

**Consultation comments received from the general public and associated organisations
on Railway Group Standards
GM/RT2484 issue 2
Audibility Requirements for Trains**

**GE/RT8000/TW1
Preparation and movement of trains general**



Rail Safety & Standards Board

Closing date 24 January 2007

1. Mr M Goddard (Birchington Against Train Horns)
2. Mr D Bell (Environmental Health Officer, Hastings Borough Council)
3. Mr D Wadmore (Chairman RATH (Residents Against Train Horns) Canterbury)
4. Mr R M Brown M.B.E. (public)
5. Mr D Ledger (Swale Borough Council)
6. Mr GT Smith (Artington Parish Council)
7. Mr A Andrews (The Teynham Group)
8. Mr M C Nicolle, Resident
9. Mr AR Gammon (public)
10. Mr P Wakeham (The Noise Abatement Society)
11. Ms S Trouillet, (Local Authorities Co-ordinators of Regulatory Services (LACORS))
12. Mrs N Banfield (public)
13. Mr Andy Irons, Secretary, Residents Against Train Horns (RATH)
14. Patricia Hughes (Protection East Hampshire District Council)
15. Mr N Saxby, Resident

Classification Code: (CC)

DC	Document changed
NC	No change

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
General comments								
1		General			<p>The recommendations are impotent in that they do not meet the immediate or far reaching needs of those affected by train horn blasts at all hours of the day and night. Viz:</p> <ol style="list-style-type: none"> 1. There is no compunction to use low tone horns. 2. Changes made to 'new' trains in that low tone horns can be fitted then is plain ridiculous. Some trains are not taken out of service for over 20 years. Do we have to wait that long for relief from this awful noise? 3. There is no date set for when the review of the necessity of whistle boards is to be looked at. The drivers on this line (Birchington) even blast their horns when there is NO whistle board and no one on the track and no danger present – just for their own persecution of the people living here. We have 7 whistle boards coming into Birchington - some no more than one hundred yards apart – and if the train horn is supposed to be heard over a distance of half a mile – and they can be heard for five miles away - then why the necessity for a whistle board one hundred yards from the preceding one? When are these boards to be looked at and risk assessed. We need a date. 4. When is the review of need to sound horns at all going to take place? 	1	NC	<ol style="list-style-type: none"> 1. The recommendation by the Industry Steering Group, as set out in the Briefing Note, not to make the change in horns noise levels retrospective relates to the industry view that the combination of recommendations will make a significant difference to the affected public. 2. The new level of noise is available for all new trains (up to 160kph) and also available on a voluntary basis to all operators from the time it is implemented. 3. The precise local arrangements for whistle boards and the use of horns are not matters for this standards change – and will be forwarded to Network Rail and the relevant train operator/s 4. Again this is not part of the current standard change proposal, but the review has already commenced. There is no particular end date for this because there are a number of varied uses and it is not yet clear whether changes will be made incrementally or all together.

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
2		General			This is a mere toothless and impotent whitewash of the real facts of abuse in the use of these horns, the sleeplessness, and mental health issues caused by continuous interruption of day to day living at the track side. The abuse of the horns by SouthEast Rail needs to be looked into as a matter of urgency, such as the victimisation of certain areas by the drivers in blasting their horns, the necessity to blast them and the night time blasts at all hours of the night. We really do need some action, with dates – not some lame promise of something in the future that leaves the responsibility of change with the perpetrators of this horrendous problem. We need dates – we need action. We need it now.	1	NC	The recommendation to have a quiet period at night is intended to address a significant part of the sleeplessness problem referred to - but does not form part of this standard change. The local use of horns is a matter for individual train operators, although the intention is to issue guidance as to good practice in the sounding of horns when the above change is introduced.

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
3		General			<p>I am grateful for the opportunity to comment on the proposed revisions to the above. I am doing a single response to both documents as I believe that they are so closely linked as to require them to be considered together. I am not using the Consultation Questionnaires as I consider these to be drawn up too narrowly to allow me to make the points I wish to raise.</p> <p>I welcome the proposal to introduce a night time quiet period from 23:00hrs to 07:00hrs but question why implementation of this has to be delayed until 7th April as this, in my opinion, is long overdue.</p> <p>I believe that too much reliance is placed on producing a blast of sound to provide a warning. Whilst this may be reasonable for an emergency situation where persons are unexpectedly observed on or near the track, I consider that it should not be used in routine situations where works are being undertaken or at crossings, etc. There must be other ways to provide a warning in such situations rather than by horns which are audible to many people who do not need or want to know about an approaching train.</p> <p>I believe, therefore, that the approach taken, i.e. to stipulate minimum and maximum sound pressure levels for train horns, is misplaced. The minimum sound pressure level proposed is still very high and will undoubtedly be heard over a wide area.</p> <p>(continued below)</p>	2	NC	<p>Noted</p> <p>Implementation will be in line with the need to consult across the industry to get effective adoption of the changed requirements.</p> <p>This is not part of the current standard change proposal, but the review has already commenced. There is no particular end date for this because there are a number of varied uses and it is not yet clear whether changes will be made incrementally or all together.</p> <p>The industry believes that the implementation of the recommendations will make a significant beneficial impact. However, the industry, including RSSB will monitor the implementation of all the recommendations.</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
					<p>(Continued from above)</p> <p>The requirement for train horn audibility at 400 metres will undoubtedly mean that in many locations considerable numbers of people who don't need or wish to know will continue to be disturbed by being advised of a train's approach.</p> <p>I do not have any great confidence in Network Rail identifying and assessing high risk crossings in any sort of reasonable time frame. When I enquired in October about locations where horns had to be sounded in our area they were unable (or unwilling?) to tell me. I have been waiting since 2nd November for the outcome of a request for a re-assessment of the need for a whistle board at a crossing. I have also requested the reason(s) for reported increased frequency of horn sounding in this area in recent months. Reminders have failed to prompt any response whatsoever.</p>			<p>We have passed this information on to Network Rail</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
4		General			<p>On behalf of the RATH committee may I thank you for the advances made so far in the search to rid the public of the health hazard caused by the train horns.</p> <p>While we feel that your committee's proposals are a step in the right direction, we must say that our support is somewhat tempered by the fact that the horns themselves will remain unaltered for the foreseeable future.</p> <p>We will decline your kind offer to attend our committee meeting, but instead hope that you will attend our yet-to-be-arranged public meeting, where you will have the chance to address a wider audience. We will be holding this after the changes that your committee suggest have been put into effect. We will, of course, give you as much notice as possible.</p> <p>Once again our thanks to you and the members of your committee for the work done thus far. It would be good to think that we will all agree on, and find a practicable way to implement, the right solution.</p>	3	NC	<p>Noted - thank you.</p> <p>We note that you are disappointed with the implementation proposals for the quieter horns. RSSB and Train Operators will be monitoring the effectiveness of the changes that are implemented to determine whether any further changes will be needed.</p> <p>RSSB will be happy to attend when the time comes.</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
5					<p>We, my wife and I, live beside the railway line just west, on the down side of Bentley Station and have played our part in expressing concern over train horn nuisance. We are pleased with your proposal, but must mention the following points:</p> <ul style="list-style-type: none"> a) Train horns seem to have become louder since some weeks before Christmas 2006. b) Use of horns by drivers seems variable whether at night or by day c) Horns are often used by up-trains whilst slowing to stop in Bentley Station, which means stopping before reaching the crossing point. <p>These points are of significance to our annoyance over horn usage.</p>	4	NC	<p>Thank you for your support.</p> <p>This proposed standards change does not relate to specific trains on specific routes. It is not clear why you should have experienced a change in December 2006, but this will be brought to the attention of SWT</p> <p>Guidance to train operators to help them achieve consistency is one of the recommendations being taken forward. As you describe the situation, there is no requirement in the Rule Book for drivers to sound the horn, unless the footpath crossing beyond the platform in the up direction has an associated whistle board to the west of the station. This may have been placed when the line was used by trains not stopping at Bentley. Network Rail is reviewing whistle boards on its network and this problem will be drawn to Network Rail's attention</p>

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	Page	Section	Page	Section				
6		General			General Comment. The proposals are seen as a step in the right direction, but they do not go nearly far enough. There needs to be greater acknowledgement of the problem by the industry and a wider range of alternatives solutions put forward. The permanent reduction of train horn volume for all trains is essential for some problem spots, but other solutions such as moving or the complete removal of whistle boards may be right for other places on the network. The RSSB would need to pull all these threads together upon completion of the consultation and formulate a strategy for the way ahead. Reducing the volume is a necessary and permanent solution, removing, or at other times adding whistle boards can only be a temporary cosmetic measure.	5	NC	This is not part of the current standard change proposal, but the review has already started. There is no particular end date for this because there are a number of varied uses and it is not clear whether changes will be made incrementally or all together.

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	Page	Section	Page	Section				
7					<p>What is required is for this document, or perhaps another document to “instruct” train operators to introduce a phased programme for modifying the existing horns to bring them into line with the new standard within 12 months.</p> <p>The Class 375 fleets have only been introduced relatively recently in Kent after a long period using the previous fleet of trains that used much quieter horns. Taken at face value, it could mean that the current fleet of trains could retain unmodified train horns at their present potential sound pressure level for 30 to 40 years. Whilst drivers may be instructed to take care to not sound their horns excessively, at the current volumes, this may well be a continued irritation to local residents for a long time to come, and there is far too much room for variation in volume, and this is unacceptable. A range of 20 dB (A) has been measured inside bedrooms from train horns, as also stated in my comments to the other consultation document. This wide range is very much at the whim of the driver and this large variation in sound goes from what may be deemed acceptable to unnecessarily loud inside dwellings close to the whistle boards.</p> <p>There is presently a strong groundswell of public opinion for movement and change by the industry and train operators to make the effective changes in 2007, and it may be considered by the industry that the night time ban is an effective and inexpensive remedy to resolve most of the issues. It is however felt that should daytime use continue as before that may result in complaints in the future, there will be more resistance for any change that will involve expense. Householders would be able to bring far less pressure to bear than is present now. It is important to get all the necessary changes right at one time.</p>	5	NC	The industry steering group believes that the implementation of all the recommendations will make a significant impact on the majority of affected neighbours. The final recommendation is however to keep the situation under review, so that if they do not have the desired effect, further steps can be considered.

