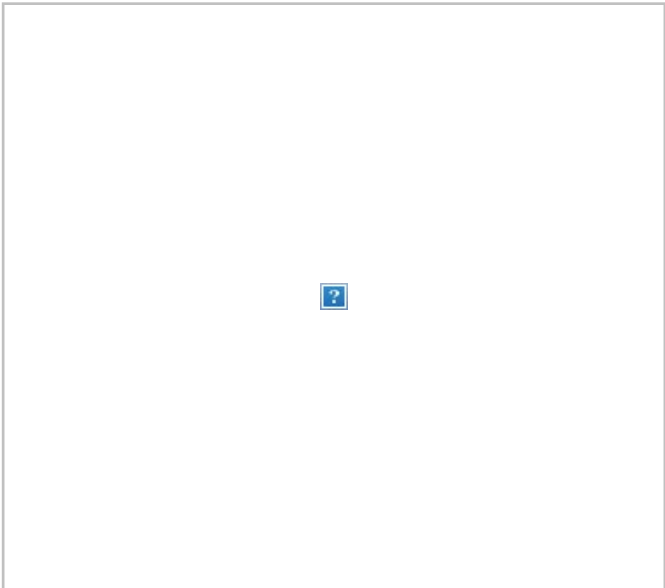
The further justification for Policy EC2 (Please note it says EC1; I think that's a typo), paragraph 5 (pg 91) provides information on numbers of traverses over Crannaford level crossing recorded in 2018 comparing this to traverses being experienced at the nearby Pinhoe level crossing. It goes on to assume that both crossing can take the same amount of use and that Crannaford level crossing has capacity for additional traffic. This assumption is incorrect as there is simply no comparison in the level of safety of these two crossings. Some key differences are as follows:

Pinhoe is a *fully-protected level crossing*, known as a Manually Controlled Barrer level crossing observed by a signaller via closed circuit television (MCB-CCTV). Where there is no bridge they are generally suitable for any situation. Operation of these level crossings is managed fully by the signaller. The level crossing is provided with railway signals on each approach interlocked with the barriers so that it is not possible to clear the signals and permit a train through unless the road is fully closed by the barriers. It is also not possible to open the road once the route has been cleared for the passage of a train. The signaller may only raise the barriers once the train has been confirmed clear by the train detection. As such any misuse at this type of crossing, whether accidental or deliberate leaves very little chance of a collision occurring. **This is the safest type of level crossing.**

Crannaford is an *unprotected level crossing*, known as an Automatic Half Barrier (AHB). Trains strike in on approach to these crossings at up to 100mph and there is no intervention either automatically or manually via a signaller to stop a train should a person or vehicle be on the level crossing. Once the barrier – which only extends halfway across the road – is lowered a train will arrive at the crossing in as little as 7 seconds. On the Off-Side approaches there is nothing to prevent a person who may be distracted walking directly into the path of an approaching train. Likewise a vehicular user is simply able to weave through should they not be prepared to wait. These level crossings are a legacy from a different era (installed in the 1960's – 1980's) and Network Rail do not install new ones of this type. When these crossings become life expired they are replaced with full barriered, interlocked crossings like at Pinhoe. AHB level crossings were installed in very rural areas with low amounts of vehicular and pedestrian traffic and they simply would not have been permitted in such close proximity to a school which now exists. Or indeed the town of Cranbrook. Over the years, roads have become busier, communities have grown and in many locations they are no longer serving the purpose for which they were conceived. Though they make up only 6% of level crossings, they account for 32% of modelled risk. A further condition of their construction was that the road layout, profile and traffic conditions should be such that road vehicles are not likely to become grounded or block back obstructing the railway. Crannaford crossing now falls foul of this risk because of the Cranbrook development, and the crossing should be either upgraded to an MCB-type, be replaced with a bridge or have the road stopped up either side of the railway with traffic diverted. **It is at this type of public road level crossing where the most risk of catastrophic collision is present.**

A 9 day camera census taken in April 2021 by Tracsis shows that an average of 1,200 vehicles and 2,300 pedestrians are using the crossing daily. We currently have a camera at the crossing and it is corroborating its heavy usage; this is far more than ever intended for what was a quiet, rural backroad. We cannot accept any increase in traffic over this crossing without mitigation. An upgraded to full protection should be provided before any further developments are made.

It is not clear from Figure 35 where the access for this site is but it looks to be very close to the level crossing. Our experience is that where there is an access which might be restricted (single track) and so close to a level crossing blocking back might occur. Blocking back is a situation where road vehicles enter a level crossing when they are unable to leave because the exit is blocked by other vehicles, so vehicles are stationary on the level crossing. This is a very dangerous situation and consideration of this should be given.



We would like to see the 'Further Justification for Policy EC2' re-written to make clear that no additional traffic will be acceptable without an upgrade being provided for Crannaford level crossing and an assessment of the sites access to ensure there is no blocking back over Crannaford level crossing and where required, suitable improvements made to the access.

If you would like to meet with the Route Level Crossing Manager and myself to discuss this please let me know.
Kind regards, Lisa.



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Please be aware my normal working hours are Tuesday to Friday.



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