

Safety at Street works and Road works Code of Practice – Consultation draft March 2010

The IHE endorsed the NHSS12D Committee's working group response to the above document, which can be found on the following link:

<http://www.dft.gov.uk/consultations/open/2010-15/annexb.pdf>

The response documents comprise the following:

1. General comments on the Draft Code of Practice (DCOP)
2. Specific comments on the DCOP (page by page)
3. Completed Annex A

1. General Comments

Notes from 12D Working Group – Feedback on Red Book 15th & 16th April 2010 4th, 5th & 14th May 2010

This working group was convened by the SSD12D Committee which comprises of a number of representatives who have an interest in the development of national standards for temporary traffic management on urban and rural roads. The aim of the group was to analyse the Draft Code of Practice (DCOP) as it was the Committee's view that if the document is to be a national standard, signed by the Secretary of State, it needs to be factually correct and easy to interpret. The COP underpins all 12D training and assessment criteria which is why the Committee feel it is vitally important they are included in this consultation as the revised COP will have an impact on all TTM operations undertaken on rural and urban roads.

Attendees

Nick Philp	Health & Safety Officer for Warwickshire County Council – Chair of SSD12D – co author of the 12D Training Materials – Chair of Highway Safety Officers Group – 20 years TTM experience including Training
Andy Murray	General Manager TTM for Aggregate Industries representing Traffic Management Contractors Association – original author of the SS12A/B Foremans Course - Member of the Temporary Practitioner's Board for Chapter 8 2008/9 publication - 36 years TTM experience
Eddie Chapman	Traffic Safety Officer for Carillion – co author of the 12D Training Materials - 35 years TTM experience and General Highway Construction as operative, foreman, supervisory & management (including planning) TTM Trainer for 20 years
Peter Dipper	Independent TTM Training Advisor representing Highways & Construction Training Association - original co-author of the SS12A/B materials – writer of training column for the Surveyor Magazine - 30 years TTM experience

Brian Adams	Owner of a TTM Company specialising in mobile lane closures and Chair of SSD12C – original author of the SS12C Training Courses - contributor to Chapter 8 - member of the Mobile Lane Closure Association - 15 years TTM experience
Liz Hancock	Awarding Body - Lantra Awards - Secretariat
Sally Green	Awarding Body - Lantra Awards – Business Development Manager for Sector Schemes specialising in the facilitation of all TTM Sector Scheme Documents & training materials for 12A/B, 12C & 12D – 15 years TTM experience

Introduction

The working group met over 5 days to review the draft code of practice in detail, with the aim of developing constructive comment for a document which the Committee support and agree requires revision. Attached is a page by page review of the DCOP with specific comments. The Committee's general comments are listed below:

General Comments

1. The impact assessment document under the heading of policy options states that Chapter 8 is very detailed and unsuitable for use by operatives and this is agreed. The DCOP in its present form does not meet the needs of the intended recipients as stated in the foreword and confuses the roles of planning and operations. It is therefore felt that it is not an easy reference document and falls into the same category as Chapter 8.
2. The sequence of operations does not flow logically.
3. The text and pictures need to be aligned on the same or adjacent pages for example:
 - a. Cover pictures are not relevant to the DCOP
 - b. Pictures & diagrams need to be relevant
 - c. Some drawings appear to have incorrect content
 - d. Boxes of text – 3 different colours no definition of warning, caution and note
 - e. General layout is chaotic and difficult to follow – references do not match
4. No index, no glossary of terms and no definitions (particularly of operatives, supervisors, managers and competent persons or other competent persons).
5. In order to align with Chapter 8 instructions such as “need” should be replaced with words “must, should, shall or may” as appropriate.
6. Requires proof reading to eliminate typographical and grammatical errors.
7. The DCOP is attempting to be appropriate for operatives on site and planning operations. It is felt it hasn't achieved either. The DCOP would be better served by limiting it to an onsite operative's guide for TTM, supplemented by a separate design guide or directing designers to Chapter 8.
8. Competence - training and assessment
 - a. The DCOP refers to competencies which are not currently assessed in the Street Works Qualification. The TTM element of the qualification does not directly equate to the standards of 12D training and assessment programme. The DCOP would appear to infer, on Page 3, that these qualifications are comparable.
 - b. The DCOP refers to foremen, managers, competent and other competent person but does not define the competency requirements.
 - c. ***All the competencies required by the Code are currently covered within the NHSS12D suite of training and assessment modules.***
9. Short duration works – 90 minute ruling – this is open to misinterpretation, there is no clear definition – it does not relate to Chapter 8 as Chapter 8's 90 minute requirement refers to incident management only. The drawings relating to this do not show speed of road and only shows a give & take signing arrangement; which is a static site not mobile operations, works in this category may omit the use of signs and traffic barrier.

