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5th July 2010

Dear Chandrika,

ORR's Consultation on The Review Of Guidance On Level Crossings

I have pleasure in responding to the ORR consultation on Review of Guidance on Level Crossings on behalf of the London & Birmingham Railway Company, trading as London Midland, specifically on the two documents provided for review. These were Using Level Crossings Safely, a guide for level crossing users, and Managing Level Crossings, a guide for managers, designers and operators.

London Midland's comments are as follows;

Using Level Crossings Safely

London Midland strongly supports the creation of guidance for level crossing users, recognising that the overwhelming source of risk at level crossings arises from user errors and violations. What is not clear from the document reviewed is the means by which the guidance it contains will be brought to the attention of the many millions of members of the public to whom the guidance is addressed. A communications strategy is critical if the guidance is to offer any real benefit over and above the industry's own efforts at user communication and education.

On page 3 the introductory paragraph reads as though Network Rail is the only level crossing manager, whereas that is not the case.

Managing Level Crossings, a guide for managers, designers and operators

The overall format and presentation of the document is very similar to the current RSPG 2E, as is much of the content. It is however pleasing to see the incorporation of concepts and requirements that take into account technological developments since RSPG 2E, particularly barrier crossings operated by obstacle detector and predictor technology.

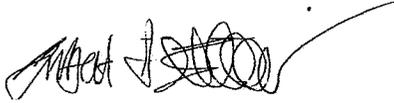
The crossing type diagram on page 16 does not include station foot or barrow crossings.

The document contains a number of useful diagrams as appendices; we feel these may better aid understanding of the guidance if they were incorporated at the appropriate parts of the main body of the document.

London **midland** |

The incorporation of the level crossing order process is welcomed; however the inclusion of contact details for the level crossing team may well quickly fall out of date and require update.

Best Regards,

A handwritten signature in black ink, appearing to read 'Gilbert Fraser', with a long, sweeping horizontal line extending to the right.

Gilbert Fraser
Acting Head of Safety & Standards
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