



West Suffolk Council
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 Bury St Edmunds
 IP33 3YU

Network Rail
 1 Stratford Place,
 London, E15 1AZ

22/12/2020

Submission by email: planning.policy@westsuffolk.gov.uk

Network Rail Consultation Response: West Suffolk Local Plan Issues and Options Consultation 2020

Dear Sir/Madam,

Thank you for consulting Network Rail on the West Suffolk Local Plan Issues and Options Consultation 2020.

Context

Network Rail (NR) is the statutory undertaker for railway infrastructure in England, Scotland and Wales, reinstating and protecting the infrastructure for the operational railway. Therefore, this letter is an operational response, as statutory undertaker, which focuses on safety and the maintaining of the railway, including railway and railway related uses.

- Local Policy aspirations and key considerations are included within the following sub-sections;
 1. **Local Policy Aspirations (Issues & Options)**
 2. **Liabilities;**
 3. **Freight, and;**
 4. **Asset Protection (ASPRO).**

Additionally, Network Rail is also a landowner in West Suffolk. However, Network Rail have provided a detailed supporting letter for the development opportunity in relation to the railway sidings at Station Hill, Bury St Edmunds – *See the attached 'Station Hill' plan and letter by 'Rapleys'*.

1. Local Policy Aspirations

On, initial, review of the West Suffolk Issues and Options, plus existing West Suffolk planning policy, Network Rail have outlined policy aspirations below;

- a) Specific themed policy aspirations (E.g. Liabilities, Freight and ASPRO) are included in further sub-sections within this consultation response – *See Sub-Sections below*.
- b) Network Rail to understand how future developments, in the locality, will contribute (including 3rd party contributions) to;
 - The operational railway – *See Liabilities and ASPRO Sub-Sections below*
 - Sustainable transport (including infrastructure and infrastructure projects)
 - Sustainable development

- Network Rail appreciate further engagement on these aspirations will be required.

- c) Policy to identify the importance of Network Rail as a key stakeholder for;
 - Safety to and near the operational railway.
 - Delivery of improvements impacting rail infrastructure, which could include (but not limited to) stations alterations or level crossing closures in the area.
- d) Policy/Local Authority to engage Network Rail on the planning and meeting of the sustainable transport needs (including modal change) as a result of any preferred growth option, as outlined in growth options 1-4 (*West Suffolk Local Plan Issues and Option - Part One*). Particularly for;
 - Infrastructure capacity constraints for Bury St Edmunds – *Point 2.2.3*
 - (*West Suffolk Local Plan Issues and Option - Part Three*)
 - Boundary development to neighbouring Brandon Station and Freight site

2. Liabilities

Liabilities Local Plan Aspirations:

- a) Policy support for closure of level crossings, contributed to via developments.
 - i. *E.g. “developments in the vicinity of level crossings (both vehicular and pedestrian) will be expected to assess the potential increase in risk at each crossing affected and indicate the appropriate mitigation required to reduce or remove such risks”.*
- b) Policy support for developer consultation with Network Rail on development(s) near the railway.
 - *As Local Planning Authorities would consult us on any forthcoming planning applications in line with the Development Management Procedure Order (DMPO) (E.g. Within the 10m of the railway, etc.).*
- c) Policy support for Network Rail, as a key stakeholder, in projects and wider work contributing to the promotion of sustainable development and transport.

Liabilities Supporting Information:

The railway network has various private obligations to adjoining landowners such as bridges, level crossings, fencing, and drainage. These are known as accommodation works and they are maintained for the purpose of accommodating land uses in place when the railway opened. Development on any land near the railway can impact on the railway or the suitability of existing accommodation works. The railway company should therefore be consulted on development near the railway so that the need for upgrades, replacement or discontinuation of accommodation works can be assessed. Any necessary changes are expected to be at the developer’s expense.

Changes to usage at public or private level crossings can impact on safety and network reliability. Any development that will materially impact on level crossing **must [statutory obligation]** be advised to Network Rail. Network Rail favours closure of level crossings where reasonably practicable. Closure may be by extinguishment, diversion, or provision of a bridge. New highway entrances close to public road level crossings are a particular area requiring consideration. Mitigation must be at the developer’s expense.

For any future development, consideration should be given that many road bridges over/under the railway are constrained and the replacement of these structures with larger ones at the developer’s expense might ease traffic flows in the area.

Railway service provision and new rail links might be outside the scope of this policy consultation. However, Network Rail supports the promotion of sustainable development and have improvement projects in the wider region which may provide additional benefit to this locality. Network Rail continues to work with key stakeholders for railway projects, including the Local Authority.