10. Warning boxes throughout the document refer to a “full on site risk assessment” this suggests there is a lesser type of risk assessment.
11. The imposition of temporary mandatory speed limits does not enable the reduction of safety zone widths in the 2009 edition of Chapter 8, unless applied to convoy operations.

2. Detailed Notes from 12D Working Group – Feedback on Red Book 15th & 16th April 2010 - 4th, 5th & 14th May 2010

These detailed notes should be read in conjunction with the general notes from this Working Group.

Any adoption of these detailed changes may result in the need to reformat the DCOP.

Observations only apply to the pages listed below:

Cover

- European/Irish Signs not in the TSRGD.
- The second picture appears to be a motorway picture. The chevrons on the rear of the IPV do not conform to Chapter 8 requirements detailed in general vehicle issues (05.2.3).
- The third picture appears to show a cyclist in the outer lane of a carriageway.
- The fourth picture shows a person with no sleeves on PPE – PPE does not conform to the DCOP requirements.

Foreword

- The first sentence of the first paragraph should be removed and replaced by the second paragraph on Page 1.

Page 1

- Paragraph 2 should be moved to Foreword
- Requires definition of a “competent person”
- Remove repetition of “motorways and higher speed dual carriageways” and continue that removal to avoid further repetition throughout the document.

Page 2

- Only defines the operative responsibilities not roles of other named parties

Page 3

- Last paragraph should be amended by removing “involving the use of portable traffic signals”
- Should refer to “12D” not just “SS12”
- Add in – you must be competent to perform any form of traffic management – take out information on signals (not specific)

Page 5

Insert additional paragraph after “Works instructions”

“Ideally before operations start on site a competent person should visit the site to carry out a risk assessment and prepare a method statement to accompany the work instructions.”

- Third bullet point “Shape” of site – odd use of word – what does this mean?
- Merge the section on high visibility clothing and merge with the information for high visibility clothing given on Page 91. Remove all reference to sleeve length as it is covered by the standard.
- High visibility clothing within the works is currently not a requirement. This is an opportunity to ensure that high visibility clothing to BS EN471 Class 3 is worn at all times when working on or near the highway.
- Add an additional warning box “you must have approval from the appropriate traffic authority prior to commencing any works on the highway”

Page 6

- Between Paragraph 1 & 2 insert sub heading “Risk Assessment”
- Remove first sentence from Paragraph 3 and the words “if that is not possible then” from the second sentence of Paragraph 3 and substitute with “**You will need to look at the job before you start and make a simple on site risk assessment to confirm the adequacy of any instructions given. If you have any doubts about these instructions or whether the arrangements in this code are sufficient.....**”.
- No definition of “Emergencies” given

Page 10

- Sentence starting with “If there is limited visibility ... placed first.” Should be moved to end of section “Road works ahead”.
- Add to the second paragraph “Signs erected in carriageway – should have a cone and road danger light (during the hours of darkness). All signs must have a minimum ground clearance of 300mm.”