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
8					With night-time emergency use of horns, this will prove even more problematic to some local residents, due to the current loudness and ad hoc nature of sounding, i.e. nothing for weeks, perhaps months, then they are woken up, albeit for legitimate reasons by potentially very loud horns. Indeed for night time use with lower background noise levels, there is even less need for the current sound pressure levels on the horns to be so high, as sound carries so much further.	5	NC	The total package of proposed solutions is aimed at delivering to controls necessary to alleviate the problems that the railway's neighbours are currently experiencing.
9		General Comment about the consultation:			The ability for organisations and individuals to be able comment on what is an important industry document is much appreciated. Clearly safety is an overriding concern and those outside the industry could not seek any changes that would compromise this. It is hoped that the RSSB will take the comments made seriously as they have a wider significance than just the instructions to the drivers in this document, and it must be said that whilst the proposals will bring improvements, there is still much more that needs to be done to reduce the impact of noise from train horns on people by the industry as a whole	5	NC	Noted, thank you. All the comments have been taken seriously and a number have provided ideas for further exploration. This package of changes should not be assumed to be the last.

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
10		General			<p>The current situation at Teynham is that the higher sound pressure level train air horns are in use on the approach to, when passing through and when stationary within the station. The introduction of the increased volume of the train air horns by South Eastern Trains and the frequency and manner of use is seen as extreme provocation.</p> <p>The Noise Abatement Society has already expressed its disappointment at the “Final Recommendation” produced by the Train Horns Steering Group. The Teynham Group is similarly disappointed at these proposals, specifically as follows:</p> <p>1. Train Horn Tones.</p> <p>The proposals for the use of the low air horn tone are only with regard to where this is possible. There is no mention in the proposals of a mandatory change of air horn so that only the low tone is available for use.</p>	7	NC	<p>The proposals are pragmatic ones designed to get the maximum effect at the lowest cost. Together with the night time quiet period we expect that every affected neighbour will experience some improvement and many neighbours will experience both.</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
11		General			<p>2. Night Time Quiet Period.</p> <p>We have on file a letter from Connex, dated 25th July 2003, which clearly states that a night time ban on the use of train air horn was in place at that time, between the hours of 23.30 pm and 7.00 am. This ban was never implemented or enforced. If the TOCs are able to ignore existing bans on the night time use of the train air horns, why would they need to comply with a new ban on the night time use of the air horns? We would welcome the introduction of a night time ban on the use of the train air horns as this would prove to us that the horns were not necessary.</p> <p>In the unlikely event that a night time ban on the use of the train horns is both implemented and enforced, the proposals do not specify a date when this prohibition will come into force. If indeed a night time ban on the use of the train horns is implemented this will reduce by one third the number of hours in one day that South Eastern Trains breach our Human Rights by the imposition of their operational noise upon track side residents. No consideration has been given in the proposals for a Quiet Period for children who go to bed between 1800 hrs and 2300 hrs.</p>	7	NC	<p>The current Rule Book requirement is to sound the horn at all times when passing Whistle Boards. The proposal under consideration is to change that</p> <p>The proposals involve an adjustment in the balance between the interests of users of footpath crossings and lineside neighbours. There is no single change that would meet the aspirations and needs of all concerned, and the recommendations represent what we believe to be the most appropriate balance. By providing for a quiet period in the core of the period that most (but not all) people sleep, it will enable all members of the population to have a core quiet period during their resting hours.</p>

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	Page	Section	Page	Section				
12		General			<p>Sound Pressure Levels</p> <p>We note from the proposals that the sound pressure levels from the train air horns will be 101dB minimum and 106dB maximum. However, while this is still too high, this is only proposed for new or modified equipment and is not retrospective. This would appear to allow existing rolling stock to continue to use the current and much louder air horns, which is not acceptable. We note that “no requirements relating to sound to the sides will apply”. The railway industry still considers that it has a right to broadcast noise to the sides of the track onto private property. It has no such right.</p>	7	NC	<p>We are not sure why you are saying that the proposed level is still too high. We have been pressurised by all interest groups to ‘return to the sound made by the old trains’ and the proposed levels of sound have been derived from measurements taken from those trains. The reason that no requirements are specified to the side is that at the levels proposed horns will be quieter in all directions.</p> <p>In addition, work is continuing to develop a specification that could be used to develop a Broadband Horn, which, according to the manufacturers has the potential to be more directional.</p>
13		General			<p>4. “Whistle” Boards.</p> <p>We question the “proactive” approach by Network Rail with regard to the removal of “whistle” boards. On June 1st 2006 a public meeting was held at Teynham station, which was attended by our MP, Mr Hugh Robertson, representatives from Network Rail and local residents whose lives are affected by the train horns. At this meeting Network Rail advised that they would be removing the “whistle” boards on the approaches to Teynham Station. To date we are still awaiting their removal.</p>	7	NC	<p>We have passed this information on to Network Rail</p>

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	Page	Section	Page	Section				
14		General			<p>5. Finally.</p> <p>The implementation of the proposals are unlikely to stop the public protest at the effect that the train air horn have upon their lives. If these issues are not now resolved we will need to consider the Human Rights issue.</p> <p>We advise that The Teynham Group has no association with and does not condone any actions by any persons who may wish to take direct action against individuals or the equipment that are involved in this dispute.</p>	7	NC	The industry steering group believes that the implementation of all the recommendations will make a significant impact on the majority of affected neighbours. The final recommendation is however to keep the situation under review, so that if they do not have the desired effect, further steps can be considered.
15		General			<p>We have a Whistle Board (WB) at the bottom of our garden and have suffered the consequences for almost three years. We therefore particularly welcome the proposed night time quiet period and also the use of low tone horns where possible. We also hope that the intention to review local conditions might bring us some relief. It seems unnecessary for up trains stopping at Bentley Station to sound their horns before arriving at the station when the pedestrian crossing is a couple of metres in front of them BEFORE they move off again.</p>	8	NC	Thank you for your support. As you describe the situation, there is no requirement in the Rule Book for drivers to sound the horn, unless the footpath crossing beyond the platform in the up direction has an associated whistle board to the west of the station. This may have been placed when the line was used by trains not stopping at Bentley. Network Rail is reviewing all whistle boards on its network over a period of time.
16		General			<p>I note from the proposed General Guidance to drivers that they are to be instructed to use the low tone on the LOUD setting when passing WBs. Can drivers not be given discretion to use the soft setting at lightly used crossings such as that here? This would help relieve the remaining problem of likely continued disturbance to children put to bed in the early evening.</p> <p>I am grateful for the opportunity to have been able to comment on these helpful proposals.</p>	8	NC	There is evidence that some drivers do use their discretion, based on experience and local knowledge, in their use of the horn specially at night. However, it is difficult to define an operating rule, which of its nature is prescriptive, to encompass this.

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	Page	Section	Page	Section				
17		General			<p>In response to continued public concern at the levels of train horn noise, the Rail Safety & Standards Board (RSSB) has just published its recommendations for the rail industry to consider.</p> <p>The main recommendations of the Train Horns steering group include:</p> <p>(1) The introduction of mandatory night time quiet period from 23.00 to 07.00 hrs except when train drivers see people on the track or for other emergencies.</p> <p>(2) To use only the low tone horn at whistle boards whenever possible.</p> <p>(3) For all new trains, travelling up to 160 kph, to fix the minimum sound pressure level at 101dB and at a maximum of 106 dB.</p> <p>(4) To progressively reduce the number of whistle boards and adopt a new All Level Crossing Risk Model.</p>	10	NC	There are a total of 9 recommendations. Not all are listed by the NAS. The full list is published on the RSSB web site

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	Page	Section	Page	Section				
18		General			<p>The problems from train horn noise, which beset areas of the South East, and also other parts of the UK, following introduction of new stock a few years ago cannot have arisen accidentally, but by intent, although it may now be accepted that the intent was misguided.</p> <p>Before new trains are ordered, a comprehensive specification for all parts of the train will have been developed, including the train horns, and it must be assumed that the horns were supplied to their specification. If not, the problem is the responsibility of the supplier, who should have modified the horns at no cost to the operator. Therefore it appears that the operators were given what they specified, and that the responsibility for problems lies with them. However, the operators may claim that they were working to noise standards imposed upon them by others; in particular the Rail Safety and Standards Directorate, through the audibility requirements which were developed in the 1990s. The Standard (GM/RT2180)ⁱ specified the tonal quality of train horns and their levels as follows.</p> <p><i>[extracts of GM/RT2180 supplied]</i></p> <p>A later version of GM/RT2180 has the same levels.ⁱⁱ A code of practiceⁱⁱⁱ,^{iv} was issued to support GM/RT2180. It is likely that the horns on the new trains (typically Bombardier Electrostar 375 and similar) were designed to meet the levels in GM/RT2180. In this case it is those who advised Railtrack, over 10 years ago, to standardise to these horn levels who are at the root of the problem.</p>	10	NC	<p>The cause of complaints in recent years has been identified as the introduction of new Whistle Boards and the introduction of new trains. The new trains were procured against a standard that can be traced back to British Rail in 1976. There was no intent to make train horns noisier at the time of the introduction of these new trains</p> <p>This is correct, but there was no substantive change from the standard set by British Rail in 1976</p> <p>For the purposes of considering changes that are proposed today, there is no point in RSSB entering into a debate about who did what in the 1970s or 1990s. The industry has acknowledged, through the train horns steering group, that it is appropriate to make changes and the recommendations have been developed to promote these changes.</p>

