

## Consultation comments and responses

Document Title: Train stopped by train failure. Document number: GERT8000-M1 Consultation closing date: 14 June 2023

## 1. Responders to consultation

No	Name	Company
1	Stewart Player / Kevin Curtis / Nigel Trower	SW Railway
2	Gary Mewis	TfL
3	Nicola Wilkinson	Transport for Wales
4	lan Carroll	Network Rail
5	Peter Williams	Network Rail
6	Paul Ashton	Network Rail
7	Steve Burgess	Network Rail
8	Martin Bloomfield	Network Rail

## 2. Summary of comments

Code	Description	Total
-	Consulted	454
CE	Critical errors	
ED	Editorial errors	
ТҮ	Typographical errors	
ОВ	Observations	
-	Total comments returned	

Classification codes for a way forward:

- DC Document change
- NC No change

## 3. Collated consultation comments and responses

No	Page	Clause	Comment	Suggestion	Ву	Way forward	Page	Clause	Response
1		General	You are making the assumption that a driver will always have access to a spare red lamp and white lamp, in the case of a freight service it is very often the case that a driver will have access to maybe one spare tail lamp and will not want to use their bardic lamp for the front as they will probably not get it back.	Where this scenario presents itself, can we include the instruction that in this case before a rear portion is left in section that we use detonators as we do currently to give an alternative solution. If we do not include this then we could end up with the situation whereas the front portion would not be allowed to continue.	7	NC		General	The objective of this pa on the use of detonato trains. The quantitative proposals was unable t the case of a divided tra- each end was develope assessment included in Section 8.4 of the BCfC provision of additional cost of which has not b detonators for use in th the provision of detona
2		General	There is also a risk that the lamps that are to be placed run out of power (flat battery) before an assisting train can be sought, and in removing the detonators there would be nothing physical in which the assisting driver could gauge their approach.		7	NC		General	It would be a conseque requirement is created carried in cabs at perior
3		General	The white lamp being referred to will in all likelihood be a bardic lamp placed on the front of the vehicle, I do not consider these types of lamps as acceptable in terms of the ability to clearly see them as they are very poor in terms of brightness / lumens.		7	NC		General	This is a valid point. An require to be visible fro the existing portable ta the 300 metre warning
4		General	The business case for change seems to dismiss the likelihood of approaching a stationary vehicle where no GSM-R communications are available during poor visibility. In the event of a divided freight train, where the rear portion is to be left, this presents the scenario of no GSM-R and also as we live in a country where poor visibility is often a factor given the recent weather changes, I would suggest that this scenario could happen more often than anticipated. Just because there are no examples of this scenario occurring it does not mean that the risk is not present.		7	NC		General	Revisions to these instr absence of any instruct how the assisting train quantitative risk assess indicates that the divid challenge because of th solution is one that doe divided train being wor anyone additional to be have been issues with t proposal is one that can including poor visibility be dismissed as a possi to proceed at caution, a term as included in the those conditions the sp



art of the project is to remove reliance ors in the case of failed or divided e risk assessment in support of the to propose any practical alternative in rain, and the provision of lamps on ed by means of the qualitative risk in the Business Case for Change (BCfC). C acknowledges that this may imply I lamps in driving cabs, the possible been assessed. Retaining the use of this situation prevents any reduction in ators for use by drivers.

ence of this proposal that a d to confirm the status of lamps odic intervals.

ny lamps used for this purpose would om a distance equivalent to that of ail lamp. In clear weather this exceeds g distance provided by detonators.

ructions were seen as necessary in the tions to either drivers or signallers on or locomotive is to be dealt with. The sment (QRA), as quoted in the BCfC ded train scenario represented a he degree of variability. The proposed es not prevent the front portion of a rked forward, nor does it require e provided trackside. These would the solutions included in the QRA. The an be adopted in all situations, y, which it is correct to say should not ibility. As the assisting train is required application of the meaning of that Rule Book would suggest that in peed of approach would be low.

No	Page	Clause	Comment	Suggestion	Ву	Way forward	Page	Clause	Response
5	20	5.4	Red light on rear and white light on front, is there any contingency for freight if they do not have a red and white light		4	NC	20	5.4	Section 8.4 of the BCfC provision of additional cost of which has not b
6	20	5.4	Whilst the provision of red and white lights does assist with the recovery and assistance of a divided train, I believe that removing the detonator protection and having a ceiling speed increases the risk of a collision.	Leave the requirement to have detonator protection.	5	NC	20	5.4	The QRA suggests a 199 divided train if detonate control measures are a absolute maximum spe visibility the correspond small increase. The qua use of lamps on the div this risk, which would a collision risk is increase portion is not clearly vis intermodal flat wagons requirement for detona need for the RU to prov
7	P.20	M1-5.4	M Bloomfield 08/06/2023	Please note an observation for further consideration regarding if the visibility of a portion left on the running line is less than 300 metres due to weather, curvature, tunnel and other circumstances.	8	NC	20	5.4	These would appear to where it has been cons
8	P.21	M1 - 5.5	M Bloomfield 08/06/2023	I believe stating that a ceiling speed may be perceived by Train Drivers as a speed that they may travel at rather than retaining the current caution instruction. Travelling at caution indicates to a Driver that the speed is subject to their route knowledge based on the Drivers judgement and experience around visibility, route knowledge, weather conditions, complexity of signalling, and other associated route knowledge element	8	NC	21	5.5	The QRA work consider maximum speed would increased collision risk detonators is reduced f reduction is from a fact mph maximum approxi distance of 325 metres approximately 300 met by the use of detonator proceed at caution and mph, which aligns with the Rule Book is design speed. Applying the def module TW1 would res than this where conditi