Page 11

- Change title “Traffic control ahead” to “Traffic control systems”
- Change positions of Paragraphs 1 & 2

Pages 11 & 12

- Pages 11 & 12 should be combined with diagrams given on Pages 16 & 17 with a brief description for the use of each sign as depicted in the TSRGD

Page 13

- The warning box 30m does not agree with distance on table at the back of the book.

Pages 14

- Paragraph 2 the definition in relation to use of temporary speed limits to determine safety zones does not conform with that given in Chapter 8.

Page 15

- Diagram is poor – lead in taper should be 45 degrees, carriageway appears to be limited to shuttle working.
- The drawing on Page 15 should follow the descriptions on Pages 18 & 19 or should be on the same page.

Page 16 & 17

- Pages 16 & 17 should be repositioned as previously described.
- Traffic barrier doesn't conform to TSRGD

Page 19

- The information given conflicts with information on Page 56 and Chapter 8.
- Exit taper must be provided whatever happens on a 2 way road.
- Query the word "must" give confirmation of whether a legal requirement or not
- The warning box could lead to misinterpretation.

Page 20

- No previous mention of the TSRGD. This needs explaining in a terms and glossary
- The meaning of the wording in the sixth paragraph is unclear.

Page 21

- In order to maintain the continuity of distance measurements $\frac{1}{4}$ of a mile should be changed to 400m.

Page 22

- The sequence set out on Pages 21 & 22 is unclear and there is no reference on how to determine the datum including the long ways clearance.
- Item 3 there are no diagram shown for this item, update the use of photographs or diagrams in the COP, make sure "S" and "L" measurements are on the diagram

Page 24

- Need clarification as to what legal signs are available for use in the document – as there is not a footway closed sign at the moment.

Page 25

- “Temporarily reinstate excavations” definition of “Temporarily” required
- Vehicle Restraint Systems not mentioned where there is an excavation or other structural hazard.

Page 26 - 28

- Footway board – traditionally called “excavation covers” in past
- All crossovers must cater for the vehicles using the access/egress (2.5m may not be adequate)
- “Footway ramps” to be expanded to include all the requirements of DDA (guidance on access for disabled people)
- Temporary footway delay signs – not in TSRGD (will this be included in the revised TSRGD) needs clarification
- Clarification on all signs mentioned – individual explanation of each sign TSRGD (will this be included in the revised TSRGD)

Page 29

Diagram – not relevant to the text – out of place

Note 1 – doesn’t state in drawing

Traffic signal heads – one is missing on drawing (should be by nose of taper) – copy diagram properly from Chapter 8 on Page 103 Plan SC7

Note 2 – traffic signals sign should be included

Page 30

15mm for ramp warning signs – needs including for consistency

Page 31

The requirements for TTROs needs to be stated at the front of book.

Should last paragraph be in a red box? – seems to be in the wrong place

General Statement to be identified at the beginning of the document – no definition for emergency works.

Page 32

Third bullet point – this should apply to all works activities not just tramways and railways i.e. risk assessments and method statements should be kept on site.

16th April – Lantra Awards

Page 34

Take out the word “street works” and just refer to “works”

Traffic should not remain stationary replace the word “should” with “must”

Take out “for any length of time”

Page 35

Arrows indicating safety zones incorrect – one adjacent to tip of arrow should be edge of the yellow line.

Diagram – poor example – does not show speed limit for trams and the safety zone is measured from the swept path.

Note: Page 33 the definition of the tramway path differs from the drawing which shows a swept path.

Page 37

The red box warning should apply to trams as well

Last paragraph – condense paragraph to make only one reference to Appendix C & D of the code.

