

Your ref: 367516/2.4.1/AN001
Our ref: CLFH/NR/ALARCS
Date: 15th July 2016
Contact: Mrs Camilla Rhodes
Direct Dial: 01223 715621
Contact Centre: 0345 045 5212
E Mail: camilla.haggett@cambridgeshire.gov.uk



Economy, Transport & Environment
Executive Director, Graham Hughes

Mark J Taylor
Mott MacDonald

Highways Service, Box No. SH1313
Infrastructure & Management Operations Directorate
Shire Hall
Castle Street
Cambridge
CB3 0AP

By Email only

Dear Mark,

Re: Traffic Census Data Collection – Anglia Level Crossing Reduction Strategy

Thank you for your time on the 6th July discussing the traffic census methodology. I am sorry for the delay in forwarding our detailed response to you. Unfortunately we recently became aware of problems with some of the crossings under discussion, which has been taking up a large amount of officer time.

These comments are based on the Advice Note provided by Mott MacDonald to Network Rail dated 20th June 2016 concerning the Anglia Level Crossings – Census Data Collection and the guidance *Network Rail GRD007 – Appendix B Level Crossing Census Requirements*. The County Council welcomes the sharing of these documents, as it is important for all parties to understand the method being applied and the potential implications for the subsequent analysis as to the suitability of closure, downgrade or diversion of public rights of way and unclassified roads. The comments are divided into two sections:

- Section 1 – Principles of the census methodology and application to public rights of way
- Section 2 – Comments on the census undertaken 18-26 June 2016 and additional censuses required

1. Principles of the census methodology and application to public rights of way

General comments

1.1 The County Council is concerned to note that Network Rail's guidance appears to be based primarily on urban pedestrian-centric advice provided by the CIHT's *Guidance for providing journeys on foot, 2000*, as no other sources are quoted apart from references relating to vehicles on roads. The majority of the crossings under consideration in this project in Cambridgeshire are rural public rights of way, either public footpaths or byways. The other crossings are unclassified roads that constitute part of the rural network together with public rights of way.

1.2 Whilst the County Council acknowledges that there is little published guidance available specifically on the monitoring of public rights of way, it considers that an urban pedestrian-centric approach is unsuitable for the reasons set out below.

1.3 There are many factors unique to public rights of way that differentiate them from an urban pedestrian-centric approach, which should influence methodology. These include:

- Public rights of way (PROW) are primarily recreational and thus not suited to a short, intensive period of monitoring
- Usage can be for dog-walking; health benefits including running, cycling, riding and walking; commuting to work (walking or cycling); leisure use such as enjoyment of the countryside, social organised walking groups, or walking to the pub; and utility such as walking to the shops or railway station.
- Infrastructure on railway crossings can be significantly discouraging to users, something that highway authorities have consistently raised with Network Rail for some time. Much infrastructure does not comply with British Standards on disability compliance, e.g. stiles instead of gates, field gates on bridleways instead of bridle gates at the side.
- Rights of way are acknowledged to have a positive impact on rural tourism, as demonstrated by the effect of Foot and Mouth disease in 2002.
- Research and government guidance acknowledges that rights of way and access to the countryside are important, free resources encouraging people to keep active, reducing mental health problems, obesity and other physical disorders that in return reduce the burden on the NHS. At least two of the routes under consideration for the Anglia scheme are known to be used by local health groups on a weekly and monthly basis.
- As use of rights of way is often for leisure purposes, and is thus choice-based, the weather can have a significant impact on usage. Therefore a longer period of survey of three weeks would be more likely to capture a range of weather conditions, and thus provide a fairer picture of usage. Weather conditions should be noted for each location during a survey, and analysed against the usage recorded. This should then be weighted accordingly.
- Seasonal change needs to be captured. For example there is significantly more agricultural traffic on the roads and byways of Cambridgeshire during a long harvest season of grain through to root crops as late as November.
- Low-populated areas will have a direct relationship with the volume of usage of rights of way. However these PROW will still be proportionally important to those communities, and usage should be weighted accordingly.
- Rights of way are long term community assets, and need to be retained where they would serve future development for reasons given above.
- Full equality impact assessments should be undertaken for major schemes such as the Anglia project.

Timing of surveys

1.4 Most transport models are based on road traffic, predominantly vehicles and bicycles, and urban pedestrian areas, and are therefore not suitable for rural rights of way surveys. Advice on neutral months given in 3.3.6 of DfT's TAG Unit m1.2 Data sources and surveys dated 2014

(https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/427119/webtag-tag-unit-m1-2-data-sources-and-surveys.pdf) is that May, September and October are equally good neutral months as June. The County Council considers that May or September-October would be better for monitoring PROW due to the following factors:

- Surface vegetation is at its worst in June-August, and will be dependent upon weather and the ability of the local authority budgets to undertake cuts. In Cambridgeshire cuts programmed for late May have still not been undertaken in some areas due to prolonged wet weather in May and June. Ideally, surveys should be agreed with local authorities to fit in with their cutting programme. If not then appropriate weighting should be applied to

reflect the problem. This supports the need for either an extended single census for a second survey for projects requiring a census.

- June is not a good month, as it is the school and university exam period. Road traffic is noticeably lighter as students are on study leave and teachers are not in school as much; many will be engaged in marking papers. The weather can also be very wet due to the predominance of Atlantic weather systems during this month.
- The County Council accepts that full holiday season can result in quiet months as people are away. However, given the significant factor of leisure in the use of rights of way, it would be sensible to capture some holiday as well as 'normal' times of year. An example would be the late May bank and half term holiday. A three-week period would cover this with normal time either side.