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	Page	Section	Page	Section				
20		General			<p>Do they mean what they say?</p> <p>An up- beat press release was put out by RSSB on December 19, 2006 ^{viii}including the following statements “The main recommendations are: Introduce a night time quiet period from 2300hrs to 0700hrs, except for when drivers see people on the track or other emergencies.</p> <p>Where possible, use only the ‘low tone’ at ‘whistle boards’.</p> <p>For all new trains capable of speeds up to 160kph or when changing their horns, establish a lower minimum sound pressure level of 101dB, and a maximum of 106dB.</p> <p>Over time, and taking account of the changes listed above, further reduce the number of whistle boards through, crossing closures, local review, challenging some of the current criteria, and adopting a new level crossing risk model.</p> <p>Review and eradicate all other routine requirements to sound train horns The industry will continue to develop a specification for possible alternative technologies”.</p> <p>(continued below)</p>	10	NC	<p>We will not comment on the observations about the press release, but the proposals, if implemented, would lead to the following changes for all those people that live where ‘noisy horns will continue to be sounded’.</p> <p>1. A night time quiet period will mean that horns will not routinely sound between 2300 and 0700 2. Where horns continue to be sounded (because there is a whistle board) between 0700 and 2300, the driver will be instructed to use only the low tone, where this is technically possible.</p>

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	Page	Section	Page	Section				
					<p>(continued from above)</p> <p>Accompanying quotations in the Press Release were: Anson Jack of RSSB, Chairman of the Train Horns Steering Group said “For some years those people living near to railway whistle boards have had to put up with noise levels that affect their lives. This review acknowledged that the rail industry should take proper account of the impact of its activities on neighbours, and established a means to do so. I believe that the implementation of the review findings, which the steering group has recommended to the industry, will make a significant difference to the lives of those affected The review has been conducted in an objective way overseen by members of the industry and the Office of Rail Regulation, using site surveys and observations by experts in their respective fields. Cross-industry cooperation enabled sharing of data and the development of a consensus as to the way forward. The report and recommendations are intended to support the industry in using its judgement as to the most appropriate way forward. The introduction of a night time quiet period and the use of the low tone should remove many of the concerns of the public and establish an appropriate balance between the safety of crossing users and the health of neighbours of the railway.” John Armitt, Network Rail Chief Executive, said: “We are delighted to have been able to respond to the concerns of our line-side neighbours who were being affected by noise from train horns. (continued below)</p>			

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	Page	Section	Page	Section				
					<p>(continued from above)</p> <p>The industry has carefully considered the issue, carried out detailed and thorough analysis and risk assessments, and has been able to find positive solutions.”</p> <p>Steve Bence, Director Operations Support at the Association of Train Operating Companies said "Train Operators welcome these recommendations and will consider them very carefully. Train Operators recognise that the recommendations attempt to strike a new balance between the essential requirements of safety on the railway and the needs of local residents and neighbours".</p> <p>The recommendations and statements from the industry do not relate very closely to the introduction of quiet horns. All except the third and final recommendation relate to restricting the use of the existing horns, not to quieter horns. The third recommendation gives the levels for new horns, not yet introduced. The final recommendation is a way forward, but has to be pursued effectively. However, if the intention to introduce new horns with lower noise levels continues to be for only new trains, or when horns are changed at some unspecified future date, there is no benefit at present to those people who live where noisy horns will continue to be sounded. It could take a generation for the recently introduced trains to be replaced, during which time horns that do not meet the new standard for noise levels will continue to be sounded.</p>			

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	Page	Section	Page	Section				
21		General			<p>We have to question whether the industry is taking “proper account of the impact of its activities on neighbours”? - Anson Jack above.</p> <p>The industry is responding to “the concerns of our line-side neighbours who were being affected by noise from train horns”? - John Arnitt, above. (“were” or “are” ?). The industry is responding to the “needs of local residents and neighbours”? Steve Bence, above.</p> <p>In the absence of a firm commitment from the industry to change all those existing horns which exceed the levels in the new standard, the whole consultation on the problem degenerates into a cruel charade, in which expectations of noise sufferers have been raised, only to be told that the problem may not be solved in their lifetime but it should be OK for their grandchildren in 30 to 40 years time.</p> <p>It is possible that the convention for changes in Standards within the rail industry is that they are not normally applied retrospectively. For example the old horns were not changed after the introduction of GM/RT2810 in 1995. But it is not the same in other industries. For example, the recent EC changes in Health and Safety limits on worker exposure to industrial noise apply throughout existing manufacturing industry, and should apply retrospectively also to the exposure to train horn noise.</p>	10	NC	The recommendation not to make the change in horns noise levels retrospective relates to the industry view that the combination of recommendations will make a significant difference to the affected public

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
23		General			Latterly, the response of the industry has been to introduce some derogation orders at tunnels and remove whistle boards in order to restrict use of new horns already installed on trains, rather than to accept their responsibilities and change back to quieter ones.	10	NC	The industry responded by changing the rules (not derogations) for sounding horns near tunnels. The reason that it is not proposing the retrospective changing of horns is because to do so would cost excessive amounts of money and the industry view is that the implementation of the recommendations taken together, will make a significant improvement for most of our neighbours. Nevertheless we are also keeping the situation under review to consider whether these changes will be sufficient.
24		General			It is clear that an error was made in the mid-1990s by not considering environmental effects of the proposed train horn levels. This was at a time when there was considerable interest in the environmental effects of train noise ^x and a calculation procedure had been developed for the noise of trains moving on tracks but it did not include noise from horns. ^{xi} The industry must be required to accept that the high horn levels on the new trains are a mistake, an aberration for which it has to take responsibility and put right on a short time scale.	10	NC	The industry has considered all the work undertaken and has decided to proceed with considering the recommendations made following the Steering Group review and report.
25		General			Conclusion The Noise Abatement Society welcomes the spirit in which the RSSB has approached the problem of the train horn noise issue during the last year and the report which clearly recognises the unequivocal distress being caused by this horn. However, the actions that the RSSB suggests should be put in place, may have limited effect.	10	NC	The industry believes that the implementation of the recommendations will make a significant beneficial impact. However, the industry, including RSSB will monitor the implementation of the recommendations.

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
26		General			<p>A mandatory silencing of the train horn between the hours of 11.00pm and 7.00 am will satisfy a few complainants who will at least be allowed to sleep without anticipating the blast of a horn, however, this will not satisfy those who wish to sleep earlier than 11.0 pm including children, night workers who sleep during daytime hours and any person in the vicinity of the train during the day especially during the summertime when windows cannot be opened and the garden becomes a no-go area.</p> <p>A train driver should be able to sound the train horn at any time that he deems necessary and the introduction of a night time ban can only add pressure to the driver and possibly compromise safety on the tracks.</p>	10	NC	<p>The work that was undertaken by Faulkland Associates and by RSSB showed that the vast majority of the harm to members of the public arises from sleep deprivation or the consequences of sleep deprivation. That is why the core recommendation is focussed on providing a period of quiet that coincides with the most common times of sleep, and the lowest usage of footpath crossings.</p> <p>Clarifying the rules for sounding horns at night is not expected to add pressure on drivers, because the evidence that we have found is that drivers do not consistently apply the rules today (reacting in some cases to an awareness of the noise issues). Making it clear to both drivers and public that the horn will be sounded before 2300 and not after will be much clearer for all concerned.</p> <p>There will be a limited number of locations at which there is some risk to users of crossings at night, and Network Rail will be implementing a risk based review to consider whether there are any further steps that should be taken. Having taken account of the work to consider the safety benefits of whistle boards, the view of the steering group is that the balance between the noise nuisance and the safety benefits of sounding horns at all times is currently set at the wrong level, and should be changed as soon as possible – through the implementation of the recommendations.</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
27		General			<p>Sounding only the lower tone of the two-tone horns: the majority of trains do not have two-tone horns. The horn has a very shrill nature to its sound which is why it has received so many complaints. The lower tone of the two-tone horns that do exist will still sound shrill so the hearer may not notice any difference in annoyance.</p> <p>The NAS have written to all operating companies asking for details of how many of their trains do have the two-tone horns fitted. This will show where we can expect to see the low tone used. We would like an explanation to the statement “when ever possible” what does this mean, if the trains have two- tone horns it should always be possible to use it.</p>	10	NC	<p>Most trains do in fact have two-tone horns, the main exception being GNER, most of whose trains sound a 3-note chord. What does vary is the horn control, which on some trains allows the driver to sound each tone separately. Some of the new trains (Desiros) have two tone horns that are operated by a single control, and the driver has no choice other than to sound both. Electostars have controls that allow the driver to sound one tone without the other.</p> <p>Wherever possible’ in the draft rule refers to this difference between train types: some drivers will be able to use the low tone on its own, others not.</p>
28		General			<p>Changing the Railway Group Standard GM/RT 2484: It will be helpful to revise the minimum sound pressure levels for train horns, however, the benefit of this revision will not be felt until new rolling stock is introduced which may not be for another 30 to 40 years and is not to be applied retrospectively.</p>	10	NC	<p>This is strictly correct – however the NAS should note that following the change in standard in 2005 all of the south eastern train operators made changes to their horns (with differing levels of success) even though the new standard did not mandate retrospective changes. The recommendation not to make the change mandatory is partly because of the reasons set out above (we believe that the recommendations will make a significant beneficial impact) and partly to leave flexibility for operators, all of whom have different local circumstances.</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
29		General			It should also be noted that the amendment mandating the sound pressure level to be 5 dB lower to the side of the train than in the front of the train has been found to be technically unfeasible, and that is where the noise is felt at its worst by trackside residents and pedestrians. Broadband technology could meet this requirement.	10	NC	<p>The reason for not mandating requirement for sound levels to be 5dB quieter to the side is because the introduction of an overall quieter horn (consistent with the sound levels of the old slam door stock) will meet the stated demand of the public, our neighbours, to return to the old sound levels and it will not be necessary to recommend a quieter level to the side.</p> <p>Work continues to define a specification that could enable the development and testing of a broadband horn.</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
30		General			<p>Removing whistle-boards: The extensive work done to investigate the necessity of some whistle-boards is welcomed with reservation. Many whistle-boards will have to remain because of bad sight-lines, but the wholesale removal of whistle-boards, which have been placed historically for good reason, may compromise safety on the track.</p> <p>There is also no guarantee that those whistle-boards which have been removed may not be replaced at some time in the future. This could affect house sales.</p>	10	NC	<p>The work that has been undertaken has shown that there are some whistle boards where the case for removing them may be strong, relating to low usage, actual train speeds or means of improving sight lines for those using crossings.</p> <p>In all that is done in the are of level crossing safety, taking proper account of the safety impact is the industry's (and particularly Network Rail's) obligation, while at the same time, the work we have done to understand the impact of sound on neighbours, has highlighted that there is equally an obligation to take proper account of that impact. Although the introduction of quieter horns would result in a shift in the balance, it would still be the case that the industry should be looking to avoid sounding horns wherever possible.</p>
31		General			<p>The NAS is alarmed that the RSSB has not addressed the source of the noise problem which is the horn itself.</p>	10	NC	<p>The report and recommendations has addressed all those areas that were under consideration, and as publicised during the course of 2006. We note that the NAS would prefer a different set of recommendations to have been made, but believe that the combined implementation of the recommendations will make a significant impact on our neighbours. The reasons for choosing the set of recommendations that have been made are all explained in the responses to the NAS comments.</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
32		General			It would seem to be a common sense approach to change the offending horn which has been acknowledged by the report to be excessively loud and serving no safety purpose by being so. In fact it has been pointed out by Prof. D. Withington that the loud horn can bring about a 'freeze' effect on the hearer which is counter productive in safety terms.	10	NC	The option that the NAS is promoting represents the highest cost solution. In the work of the steering group, it has sought to balance the interests of all the affected stakeholders – level crossing users, neighbours, train drivers, and the rail industry businesses. The rail industry is conscious of the extent to which it is funded through public money and subject to various checks as to whether it has spent what funds it has available. This involves making difficult trade offs. Some of the recommendations are capable of implementation significantly quicker than it would take to implement the NAS' favoured option
33		General			The report congratulates itself by stating that all the proposed changes will cost nothing to the railway operators. This does imply that the cost of changing the horn to a quieter one, thus being rid of the noise pollution completely, is not being considered seriously on the grounds of cost and yet option number 2 in the RSSB's programme of work published in June 2006 promised trials of the new technological Broad Band sound for train horns which could be a quieter, safer and inexpensive alternative.	10	NC	There is no report that we are aware of that 'congratulates itself' nor do we think that any form of congratulation is appropriate when dealing with such matters. The industry has incurred significant costs over this issue and continues to do so – in developing and considering standards changes for instance. It is not yet clear whether Broadband horns will be technically viable, and if they are, whether they will be inexpensive compared to the conventional air horn. If the Broadband Horn becomes technically viable, it will be added to the range of options available to Train Operators, but would not become a mandatory requirement – for the same reasons that changing conventional horns is not proposed as a mandatory change, unless they could be installed for negligible cost.