Page 38

In the warning box insert word “outer” between the words “railway” & “boundary”

Page 39

The first sentence of the first paragraph should be in a warning inside a red box

The second sentence should be removed

Remove the word “usually”

Page 40

Advice notes attached to the diagram are conflicting

On the drawing – the note should refer to pages 23 to 28

The drawing is correct but should be in the footway section

Page 41

The drawing is correct but should be in the footway section

From the left datum to the “End” board – remove “D/2” and replace with “E”

Diagram Note 3 on the drawing quotes an incorrect page also shows incorrect sign – road narrows from the wrong side

Page 42

Final paragraph – differs to Chapter 8 – should be consistent (see Page 14)

Blue note – the text and drawing on Page 42 is not consistent

The long ways clearance “L” is different to what the diagram says – conflicts with information on Page 15.

Page 43

The diagram is wrong – working space should include the works vehicle

To show this diagram as an example is poor - as the normal maximum road widths would not be wide enough – this diagram is redundant as the diagram on Page 15 shows it far more effectively.

Page 44

Road widths – remove paragraph replace with table on Page 56 – text incorrect

Page 45

Diagram incorrect – vehicle is inside the safety zone not the working area – no work access or egress – barrier and return taper not required – taper lengths should be as per Chapter 8 not the width of obstruction as shown on back page – datum to the end sign shown as “L” should read “E”

Page 46

No distance for “E” shown – vehicle access and egress incorrect as per diagram on Page 45

Note reference “pedestrians” not required as footway not shown

Sideway safety zone (S) not shown

Distance “D” & “T” should be given in actual dimensions not reference by letter

Page 47

Works at road junctions – second sentence – traffic control will be required

The text does not agree with diagrams on page 51 & 52

Approaches to Junctions – can be removed

The red warning box add “Consult the Highway Authority”

Page 48

Figures 1, 2 & 3 do not relate to drawings on Pages 49 – 52

Pages 49 – 52

Drawings do not relate to the text

Content of all drawings are incorrect

Page 53

Works at roundabouts (entrance & exit) – text is confusing should be a red box stating “this work requires the permission of the highway authority” – text does not relate to drawings on Page 54. Low speed dual carriageways approaches are not covered

Page 54

Diagrams very poor – do not reflect text – do not show traffic flow or diversions

Note 2 – The word “may” should be replaced with “will”

Page 55

Poor grammar needs to be more concise.

Page 56

Chart does not agree with Chapter 8 and is in conflict with pages 57 and 77.

Page 57

3 metres is quoted which contradicts the chart

Setting up traffic control – is the text correct? (TMA) – should authorisation be required for all traffic control?

Choice of traffic control method – method from the table on Page 58

Page 58

Stop and go distances for coned area length incorrect – first distance should read 100 metres not 10 metres and final distance missing altogether – should read up to 500 metres

Notes attached to the above should read “greater than 500 metres”

Page 59

Reference to page 61 delete

Page 60

States minimum width for two way flow which is incorrect

Traffic barrier in the wrong position

Show maximum site length 50 metres datum to datum

Page 61

Incorrect – does not conform to the guidance notes on Page 58.

Page 62

Speed limit maximum of 50 miles an hour is conflicting with the chart on Page 58

No visibility distance for 60 mph

Page 62/63

Query the need for priority end signs when road work end signs are required

Indicate maximum shuttle lane width (3.7m)

Barrier at exit is incorrect and barrier on entrance in the wrong place

Page 64

Should we use this as an opportunity to make sure a safe position is identified for manually operated stop and go boards (in safety zone)

Page 65

Last sentence of first paragraph is incorrect – “3 way stop and go” is possible

Two way traffic control – “circumstances” should have a general caveat at the bottom – anything outside these circumstances – authorisation is needed by the Highway Authority

In between the first and the second paragraph – use of portable traffic signals should be in accordance with the recommendations as laid out in the “An Introduction to the Use of Portable Vehicular Signals” ISBN 9780115529368 (The Pink Book) and manufacturers’ guidance

Remove bullet point 4 and insert “signals are type approved for use on highways”

Page 66

Incorrect sign “when red light shows”

Remove all reference to surface dressing including signs - as it confuses

Positions shown for the “stop and go boards” are for manually operated boards only – as previously stated it is recommended that the location of operatives should be reviewed.

