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**Strategy and Investment**

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Your ref:

Our ref:  
NRS10-059

Date:  
07 July 2010

Dear Chandrika

### **Consultation on the review of guidance on level crossings**

Thank you for the opportunity to comment on the review of guidance on level crossings.

Transport Scotland considers this document to be well-written comprehensive guidance, and is generally supportive of the content.

We do, however, offer some comments for consideration when preparing future draft versions. These are set out in the annex to this letter.

I hope that these comments are helpful. If you have any questions about this response, in the first instance please contact Gordon MacLeod ([Gordon.macleod@transportscotland.gsi.gov.uk](mailto:Gordon.macleod@transportscotland.gsi.gov.uk)) in the Rail Regulations and Standards Team.

Yours sincerely

**Jonathan Pugh**  
Head of Rail Regulations and Standards

## Annex

### Consultation on the review of guidance on level crossings

#### Foreword:

**Page 3. Who is this guide for?**

Road Authorities should be added to the list as in Scotland, Highway Authorities are known as Road Authorities.

**Page 4. What is ORR's policy on level crossings?**

2nd Paragraph – please add the term Road Authorities for same reason as above

#### Chapter 1: The legal framework

**Page 7. Overview**

3rd Bullet point should read:

*“highway, road and traffic authorities”*

10<sup>th</sup> Bullet point should read:

*“Transport and Works Act 1992, enables the Secretary of State for Transport to make Orders that authorise the construction of a railway in England and Wales, including allowing it to cross the highway by means of a level crossing. Similarly, the Transport and Works (Scotland) Act 2007 enables the Scottish Ministers to make Orders that authorise the construction of a railway in Scotland, including allowing it to cross the highway by means of a level crossing.”*

12<sup>th</sup> Bullet point:

NB: The ROGS regulations are currently under revision with publication expected in summer 2010.

#### Chapter 2: Managing risks at level crossings – Guide for managers, designers and operators

**Page 11.** 4. We suggest the second sentence read: *“This includes highways and roads authorities, who.....”*

**Page 13** 10(b). We suggest adding *“....., changes to road traffic conditions, ....”*

Section 4 : It should not be possible to open the road unless the signals are at Stop and free of Approach Locking.

Section 5 : It should not be possible to open the road unless the signals are at Stop and free of Approach Locking.

Section 6 : *“Appropriate means to stop any train approaching the crossing in an emergency situation are required.”*

This statement needs to be qualified as compliance could be quite onerous. Radio communication may be deemed appropriate but national GSM-R coverage is some time away and may not include all lines. Perhaps more flexible wording could be used, such as ‘ where reasonably practicable and before a train has passed the last protecting signal.....’

*“Trains should not normally arrive at the crossing in less than 27 seconds after the amber lights of the road traffic light signals first show.”*

*“Normally”* is ambiguous. It needs to be quite clear that the road light / barrier sequence must not be less than 27 seconds.

*“The carriage on the approaches to the crossing should be sufficiently wide to enable vehicles to pass safely.”*

“Carriage” should read “carriageway.”

*“There is no limit to the amount of road traffic, but the road layout, profile and traffic conditions should be such that road vehicles are not likely to become grounded or block back obstructing the railway.”*

As there must be an upper limit of road traffic, perhaps this could be reworded as *“Whilst there is no limit to road traffic there may however be situations where alternative level crossing provision needs to be considered when road traffic levels are excessively high.”* Pedestrian usage may also be a factor in determination of the crossing type.

#### **General Comment on Table 1:**

Has ERTMS been considered? Whilst it is agreed that the level crossings as described will not generally change in terms of operation and road user perspective, there will be opportunities to use ERTMS to control and monitor Level Crossings. This will enable movement authorities to be issued over level crossings and offer a better and more effective monitoring of the crossings which can be easily communicated to the driver of a train. I agree that the general principles of operation will not change.

