

Dear Paul

I am replying on behalf of London TravelWatch and Passenger Focus to the ORR consultation on Revising Railway Safety Regulations. As you will be aware, these two organisations act as the statutory voice of passengers of the railway in the interests of users of the transport system

First, let me say that we welcome the work of the ORR in contributing to the improvement of safety on the railways. The overall risk to passengers is significantly lower than it was a decade ago. However, there should be no room for complacency and we would urge the ORR to continue in its vigilance.

Turning to the specific questions, we have no overall disagreement with your intentions to revoke regulations 3, 5, 6 and 7 of the MPR 97 nor to the regulation 5 of the 1999 regulations.

We welcome your proposal to retain the regulations to mandate the use of TPWS, to ensure adequate means of communication and to prohibit the use of Mark 1 rolling stock. TPWS has been proven to reduce passenger risk. On that issue, we would urge you to convert 60mph to 95km/h. While we appreciate that this is slightly lower than 60mph, 100km/h is significantly higher than the current permitted speed (approx. 66mph!).

Our only note of caution is a potential over-reliance on the use of safety management systems to ensure overall safety within a company. While these are now mandatory, they are still variable in quality and usage across the industry. We believe that it will be important for the ORR to continue its own evaluation of their effectiveness and of the contribution that they make to improving safety for passengers.

We note that inclusion at the end of the draft regulations to the need to review the effectiveness of the proposals. We fully support this: the objective of any regulations must be to improve the safety of those using and working on the railways.

We have no objection to these comments being in the public domain.

Best wishes

Robert Gifford

Rob Gifford
Safety Advisor