acknowledges that this may imply lamps in driving cabs, the possible een assessed.

% increase in collision risk with the tors are removed and no additional applied. The imposition of a 25 mph eed would reduce this to 4%. In poor nding figures are a factor of 6.8 and a alitative risk assessment suggested the vided portion as potentially reducing align with the QRA comment that ed in a situation in which the divided isible, as for example when s are involved. Retaining a nators prevents any reduction in the wide these.

be related to the next comment sidered.

ered whether imposition of an absolute d reduce the collision risk. Overall the by comparison with the use of from 19% to 4%. In poor visibility the ctor of 6.8 to a small increase. A 25 kimately equates to a stopping s on level track. This is similar to the ettres warning that would be provided ors. The wording that the driver must d travel at a speed not exceeding 25 in that previously used elsewhere in need to avoid any suggestion of a target efinition of 'at caution' in Rule Book sult in the actual speed being lower tions dictate this.

No	Page	Clause	Comment	Suggestion	Ву	Way forward	Page	Clause	Response
9	21	5.5	Providing a ceiling speed can have an adverse effect where drivers drive 'at' that speed (a speed to be attained). How do the proposed new rules take into account poor weather conditions, darkness etc, where undertaking this activity can be more difficult for a driver even with the addition of a light added to the divided train.	Remove the ceiling speed of 25mph and just say 'at caution'.	5	NC	21	5.5	A consideration in the C effectiveness of imposin calculation of this was in benefit, the maximum s This does have a close s distance on level track t required if a driver only on exploding detonator speed was recognised a assisting train is require distance, expressed in t section'. Particularly if t interpretation of the de caution could lead to a circumstances a higher equally important to em rather than a target spe
10	21	5.5	the colour of the light that is displayed on the divided portion – is there mitigation if there are no lights provided, especially during poor visibility		4	NC	21	5.5	In the interests of provid possible without specify been made an absolute demonstrates that by ou movement there is an ir subsequent work sough measure which it appea
11	21	5.5	to proceed at caution and travel at a speed not exceeding 25 mph (40 km/h) – this is another speed signals will be required to memorise	Change to 20mph – this is in line with other regulations and would keep rule book consistency	4	DC	21	5.5	This raises an interesting previously. If the Rule B must observe in a given for the signaller to 'repe state the nature of the r been no defined instruc- terms an assisting train failed train. It would the 25 mph speed only in a would be consistent with been presented in mode
12	21	5.5	be prepared to stop on reaching the divided portion. Isn't this an obvious bullet point.?	Delete	4	DC	21	5.5	This is probably an unne omitted from the instru



QRA work was to consider the ng an absolute ceiling speed, and a ncluded. As this demonstrates a speed of 25 mph has been included. similarity to a required stopping to that which would currently be becomes aware of the train ahead rs. The need for a possible ceiling as being particularly relevant if the ed to proceed for a considerable the QRA report as 'a long block this is the case, a driver's efined meaning of proceeding at decision that in favourable speed is appropriate although it is nphasise that this is a ceiling speed eed.

iding as simple a set of rules as ying a range of variations this has requirement. The QRA work only applying a ceiling speed to the ncreased risk of collision, and the nt to introduce an additional control ared would counteract this.

ag point that has been considered Book specifies instructions a driver a situation, it should not be necessary eat' these to the driver, but only to movement. There has up to now ctions for what Block Regulation 7 in situations other than assisting a erefore be preferable to refer to the rule directed at the driver. This th how a similar situation has now ule M2 following a similar comment.

ecessary statement and will be uctions directed at the driver.