Page 67

Bullet point 5 – remove “especially where traffic approaches at high speed”.

Page 68

Note 1 – “referring to ramps” is missing

One signal head is missing

Diagram is wrong use Chapter 8 SC7 on page 136 and remove 29 and replace with SC7 from Chapter 8.

Page 69

3 & 4 way traffic control – site length 300m or less - From which datum point?

Page 70

The warning box on page 70 should refer to pages 36 & 37

4th bullet point needs to be reworded – monitoring will not clear any problems need to take action.

Page 71

Warning box – who provides this training? – Not currently covered in unit 2 or 10

Too much repetition – see “an introduction to the use of portable vehicular signals” (The Pink Book) – This infers that referencing the pink book only equates to a trained and competent operative.

Page 72

“Traffic Control by Speed Reduction” – the text is not in line with current Chapter 8 and text does **not** agree with drawing on Page 68

The wording in the cautionary box – does **not** flow and refers to speed reduction not chicanes.

Page 73

3rd bullet point – This bullet point should be removed as the method is designed to protect the workforce/travelling public **not** the road surface.

Warning should refer to the TTRO requirement for speed reduction

Page 74 - 76

Repetition – should be covered under “Pedestrian Routes” (starting page 22)

Page 77

The wording “unless the site is already signed and guarded” could be misinterpreted although this is as worded in Chapter 8. D5.9.

This is covered on Page 55

Why are there 22 pages between relevant information on the same subject i.e. pedestrian crossings

Page 78

Poor diagram signs reflect sufficient space for two way traffic however reality is more likely to be shuttle working – diagram shows sign no 516 and 517 on the same layout which cannot happen. Datum points incorrect.

Diagram would be more suitable if attached to Page 55

Page 80

Put additional wording as below in red (first sentence of second paragraph):

When deciding on the number of checks **and the number of operatives needed to carry out those checks** the level of risk may be affected by the following:

Remove wording “if appropriate” from within the brackets in the “Removing the works” section

Remove entire sentence from “If temporary traffic control.....to minimize confusion”

Remove sub heading “clearing up”

Page 81 to 90

The content of pages 81 to 90 is ambiguous and misleading. They do not conform to Chapter 8 and the legal requirements of the TSRGD for vehicular mounted signs are not met. Some of the diagrams appear to show mobile operations within static closures.

Page 81 & 82

Should have a heading not just a sub heading – needs consistency as it goes from having heading to not having headings

Two references to stops of up to or more than 90 minutes. It is assumed that this is a reference to Chapter 8 083.3 (Page 96) which refers to inspections stops only.

Does this mean that static signage and cones is not needed for work lasting less than 90 minutes.

Risk assessments must be carried out for ALL works.

You must conduct your risk assessments before writing your method statements.

Why is the risk assessment paragraph only relating to mobile and short duration works.

Mobile works

Diagrams incorrect - Conflicting written information – freedom to abuse the intention of use of TTM

Pages 89 & 90

Short duration traffic delays – what is the legal justification for this sign?

Page 91

Hi visibility clothing – remove reference to sleeves as it is covered in the rest of the standards – this should also be on Page 5.

Under the heading of signs and cones take out the reference to 2002 - just refer to the current edition of TSRGD

Page 92

The chart should be underneath the section on "Road warning lights"

Page 93

Third paragraph – should this be as a boxed note

Pages 91, 92, 93 & 94

All items covered on these pages could be merged in appropriate places on earlier pages

Page 95

Bottom table should also quote desirable long ways clearances

Speed limit of 70mph not needed

Details of the lead in taper needs to have an extra note added stating "where two way traffic is passing the works"

Note 4 is in conflict with the requirements of Chapter 8.