**Page 20.** 26 : We suggest adding *“The power supply status shall be monitored at all times. See Section 29 which refers to equipment failure / damage only.”*

**Page 23.** 43 : We suggest adding *“crossings”* to reword as follows:

*“Telephones for use by the public are not normally provided. Telephones will be required at crossings where barriers can be lowered automatically by an approaching train.”*

- Page 24.** 49 : Suggest adding “automatically or manually” to reword as follows:  
*“Barriers should rise automatically or manually as soon as practicable after all trains for which the lower sequence has been initiated, have passed clear of the crossing.”*
- Page 26.** 59 : Reference should be made to Section 46 for manual operation when the obstacle detector is in a degraded state.
- Page 28.** 69. Second sentence should read: *“Audible warning to pedestrians is also provided and will continue to sound until the barriers are raised.”*
- 70 : See Table 1 Section 6. This is ‘fixed’ at a minimum 27 Seconds for the fastest train running at line speed.
71. First sentence should read: *“The barriers rise immediately the train has passed unless another approaching train is so close that a minimum of 10 seconds road open time cannot be achieved before the next closing sequence is activated.”*
- Page 29.** 72. Question: Why is the telephone located on the right hand side of the road? To use it a driver would be required to cross the road to access the telephone. Would it not be safer to recommend that the telephone was located on the left hand side of the road. If a decision is made to change the guidance to suggest the location of the telephone on the LHS of the road it would need to be emphasised that this was only be a recommendation to avoid unnecessary relocation of existing telephones. To ensure consistency a notice would need to be placed on each side of the road advising the location of the telephone.
73. This paragraph will need rewording. The supervising point is not be able to stop any train approaching the crossing. Since AHBC are not protected by signals, the nearest signal before the crossing may be a considerable distance (many miles) from the crossing. If the approaching train has already passed the nearest signal the supervising point will not be able to signal the train to stop. Whilst there is still a possibility that the signaller could radio the approaching train driver, this is not guaranteed. See Table 1 Section 6 comments about appropriate means to stop a train.
- 75 : It is noted that when a ‘predictor’ is used it is permitted to allow trains to arrive at the crossing in *“slightly sooner than 27 seconds”* however it also states that *“No trains should arrive at a crossing in less than 22 seconds after initiation of the road traffic lights.”* A full 5 seconds out of a minimum 27 second sequence seems somewhat more significant than *‘slightly sooner’*.
- Page 30.** 80 : See Table 1 Section 6 comments on appropriate means to stop a train.
- Page 31.** 83 : There is no mention of Local Operation for Manually Controlled Barriers (CCTV Monitored).
85. Third sentence should read: *“Audible warning to pedestrians is also provided and will continue to sound until the barriers are raised.”*

**Page 32.** 88. First sentence should read: *"The barriers rise immediately the train has passed unless another approaching train is so close that a minimum of 10 seconds road open time cannot be achieved before the next closing sequence is activated."*

90(c) Suggest rewording: *"a means of communicating with the train driver approaching the crossing who has yet to pass the last signal on approach to the crossing."*

**Page 40.** 137. Why does the board display the speed as 15 KPH? All other train speed indicators are in MPH.

**Page 46.** 171 : Audible Warnings. There is no reference to reduction in volume of the audible warning between the hours of 23.00 and 07.00 hours in residential areas.

**Page 48.** 184. Table 3, Page 49. Pedestrian signals are also required at manually controlled barrier crossings from initiation of light sequence to the complete closure of the barriers.

### **Chapter 3: A guide to the level crossing order submissions**

**Page 96.** 2.1. Suggest rewording of 1<sup>st</sup> sentence as follows. *"..... following the closure or diversion of a highway, road, or....."*

2.1 Suggest adding to last sentence as follows: *"... installing and maintaining level crossings to remove speed restrictions that may exist at the level crossing."*

**Page 97.** 2.3 Second sentence: The Transport and Works (Scotland) Act 2007 has now been published, so the statement *"when brought into force"* can be deleted.

2.3 Fourth Paragraph. Is Railway Safety Publication 7 – Managing level Crossings: A Guide for Users, Designers and Operators likely to be superseded with the new Level Crossings Users Guide?

**Page 103.** 4.3 Fourth Paragraph, third sentence. Recommend that only titles are used to future-proof document and the name "Mr DG Wilson" be deleted from the text.

**Page 104.** 4.4 First Paragraph: Recommend that only titles are used to future-proof document and the name "Mr DG Wilson" be deleted from the text.

## **Appendix D: Legislation and publications**

Add to legislation section: Transport and Works (Scotland) Act 2007

Add to Publications Section: Using Level Crossings Safely (Published by ORR)