No	Page	Clause	Comment	Suggestion	Ву	Way forward	Page	Clause	Response
13	21	5.5	Will the inclusion of 25mph or 40 Kmh be a target speed that could lead to an increased risk of speeding and collision?	Should the requirement be to travel at caution without a ceiling speed?	6	NC	21	5.5	A consideration in the C effectiveness of imposin calculation of this was in benefit, the maximum s This does have a close s distance on level track t required if a driver only on exploding detonator speed was recognised a assisting train is require distance, expressed in t section'. Particularly if t interpretation of the de caution could lead to a circumstances a higher equally important to en rather than a target spe
14	21	5.5	Should there be a corresponding section for the Driver informing them of their instructions?		6	DC	21	5.5	This raises an interestin previously. If the Rule B must observe in a given for the signaller to 'repe state the nature of the been no defined instruc- terms an assisting train failed train. It would the 25 mph speed only in a would be consistent wit M2.
15	21	5.5	What are the instructions for a Signaller to give a Driver during hours of darkness, poor visibility or in tunnels?		6	NC	21	5.5	The description of what module TW1 requires th any specified speed to t the distance that can be speed that will allow the train or vehicle. It is the reference in this module



QRA work was to consider the ng an absolute ceiling speed, and a ncluded. As this demonstrates a speed of 25 mph has been included. similarity to a required stopping to that which would currently be becomes aware of the train ahead rs. The need for a possible ceiling as being particularly relevant if the ed to proceed for a considerable the QRA report as 'a long block this is the case, a driver's efined meaning of proceeding at decision that in favourable speed is appropriate although it is nphasise that this is a ceiling speed eed.

ng point that has been considered Book specifies instructions a driver in situation, it should not be necessary eat' these to the driver, but only to movement. There has up to now ctions for what Block Regulation 7 in situations other than assisting a erefore be preferable to refer to the rule directed at the driver. This th how this is presented in module

t is meant by proceeding at caution in he driver in addition to not exceeding take account of conditions such as e seen to be clear and travel at a he train to be stopped short of any erefore not necessary to add any le to conditions such as poor visibility.

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No	Page	Clause	Comment	Suggestion	Ву	Way forward	Page	Clause	Response
16	21	5.5	The assisting train is instructed to proceed at a maximum of 25mph, this is another new speed that a signaller must get used to.	When instructing a driver in this scenario a maximum speed of 20mph is more consistent with other parts of the rule book and would be easier for the signaller to remember and apply.	7	DC	21	5.5	A consideration in the C effectiveness of imposit calculation of this was i benefit, the maximum s This does have a close s distance on level track f required if a driver only ahead on exploding det instructions a driver mu should not be necessar the driver, but only to s The proposed wording requirements to procee mph are shown only in
17		5.4	What are the arrangements if leaving a portion of a divided train behind? There does not seem to be any protection either in good conditions or poor visibility.		1	NC	20	5.4	This section provides the cannot be recoupled and QRA suggests a 19% income train if detonators are re- measures are applied. maximum speed would the corresponding figur increase. The qualitative of lamps on the divided risk, which would align risk is increased in a situ not clearly visible, as fo wagons are involved.
18		5.4	Where does a driver get a white light from to put on a divided train if it is engine and wagons as most crews do not have lamps that fit on lamp brackets.		1	NC	20	5.4	Section 8.4 of the BCfC provision of additional cost of which has not b



QRA work was to consider the ing an absolute ceiling speed, and a included. As this demonstrates a speed of 25 mph has been included. similarity to a required stopping to that which would currently be y becomes aware of the vehicles etonators. If the Rule Book specifies sust observe in a given situation, it ry for the signaller to 'repeat' these to state the nature of the movement. g has been amended so that the eed at caution and not to exceed 25 in instructions directed to the driver.

he instructions when the two portions nd a portion has to be left behind. The crease in collision risk with the divided removed and no additional control The imposition of a 25 mph absolute d reduce this to 4%. In poor visibility tres are a factor of 6.8 and a small we risk assessment suggested the use d portion as potentially reducing this is with the QRA comment that collision tuation in which the divided portion is or example when intermodal flat

acknowledges that this may imply lamps in driving cabs, the possible been assessed.

No	Page	Clause	Comment	Suggestion	Ву	Way forward	Page	Clause	Response
19		5.5	When the assisting train is to enter the section to remove the portion of the divided train they are instructed to proceed at no more than 25mph, this is towards a train that is not protected and potentially in poor visibility. This seems high risk.		1	NC	21	5.5	The QRA work considered maximum speed would increased collision risk be detonators is reduced fr reduction is from a factor mph maximum approxin distance of 325 metres of approximately 300 metre by the use of detonators proceed at caution and mph, which aligns with the the Rule Book, is design target speed. The descrip proceeding at caution in addition to not exceedin account of conditions su to be clear and travel at be stopped short of any necessary to add any re- such as poor visibility.
20		5.5	The exact location of the divided portion.	If you get this wrong you have the same as you had at Lunan Bay where the engine was buried in the rear coach.	1	NC	21	5.5	That accident has influe rules as the driver of the completely wrong locati expecting to encounter proceed at caution using mean that a driver shou that will allow this. The maximum speed approx that speed on level track work as a further mitiga
21		5.5	The colour of the light that is displayed on the divided portion	Surely you are going towards the rear so it will be red according to 5.4, it does not mention wrong direction.	1	NC	21	5.5	Depending on the cause rear portion is being rem movement and the assis from the leading end in this possibility is covered