Low speed dual carriageway taper length is not based on "width of hazard" but on "lane width" and should be deleted.

3. DfT consultation response form

PART 2 - Your Comments

<p>1. Are there any kinds of activities carried out as works for road purposes that are not covered by the revised Code? If so what additional requirements would you want to see covered?</p>	<p>Yes <input checked="" type="checkbox"/></p>	<p>No <input type="checkbox"/></p>
<p>Please explain your reasons and add any additional topics on which you would wish to see further guidance :</p> <p>Incident management Convoy operations Mobile works carried out at normal road speeds e.g. road clearance – gritting etc This list is not exhaustive</p>		
<p>2. Do you agree that the Safety Code should be limited to:-</p> <ul style="list-style-type: none"> ▪ single carriageway roads; and ▪ dual carriageways with a speed limit of 40 mph or less <p>If not what roads should the Safety Code cover and why?</p>	<p>YES <input checked="" type="checkbox"/></p>	<p>NO <input type="checkbox"/></p>
<p>It covers sufficiently all urban and rural roads</p>		

<p>3. Are there any factors you would like to see included as part of the risk assessment? If so what are they and why do you consider they represent a risk?</p>	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
<p>Pages 6, 7 & 8 should have a sub heading of Risk Assessment which does cover the potential items to be considered</p>		

<p>4. Are there any factors that you consider irrelevant and would like to exclude? If so why?</p>	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
<p>See extensive notes attached.</p>		

<p>5. Do you think that the Safety Code strikes the right balance between the needs of pedestrians, the needs of other road users, and the need for contractors to get the job done safely and efficiently? If not, why not, and what would you want to see instead?</p>	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
<p>See attached notes</p>		

<p>6. Are you content with the proposed widths for lanes where shuttle working is employed? If not what evidence do you have to support alternatives?</p>	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
<p>The existing guidelines in Chapter 8 are more appropriate to rural and urban roads. Those suggested in the Draft Code of Practice (DCOP) restrict work areas and encourage overtaking of cycles/motorbikes in the shuttle lane</p>		

7. Are you content with the provisions for mobile works? If not what alternatives do you want to suggest and why?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
The DCOP confuses static works and mobile works placing mobile works within coned off areas		

8. Should the duration for short duration works be 90 minutes? If not what alternative maximum period would you consider appropriate and why? <ul style="list-style-type: none"> a) up to 30 minutes b) up to 60 minutes c) up to 120 minutes d) other – please specify 	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
Please explain your reasons and add any additional comments you wish to make: (d) Should conform to guidelines given in Chapter 8 and should remain at 15 minutes maximum. (90 minutes shall only be used for incident management only)		

9. Are you content with the proposals for short duration works up to 90 minutes? If not what alternatives would you propose and why?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
Short duration works – 90 minute ruling – this is open to misinterpretation, there is no clear definition – it does not relate to Chapter 8 as Chapter 8’s 90 minute requirement refers to incident management only. The drawings relating to this do not show speed of road and only shows a give & take signing arrangement; which is a static site not mobile operations, works in this category may omit the use of signs and traffic barrier.		

10. Is the revised text sufficient on what needs to be done when works may take place near a level-crossing? If not, why not? What else would you like to see covered?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
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11. Are the revised requirements for works near tramways sufficient for the safety of operatives and road users? If not what else would you like to see covered and why?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
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Take out the word “street works” and just refer to “works”

Traffic should not remain stationary replace the word “should” with “must”

Take out “for any length of time”

Arrows indicating safety zones incorrect – one adjacent to tip of arrow should be edge of the yellow line.

Diagram – poor example – does not show speed limit for trams and the safety zone is measured from the swept path.

Note: Page 33 the definition of the tramway path differs from the drawing which shows a swept path.

12. Do you agree with the requirement for long-sleeve high-visibility jacket to be worn when operatives are working outside the work zone? If not why not?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
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This is an ideal opportunity to ensure all operations in the highway should require the wearing of high viz in accordance with BS EN 471.