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
34		General			The NAS understands that the specifications for this horn were written by AEA Technology but have been returned to them for clarification. This is seen by the public as another delaying tactic.	10	NC	Development of a specification for what 'sounding like a train horn' means is a complex activity, and one that was reported in June 2006 (when we published a plan) as expected to continue into 2007. This work is being undertaken for RSSB by Delta Rail Limited (Formerly AEAT). The report will be submitted to RSSB for industry consideration and decision. There are no delaying tactics being adopted and to suggest there is will not help anyone's cause – the industry is keen to get on with implementing the recommendations and has received significant and broadly based support for doing so – though regrettably not from the Noise Abatement Society.
35		General			The suggested massive tinkering with the railway system will compromise safety, put huge pressure on the drivers and still leave a blanket of excessive unnecessary noise pollution throughout the UK. The Noise Abatement Society reiterates that safety is paramount. The report clearly has ignored the source of the problem and that is quite simply the Horn itself. This Train Horn must be changed and swiftly.	10	NC	For the reasons set out in all the other comments on the NAS response, we do not agree with any of these conclusions. For the reasons set out in all the other comments on the NAS response, we do not agree with this conclusion.

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
36		General			<p><u>Background and general comments:</u></p> <p>The Local Authorities Co-ordinators of Regulatory Services (LACORS) is an established local government body working with and on behalf of local authority associations across the UK.</p> <p>We aim to facilitate best practice and consistency in the enforcement of regulatory services provided by local authorities and we are committed to the improvement agenda in this area. We also represent, and lobby for the interest of councils across our regulatory service remit.</p> <p>LACORS works with all local authorities across the UK in a number of key policy areas, including environmental protection (for England and Wales). The environmental protection team's remit covers environmental regulatory services, including statutory nuisance (mainly noise). We utilise robust communication systems to facilitate work with councils, including policy discussion groups, the LACORS website and specialist emails.</p> <p>For more information on LACORS, please go to www.lacors.gov.uk</p> <p>(continued below)</p>	11	NC	Noted, specific responses are given to each of the issues raised.

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
					<p>(continued from above)</p> <p>This response is on behalf of Local Government. For the purpose of this consultation, we carried out discussions and exchanged emails with council officers and key stakeholders. We also organised a meeting with council environmental protection officers dealing with train horn issues and also heard views from representatives of a residents' association and the Noise Abatement Society.</p> <p>LACORS welcomes the two consultations issued by RSSB following the publication of the recommendations by the Train Horns Steering Group and hopes that this will be an opportunity to solve the problems relating to train horn noise. Overall, proposals outlined in the two consultation documents (on audibility requirements and on the RSSB steering group's recommendations) are a step in the right direction but do not go far enough. All the issues related to train horn noise need to be addressed together to ensure that the new requirements put an end to the confusion around requirements and to the complaints by local residents living at the side of the railway lines. Clearly, audibility requirements are one aspect but there are many linked issues, which we will address in more detail in the response to the second consultation on the wider recommendations.</p> <p>We outline below comments in relation to the consultation document on the audibility requirements for trains. We refer RSSB to additional detailed comments sent directly to RSSB from individual councils.</p>			<p>Noted. Thank you for your support. We note that you do not consider that the changes go far enough, but for the reasons set out in this and other documents consider that it is important to implement the changes as soon as possible and then to monitor the effectiveness of the changes.</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
37		General			<p><u>Additional measures</u></p> <p>LACORS strongly believes that the introduction of the night time quiet period and the other RSSB recommendations need to be implemented in conjunction with additional robust measures, including a comprehensive review of the location of and need for whistle boards along the tracks. Suggestions for additional measures were made by council officers during the meeting LACORS organised to discuss the RSSB consultation papers and during additional exchanges. We believe that these measures need to be implemented in addition to the action previously described in this response- they are not 'optional extras'. The additional, necessary measures are:</p> <ul style="list-style-type: none"> - A phased programme to ensure that each train operating company retrofit its trains with horns that comply with the new requirements on the reduction of sound pressure levels during an agreed time period (probably over 12 months). The need for this phased retrofitting process is felt to be necessary, especially in areas where train operators have just replaced their old rolling stock (equipped with slam doors but with quieter horns) with new faster and quieter trains (but with louder horns). - LACORS supports the introduction of broadband horns in all existing and new rolling stock. Broadband horns are directional and would prevent unnecessary noise spillage away from the tracks when sounded. 	11	NC	<p>The review of all whistle boards is being progressed by Network Rail. They are assigning priority to those most affecting railway neighbours but their resources are finite.</p> <p>We note that no one from RSSB or the rail industry generally was invited to the meeting although we had offered to meet with both the NAS and RATH to explain the rationale for the recommendations</p> <p>The recommendation by the Industry Steering Group, as set out in the Briefing Note, not to make the change in horns noise levels retrospective relates to the industry view that the combination of recommendations will make a significant difference to the affected public. Individual Operators will therefore have the flexibility to consider if and when any further steps are needed.</p> <p>Noted. Research is going on to define a suitable specification and we hope that a viable Broadband product will be available in due course – we expect to publish a draft specification in the near future.</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
38		General			<p><u>Additional measures</u></p> <p>The reduction of the number of whistle boards. One of the train horns' steering group's recommendations suggests a reduction, over time, of the number of whistle boards. This measure is very welcomed but needs to go further and should make it a requirement for Network Rail to work with local councils in setting out a clear timetable to carry out such an exercise. Noise nuisance, which has been affecting railway neighbours since the introduction of the new rolling stocks across the country, should be put to a halt as quickly as possible for the benefit of all stakeholders involved. This could be achieved with a review of risk assessments at crossings to progressively reduce the number of whistle boards, either based on attainable speeds rather than permissible speeds, or by physical means to restore the line of sight at crossings. Risk assessments would be subject to a regular review, especially to take into account the progresses allowed by technological innovations. LACORS is fully aware that the removal of a whistle board might not be permanent and that the removal option should be explored together with other solutions such as improving sight lines at crossings or diverting/closing some of these crossings.</p> <p>The review of the location of whistle boards. Another way to reduce noise disturbance for residents and to reduce the negative impact of train horn noise on the value of their houses is to review the location of whistle boards and to try to find alternative/ more appropriate locations. This exercise would require some local monitoring and research by Network Rail and council environmental protection officers who have a good knowledge and expertise of local characteristics and circumstances.</p>	11	NC	<p>As indicated, Network Rail is reviewing the need for all whistle boards. Network Rail is also assessing the use of train speeds rather than maximum line speeds to determine the sighting distances at crossings, thus providing a potential opportunity to remove whistle boards at some locations.</p> <p>These comments and suggestions are being passed to Network Rail Presumably any such programme could also include effective use of the statutory footpath closure procedures, to reduce the number of pedestrian railway crossings.</p> <p>This may have local value and the suggestion will be passed to Network Rail.</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
39		General			<p><u>Additional measures</u></p> <p>More research needs to be undertaken to measure variations and noise levels within houses (and especially bedrooms) at the sides of the rail lines because the consultation documents and associated research focus specifically on the monitoring of noise propagation at crossings. Measuring noise levels inside houses will ensure that we have a full picture of how they affect residents' health and well-being. As mentioned in LACORS' response to the first consultation, more research could also be carried out on the audibility of noise frequencies.</p>	11	NC	There is nothing to prevent this being done now but the methods used for the work commissioned by the Industry Steering Group were less intrusive and the results made a powerful case for change.
40		General			<p><u>Additional measures</u></p> <p>Consultation process before the erection of whistle boards. The establishment of a consultation process between council environmental protection and Network Rail prior to the erection of whistle boards as part of an environmental impact assessment would be a good way to prevent any future nuisance problems and complaints from residents.</p>	11	NC	It is hoped that no new whistle boards will be erected, particularly as it is hoped that no new footpaths would be created routed across the railway at grade. The suggestion for consultation has been passed to Network Rail.

