

# EAST LANCASHIRE RAILWAY

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Chandrika Shah,  
Legislative Development,  
3rd.Floor,  
Office of Rail Regulation,  
One Kemble Street,  
LONDON, WC2B 4AN

4th.June,2010

Dear Sir,

## Proposed Revised Guidance on Level Crossings

I refer to the consultative document published by you recently on which you have invited comments. I have been asked by the Heritage Railway Association to provide them with a commentary and as a matter of courtesy am enclosing a copy to you as well.

Yours faithfully,



R.Johnstone,ELR Co.Safety Manager & HMRI Liaison.

cc Mr.R.Law, ELR Safety & Operations Director.

HEYWOOD - BURY - RAMSBOTTOM - RAWTENSTALL

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Consultative Document on new Level Crossing Guidance

Comments Submitted by the East Lancashire Railway

General: It is assumed that where changes in infrastructure provisions are cited in the Guidance it is not intended that they should be retrospective, always providing that any existing Order requirements are complied with and general good practice is followed. This would not of course, preclude improvements made voluntarily where these would be appropriate - and affordable. Operators making up the heritage railway industry do not enjoy the vast resources available to the national operator.

Section 2, Para.20: In relation to types of crossing why should gated crossings controlled by railway staff be limited to low traffic moment and daily road usage? Remote operation of gates from, say an adjacent signal box plus road traffic lights offers protection equivalent to full barrier crossings.

Section 4, Para.30: It is usual that gates operated from an adjacent signal box by mechanical linkage close simultaneously, not alternately. Due to the volume of modern road traffic it has long been necessary for gates to be normally closed against the railway and opened for a train. The new Guidance provides an opportunity to recognise this situation by requiring HMRI consent only where gates can, rarely, be closed against the road. If traffic lights are provided they should be interlocked with the gate operating mechanism so that the latter cannot be engaged unless the lights are showing a Stop signal to road traffic.

Section 6, Para.69: It is suggested that no new AHB crossings be authorised unless a measure to prevent zig-zagging around the barriers by road users is required.

Section 7, Para.85: As pointed out in the Guidance ABCL crossing appear identical to AHB protection to road users; the same stricture is therefore suggested for this type as in Section 6, Para.69 above.

Section 8, Para.109 et seq: The AOCL classification appears to be intended to include those open crossing with traffic lights but no automatic function at all. It is suggested an additional classification be included for Open Crossing Locally monitored (Trainman Operated) OCL(TMO).

Section 10 Para 142: Use of the same paragraph identifying letters in both the main body of the Guidance and in the guidance on level crossing Orders is confusing. It is suggested that the Appendices in the Guidance and guidance on Orders should have sequential letter identification.

Section 8 Para 116: Experience has shown that the specified interval of 27 secs. between the amber light and clearance for a train to proceed is too long where non-automatic light protected open crossings, OCL(TMO), are concerned. This is a very long delay for road users who conclude that no train is coming and 'jump' the red stop lights. The problem does not of course exist for barrier protected crossings.

Section 11, Para.149: It is suggested that the word 'reasonable' in the first line of this paragraph be deleted to strengthen its impact.

Section 16, Para.229: The requirement that gates should be normally closed against the road should be deleted and for all as being hopelessly inappropriate for modern traffic conditions even on the most minor roads. This would obviate the necessity for HMRI to give permission for gates to be closed against the railway which would be equipped with fixed signals covering the crossing.