13. If you are a contractor or directly employ people working in the highway, do you already require them to wear Class 3 high visibility jackets?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
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To obtain the maximum visibility available

14. Do you accept that the frequency of visits and the type of guarding used should reflect local factors at each site? If not, what alternative measures would you prefer to see and why?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
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This should be identified as part of the Risk Assessment

<p>15. Do you agree that sites where no-one is working should be visited at least once every 24 hours to ensure that the site is safe? If not, what alternatives would you suggest?</p> <p>a) at least once every 24 hours; b) at least once a day; c) at least every 36 hours; d) other, please specify</p>	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
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a) Increased inspections should be in accordance with the guidance given on Page 80 of the DCOP.

<p>16. Do you accept that in certain locations the risk may require the use of temporary backfill, or covers to minimise consequences should people enter the works zone? If not what other measures could be taken to minimise the consequences should someone, accidentally or deliberately, enter the works area? If your organisation has already identified different measures to reduce the risk, please provide examples and explain their impact.</p>	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
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Providing the guidance in the SROH is covered
What relevance does this have to a COP for TTM?

<p>17. If your organisation works in the highway, do you have a record of the number of incidents where members of the public access, accidentally or deliberately, the work area at night or weekends? If so would you be willing to provide this to the Department for use in an aggregated and unattributed format?</p>	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
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Individual information not available to the NHSS12D Committee

<p>18. Do you agree that all works vehicles stopping on the highway or carrying out mobile works should be conspicuously marked with chevrons of red and yellow? If not what would you suggest is used instead to make vehicles conspicuous?</p>	<p>YES <input checked="" type="checkbox"/></p>	<p>NO <input type="checkbox"/></p>
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<p>19. Do you agree that all vehicles should have either a roof bar or two independent amber lights all visible 360°? If not why not and what alternatives do you suggest?</p>	<p>YES <input checked="" type="checkbox"/></p>	<p>NO <input type="checkbox"/></p>
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<p>20. Do you agree with the introduction of a standard for the stability of barriers in wind resistance? If not how would you improve the ability of barriers to withstand weather conditions?</p>	<p>YES <input checked="" type="checkbox"/></p>	<p>NO <input type="checkbox"/></p>
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<p>21. Do you agree with the conditions for the use of signs for temporary footway or carriageway delays? If not what conditions would you want to see for their use?</p>	<p>YES <input checked="" type="checkbox"/></p>	<p>NO <input type="checkbox"/></p>
<p>Ensure that the TSRGD is amended to include these signs</p>		

<p>22. Do you agree that the current size and format should be retained? If not what alternative would you suggest and why?</p>	<p>YES <input type="checkbox"/></p>	<p>NO <input checked="" type="checkbox"/></p>
<p>The current size is ok; the format of the DCOP is too detailed</p>		

<p>23. Is the revised order of text helpful? What additional sections, if any, would you wish to see covered and why?</p>	<p>YES <input type="checkbox"/></p>	<p>NO <input checked="" type="checkbox"/></p>
<p>1. The impact assessment document under the heading of policy options states that Chapter 8 is very detailed and unsuitable for use by</p>		

operatives and this is agreed. The DCOP in its present form does not meet the needs of the intended recipients as stated in the foreword and confuses the roles of planning and operations. It is therefore felt that it is not an easy reference document and falls into the same category as Chapter 8.

2. The sequence of operations does not flow logically
3. The text and pictures need to be aligned on the same or adjacent pages for example:
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5. In order to align with Chapter 8 instructions such as “need” should be replaced with words “must, should, shall or may” as appropriate.

The DCOP is attempting to be appropriate for operatives on site and planning operations. It is felt it hasn't achieved either. The DCOP would be better served by limiting it to an onsite operative's guide for TTM, supplemented by a separate design guide or directing designers to Chapter 8.