Method of survey

1.5 The County Council welcomes the use of 24-hour video to enable the capture all traffic user categories. It asks if an explanation could please be provided as to how users after dark are identified? It would also like to know how the analysis of the video footage is undertaken?

1.6 The County Council wonders if there are other techniques that could usefully be considered, particularly for censuses of unclassified roads and where 'alternative on-road routes' are proposed, because it understands that ATCs only count wheeled traffic, missing equestrians, pedestrians and horse-drawn vehicles. In addition, current traffic flows and patterns of use of roads proposed for 'alternative routes' need to be fully understood.

Summary

1.7 Whilst recognising the constraints of resources, equipment limitations and project timing should not drive the methodology. Making permanent changes to the highway network has a lasting impact for communities and the economy is hard to measure but should not be underestimated, and proposals to change them need to be sufficiently resourced to enable the collection of reliable, quality evidence suited to the purpose, and appropriate analysis. It would also be helpful to understand what is defined as significant usage that creates risk, so this can be factored into the methodology.

1.8 The County Council observes that the CIHT 2000 guidance is not current, and should now complement the CIHT's Planning and Designing for Walking published in 2015. The CIHT has also produced Planning for Cycling in 2015, and Sustrans have done useful work on monitoring of cycling and walking networks which could be considered (<http://www.sustrans.org.uk/our-services/what-we-do/route-design-and-construction/route-design-resources/monitoring-and>).

1.9 The County Council recommends that effort should be made to develop a more appropriate methodology specifically for public rights of way for the future benefit of all parties. This could be done with the Association of Directors of Environment, Economy, Planning & Transport (ADEPT) and the Institute of Public Rights of Way & Access Management (IPROW), as has recently been done with the Memorandum of Understanding setting out the principles for partnership working between Network Rail and local authorities. We would be willing to contribute to this work.

Comments on the census undertaken 18-26 June 2016 and additional censuses required

- 2.1 These comments are made specific to the traffic census undertaken between 18 and 26th June on a number of crossings under the Anglia Level Crossing Reduction Strategy proposals ('the Anglia project').
- 2.2 Please note that the list provided by Tracis to the County Council with their application contains seven errors with regard to the status of routes. Please find attached this spreadsheet annotated with the correct statuses. Please correct your records accordingly and ensure that lists provided to Tracis for any future surveys are correct. The County Council is concerned to understand the implications of these errors for the traffic survey and following analysis.
- 2.3 We understand that the census was undertaken 18-26 June, not in early July as suggested by the Advice Note in the Introduction.
- 2.4 The classification listed in the Introduction does not include equestrians and cyclists. As a number of the crossings proposed for closure or downgrade are unclassified roads, these should also be listed.
- 2.5 The County Council appreciates that the longest census possible under Network Rail's current guidance has been selected, that of 9 consecutive days. However, as noted above in section 1 the County Council does not believe that that is an appropriate period for the majority of the paths in question, which are very rural in location. Therefore as a minimum effort to address this problem, it considers that additional censuses should be undertaken on several routes. Please find attached a list of all the crossings under consideration entitled 'Level crossings_additional traffic censuses'. This list identifies the additional censuses that County Council considers necessary to provide more substantive evidence about the true usage of the routes concerned, whilst recognising that the constraints of the methodology employed mean it is unlikely a complete picture can be achieved (see comments above in section 1).
- 2.6 In summary, the County Council considers that there is a minimum total of 18 additional surveys required, comprised as follows:
- 2.6.1 13 of proposed crossings require an additional survey
- 2.6.2 Six of these are crossings that appear to have been missed off the survey undertaken in June. At the last workshop in January the County Council requested that surveys be undertaken on all crossings. It is disappointed that this has not been done, particularly as we have significant concerns about all six. Therefore please undertake surveys on these routes to provide some traffic evidence.
- 2.6.3 Five surveys are required where the alternative routes proposed are on-road to enable analyse as to the safety and volume, nature and behaviour of road traffic into which pedestrians would be introduced versus the safety of current route.
- 2.6.4 Two other crossings (Silt Drove, March and Barrington Road, Foxton) may potentially benefit from additional survey, depending on the method of analysis.
- 2.6.5 Three of the crossings (C09 Second Drove, 10 Coffue Drove and C24 Cross Keys) appear to have been temporarily closed from around 7th May to enable works to take place on the railway, continuing during and after the census was run. Gates have been locked and the decking raised. The crossing over BR25, which connects to both paths from Ely Road and enables a circular route with FP15 Ely along the river bank, has been similarly temporarily closed. These problems must invalidate the censuses for each of these routes, and they will

need to be re-done as quickly as possible. The County Council does find it strange that Tracsis did not report these closures. However, the County Council is taking up these problems with Network Rail, and I appreciate that you may need your client's permission for further surveys. Please contact me to agree the dates once approval has been given.

I hope that this provides a full explanation as to the additional censuses that the County Council considers necessary, but please do ask if further clarification is required. In our telephone conversation of 6th July we mooted holding a telephone conference to discuss the matter in more detail, and that this should be before the workshop with Network Rail and Mott MacDonald on the 26th July. I would be happy to do this on 25th July and look forward to hearing from you. Laurence Smith (Definitive Map Manager), Karen Champion (Rights of Way Officer East) and Peter Gaskin (Rights of Way Officer South) should ideally also attend from the County Council. I am on holiday until the 21st July, but if you would like to contact Sandra Cooke at Sandra.cooke@cambridgeshire.gov.uk or 01223 715459, she can assist you in setting up an appointment.

Yours sincerely,

A handwritten signature in blue ink that reads "C. Rhodes". The signature is written in a cursive style and is underlined with a single horizontal stroke.

Mrs Camilla Rhodes (*formerly* Haggett) MA MLE MRICS
Asset Manager - Information