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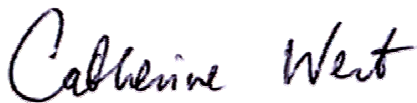
Date: 2 October 2012

London Councils' response to the Mayor's and TfL's "Towards a Road Safety Action Plan for London: 2020" consultation document

London Councils welcomes the draft Road Safety Action Plan and the opportunity to respond to it. Please see our attached response, which has been developed following consultation with all London boroughs and addresses the specific questions posed in the consultation document as well as additional significant issues.

Despite the progress in reducing casualties on London's roads that we have collectively achieved, there is still much to do to increase safety further. But, as significant efforts have already been made, this is unlikely to come simply from the continuation of existing work. The draft Plan and the consultation on it rightly marks the start of a renewed and refocused effort, and we look forward to working with the Mayor and TfL, alongside other key stakeholders, to make the further road safety improvements for Londoners that we all want to see.

Yours faithfully,

A handwritten signature in black ink that reads "Catherine West".

Cllr Catherine West
Chair of the London Councils Transport and Environment Committee

London Councils' response to the Mayor's and TfL's "Towards a Road Safety Action Plan for London: 2020" consultation document

London Councils represents all 32 London boroughs, the City of London, the Metropolitan Police Authority and the London Fire and Emergency Planning Authority. We are committed to fighting for fair resources for London and getting the best possible deal for London's 33 councils. We lobby on our members' behalf, develop policy and do all we can to help boroughs improve the services they offer. We also run a range of services ourselves which are designed to make life better for Londoners.

Our response has been developed following consultation with all the London boroughs.

Summary

The key points included in our response are:

- London Councils welcomes the draft Road Safety Action Plan as a framework to help drive and coordinate pan-London action and acknowledges the significant progress in reducing casualties to date, but we believe significantly more needs to be done to lower casualties, particularly among vulnerable users. However the delay to, and timing of, the consultation has delayed boroughs' planning and is likely to have reduced stakeholder engagement
- we support the Plan's focus on the most vulnerable road users
- closer and earlier liaison between TfL and the boroughs is needed in order to maximise road safety advancements. Boroughs would welcome greater transparency in TfL decision-making and a greater decision-making role on road safety in their area, particularly where TfL's road network forms the local high street
- we would like to see within the Plan more clarity and emphasis on research outcomes and what has been shown to work
- we welcome the commitment within the Plan to support the deployment of new technology and innovation, although boroughs stress that this must be rolled out where it is most appropriate and supported by evidence. There is support for the plan going further in embracing and implementing new technology
- recasting the metrics to present the risks per kilometre travelled per group might better help to assess where the greatest risks lie and better illustrate the challenges the Plan needs to address
- more-robust measures, over and above what is set out in the Plan, are needed to reduce casualties to vulnerable users, particularly cyclists, powered two-wheelers and pedestrians. For example, we would like to see the Plan better support local cycling routes to create a safer network of useful routes
- there is some support for a generic, London-wide target to reduce the number of killed and seriously injured casualties, but significant support for additional targets – or at least establishing a means of clearly tracking progress – focused on the most vulnerable road users
- the Plan should include consideration of key issues and Mayoral/ TfL policies, such as congestion and "smoothing traffic flow" that link to, and may potentially conflict with, protecting the safety of vulnerable groups
- the Plan should also cover how to ensure that the data recorded by the police relating to collisions is consistent, comprehensive and sufficiently detailed
- TfL should ensure that it adequately involves road user groups, and other key interests such as health, in the implementation of the Plan and its actions.