<p>24. Which do you prefer</p> <p>a) plan view illustrations</p> <p>b) three-dimensional illustrations</p> <p>Why?</p>	<p>YES <input type="checkbox"/></p>	<p>NO <input type="checkbox"/></p>
<p>No preference but drawings must be accurate and appropriate without misleading vehicle sizes and carriageway widths.</p>		

<p>25. In the plan view illustrations do you prefer the signs to be represented so that they are correct for the reader, or to be orientated as they would be when placed in the highway (i.e. facing on-coming traffic)?</p> <p>a) reader b) road user</p> <p>Why?</p>	<p>YES <input type="checkbox"/></p>	<p>NO <input type="checkbox"/></p>
<p>To ensure that the persons using the guide position the signs with the correct orientation.</p>		

<p>26. Are there any further changes you would want to see to increase the consistency between the Safety Code and Chapter 8 (2009 edition) documents? Is so what are they and why?</p>	<p>YES <input checked="" type="checkbox"/></p>	<p>NO <input type="checkbox"/></p>
<p>See attached comments</p>		

<p>27. To enable operatives, supervisors and inspectors to be competent in the revised Safety Code, especially those working on behalf of highway authorities, how long should the gap is between publishing the Code and it coming into force?</p> <p>a) 3 months b) 6 months</p> <p>c) other</p> <p>If other, what period would be appropriate?</p> <p>Why do you need this time?</p>	<p>YES <input type="checkbox"/></p>	<p>NO <input type="checkbox"/></p>
<p>Six months would be the minimum for current holders of unit 2 & 10 (signing, lighting and guarding) to be given additional training.</p> <p>Those holding NHSS12D Accreditation in all training & assessment modules will require minimal additional updates (if and where appropriate) and will be included in the refresher training.</p>		

<p>28. If you need to purchase new equipment, would a longer lead time be helpful? If yes, how long would you require for</p> <ul style="list-style-type: none"> a) long-sleeve high-visibility jackets b) beacons on works vehicles c) conspicuous markings on works vehicles d) use of barriers that when correctly erected meet the wind resistance standards 	<p>YES <input type="checkbox"/></p>	<p>NO <input checked="" type="checkbox"/></p>
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<p>29. How frequently do you:-</p> <ul style="list-style-type: none"> a) replace high-visibility jackets; b) replace or re-paint works vehicles; c) replace barriers; d) provide refresher training on signing, lighting and guarding to operatives? 	<p>YES <input type="checkbox"/></p>	<p>NO <input type="checkbox"/></p>
<p>a), b) & c) As and when required to achieve economical serviceability and maximum visibility.</p> <p>d) as appropriate to the registration scheme</p>		

<p>30. Do you disagree with any of the assumptions in the impact assessment? If so why? Please provide justification for using alternative assumptions.</p>	<p>YES <input checked="" type="checkbox"/></p>	<p>NO <input type="checkbox"/></p>
<p>The NHSS12D Committee does not agree with the DCOP contents.</p>		

<p>31. To assess the potential benefits more accurately, it would be helpful if you could share information to be used on an unattributable basis on any incidents in a recent 12-month period where:-</p> <ul style="list-style-type: none"> a. operatives have been injured by vehicles, including mobility scooters, cyclists or motorcyclists entering the works site 	<p>YES <input type="checkbox"/></p>	<p>NO <input checked="" type="checkbox"/></p>
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<p>(including works area and safety zone);</p> <p>b. traffic has entered the safety zone - broken down by whether the site was attended or unattended and whether drivers were uninjured, injured or killed; or</p> <p>c. pedestrians have entered a works site - broken down by whether the site was attended or unattended and whether pedestrians were uninjured, injured or killed;</p> <p>It would also be helpful to know the number of sites operated in that same 12 month period, so that the responses can be put into context.</p>		
<p>Individual information not available to the NHSS12D Committee</p>		