



Tracy Phillips
Office of Rail and Road
One Kemble Street
London
WC2B 4AN

23 October 2015

Dear Ms Phillips,

Railway Safety Regulations 1999 exemption application – train protection arrangements for running of Crossrail trains between Paddington and Heathrow Airport Junction

RSSB has reviewed the document supplied as part of the above consultation.

We note that the intention is to progress with 'Plan A' and fitment of ETCS as originally planned and that 'Plan B' is a mitigation for project risk that will only be used in the event that Plan A cannot be implemented in time. Furthermore, Plan B will only be applied for the interval until Plan A can be implemented.

We also note the process that has been documented. This describes that Network Rail has applied the Common Safety Method on Risk Evaluation and Assessment, used the Safety Risk Model, the Signal Overrun Assessment Tool, RIS-0386-CCS Rail Industry Standard on Signal Overrun Risk Evaluation and Assessment, and the TPWS Effectiveness Spreadsheet Methodology. There is not sufficient information to verify calculations, but we consider that the approach taken is good practice. The results as presented appear to be logical and we have not identified any errors or inconsistencies that would materially affect the conclusions.

We recognise that there are benefits to the operation of Crossrail services to Heathrow and a failure to provide through services potentially indirectly impacts safety risk, although it is not apparent that this risk has been taken into account in the options analysis. We do not consider this to be a significant omission and if taken into account might even strengthen the case presented.

RSSB has facilitated and contributed to a review by the cross-industry Train Protection Strategy Group (TPSG). These comments are being supplied from TPSG under separate cover.

We acknowledge that there has been wide stakeholder engagement in the preparation of the document and that the responses to this have been supportive.

In conclusion, based on the information supplied, a good process has been used, the results appear to be consistent and are supported by those most directly affected.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tom Lee', with a horizontal line extending to the right.

Tom Lee
Deputy Director of Research & Standards and Professional Head of Control Command and Signalling