

From: [Roberts, Ali](#)

To: [Roberts, Ali](#)

Cc:

Subject: The Proposed Extinguishment of Penleigh Park Level Crossing, Footpath Westbury 15

Attachments: [3 Week Census Results Pen Park 211224-120125.xlsx](#)

Sent: 26/06/2025 11:51:00

Highways Act 1980 S.118A

Transport and Works Act 1992

The Proposed Extinguishment of Penleigh Park Level Crossing, Footpath Westbury 15 (part)

Questions raised by Wiltshire Council, Strategic Specialist, Major Highways Projects Team, were forwarded to Network Rails response. Network Rail's responses can be seen in blue. The attached spreadsheet is the breakdown of the 3 week period discussed in the application between 21 December 2024 and 21 January 2025 (Network Rail notes that the spreadsheets dates are incorrect). Please scroll the full spreadsheet A-Z.

1. "Please can we be directed towards the guidance that underpins the assessment?"

Please see the list of guidance and assessment use to assess and report on level crossings.

XNG 001 Provision and Risk Management of Level Crossings

XNG 002 Level Crossing Manager Competence Framework

XNG 100 Level Crossing Asset Policy

XNG 202 Prioritisation of Level Crossing Defects

XNG 308 Risk Assessing Level Crossings

XNG 309 Level Crossing Administration

XNG 19608 Inspection of Level Crossing Systems

XNG 30020 Level Crossing Design Handbook

XNG 30020/A28 Signage for level crossings

OHS 019 Safety of people at work on or near the line.

TRK 4040 Level Crossing Surface Systems

TRK 4041 Maintaining Track Assets at Level Crossings

NR/L2/SIG/11201/ModX01 Signalling Design: Module X01 Level Crossings: General

NR/L2/SIG/11201/ModX02 Signalling Design: Module X02 Level Crossings: Common Design Requirements

NR/L2/SIG/11201/ModX10 Signalling Design: Module X10 Level Crossings: Automatic Half Barriers

NR/L2/SIG/11201/ModX11 Signalling Design: Module X11 Level Crossings: Automatic Barrier

Crossing Locally Monitored

NR/L2/SIG/11201/ModX12 Signalling Design: Module X12 Level Crossings: Automatic Open

Crossing Locally Monitored

NR/L2/SIG/11201/ModX13 Signalling Design: Module X13 Level Crossings: Automatic Open

Crossing Locally Monitored Plus Barriers

NR/L2/SIG/11201/ModX14 Signalling Design: Module X14 Level Crossings: Open Crossing with

Additional Flashing Lights

NR/L2/SIG/11201/ModX15 Signalling Design: Module X15 Level Crossings: Automatic Full Barrier

Crossing Locally Monitored

NR/L2/SIG/11201/ModX20 Signalling Design: Module X20 Level Crossings: Manned Gated Crossings

NR/L2/SIG/11201/ModX21 Level Crossings: Manually Controlled Barriers with Obstacle Detector

NR/L2/SIG/11201/ModX22 Signalling Design: Module X22 Level Crossings: Manually Controlled

Barriers

NR/L2/SIG/11201/ModX23 Signalling Design: Module X23 Level Crossings: Manually Controlled Barriers with Closed Circuit Television

NR/L2/SIG/11201/ModX24 Signalling Design: Module X24 Level Crossings: On Call Barriers

NR/L2/SIG/11201/ModX25 Signalling Design: Module X25 Level Crossings: Wicket Gate Magnetic Locks

NR/L2/SIG/11201/ModX30 Signalling Design: Module X30 Level Crossings: Traincrew Operated Gates

NR/L2/SIG/11201/ModX31 Signalling Design: Module X31 Level Crossings: Traincrew Operated Barriers

NR/L2/SIG/11201/MODX39 System Application Specification for Overlay Miniature Stop Light Level Crossings

NR/L2/SIG/11201/ModX40 Signalling Design: Module X40 Level Crossings: Miniature Stop Lights

NR/L2/SIG/11201/ModX41 Signalling Design: Module X41 Level Crossings: User Worked Barriers

NR/L2/SIG/11201/ModX42 Signalling Design: Module X42 Level Crossings: Power Operated Gate Openers

NR/L2/SIG/11201/ModX99 Signalling Design: Module X18 Level Crossings: History of Level Crossings

2. ***Walking speed – whilst being ‘mandated’ and used in other similar level crossing assessments, I cannot find the guidance that presents the speeds used; 1.006m/s and 1.189m/s. HA’s use 1.2m to cover all users when determining crossing speeds at signals and NR use a lower speed than this and also add a further 50% crossing time to take account of vulnerable users. Further guidance and justification for the 50% addition should be sought, along with the speed guidance.***–

Taken from ORR Level Crossings: A guide for Managers, designers, and operators –
Method of operation

160. The warning time should be greater than the time required by users to cross between the decision points at either end of a crossing. In assessing how quickly users will cross, take account of the mobility of likely users and the type of crossing surface.