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
41		General			<p><u>Research on sound frequency levels:</u></p> <p>We believe that there is a need for more research into effective sound frequency levels of train horns. The old fleet of trains was equipped with horns that were not a cause for concern and did not prompt complaints from residents living along the rail lines. The railway industry should carry out some research to understand why these horns were acceptable and why the new ones are not and the related issue of sound frequencies.</p>	11	NC	RSSB has a study already underway to more accurately define the characteristics of train warning horns that will enable a quantitative assessment to be made. When completed, proposals will be developed and consulted on.

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
42		General			<p><u>Alternative solutions:</u></p> <p>LACORS feels that there is a wide expectation amongst councils, affected residents, and the public more generally that the railway industry will comprehensively acknowledge the scope of the problem through this consultation exercise. The outcome of this process should be the publication and implementation of a coherent strategy to answer all the issues related to train horn noise.</p> <p>From our discussion with council officers, it is clear that the reduction of sound pressure levels needs to be explored in conjunction with alternative solutions. The experience of environmental protection officers has shown that some residents live so close to the rail tracks that the train horn noise, whatever its intensity, will always cause a nuisance and have adverse health effects.</p> <p>Suggestions for alternative solutions were made during our meeting with council officers. We will set these out in our response to RSSB's second consultation on the steering group's recommendations to contribute to a comprehensive strategy to addressing unnecessary train horn noise while maintaining safety on the railway.</p>	11	NC	<p>This is not part of the current standard change proposal, but the review has already commenced. There is no particular end date for this because there are a number of varied uses and it is not yet clear whether changes will be made incrementally or all together.</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
43		General			<p><u>Conclusion:</u></p> <p>LACORS hopes that the outcome of this consultation process will be the publication and implementation of a coherent strategy to answer all the issues related to train horn noise, as outlined in this response.</p> <p>We welcome the introduction of a night time quiet period between 23.00 and 07.00 and the other RSSB recommendations but believe that some of the recommendations need to be made much more robust in terms of scope and timescales if the problems for residents are to be resolved within an acceptable period of time. Specifically, we believe that the mandatory reduction of sound pressure levels of train horns in all rolling stock within an agreed time frame is necessary to reduce noise disturbance for residents. Broadband technology (and especially its benefits in terms of directionality) and additional measures such as the removal/relocation of whistle boards without compromising safety also need serious further consideration if we are to reach a full resolution of the current train horn problem.</p> <p>In conclusion, LACORS believes that the requirement to reduce the sound pressure levels is a step in the right direction but is only part of the required solution. We believe that further work is required on sound frequency levels and directionality to get an accurate picture of the level of noise affecting residents along the rail lines.</p>	11	NC	<p>This is a summary of earlier more detailed comments, to which responses have been given in this document and in other responses to correspondents</p> <p>See earlier comments on broad band technology</p> <p>The recommendation by the Industry Steering Group, as set out in the Briefing Note, not to make the change in horns noise levels retrospective relates to the industry view that the combination of recommendations will make a significant difference to the affected public.</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
					<p>Continued from above</p> <p>We also believe that it is imperative to set out a phased programme allowing companies to retrofit all existing trains. This phased retrofitting exercise (over a 1 year period) would ensure all train horns to comply with the new standards on the reduced minimum level of sound pressure. The RSSB will need to ensure that train operators are respecting any agreed timetable for this retrofitting programme to prevent further delays affecting councils, residents and the railway industry.</p> <p>Following discussions, email exchanges and meetings with council officers and residents affected by train horn noise, LACORS feels that there is a strong need to make the changes effective in 2007.</p> <p>Using this consultation exercise to solve the problem permanently will benefit all stakeholders.</p>			
44		General			<p>Our house and garden are parallel to the railway track with just a fence separating us. We have a whistle board across the track right outside our house on the down line approx.12m away from our windows and another on the up line approaching our house approx. 300m away again beside our garden</p>	12	NC	<p>The changes in standards that are being proposed do not affect the sighting and locations of specific whistle boards. Under the recommendations of the steering group, Network Rail will continue to review the appropriateness of specific Boards, and will also be developing a new risk assessment model to consider whether there are further Whistle Boards that can be removed. These considerations do not impact on the proposal to change the train horn standard</p>

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	Page	Section	Page	Section				
45		General			<p>“RATH” supports and endorses any proposals the rail industry has to go towards safe solution of the horn problem.</p> <p>But we do not support any measure that may compromise safety on the track or at crossings. We consider that too many whistle board removals and bans on the sounding of the horn while they may be very cost effective, it may create more casualties for the future than could ever be claimed to be saved by the increases in volume, tone and sideways radiation of the horn that is the root of all the problems.</p> <p>The nighttimes ban between 11pm and 7am is perhaps the most effective of your proposals...but again, safety is reduced and disruption to lives shall still continue in the daytime, more noticeable or even unbearable enough to render any future outdoor activity untenable when driver enforcement to sound is enforced at all times... in particular when the hot weather arrives again and with small gains of “Horn free” periods for children needing to sleep earlier or shift workers attempting the sleep patterns they enjoyed before this blasted Horn.</p> <p>While reductions in minimum levels and the introduction of a maximum are welcome, but to only change with new rolling stock means a wait of perhaps 30 years, these proposals are perhaps not even worthy of consideration at this point in time.</p>	13	NC	<p>The Industry Steering Group does not believe the changes will compromise safety at footpath crossings in the way you suggest. The harm to residents under the existing arrangements significantly outweighs any benefit they provide for pedestrian crossing users, particularly night time users. The report and recommendations have addressed all those areas that were under consideration, and as publicised during the course of 2006. We note that RATH would prefer a different set of recommendations to have been made, but believe that the combined implementation of the recommendations which have been made will make a significant impact on our neighbours. The reasons for choosing the set of recommendations that have been made are explained in the documentation supporting the consultation and in the responses to the consultation comments.</p> <p>The recommendation not to make the change in horns noise levels retrospective relates to the industry assessment that the combination of recommendations will make a significant difference to the affected public</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
46		General			<p>Sounding of only the low tone at whistle boards; This will be as loud as the high tone and shall still radiate to the sides. Not all trains are fitted with this facility. Perhaps not as startling as both tones but again we feel not enough to make enough difference for purpose. Objective response to this could of course only be made if experienced first hand so perhaps we concede opinion must be reserved for this one.</p> <p>“RATH” still maintains, as it has from the beginning that it is the horn that’s the problem...it’s the Horn that needs to be fixed. We endorse and support all comments made in response to you by the Noise Abatement Society and Mr A R Carraro.</p> <p>We also consider the burden of demand upon Train Drivers unreasonable...to maintain their watch, principally by night when bans are in place particularly unfair to them.</p> <p>We would go further to suggest that, If you were a tradesman having performed a task, and that task was not up to standard then it is not unreasonable to expect you to put right that mistake at whatever your cost. You made a mistake in the beginning not to perform an environmental Impact survey. Recently conducted Faulklands and Spectrum surveys support our case. The new train horns have proved far too loud for purpose. Please change this horn to more humane levels and tone to put right your mistake.</p>	13	NC	<p>The low tone is, as you say, probably no quieter in technical terms than the high tone. It is perceived, however, as being less aurally intrusive than the high tone. We accept that not all trains will be equipped to apply this aspect of the changes. The Industry Steering Group is committed to keeping the results of this package of changes under review. See our responses to those comments.</p> <p>Your comment underestimates the professionalism of train drivers. The proposed changes make drivers responsibilities much clearer.</p> <p>Your remaining points are noted but generally repeat points answered earlier.</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
47		General			<p>So far I imagine the cost within the industry to defend this mistake must be equal, if not more than what the cost would have been to change the horns in the first place. RSSB costs will be met by their funding organisations (the Train operating companies) who in turn will pass this on to commuter fares.</p> <p>If I held shares in this company, I would be very concerned how my investment was being managed. I would also be concerned for the future costs of possible litigation for damage to health by trackside residents and Railway staff, both in the cab and at the trackside. Reduction in property prices would be another area for apprehension. All the while that initial cost to replace horns remains. Is it perhaps time to abandon the spades? This protest will not fade away; every sufferer is reminded every time the horn sounds and resolve for justice is reinforced with every blast.</p> <p>The only option is to change the horn. A recent meeting, Organised by LACORs and LGA between County and Ward Councillors, National Council Environmental Protection Officers, Noise Abatement Society and RATH. We took member opinion to the meeting table. It was concluded overwhelmingly by all present that changing this horn was the only solution. I have been advised that responses from these organisations will be made to you shortly...what more burden of proof is required to prevent this waste of funds that is currently being made to defend the indefensible while the real problem continues to manifest...The Horn!</p>	13	NC	<p>The purpose of the Industry Steering Group is to ensure full participation of our members (the train operators and Network Rail) and other stakeholders (including the industry's safety regulator, the ORR) in the work to resolve these problems.</p> <p>See responses to comments from those organisations which have responded and to your previous comment on the non-retrospective effect of the change to GM/RT2484. Many of the comments from local government representatives were constructive.</p>

