

The Network Rail (Essex and Others Level Crossing Reduction) Order

Note in response to Mr Kay's submission on Whistle Boards Policy submitted 7 January 2019

Network Rail has considered Mr Kay's latest note on *Whistle boards policy and the 20mph Speed Limit – New Info* submitted to the programme officer on 7 January 2019. In Network Rail's view, the latest note covers the same points as made by Mr Kay at inquiry and responded to by Mr Kenning and Mr Fisk on day 19 (23.10.2018).

Mr Kay received a formal response from Network Rail (attached) in relation to the matters raised by him in relation to whistle boards at Pagets crossing in by way of letter dated 19 November 2019. Although Mr Kay says that Network Rail has not addressed his points, the formal response explains that the change was not implemented and is not ORR policy.



Mr P Kay
By Email

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19 November 2018

Dear Mr Kay,

Padget Foot Crossing Whistle Boards

I am writing to you following your correspondence with Mr Jonny Schute of the RSSB regarding the implementation of the whistle boards at Padget foot crossing in Wivenhoe.

Mr Schute forwarded your complaint to Allan Spence, Head of Corporate Passenger and Public Safety, which has now been received by the Anglia Route.

Network Rail utilise the All Level Crossing Risk Model (ALCRM) to assess the operational safety risk at level crossings to crossing users, train passengers and train staff on Network Rail controlled infrastructure.

Padget foot crossing was assessed in March 2017 and is due to be assessed again in 2019. From the assessment that was conducted in March 2017, the crossing was assigned a C4 risk score with 94 trains traversing the crossing per day. The line speeds at this location is 50mph on the up line and 20mph on the down line. The down line 20 mph speed limited is restricted by a temporary speed restriction, the maximum line speed should be 50 mph.

With a line speed of 50 mph on both lines, the sight lines for Padget foot crossing are insufficient in all directions. (See table 1). This means whistle boards are required to provide an audible warning to a user that a train is approaching.

Train drivers do not sound their horn between the hours of 23:59 and 06:00. However, Padget foot crossing has been identified as having people use the crossing between these hours meaning they were not receiving any additional warning and could not see a sufficient distance to know if it was safe to cross the railway line.

Due to this Network Rail, had to implement a speed restriction of 15 mph and 25 mph on the up and down line respectively.

Network Rail has installed Covtec, a whistle board repeater system at the crossing. This system work 24 hours a day, so provides a suitable warning to any pedestrians using the crossing during night time quiet period. Covtec is only a supplementary warning system which can only be used at a crossing that already have whistle boards in place. Installing

Covtec has enabled Network Rail to remove the 15 mph speed restriction on the up line and revert it back to line speed of 50 mph, the down line 25 mph has had to be restricted further down to 20 mph to ensure Covtec and the whistle board provides a sufficient warning to any user on the crossing. This is vital to ensure users get consistent warnings irrespective of which direction the train is approaching from.

In relation to your point raised regarding the RSSB T668 paper regarding the removal of one of the whistle boards at a crossing where there is sufficient sighting, leaving the other whistle board in place where there is not sufficient sighting. I have quoted the sections where they suggest that a removal of one whistle board could be exercised.

“This analysis suggests that there may be some locations where it is possible, subject to site specific checks, to remove whistle boards either because (a) further vegetation control maintain sight times to the required level or (b) actual train speeds are lower than theoretical maximum linespeed. It is very important, however, that any decisions to remove any whistle boards consider the possibility that there will be a period of time after the whistle board is removed, that risk is higher due to user expectation of hearing a train horn.

Should the industry decide to remove any whistle boards, it will be very important to consider any possibly adverse impacts on risk during the ‘transition’ period. Many users will have become accustomed to the sound of the train horn being a prompt to look for an approaching train; this expectation could lead to increased risk for a period after the whistle board is removed”.

We do not have any details that can categorically state why this recommendation was not taking forward, however, I can state that the latest version of the ORR’s RSP7, Level Crossings: A guide for managers, designers and operators (December 2011) stipulates:

“Where whistle boards are provided, they are normally required on all railway approaches. The time between first hearing a horn and arrival of a train should be the same for trains travelling in either direction”.

That said and adding to this, the ORR have this year issued Network Rail with an action that they have requested a formal response on, this action is as follows:

“Network Rail should ensure whistle boards are placed on all approaches to crossings unless they can demonstrate that the possible human error is being managed effectively”.

Network Rail (and perhaps the ORR) believe the only way to manage the risk and avoid entrapment, where a user has perhaps only been accustomed to traversing the crossing when a train has approached, from the single whistle board fitted direction and is reliant upon hearing the whistle board, this user could then be potentially struck by a train approaching from the direction which does not have whistle boards fitted, but the user would be expecting a train to sound its horn like it would when approaching from the other direction.

This above scenario is an example of why we believe the recommendation in T668 to remove whistle boards where sufficient sighting is provided has not been progressed. While

the balancing act was being assessed it was probably decided that providing consistent warnings in both directions and perhaps mirroring a user's expectation greater was felt to be the correct course of action to follow.

It is also worth noting that none of the sight lines at Padget foot crossing have sufficient sighting, nor can we clear vegetation to improve the sighting, it is permanent structures that are obscuring sighting. Therefore, the recommendations of T668 would not be possible to apply at Padget foot crossing.

Table 1. Sighting distances at Pagets level crossing.

All distances are recorded in metres	Minimum sighting distance required	Measured sighting distance	Is sighting compliant?
Upside looking toward up direction train approach	256	83	No
Upside looking toward down direction train approach	256	170	Yes
Down side looking toward up direction train approach	256	240	No
Down side looking toward down direction train approach	256	160	Yes

I hope this is useful, thank you for your questions.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Paul Lennon', enclosed in a light gray rectangular box.

Paul Lennon
Community Relations Manager