3. Freight

Freight Local Plan Aspirations:

- a) Policy support and appropriate site allocations for the four identified sites, outlined below in the;
 - i. *'Freight Site Analysis for West Suffolk'*
 - Three out of four sites for freight related uses and one site for residential led, mix use, development.
- b) Policy support to avoid any development adjacent (without significant restrictions and mitigations) to these freight sites that could threaten the sustainability of these sites for freight related uses.
- c) Network Rail would seek to be consulted on existing and future freight uses, especially as site specific freight usage may alter (I.e. increase/change/remove) with, or as a result of, wider strategic operations over the life of the Local Plan.

Freight Supporting Information:

West Suffolk, including wider Anglia, requires important freight use and has key freights sites, which should be protected where appropriate or supported in policy as either/both sustainable and environmental transport locations. West Suffolk freight sites (I.e. existing/changing/potential) have been briefly analysed in the *'Freight Site Analysis for West Suffolk'* below.

Any development adjacent to these freight sites without significant restrictions and mitigations that could threaten the sustainability of these sites for freight related use (I.e. residential development) should be prevented or protected against with freight or strategic safeguarding allocations and mitigations.

Although freight sites vary, it is important that the;

- Operation and function of the freight site should not be prejudice against from a new development site. The development would need to consider appropriate restriction and mitigation measures, which would need to be assessed and implemented.

Network Rail would seek to be consulted on existing and future freight uses, especially as site specific freight usage may alter (increase/change/remove) with, or as a result of, wider strategic operations.

Freight Site Analysis for West Suffolk:

1. **Brandon** – Neighbouring Station and Freight site – See attached plan: 'Brandon'
 - a. Site Context: Whilst both Brandon Station and Brandon Freight site neighbour the West Suffolk boundary. Both these sites and site uses should be given due material consideration for any development close by and be referenced to in new local policy.

- i. The Freight site is an active rail served aggregates terminal servicing the local aggregates market including for recent projects at RAF Marham and Lakenheath. It is internally designated as a “Supplemental Strategic Freight Site”, which means it will be ring fenced and protected for future rail freight use.
 - b. Therefore, NR would welcome and appreciate further consultation and policy support.
2. **Bury St Edmunds South** – Allocation for development – See attached plan & Rapleys letter.
3. **Bury St Edmunds North** (*‘Thingoe Hill’*) – See attached plan: ‘Bury St Edmunds (North)’
 - a. Site Context – ‘Bury Down Yard’, the area in question is that being highlighted by red verge on the north (top) side of the tracks. This site is in the process of being internally designated (*by Network Rail and the Rail industry*) a “*Supplemental Strategic Freight Site*”, which means it will be ring fenced and protected for future rail freight use.
 - i. It is anticipated that such use would be for an urban logistics type use (E.g. high value, small volume) rather than the traditional heavy volume rail freight products move by rail such as aggregates.
 - b. Therefore, NR would welcome Policy support and consideration of freight related development.
4. **Kennett** – ‘Southern’ Half of the Tarmac High Asphalt Plant – See attached plan: ‘Kennett’
 - a. Site Context – The existing freight use developments in this location (including the adjacent Northern Half of the asphalt site) have no direct freight related site allocation. They do however, sit within a wider Stone Curlew constraint area (which references policies CS2, DM10, DM11 & DM12) that is focused on the environment, biodiversity and managing development accordingly.
 - b. Therefore, NR would welcome Policy support and consideration of existing freight related development. This would assist the sustainability of these important and existing freight sites, which may need to alter/adapt over the life of the Local Plan.

Strategic Railway Enhancements/Proposals

NR has wider aspirations for capability and capacity enhancements in Greater Anglia, including West Suffolk, to support strategic rail initiatives. These enhancements include proposals for ‘twin tracking’ (the creation of additional rail line/track), which would support and increase the capacity of railway movement (I.e. passenger/freight).

3. Asset Protection

Asset Protection Local Plan Aspirations:

- a) Policy support for developer consultation with Network Rail on development(s) near the railway.
– *As Local Planning Authorities would consult us on any forthcoming planning applications in line with the Development Management Procedure Order (DMPO) (E.g. Within the 10m of the railway, etc.).*
- i. This is to ensure Asset Protection can manage and mitigate numerous risks to and from the operational railway.

Asset Protection Supporting Information:

Asset Protection (ASPRO) maintain the railway infrastructure and strongly recommend that for any development, near the railway, the developer(s) contacts Network Rail's Asset Protection team via AssetProtectionAnglia@networkrail.co.uk at an early stage and prior to any works commencing on site, and also to agree an Asset Protection Agreement with us to enable approval of detailed works.

ASPRO manage and mitigate numerous risks to and from the railway to ensure that proposed development(s) do not have an adverse impact on Network Rail's operational railway infrastructure.

For further information on Asset Protection, please see the Network Rail Asset Protection website below;

- <https://www.networkrail.co.uk/running-the-railway/looking-after-the-railway/asset-protection-and-optimisation/>

Conclusion

Network Rail have provided Local Policy aspirations and key considerations within the earlier sub-sections;

1. **Local Policy Aspirations (Issues & Options)**
2. **Liabilities;**
3. **Freight, and;**
4. **Asset Protection (ASPRO).**

Network Rail will continue to work with West Suffolk Council and would welcome any further discussion on this consultation response, as well as further Local Plan considerations, or developments including future correspondence and meetings.