Specific comments on GM/RT2484

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
48		1.1.1			Refers only to statutory minimum levels of noise from train horns – does not refer to statutory maximums. This is a defective purpose and reference should be made to statutory maximum levels.	14	DC	Agreed – text amended
49		1.1.1			This paragraph only refers to the mandatory minimum sound pressure levels but it should also mention mandatory <i>maximum</i> pressure levels.	11	DC	Agreed – text amended
50	2	3.2			The requirement should apply to new warning horns and to all horns on existing trains.	9	NC	The recommendation by the Industry Steering Group, as set out in the Briefing Note, not to make the change in horns noise levels retrospective relates to the industry view that the combination of recommendations will make a significant difference to the affected public
51	3	4			<p>The main recommendation concerning sound pressure levels applies only to new trains or when horns are changed. The problem has, of course, arisen because new trains and new horns have been installed with a much higher noise level than previously. It will take a considerable time before these new trains and new horns need to be replaced.</p> <p>It was clearly a mistake to have set the current levels as high as they are, and this has been recognised by the Steering Committee. This mistake should be corrected forthwith and the general public should not have to endure the unacceptable and unnecessarily high noise levels. A programme should be agreed for the renewal or modification of horns to meet the Steering Group's recommendations as a matter of urgency.</p>	6	NC	<p>The recommendation by the Industry Steering Group, as set out in the Briefing Note, not to make the change in horns noise levels retrospective relates to the industry view that the combination of recommendations will make a significant difference to the affected public</p> <p>The means by which operators react to the proposed changes in the sound levels of horns is a matter for them. However, we understand that most operators support the collected recommendations and will keep the situation under review to see whether the implementation of the recommended changes do have an impact on neighbours.</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
52	5	2.1 2.1.2 2.1.2.1			We can hear the Horn's at a distance of MINIMUM 1000m(1km) and most times 2-3kms from INSIDE our house with the door and windows SHUT Surely this is in excess of the 400m stated.	12	NC	The revisions to the minimum and maximum sound pressure levels are intended to address this issue, though the introduction of the quieter horn is not mandated in the standard.
53	5	2.1.3			When the two tone horns are sounded outside our house they then echo back to us from the hill (wood) on the opposite side of the track.	12	NC	The revisions to the minimum and maximum sound pressure levels are intended to address this issue though the introduction of the quieter horn is not mandated in the standard

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
54	6	2.1.4			<p>1. This is a sound level measured from the front of the train. However, the horns on the new rolling stock appear not to be directional. As a result, not only do people on crossings get a warning, but so do all the people who live in homes to the side of the railway line. The measurement of levels should be carried out to identify not only the forward projection of the horn noise but also the propagation of noise to the side of the train. Maximum levels of noise should be set for the sideways propagation of noise.</p> <p>2. We would question the effectiveness of a horn at 120 dB when the train is travelling at 100mph. There is concern that rather than providing an adequate forewarning of danger, that it is more likely to cause members of the public to “freeze”</p> <p>3. According to other documentation provided, it would appear that there is no intention to ensure the existing rolling stock are required to alter their horns. Therefore, this problem will continue to occur for years to come. <u>It should be a requirement of the RSSB that all horns are amended within a one year period, for the protection of those living near to railway lines.</u></p>	14	NC	<p>The revisions to the minimum and maximum sound pressure levels are intended to address this issue.</p> <p>1. The previous standard made an advisory requirement for the sound level to the side to be 5dB quieter than to the front. With a minimum of 112dB to the front this meant a minimum of around 107dB to the side (noting that it was advisory). The new standard sets a maximum of 106dB in the principle direction (to the front) which is quieter than the 107dB previously recommended for the side. Delivery of this requirement is also consistent with the repeated public requests to ‘get back to the old level of sound’</p> <p>2, The recommended levels of sound correspond to measurements taken from old (Mar One) rolling stock and have proved to be effective as a safety measure while not being too loud for the public.</p> <p>3. The recommendation by the Industry Steering Group, as set out in the Briefing Note, not to make the change in horns noise levels retrospective relates to the industry view that the combination of recommendations will make a significant difference to the affected public</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
55		2.1.4			<p><u>Directionality:</u> We acknowledge the proposal to reduce the minimum levels of sound pressure for warning horns. However, we note that this sound level is measured from the front of the train. The horns on the new rolling stock appear not to be directional. It means that train horn noise not only reaches passers-by at crossings but also residents living on each side of the rail lines.</p> <p>We therefore believe that the measurement of levels should be carried out to identify not only the forward projection of the horn noise but also the propagation of noise to the side of the train. It would give a better indication of the level of intrusion and noise affecting people living at the side of the railway. Maximum levels of noise should be set for the sideways propagation of noise.</p> <p>We believe that the deployment of broadband technology would bring significant benefits in terms of ensuring the sound is directed along the track (where it is needed to ensure safety) and ensure the sound is not directed away from the track (where it is not needed and where it affects residents).</p>	11	NC	<p>The reason for not mandating requirement for sound levels to be 5dB quieter to the side is because the introduction of an overall quieter horn (consistent with the sound levels of the old slam door stock) will meet the stated demand of the public, our neighbours, to return to the old sound levels and it will not be necessary to recommend a quieter level to the side.</p> <p>Work continues to define a specification that could enable the development and testing of a broadband horn.</p>
56	6	2.1.4.1			<p>The reduction in pneumatic horn sound pressure levels relative to the speed of the trains is warmly welcomed. It is unlikely that any trains reaching speeds above 100 miles an hour will come through this borough and thus the rolling stock in daily use will come into the middle category. This should mean in future, a reduction of the sound pressure level at a number of key locations. BUT please see further comments below.</p>	5	NC	<p>Your comments on the objectives of these changes are noted, please see detailed responses below to specific points.</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
57	6	2.1.4.2			<p>The document does not address the problem of horn directionality. Clearly it is important for adequate audibility to a measured standard at crossing points ahead of trains. It is noted that in document AEATR-PC&E-2004-002 Issue 3 "Audibility of Warning Horns Final Report", page iii of the Executive Summary that "In an open space the horns in isolation are not directional" and "However, measurements on some vehicles show higher than expected sound levels at the side of the train" and "To minimise this effect it is recommended that the sound level at the side of the train should be specified as being as least 5 dB lower than that measured at an equivalent position to the front." This 5 dB was not carried over into the proposals. Indeed it is questioned if this can be measured let alone complied with. By virtue of this, it would seem that noise levels at some 400 metres either side of the front of the train would be receiving levels approaching those required for meeting the standard in the front of the train (depending on topography, buildings etc). This is totally unacceptable.</p> <p>It is clear from the degree of complaints made, and not just from this Borough, that the volume at the side of the trains is far too high.</p> <p>(continued below)</p>	5	NC	<p>The reason for not mandating requirement for sound levels to be 5dB quieter to the side is because the introduction of an overall quieter horn (consistent with the sound levels of the old slam door stock) will meet the stated demand of the public, our neighbours, to return to the old sound levels and it will not be necessary to recommend a quieter level to the side.</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
					<p>(continued from above)</p> <p>Even with the reduced standard proposed, at the minimum of 101 dB(A) at 5 metres, even with the 5 dB reduction referred to above, the levels inside the closest houses, let alone the gardens would still be too high to be acceptable. It is imperative therefore that the industry not only pursues the testing, but also works swiftly to authorise Broadband horns, which have the desired directionality to warn at 400 metres ahead, but would not have unacceptably high noise spillage laterally as with the current horns.</p> <p>Furthermore it is imperative that the RSSB requires all train operators to retrofit all their rolling stock to this standard within 12 months. It is understood that fitting is a simple overnight operation, not requiring trains to be taken out of service. This would have a considerable effect to substantially reduce lateral noise transmission.</p>			The recommendation by the Industry Steering Group, as set out in the Briefing Note, not to make the change in horns noise levels retrospective relates to the industry view that the combination of recommendations will make a significant difference to the affected public.
58	6	2.1.4.3			If a train is going slower it STILL sounds its double horn at the same HIGH TONE.	12	NC	This section provides recommendations to control train horn volume dependent on train speed.
59	6	2.1.4.3			This section is a little confusing. The document appears to be saying the maximums relate to the maximum capability of the trains in 2.1.4.2. But in this section, it is both “desirable and permissible” for the horn levels to vary with “actual” train speeds. Please could more clarification be given to this point? If an automatic volume variation control is available, then it should be mandatory that that lower volumes match lower speeds.	5	NC	This section provides recommendations to control train horn volume dependent on train speed. It is not mandatory due to the complexities of fitment to some designs of rolling stock.
60	8	3.2.1.1			It is acknowledged that all new equipment will be required to comply, albeit in June 2007, again this is welcomed and recognised that the companies involved will need time for compliance.	5	NC	Noted

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
61		3.2.1.1 & 3.2.1.2.			<p><u>Retrofitting of all existing trains:</u></p> <p>The requirements of this document, if implemented, would only apply to new equipment used for warning horns and to operators renewing or modifying train horns in the future.</p> <p>LACORS feels that this document should also specify that each train operator is required to carry out a <i>phased programme</i> for the retrofitting of all existing trains. This measure would ensure that all train horns comply with the new standards for the sound pressure levels.</p> <p>We realise that it will have some cost implications for train operators but the phased approach (over a period of 12 months) would minimise the financial pressure.</p> <p>The need for this phased retrofitting process is felt to be necessary, especially in areas where train operators have just replaced their old rolling stock (equipped with slam doors but with quieter horns) with new faster and quieter trains (but with louder horns).</p> <p>Without such a provision, the current fleet of new trains could retain unmodified warning equipment for 30+ years. This would be unacceptable, going against all the desired outcomes of the new requirements, with many residents continuing to be adversely affected.</p>	11	NC	The recommendation by the Industry Steering Group, as set out in the Briefing Note, not to make the change in horns noise levels retrospective relates to the industry view that the combination of recommendations will make a significant difference to the affected public.

