

Submission on the Level Crossing Risk Management Guidance update

19 December 2025

To: levelcrossingguide@kiwirail.co.nz

About the Transportation Group

The Transportation Group had its origins in 1955 and was formally made a part of the Institution of Professional Engineers of New Zealand (IPENZ – now known as Engineering New Zealand) in 1972. The group is the leading industry body for transportation professionals with over 1,100 members including tertiary students, the private and public sector.

Our mission is advancing the knowledge, planning and management of transport in New Zealand. We have subgroups in safety, modelling, and traffic signals. We are associated with the Chartered Institute of Highways and Transportation UK.

More information about the Transportation Group is available online:
<https://www.transportationgroup.nz/>

Introduction

We thank you for the invitation to submit on the draft update to the Level Crossing Risk Guidance; certainly, it does seem timely for a revision. We hope that our expert opinion helps refine and improve KiwiRail's ambitions to improve rail safety in New Zealand.

The tables on the following pages consolidate the various items noted in the draft v6 Guide Summary of Changes. These include feedback from industry staff with expertise and training in level crossing design and safety. Where we have not commented on a specific key change in the v6 revision proposals, it can be assumed that we **support** the proposed changes.

Thank you for your consideration. For more information please contact:

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General stakeholder feedback

Section/Clause Reference	Comment / Suggested Change	Rationale / Justification	Organisation	Contact Details
Title	We have no issue with the proposed change in guidance title.	We agree with the greater focus on risk management instead of risk assessment.	Transportat'n Group NZ	glen@viastrada.nz
Glossary	Return the Glossary section to its previous place at the start of the Guide	The Glossary seemed better placed in its previous place at the start of the Guide, as it was easier to quickly find it, rather than being hidden between the Guide body and Appendices.	Transportat'n Group NZ	glen@viastrada.nz
Glossary	Reorder the Glossary items to mention the acronym first, e.g. "FPY: Fatalities per Year"	A reader trying to find a specific acronym will find it more difficult if they encounter the fully spelt out words listed before the acronym, and often not in true alphabetical order.	Transportat'n Group NZ	glen@viastrada.nz
NZTA TCD Manual Part 9: Level Crossings	Review and update	We note that this guidance has not been updated since 2012. Since then, several other references have been introduced or updated, including KiwiRail's Level Crossing Risk Assessment guidance, NZTA TTM guidance, and Pedestrian/Cycle Crossing Design Guidance.	Transportat'n Group NZ	glen@viastrada.nz
Site Specific Safety Score (SSSS)	Retain SSSS (without "red flag" issues) as part of LCSS scoring	We have concerns that removal of the SSSS component of the LCSS takes away some specific aspects of the scoring that are not necessarily captured fully by either the ALCAM score, or Engineers' risk scores.	Transportat'n Group NZ	glen@viastrada.nz

Specific stakeholder feedback

Section/Clause Reference	Comment / Suggested Change	Rationale / Justification	Organisation	Contact Details
1.1 Purpose	No issue - agree	We support the proposal to introduce more proactive safety improvements.	Transportat'n Group NZ	glen@viastrada.nz
2.1 Risk Management Guidance	No issue - agree	We are strongly supportive of the proposal to not require LCSIAs for site where the relative risk is assessed as “Low” or “Medium Low”. This is a practical way of minimising the number of LCSIAs that are required for often minor changes to low-risk crossings.	Transportat'n Group NZ	glen@viastrada.nz
2.3 Level Crossing Risk Elimination and Minimisation Requirements	Clarify what is meant by “2.3.2 Requirement B – Risk Minimisation”	While we are supportive of the new criteria for assessing changes in risk, Requirement B seems somewhat vague in terms of what is meant by risk “minimisation”. There does not appear a quantitative definition anywhere of what “So Far As Is Reasonably Practical” equates to.	Transportat'n Group NZ	glen@viastrada.nz
2.3.3 Figure 1	Improve the resolution quality of Figure 1	The current resolution quality of Figure is rather poor.	Transportat'n Group NZ	glen@viastrada.nz
4.7.2 Ped'n Level Crossing FPY Calculation A2.2 ALCAM Pedestrian Scoring	Clarify how the LXM scoring (and associated FPY calculations) aligns with Table 10	For ped'n crossings, all of the raw score values in the current LXM database tend to be very low (<<1) but the table in A2.2 still has values ranging from <6999 to >6 million. In the previous LXM ALCAM reports, typically ped'n risk scores were in the thousands. Should we be expected to multiply the raw LXM figure by some scalar to produce a higher value?	Transportat'n Group NZ	glen@viastrada.nz