ed whether imposition of an absolute reduce the collision risk. Overall the by comparison with the use of rom 19% to 4%. In poor visibility the or of 6.8 to a small increase. A 25 mately equates to a stopping on level track. This is similar to the res warning that would be provided rs. The wording that the driver must travel at a speed not exceeding 25 that previously used elsewhere in ned to avoid any suggestion of a ription of what is meant by n module TW1 requires the driver, in ng any specified speed, to take uch as the distance that can be seen a speed that will allow the train to train or vehicle. It is therefore not eference in this module to conditions

enced the subsequent content of the e assisting train had been given a tion for the failed train and was not any obstruction. The requirement to be the wording of module TW1 would ald always be travelling at a speed introduction of an absolute ximating to a braking distance from the was recommended by the QRA ation of the potential collision risk.

e of the division, it is possible that the moved by a wrong-direction isting train could be approaching the normal direction of travel and ed by the wording proposed.

No	Page	Clause	Comment	Suggestion	Ву	Way forward	Page	Clause	Response
22		5.5	To proceed at caution and travel at a speed not exceeding 25 mph (40 km/h)	Why do we specify a speed here for caution and not in other sections, 25 is too fast going round tighter curves in poor visibility.	1	NC	21	5.5	The QRA work consider maximum speed would increased collision risk detonators is reduced f reduction is from a fact mph maximum approxi distance of 325 metres approximately 300 met by the use of detonator proceed at caution and mph, which aligns with the Rule Book, is design target speed. The descr proceeding at caution in addition to not exceedi account of conditions s to be clear and travel at be stopped short of any necessary to add any re such as poor visibility.
23		5.5	Be prepared to stop on reaching the divided portion.	Is that not stating the obvious?	1	DC	21	5.5	This is probably an unno omitted from the instru
24		5.5	If necessary, to pass at danger the signal protecting the obstructed line or pass an end of authority (EoA) without a movement authority (MA).	Surely if a train is in a section then you will have a red signal behind?	1	NC	21	5.5	As written, this allows t situations which might direction movement or no signal to control the
25	21	5.5	A signaller cannot tell 'the exact location' of a train or divided portion is unless they have been specifically told this by the driver or other person (such as a RIO) on site.	Suggest clarification of wording to deal with these three issues.	2	NC	21	5.5	In the interests of simply worded in a way which anyone other than the is required to describe to precisely as possible to to the driver of the assi degree of precision will 'landmarks'.
			25mph max speed should be the upper limit where there are no lower PSR/TSR or ESRs in the area concerned.						It is implicit in the descr contained in module TV allow the train to be sto this does not allow any temporary speed restri
			POSA (if available) should be mentioned in the bullet concerning passing signals at danger.						This is not a situation in facility to be used.



red whether imposition of an absolute I reduce the collision risk. Overall the by comparison with the use of from 19% to 4%. In poor visibility the tor of 6.8 to a small increase. A 25 imately equates to a stopping s on level track. This is similar to the tres warning that would be provided ors. The wording that the driver must I travel at a speed not exceeding 25 that previously used elsewhere in ned to avoid any suggestion of a ription of what is meant by in module TW1 requires the driver, in ing any specified speed, to take uch as the distance that can be seen t a speed that will allow the train to y train or vehicle. It is therefore not eference in this module to conditions

ecessary statement and will be uctions directed at the driver.

the instruction to apply in all include an unsignalled wrongr one over a single line where there is e movement.

lification of the rules, these are does not assume the presence of driver of the divided train. That driver the location of the divided portion as the signaller who in turn relays this isting train. It is accepted that the I be influenced by the availability of

ription of proceeding at caution *N*1 of proceeding at a speed that will opped short of any obstruction that lower permissible speed or ction to be exceeded.

which the PoSA module allows that

No	Page	Clause	Comment	Suggestion	Ву	Way forward	Page	Clause	Response
26	21	5.5	Initial part of 5.5 states – 'When an assisting train is ready to enter the section to remove the rear portion of a divided train, you must tell the driver:'	Consideration to be given for clarity to amend the end of the sentence to 'driver of the assisting train' to ensure that it's clear which Driver the Signaller needs to communicate with at that point.	3	NC	21	5.5	It is considered that the that this conversation is of an assisting train, as 5.4 has proceeded with response to a previous instruction to a driver w driver of the assisting tr
27									
28									
29									



e wording makes it sufficiently clear s between the signaller and the driver the other driver as shown in section the front portion. As revised in comment, there is now a separate which makes it clear that this is the rain.