

From: Mike Lunan
To: Tracy Phillips, Office of Rail Regulation
Subject: Level crossings guidance
Sent: Thu 08/07/2010 12:40

Tracy:

Thanks. The documents arrived a couple of days ago and I've read through them. I have nothing as formal as a "Response" to make, but offer a couple of comments. If you would prefer these to be put formally as a Response I will be happy to do so.

Using level crossings safely

This is admirably clear. Is it intended to produce a simplified version (eg omitting all reference to behaviour required from motorists) for schoolchildren (who, I suppose, might be riding a bicycle)? Given the Elsenham accident this might be no bad thing. Children require a safety message to be delivered in a different way from adults (eg by using a friendly cartoon character to spell out the message). Given the habits of children (more likely to be wearing a hoodie, more likely to have music on a iPlayer, more likely to be larking about etc) it's necessary to emphasise the bit about *listening* as well as looking. It is recommended to remove earphones etc but not (although it is in the larger document) putting down a hoodie.

I haven't given thought to means of distribution, but *as widely as possible* would seem to be the aim. It should certainly be easy to get hold of by anyone who is aware of its existence, and who wishes to hear the safety message. It should be brought to the attention of (ie forced upon!) anyone driving a road vehicle for a living, or who carries passengers (school run). My experience is that children often embarrass their parents into safer behaviour (whether it's wearing a set belt, or eating healthily, or stopping smoking) because they - the children - have heard the message at school and, reasonably enough, wish their parents to live safely. So getting a simpler version into primary schools is an important strand in delivery.

Managing level crossings: etc

There is naturally less interface with the public in this document, which, being aimed at the rail industry, does not need to be written in such simple language. Various points occurred to me as I was reading through.

1 p15 "Definitions are in Appendix D." I looked, and they're not. But (when I reached p87) I discovered that they *are* in Appendix D *to Chapter 2*. It would be better if this were spelled out in the text (although it is in the Contents - but who reads that?) It would be better still if the Appendices to Chapter 3 were named E, F, G and H at least until Chapters 2 and 3 exist as separate stand-alone documents (if that is the eventual plan).

2 pp17/8 Table 1. In s4 (at the top of p18) in referring to AHBs the "road layout, profile and traffic condition should be such that vehicles are not likely to become grounded *or block back* obstructing the railway" (emphasis added). In ss7, 8 and 10 the wording is altered to " ...likely to ground *or regularly block back* ...". I have no difficulty with "become grounded"/"ground", although I see no need for them to differ. 199 (on p51) would seem to suggest that the profile over an AHB or UWC is critical to safety. "At other types of crossing it is less critical because these crossings are either manually operated by railway staff. or locally monitored by the drivers of trains travelling at restricted speeds such that they can stop short of the crossing." While this is probably literally true, it seems to me to imply that accidents like that at Hixon (a profile problem at a UWC, if memory serves) have not produced the right degree of concern about the importance of profile at *all* crossings.

On the blocking back point, it is not necessary for road vehicles *regularly* to block back - what matters is that they *ever* do so, or are likely to do so. Vehicles may block back after the train reaches the striking-in point, perhaps because of an road accident, or stalling of a vehicle already on, or even clear of, the crossing. In an ideal world no vehicle should enter a crossing until the one in front has cleared it, but I have never seen this happen, and I don't expect it ever will. Motorists wish to proceed with their journey as rapidly as possible, and the railway has to devise ways of accommodating such behaviour. Blocking back has caused numerous accidents, especially in the USA where there is a habit of having railroad tracks running parallel with the highway, leading to a high risk of blocking back at minor roads leading off at right angles and shortly thereafter crossing the railroad. The risk, of course, arises when vehicles wish to *join* the highway, but cannot do so because of traffic.

I should feel much happier if the qualifier "*regularly*" were removed on the three occasions it occurs on p18.

3 p49 In the caption to Table 3 there is a typo in the 4th line of text. The second word should be "with".

4 p82 Table 11 gives the factors by which the "number of trains within the period" should be multiplied. I could not discover what "the period" is - it may well be made explicit elsewhere in the text - but if it is, it would be helpful for its location to be incorporated into para2 for ease of use of this important Table. Elsewhere I recall seeing periods of 15 minutes mentioned, but I would not wish to have to search the whole document in a hurry if I were a safety officer needing to check the calculations at a particular location.

I gave much less attention to Chapter 3 and its Appendices, as these are of a highly technical and/or legal nature where I am sure that experts much better qualified than I have spotted any errors or omissions.

I shall be glad to see the Consultation when it reaches the next stage and the Law Commissions have made their thoughts known. As this time, hard copy would be greatly appreciated.

Mike