161. As a guide, a walking speed of 1.2 metres per second (m/s) may be used where the surface is level and close to rail level. In other cases, 1 m/s may be more appropriate. Increase the calculated time to cross to take account of foreseeable circumstances such as impaired mobility of users, numbers of pushchairs and bicycles or where there is a slope or step up from the decision point.

3. ***Rail Speed – we agree that the rail speed is limited to 100MPH in this locality, but it may be more pragmatic to understand the actual 85th %ile speeds of trains.*** –

Line speed at the crossing is 100mph, trains travel at 100mph unless cautioned.

4. ***Visibility – the visibility given, appears to be limited to within the track and does not allow for increased visibility within NR land through vegetation removal. Please provide Justification for the of visibility measurement.***

Visibility measured using measuring wheels and rangefinders. Vegetation clearance at this location would make minimal difference due to track curvature being the primary issue for non-compliant sighting

5. ***Vulnerable users – it would be helpful to have a copy of the survey results so that we can verify the statements made.***

Details not kept due to data protection.

It is noted in your application you have provided limited survey data for 3 weeks over the Christmas period, is this the only data you have regarding this crossing? You have stated in your application that the crossing now has a large number of vulnerable and encumbered users, do you have specific data on these numbers? You also state that there were 7 incidents of misuse during this period, please can you clarify what is meant by misuse? Please can you confirm if you will be supplying more comprehensive crossing use survey data?

Previous last two risk assessments have had longer more detailed censuses carried out using CCTV equipment, using this type of equipment helps us recognise the different types of users using the crossing, during both census’s a higher number than normal of the following types of users were captured:

- Young children; unaccompanied or in groups
- Elderly people
- Dog walkers
- Cyclists, e.g., where known not to dismount and considered ‘at risk’.
- People carrying heavy bags or large objects, with pushchairs etc.

In terms of what is meant by misuse, its simply crossing users using the crossing incorrectly and in a way that would cause harm to themselves and possibly others. Examples of this which have been discovered at Penleigh Park LC are as follows:

- Groups of children standing on the crossing whilst one observes and takes photos.
- Adults carrying out the same as above.
- Groups of Children loitering around the crossing, moving off the crossing and walking along the rails.
- The crossing being used as an access for fly tipping.

Lastly, yes camera censuses will continue to be carried out for the purpose of data collection.

6. ***Enhancements – Mitigations for the level crossing have been broadly dismissed however the author has not considered Power Opener Technology on Level Crossings as means to generate greater line protection.*** –

Assuming this means having ‘lockable’ gates at the crossing, these have not been considered as it would not make any difference to risk other than increase because it has the ability to trap users within the railway’s boundary whilst a train with the inability to stop quickly is approaching at 100mph.

For information the representations and objections received which can be viewed following the attached link [P/2025/003 - Rights Of Way - Wiltshire Council](#)

If you would like to make any observations regarding these comments, I would be very grateful if you could reply to me via email, no later than 10 July 2025.

Kind regards,

Ali

OFFICIAL

	21/12/2025	22/12/2025	23/12/2025	24/12/2025
Pedestrian	53	59	28	32
Dog on Lead	3	5	5	4
Dog not on Lead	0	0	0	0
Pedestrian with Child	1	8	4	1
Unaccompanied Child	2	4	5	2
Pedestrian with Headphones in	0	0	1	0
Pedestrian looking at phone or with Phone to ear	0	0	0	1
Cyclist	2	4	0	0
Pedestrian with Pushchair	0	2	0	1
HEAVILY Encumbered user	0	1	0	0
TOTAL PEDS	61	83	43	41

OFFICIAL

25/12/2025	26/12/2025	27/12/2025	28/12/2025	29/12/2025	30/12/2025	31/12/2025	01/01/2026
24	23	29	56	53	37	40	28
4	5	2	4	4	3	4	5
1	1	0	1	0	0	0	0
2	2	2	2	4	1	10	0
2	3	2	4	3	2	1	4
0	2	0	0	0	0	0	1
0	0	0	1	0	0	0	0
0	1	0	0	1	0	0	0
0	0	0	2	1	0	1	0
0	0	0	1	0	0	0	0
33	37	35	71	66	43	56	38

OFFICIAL

02/01/2026	03/01/2026	04/01/2026	05/01/2026	06/01/2026	07/01/2026	08/01/2026	09/01/2026
38	36	50	48	34	36	35	37
3	2	4	3	2	1	3	4
1	0	0	1	0	0	0	0
1	0	1	5	8	10	9	10
6	2	3	4	6	8	6	10
0	0	0	1	0	0	1	1
0	0	0	0	1	0	0	0
2	0	2	1	0	0	1	2
0	0	1	0	0	0	1	0
0	0	0	0	0	0	0	0
51	40	61	63	51	55	56	64

OFFICIAL

10/01/2026	11/01/2026	12/01/2026	Total	Average Daily
33	52	55	916	39.83
2	4	5	81	3.52
0	1	0	6	0.26
8	3	6	98	4.26
8	4	3	94	4.09
0	0	0	7	0.30
0	0	0	3	0.13
0	2	0	18	0.78
0	0	0	9	0.39
0	0	1	3	0.13
51	66	70	1235	53.70