

**THE ROYAL SOCIETY FOR THE PREVENTION OF ACCIDENTS
RoSPA**

**RESPONSE TO THE
OFFICE OF RAIL REGULATION CONSULTATION
CHAPTER ONE: A GUIDE FOR USERS OF LEVEL CROSSINGS**

2 February 2010

This is the response of the Royal Society for the Prevention of Accidents (RoSPA) to the Office of Rail Regulation's consultation on its draft guidance for users of level crossings. It has been produced following consultation with RoSPA's National Road Safety Committee.

RoSPA thanks the ORR for the opportunity to comment on the draft guide.

Purpose of the Guide

RoSPA's two main comments concern the language and format of the guide and the importance of promotion and dissemination.

Language and Format

The guide does not seem to be written for level crossing users, but rather seems to be targeted more at a professional and technical readership. Although the foreword states that Chapter one is aimed at "users of level crossings, such as pedestrians and motorists", the language and format does not seem to be aimed at individual road users.

Promotion and Dissemination

Advice is, of course, only useful if it is widely disseminated and promoted and reaches its intended audience. Although, it is not part of this specific consultation, RoSPA believes the ORR should try to ensure that the final guide is heavily promoted and is as widely available as possible. RoSPA would be happy to help promote the guide and, for example, provide links to it from our websites. The ORR should work closely with Local Authority Road Safety Officers, and other road safety and road user organisations to raise awareness of the guide.

Chapter One

We suggest that the guide should be a stand-alone document (perhaps in addition to being a chapter in a larger guide that is aimed at rail and highway authorities). Members of the public are unlikely to want to look through a large technical document, but are more likely to be interested in a specific guide written for them.

We suggest that most of the text on the page following the foreword could be replaced with a shorter introduction that focuses on the purpose of the guide. The information about the role of ORR and the Law Commission's forthcoming consultation is less relevant in a guide about how to use level crossings.

Using Level Crossing Safely

This is important information. Most road users do not appreciate the difference in the way trains travel, and do not think about the fact that a train takes so much longer to stop than a car travelling at the same speed, that the train driver cannot swerve or brake more sharply to avoid a collision in the way that a driver can.

Descriptions of some of the real accidents that have happened (anonymised so that those involved and the particular crossing cannot be identified) would help to illustrate some of the mistakes people make and their appalling consequences. If possible, data about the numbers of incidents, accidents, deaths and injuries should be presented, along with the potential legal charges and penalties that could be applied for mis-use.

Motorists

An example of the unnecessary technical jargon is the term “road vehicle drivers” (in the first line under the sub-heading ‘Motorists’). The word ‘drivers’ on its own is sufficient and closer to everyday language.

The advice may be stronger if written in the first person. For example, “You can reduce the risk ...” rather than “Motorists can reduce the risk ...”.

Other Users

It would be worth considering giving separate advice for different groups of users rather than putting everyone outside of a vehicle in one group. For example, pedestrians could have its own section, as could cyclists, horse riders and people with reduced mobility. In fact, although the later are mentioned in the definition of ‘other users’, there is no specific advice for them in the bullet points that follow.

There is no mention of motorcyclists.

We suggest that the trauma caused to train drivers who are involved in serious accidents, through no fault of their own, is also well worth mentioning.

Types of Crossings

RoSPA thinks it is a good approach to provide advice for each type of crossing as shown in this section. In layout terms, this could be made to look more attractive, and it is worth considering giving each type of crossing its own page. The information could then be provided as individual factsheets or web pages as well as pages within this guide.

Each type of crossing should be well illustrated with photographs and/or illustrations, and we suggest the language used in each of the descriptions is reviewed to ensure it is clearly written for a non technical audience.

For example, the text in ‘Method of operation’ for Full Barrier Crossing is a good example of language that seems aimed more at a technical audience than members of the public. In the draft it reads:

The barriers are normally kept in the raised position and, when lowered, extend across the whole width of the carriageway on each approach. An audible warning to pedestrians is also provided. The crossing is operated when a train approaches by either manually or automatically initiating the display of the road traffic light signals towards approaching road traffic followed by the lowering of the barriers.

We suggest something along the lines of the text below would be clearer.

The barriers are normally kept raised. When a train approaches, an audible warning will sound and the road traffic lights will begin to flash amber, and then red. The barriers will come down (they may be lowered automatically or by railway staff) and will extend across the whole width of the carriageway.

In the “How to use the crossing safely” box, we suggest the first bullet point should always be “Always approach the level crossing carefully and anticipate the chance that you may need to stop”.

Some of the other bullet points under the headings ‘motorists’ and ‘other users’ should be repeated in each of the boxes, in case a user only reads the description of one particular type of crossing.

RoSPA thanks the Office of Rail Regulation for the opportunity to comment on this consultation. We have no objection to the contents of RoSPA’s response being reproduced or attributed.

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