General comments

- 1.1 London Councils welcomes the draft Road Safety Action Plan (RSAP) as a framework to help drive and coordinate action by the GLA, TfL, the London boroughs and others. However, the delay to, and timing of, the consultation has been unhelpful. The delay has held up boroughs' own road safety planning. In addition, publishing the consultation during the school summer holidays, and the London 2012 Olympic and Paralympic Games, is likely to have resulted in less stakeholder engagement to the detriment of the RSAP. We note that TfL has recently extended the consultation period but, as the political sign-off process required for London Councils' and boroughs' responses will already have been started in most cases by the time the extension was announced, it is unlikely to have made much practical difference to these politically-led organisations.
- 1.2 We acknowledge the significant efforts of stakeholders to reduce casualties on London's roads to current levels. However, we believe significantly more needs to be done to lower casualties, particularly among vulnerable users if the Mayor's ambitions to further increase walking and cycling in the capital, and also increase the number of pupils travelling independently to/from school are to be realised. In this context it would be helpful for the Mayor and TfL to clarify the funding it will make available to the boroughs to realise these ambitious aims, in addition to the funding that will be made available to TfL for this purpose.
- 1.3 We believe that it is right that the RSAP focuses on the most vulnerable road users – i.e. those that are over-represented in the casualty data. The RSAP outlines that there will be more-detailed action plans focused on the most vulnerable road users. It will be important that the links between these plans and their outputs are considered alongside one another to ensure they add up to a coherent – and effective – whole. It is suggested that this could be achieved by ensuring the RSAP acts as the overarching strategy document, and that it is regularly reviewed as the related action plans are progressed. It would help to state upfront in the RSAP a clear, overarching aim, and to identify some key principles for stakeholders to focus on as we take forward work under the RSAP and the more-detailed action plans for vulnerable road users.
- 1.4 Closer and earlier liaison between TfL and the boroughs, and greater transparency in TfL decision-making, is required to maximise road safety advancements. For example, boroughs would welcome a greater opportunity to engage after a formal consultation exercise closes. The current RSAP would seem to be a very relevant and good place to improve transparency and engagement. We would like to see a greater decision-making role on road safety for boroughs in their areas, particularly where the Transport for London road network (TLRN) forms the local high street. This shift is needed to reflect the fact that high streets are local places, and are not just for traffic.
- 1.5 The following are specific examples where liaison by TfL with boroughs needs to be enhanced and/ or is particularly crucial. Whilst the Better Junctions Review is welcomed, it is also strongly felt that any improvements should be designed in close collaboration with the boroughs and other relevant stakeholders to ensure the design adequately meets the needs of pedestrians, cyclists and other users. It is also important that meaningful liaison with the relevant borough(s) takes place at the pre-design stage for all junctions, not just those junctions on borough roads. It is not acceptable for relevant boroughs to only be involved towards the end of the process. One borough states that it has yet to see the outputs from the review for junctions within its area. Another borough flagged the need for boroughs to be fully involved in revising the London Cycle Design Standards if, as the RSAP suggests, they must be adopted for all Local Implementation Plan (LIP) funded schemes. London Councils is pleased that the Mayor has committed to the London Cycling Campaign's "Go Dutch" standards, including at three flagship sites and, like many other stakeholders, will be following the initial proposals with interest. The Mayor has

mentioned that one of the sites may be in Greenwich and, although this was done without liaison with the borough, it is looking forward to working with TfL to deliver schemes on busy roads that are needed to increase the number and safety of journeys by bike. It is vital that the relevant boroughs are again involved at the pre-design stage for these sites.

- 1.6 We would like to see within the RSAP and its actions more clarity around, and emphasis on, research outcomes – what has been shown to work. Within the RSAP there is commitment to carry out further research and some of the actions focus on taking this forward. One example is the proposed investigation into pedestrian collision causation factors – which one borough has suggested should be broadened to include all KSI incidents, plus analysis of types of incidents involving different types of road user and analysis of contributory factors on both sides. However, boroughs feel that conclusive research to identify good practice and more effectively guide decision making is needed in some areas, rather than simply conducting more research. This would be aided by developing a coherent plan for the range of research proposed – identifying the gaps in knowledge that act as barriers to implementation of the RSAP, then setting out the research necessary to address those gaps and help build up a bank of good practice. Examples of work needed to identify good practice and better guide decisions include:
- further monitoring of bus lanes for powered two-wheeler (P2W) casualties and collisions with pedal cycles, with subsequent analysis and clear conclusions
 - research identifying where 20 mph schemes have been implemented and on what type of road (e.g. residential, mixed use etc), and information and analysis to establish the effectiveness of these; however this should build on, not duplicate, existing relevant research and information such as the 2009 British Medical Journal study (<http://www.8-80cities.org/Articles/BMJ-%20Effect%20of%2020mph%20traffic%20zones.pdf>)
 - information to aid greater understanding of which measures and designs are most effective in improving road-user behaviour.
- 1.7 We welcome the commitment within the RSAP to support the deployment of new technology and innovation, although boroughs stress that this must be rolled out where it is most appropriate and where supported by evidence, linked to the point about research above. There is also support for the RSAP and TfL going further in embracing and implementing new technologies. Specific initiatives supported in responses by the boroughs include:
- introducing intelligent speed adaptation systems – for example, trialling this in TfL and borough fleets
 - rolling out average speed technology in speed cameras
 - converting speed cameras to enforce 20 mph speed limits
 - pedestrian countdown technology provided it is targeted at appropriate junctions
 - rolling out Trixi mirrors to parts of the borough road network where evidence shows there would be a safety benefit, alongside the TLRN
 - boroughs assisting the police with speed enforcement.

Responses to specific questions

To what extent do you think this consultation document reflects the road safety challenges currently experienced in London?

- 1.8 Several boroughs make the point that the metrics used throughout the consultation document are crucial to setting and understanding the challenge. Casualty rates in Section 3 of the document (“Understanding the Challenge”), are analysed and presented as casualties per 100,000 population in each road user group. However, understanding the risks per kilometre travelled per group, or per trip, might better help to assess where the greatest risks lie. For example, conclusions about which age groups are exposed to the highest risks may be affected by disproportionately high use of particular transport modes by those groups. Recasting the figures in the way suggested would help to better understand the true challenges that need to be addressed by the RSAP.