Yours Faithfully,

David Brierley

Town Planner

Network Rail | Property | Eastern Region – Anglia

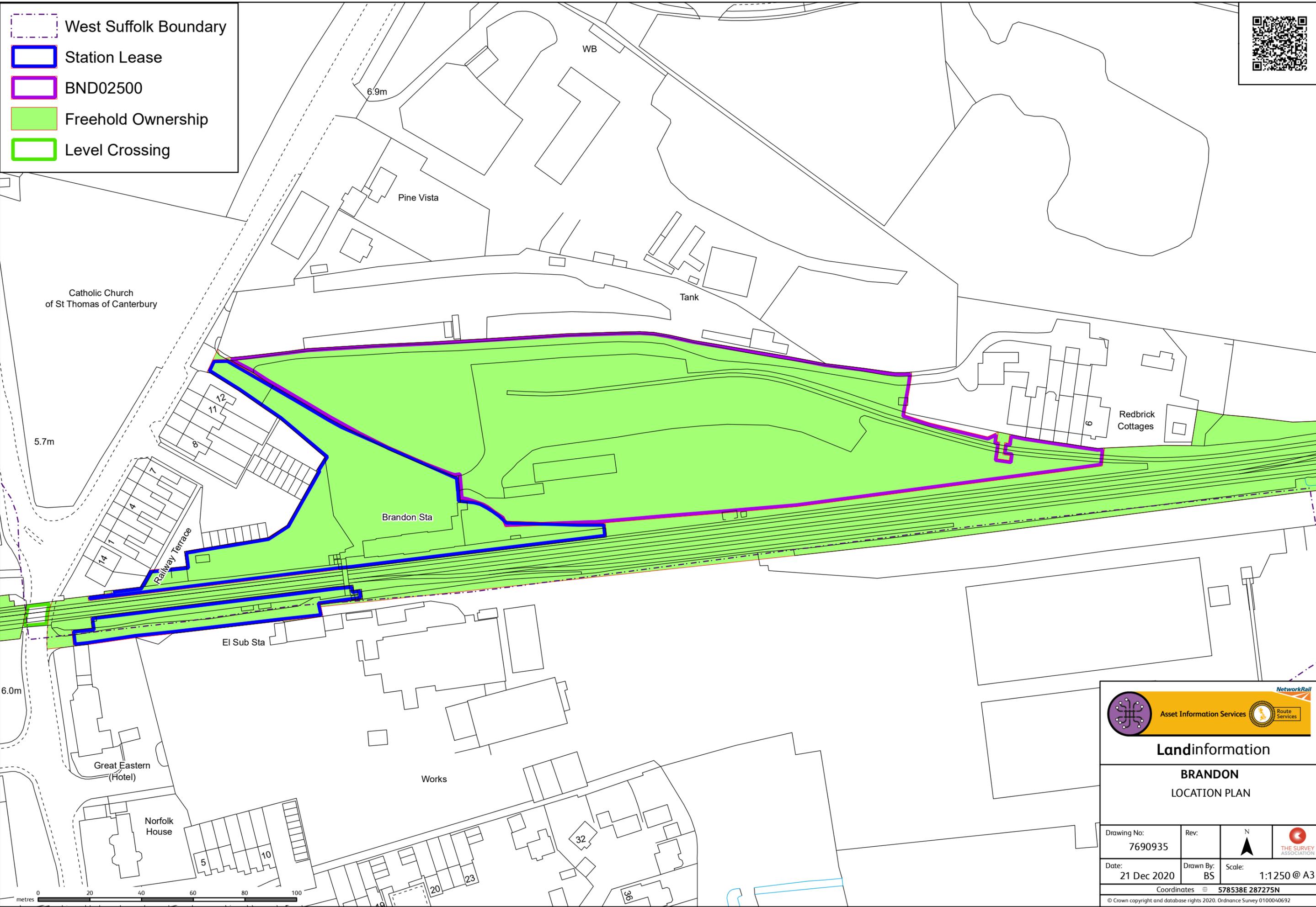
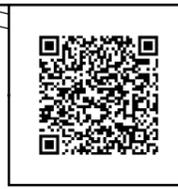
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www.networkrail.co.uk/property

-  West Suffolk Boundary
-  Station Lease
-  BND02500
-  Freehold Ownership
-  Level Crossing







Landinformation

**BRANDON
LOCATION PLAN**

Drawing No: 7690935	Rev:	N ▲	
Date: 21 Dec 2020	Drawn By: BS	Scale: 1:1250 @ A3	
Coordinates  578538E 287275N			
<small>© Crown copyright and database rights 2020. Ordnance Survey 0100040692</small>			