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
62	8	3.2.1.2			It is not acceptable that the document will simply allow for train operators to comply when renewing or modifying train horns in the future. The document falls far short of an acceptable remedy for the problems of loudness of train horns.	5	NC	The recommendation by the Industry Steering Group, as set out in the Briefing Note, not to make the change in horns noise levels retrospective relates to the industry view that the combination of recommendations will make a significant difference to the affected public.
Specific comments on GE/RT8000/TW1								
63	1 IA	3.2			When trains pass through heavily populated areas as at Littlehaven Station, would it be possible to have warning lights displayed at footpath crossings. These could be linked to the existing lights at the Parsonage Lane crossing which is quite close. Extending from an existing set of warning lights would surely not be vast expense. This would enable all "local" i.e. stopping trains to pass without sounding the horns? I feel it would be wise to continue sounding horns on the fast through trains.	15	NC	This is a local matter which can be taken up during the Network Rail reviews of crossings. These comments will be forwarded to Network Rail. Installing warning lights at crossings is one option that Network Rail can consider, but the need to interlock the lights with the signalling system means that it involves significant cost. Installing such technology at all footpath crossings would literally cost billions.

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
64	1 to 4 IA	4.2 5.3.2 5.3.3 5.3.9			<p>The old adage of STOP LOOK AND LISTEN ! used to suffice with the old trains until the 80's 90's. Also you can feel the vibration of a train approaching (much safer than crossing some roads with a bend in them)</p> <p>If the speed of trains is increased - as on the proposed new High Speed Link Canterbury to London - surely the Whistle Boards will have to be moved further away from the crossings? Otherwise the train will be on the crossing before the horn has finished sounding. A very dangerous situation.</p> <p>At night the lights on the train make it even more visible.</p> <p>Does this mean we will now only have ONE LOW TONE HORN to contend with 90% of the time instead of the LOUD TWO TONE (often DOUBLE blasted) horns we now have?</p> <p>Drivers are required to sound the Two Tone Horn if they see anyone about to use the crossing. By contrast Cars/Lorries are Not required to sound their horns every time they see someone about to cross the road - a much more dangerous situation.</p> <p>Surely we should be getting back to where PEOPLE ARE RESPONSIBLE FOR THEMSELVES AND THEIR OWN SAFETY by LOOKING TO SEE if a train is approaching before attempting to cross a line, the same as they should before using a pedestrian crossing on the roads. I fail to see the difference.</p> <p>If someone is DEAF it doesn't matter how loud the train horns are they will not hear them.</p>	13	NC	<p>Thank you for your support and other comments In another, earlier response, we have said that one of the assumptions underlying the changes is that those using footpath crossings take some responsibility for their own safety.</p> <p>The results obtained from the Faulkland Associates survey show that there is a diversity of views among the public about the extent to which the individual is responsible for their own safety. The rail industry aims to take steps that are reasonably practicable</p> <p>Although beyond the scope of Railway Group Standards, the High Speed line will not have any footpath crossings.</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
	42	10.2.a)			The general comment regarding excessive use is something good to underline, as there is a wide variation as to how drivers sound the horns in practice, and some, it must be said can go beyond what might be deemed reasonable when in residential areas. It is known that some drivers still sound horns even after the removal of whistle boards, it is probably from habit, but may also be because people had been seen near the line, but it gives a poor message to those living nearby who believe that their problem is being resolved.	14	NC	Noted. Recommendation 5 of the Industry Steering Group includes guidance to train operators to help them achieve consistency of practice in use of train horns and eliminate unnecessary use.
65	42	10.2a)			The general comment regarding excessive use is something good to underline, however much clearer rules should be provided to drivers to ensure they only use their horns at the most appropriate time. I am sure clarity would be as welcome to the drivers as those who live adjacent to the railway lines.	14	NC	Noted. Recommendation 5 of the Industry Steering Group includes guidance to train operators to help them achieve consistency of practice in use of train horns and eliminate unnecessary use.

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
66	42	10.2a)			<p>Preventing excessive use of train horns/Clarifying rules for drivers:</p> <p>LACORS believes that it is essential to send drivers clear and consistent messages regarding the reasonable use of their horns. It is important that excessive and unnecessary use of train warning equipment is eliminated.</p> <p>Discussions with council officers and residents (confirmed by results of the research commissioned by the Train Horns Steering Group) revealed that there is a wide variation in the use of horns by drivers. Some residents living along railway lines have complained about the sporadic use of horns, with some very quiet periods and some periods when horns are used extremely frequently and beyond what they consider to be reasonable.</p> <p>The use of train horns seems to be highly variable by location but also varies depending on the time of the day or night. Drivers seem to be using their judgement when deciding whether to use their warning equipment. Such inconsistencies have adverse effects on residents' health and cause unnecessary disturbance.</p> <p>Clarifying guidelines for train drivers will help put an end to the confusion and the pressure currently felt by some drivers, because of confusing messages on when/where/how to sound their horns.</p> <p>Train operators should also consider drivers' training to ensure the consistent implementation of new requirements and to minimise the use of train horns without compromising safety.</p>	11	NC	Noted. Recommendation 5 of the Industry Steering Group includes guidance to train operators to help them achieve consistency of practice in use of train horns and eliminate unnecessary use.

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
67	42	10.2a)			<p>A lack of consistency and coherence in the use of horns sends contradictory messages to the public in terms of safety. If some drivers sound their horns at certain locations, invoking safety reasons, while others do not, the safety argument loses credibility. We therefore emphasise the importance of effectively communicating clear rules and guidance to train drivers as soon as possible.</p> <p>However, it should also be stressed that fitting horns with a lower sound pressure and better directionality across all new and existing rolling stock would significantly reduce the possibility of subjective interpretation by drivers adversely affecting residents (see also comments under the additional measures section).</p>	11	NC	Noted. Recommendation 5 of the Industry Steering Group includes guidance to train operators to help them achieve consistency of practice in use of train horns and eliminate unnecessary use.
68	42	10.2b)			<p>Passing whistle boards, using the low tone on loud: Experience and monitoring has shown that the low tone can be sounded as loudly and at times more loudly than the higher tone. By removing the high tone, this could potentially, as stated, allow room for confusion as people have got somewhat used to the two tones. Experience shows during a period of monitoring, that some 20% of drivers did only use a single (or dual) tone rather than a distinct two tones. People will still be encouraged to continue to “stop, look and listen” as a safe way to cross the lines, and people using crossings will soon recognise the single tone, particularly as they will be expecting a warning tone, as they are, after all said and done, beside the railway line. This is not an issue and could be something of a red herring as people will soon learn. This applies equally to the introduction of broadband horns, which is something we support and recommend.</p>	14	NC	<p>The low tone is, as you say, probably no quieter in technical terms than the high tone. It is perceived, however, as being less aurally intrusive than the high tone. We accept that not all trains will be equipped to apply this aspect of the changes. As with the other recommendations, this will be kept under review.</p> <p>The point you make about people taking some responsibility for their own safety in the railway environment is supported.</p> <p>Research is going on into broad band technology</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
69	42	10.2b)			Local monitoring has demonstrated that at times there is as much as a 20 dB(A) variation measured inside houses, from the sounding of the horns by different drivers. Whilst the important reception point for the noise is at the crossing point ahead, this variation in sound is large and goes from what could be deemed acceptable to unnecessarily loud inside dwellings close to the whistle boards. Driver training is also an issue that needs to be addressed to ensure a more consistent approach for the use of horns.	14	NC	Variations in sound levels can relate to different technology (old trains were quieter than new) and also the way that drivers sound them. Recommendation 5 of the Industry Steering Group includes guidance to train operators to help them achieve consistency of practice in use of train horns and eliminate unnecessary use
70	42	10.2b)			It is imperative to reduce the sound power levels of the horns, as sound pressure levels at the standard receptor point of 400 metres ahead have been shown to be unnecessarily loud in the research commissioned by the Steering Group, hence resulting in the reductions being proposed for new rolling stock. Comments on this aspect have also been made on the train audibility document consultation GM/RT2484.	14	NC	Noted. As you suggest, this is a matter within the scope of GM/RT2484 rather than the Rule Book, which is the subject of this consultation. RSSB is responding separately to comments on changes to GM/RT2484.

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
71	42	10.2b)			Consideration has been given to removal of some whistle boards where safe, to eliminate complaints. What does not appear to have been considered yet for those boards deemed essential to retain, is moving the boards perhaps 20 metres or more along a line to reduce the direct impact at particular affected houses. If the speeds are low enough not to compromise visibility and the distance to the crossings, this would, for example, help houses where noise monitoring was carried out in Ospringe, west of Faversham station, where the board is beside the last house which takes the full impact of sound each time. It also affects the other houses near the last one and will depend also whether the driver sounds the horn before reaching the board itself. An alternative would be to adjust the speed down slightly at some boards, although it is recognised that this may have knock on effects for running times.	14	NC	These are matter for Network Rail. The idea can be explored during the reviews that Network Rail will be carrying out,. Moving the boards short distances may be more practical than reducing train speeds.
72	42	10.2b)			There are a number of potential solutions for individual whistle board sites and the RSSB should positively recommend that Network Rail and the local operating companies actively make improvements, in a phased programme for all whistle board sites. Although many of these sites have been reviewed in the last twelve months in the light of the complaints received, a regular review should take place as technology and risk assessments change.	14	NC	See earlier comments. Network Rail is reviewing whistle board locations, as its limited resources permit, and no doubt would be grateful for help and support from local authorities.

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
73	42	10.2b)			It is also recognised that the removal of a board is not necessarily a permanent solution, if a subsequent risk assessment, required its replacement, the problem would return. This is why the industry needs to put a range of changes into place to obtain the best result once and for all, i.e. overall reduction of train horn volume within a reasonable period by modifying or changing the horns, plus improving sight lines at crossings, removing crossings or various other site specific improvements, as well as driver education and running rules.	14	NC	The recommendations adopted by the Industry Steering Group are intended to provide a practical way forward which benefits railway neighbours as quickly as possible. The industry, including RSSB will continue to monitor the impact of these changes and review the need for further work.

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
74	42	10.2b)			<p>Passing whistle boards, using the low tone on loud: The low tone can be sounded as loudly and at times more loudly than the higher tone. Therefore this will not improve matters for those living by the railway lines.</p> <p>Members of the public are able to quickly learn about new audible warning systems – for instance the introduction of the “junction clearer” tone by the emergency services. This experience should be used in the reassessment of other forms of horn and new technologies such as broadband horns, which is something we support and recommend.</p> <p>Local monitoring and experience has demonstrated that there is as much variation in the levels of horn noise inside houses, from the sounding of the horns by different drivers.</p> <p>It is imperative to reduce the sound power levels of the horns, as sound pressure levels at the standard receptor point of 400 metres ahead have been shown to be unnecessarily loud in the research commissioned by the Steering Group, hence resulting in the reductions being proposed for new rolling stock. Comments on this aspect have also been made on the train audibility document consultation GM/RT2484.</p> <p>Continued below</p>	14	NC	<p>The low tone is, as you say, probably no quieter in technical terms than the high tone. It is perceived, however, as being less aurally intrusive than the high tone. We accept that not all trains will be equipped to apply this aspect of the changes. As with the other recommendations, this will be kept under review.</p> <p>Noted. Research into the application of broad band technology to this problem is in progress.</p> <p>Noted. As you suggest, this is a matter within the scope of GM/RT2484 rather than the Rule Book, which is the subject of this consultation. RSSB is responding separately to comments on changes to GM/RT2484.</p> <p>See earlier comments. Network Rail is reviewing whistle board locations, , and no doubt would be grateful for help and support from local authorities.</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
					<p>Continued from above</p> <p>Much greater positive action must be taken to review the need for whistle boards. The assessment process should be made available to the local residents to ensure that there is a transparency of the decision making process. A process for challenging these decisions should also be made available to local residents or other agencies.</p> <p>Plus, a timetable for the identification and introduction of alternative solutions should be formulated and acted upon. Whistle boards may be removed by reducing line speeds, closing or diverting footpaths, creating bridges or underpasses, the introduction of manned crossings and the installation of traffic light systems.</p>			<p>Procedures for closure of footpaths are controlled by local authorities. Network Rail would, no doubt, welcome positive support in making the procedures less protracted. Manned crossings are only economically viable at very busy road crossings.</p>
75	42	10.2b)			<p>Passing a whistle board- using the loud setting of the low tone:</p> <p>The new requirement set out in 10.2 b) of module TW1, if implemented, would require drivers to only sound the low tone of their horns when the equipment permits. However, using only the low tone would not necessarily solve the problems related to train horn noise heard by residents. Research has shown that the low tone can be sounded as loudly as, or even more loudly, than the higher tone. Such a measure could therefore have adverse effects on residents' health, going against the desired outcomes of the new requirements.</p> <p>Continued below</p>	11	NC	<p>The low tone is, as you say, probably no quieter in technical terms than the high tone. It is perceived, however, as being less aurally intrusive than the high tone. We accept that not all trains will be equipped to apply this aspect of the changes. As with the other recommendations, this will be kept under review.</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
76					<p>Continued from above</p> <p>Moreover, and as mentioned in the briefing note (consultation paper 1d- Impact assessment for changes to Railway Group Standards), users of footpath crossings will only hear one low tone and not two if requirements are changed. They might misidentify the source of the warning and this confusion could compromise their safety.</p> <p>It therefore appears necessary to reduce the mandatory sound pressure levels of horns. Research, commissioned by the train horns steering group, showed that the sound pressure levels at a standard receptor point of 400 metres ahead are unnecessarily loud, hence the RSSB proposals of reducing these levels for the new fleet of trains. However, LACORS believes that the current RSSB recommendation to reduce the sound pressure levels in all new trains or when changing a train's horn will not solve the current problems for residents within an acceptable time frame. We believe the industry should commit to a comprehensive retrofitting programme for all rolling stock in an agreed time period. For further details, see comments under the additional measures section and LACORS' response to the RSSB consultation on the audibility requirement of trains.</p>			<p>Whether or not a programme of changing train horns retrospectively, as you suggest, would be affordable (including the impact on travellers of the non-availability of rolling stock while the programme was carried out), it would take several years to complete. Is it suggested that no change be made to the rules in the meantime?</p>

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
77	43	10.2c)			The ban on sounding horns between 2300 and 0700 at whistle boards with the exceptions stated is welcomed and is supported. This will help householders near main lines far more than it will help those in Kent like the London to Ramsgate line that passes through this Borough. Here, the trains rarely run after 01.00 and before 05.00, so there is only a four hour improvement in the horn use. Again, this is why the actual volumes need to be reduced to reduce the daytime impact of the horns for people both indoors and in their gardens. As stated above, measurements have shown at times unacceptably high noise levels, including unnecessarily loud soundings between 0500 and 0700 (as well as through the day), at well over 70 and at times above 80 dB LAmax in an occupied bedroom 20 metres from the track and the whistle board.	14	NC	Thank you for your support. There are in fact empty trains and some freight traffic moving between 01.00 and 05.00. Your comments on the horn noise levels are within the scope of GM/RT2484 rather than the Rule Book, which is the subject of this consultation. RSSB is responding separately to comments on changes to GM/RT2484.
78	43	10.2c)			This proposal will go a long way to helping those living close to whistle boards to getting a better night's sleep. It should be noted that even the quieter horn soundings around 65 dB LAmax as measured in the bedrooms, are still well above the BS 8233: 1999 (Sound Insulation etc for Buildings) and the WHO Guidelines for Community Noise 1999 which both give the threshold for a single noise event likely to affect sleep at 45 dB LAmax. It appears that none of the published research on the Steering Group's behalf has monitored noise from within any houses, concentrating on noise propagation to crossings.	14	NC	Your comments on the horn noise levels are within the scope of GM/RT2484 rather than the Rule Book, which is the subject of this consultation. RSSB is responding separately to comments on changes to GM/RT2484. There is nothing to prevent research being carried out into noise levels inside properties, but the methods used for the work commissioned by the Industry Steering Group were less intrusive and the results made a powerful case for change.
79	43	10.2c)			The ban on sounding horns between 2300 and 0700 at whistle boards with the exceptions stated is welcomed and is supported.	14	NC	Thank you for your support.

No	Consultation		Revised		Comment	By	CC	Response
	Page	Section	Page	Section				
80	43	10.2c)			<p>Night time quiet period:</p> <p>LACORS welcomes the introduction of a night time quiet period, requiring train drivers not to sound their horns between 23.00 and 07.00, unless there is an emergency or when rail personnel are on or near the line.</p> <p>Research commissioned by the RSSB steering group confirmed that this quiet period would not compromise safety at night. If this measure is implemented quickly and consistently across the country, it will improve the quality of life of residents currently affected by train horn noise (especially in the early hours of the morning, for those living next to busy commuters' lines but also for those living further away but still within hearing distance). Sleep disturbance which can affect the health of residents is also likely to be significantly reduced. However, as previously stated and spelt out in more detail in the rest of this response, permanent resolution of the current problems for residents will require a number of additional robust measures that go further than the current RSSB recommendations.</p> <p>Early implementation of the night-time quiet period is strongly supported and if train operators ensure the comprehensive adoption of this new measure as early as 7 April 2007, they will send a very positive message to councils, residents and the wider public.</p>	11	NC	<p>Thank you for your support.</p> <p>Noted. .</p>

Row Number	Standard	Distance in front of vehicle	5 metres	
			Minimum dB	Maximum dB
1	GM/RT2180, February 1999 Levels in dBC	Trains for 160km/hour or less: Horns in loud mode	120	125
		Horns in soft mode	115	119
		Trains for above 160km/h: Horns in loud mode	122	128
		Horns in soft mode	115	119
2	GM/RT2484, April 2005 Levels in dB A or C Maximum not given	Trains with a speed of 30km/h	95	-
		Trains with a speed more than 30km/h but less than 80km/h	105	-
		Trains with a speed of more than 80km/h But less than 160km/h	112	-
		Trains with a speed of more than 160km/h	115	-
3	GM/RT2484 draft December 2006 Level in dBA or dBC	Trains with a speed of 30km/h	95	100
		Trains with a speed more than 30km/h but less than 160km/h	101	106
		Trains with speeds greater than 160km/h	115	120

Noise Abatement Society submission to comment 5

Table 1 Evolution of standards for train horn noise levels

According to RSSB, the levels in GM/RT2484 draft December 2006 are similar to those of horns fitted to the old types of rolling stock

References

- ⁱ GM/RC2680 issue one. Approved Code of Practice- Visibility and Audibility requirements for trains. February 1999
- ⁱⁱ GM/RT2180 issue two. Visibility and Audibility requirements for Trains. Safety and Standards Directorate, Railtrack, February 1999. Now withdrawn
- ⁱⁱⁱ GM/RC2680 issue one. Approved Code of Practice- Visibility and Audibility requirements for trains. February 1999
- ^{iv} GM/RC2680 issue two. Approved Code of Practice- Visibility and Audibility requirements for trains. February 2000
- ^v GM/RT2484 issue one. Audibility requirements for trains. April 2005
- ^{vi} GM/RT2484 issue two, draft 3a. Audibility requirements for trains. December 2006
- ^{vii} RSSB Briefing Note on GM/RT2484, issue two, December 2006
- ^{viii} Community relations. Rail Industry Group recommends Changes Affecting Train Horns. <http://www.rssb.co.uk:80/comrelations.asp>
- ^{ix} T681 Understanding the problems that train horn noise causes to neighbours. Faulkland Associates for RSSB, December 2006
- ^x Department of Transport (DoT) (1991), *Railway Noise and Insulation of Dwellings, Report of the Mitchell Committee*, HMSO
- ^{xi} Calculation of railway noise. HMSO 1995