How well does this consultation document set the balance between the needs of all of London's road users?

- 1.9 Overall, the RSAP strikes a reasonable balance between the needs of all road users, although please note the comments made below in relation to the problems facing vulnerable road users (Paragraphs 1.12 to 1.17), and relating to groups and stakeholders that should be given stronger recognition (Paragraphs 1.27 to 1.28).
- 1.10 We welcome the focus on high-risk groups such as teenagers and what can be done to change their behaviour to lower the risks they are exposed to, which is positive. One borough suggested TfL should make greater use of its red light cameras to tackle "red-light running". However, several boroughs also feel there is a need for greater emphasis within the RSAP on campaigns to change the behaviour of drivers and riders of motor vehicles to reduce the number of collisions they have with cyclists and pedestrians. One borough stressed that – despite brief mention in actions G5, G6 and G7 – the RSAP's policy proposals and actions should have a greater focus on all dangerous/illegal activities, not just those associated with the commitment within the RSAP to enhance the London safety camera network (i.e. speeding and red-light running). Another borough wanted emphasis and clarification on how those travelling from outside London by car or P2W will be targeted with road safety campaigns and messages. A further point made is that driver training in relation to cyclists has typically been focused on HGVs, but this should be broadened to cover other vehicle types given that data shows that the fault most often lies with the motorist rather than the cyclist.
- 1.11 It will be important that a range of both inner and outer London boroughs are represented on both the Road Safety Reference Board and the action plan groups because of the different issues in the different geographic areas.

Are the problems facing vulnerable road users (pedestrians, pedal cyclists and powered two-wheeler riders) addressed sufficiently?

- 1.12 Several boroughs feel that more-robust and new measures, over and above what is set out in the RSAP, are needed to reduce casualties to vulnerable users, particularly cyclists and P2Ws. Specifically it is questioned whether there are sufficient new actions – as opposed to continuation of existing actions – to protect cyclists, such as measures to separate cycle traffic from motor traffic on busy roads.
- 1.13 We acknowledge that the Cycle Safety Action Plan (CSAP) is the place where more-detailed actions to take cycle safety forward are set out. However, we believe that more-robust measures are required over-and-above those set out in the CSAP to achieve the necessary progress. This may be an opportunity to revise and update the CSAP to firm up timescales to ensure timely progress and to take account of the recent upward trend in KSI casualties.
- 1.14 London Councils would like to see the RSAP better acknowledge and support local cycling routes, including adequate investment and better integration with the Cycle Superhighways, to create a safer network of useful routes. Local routes such as the London Cycle Network and the London Greenways network are often on quieter roads or are traffic-free and are likely to be more suitable for less confident and inexperienced cyclists, which would support the Mayor's target of a 400% increase in cycling by 2026. It is important that this crucial local network is completed and maintained to a safe standard, rather than being neglected in favour of the Cycle Superhighways. The local network can and should complement Cycle Superhighways.
- 1.15 It will be important that robust actions to increase P2W safety are developed and included in the Motorcycle Safety Action Plan to make the necessary improvements.

- 1.16 The RSAP seems to down-play the fact that the previous casualty targets for cyclists and P2Ws were not met, and the significant increase in cycle KSI casualties over the last year, by focusing on the increase in pedal cycle usage and P2W vehicles licensed over the same time period. Research backs up that cycling is safer where cycle use is high – far higher cycling levels are associated with lower casualties per kilometre travelled in countries such as Norway, Denmark, the Netherlands and Sweden. We suggest that the RSAP should acknowledge this scenario and identify it as an aspiration.
- 1.17 Some boroughs wish to see within the RSAP a greater commitment of resources and interventions to reduce pedestrian casualties. For example, one borough highlights the need for greater support for training for pedestrians in schools, as well as cycle training. A number of boroughs indicate that greater focus is needed within the RSAP and its actions on reducing pedestrian casualties among the elderly. The forthcoming Pedestrian Safety Action Plan (PSAP) is welcomed, but it is felt that the overarching Road Safety Action Plan does not contain sufficient actions to improve the safety of pedestrians. One borough would like to see the PSAP focus on removing barriers to walking, and designing better streets where the needs of pedestrians are prioritised.

What is your view on a London-wide casualty reduction target?

- 1.18 There is some support among the boroughs for a generic, London-wide target to reduce the number of killed and seriously injured (KSI) casualties, although a number of boroughs caution that – on its own – this single target could mask increased problems among particular road-user groups or in particular geographic areas. We also note that a simple percentage reduction becomes even more difficult to achieve as road safety improvements are made. A rate based target – expressed per trip or per kilometre – may be alternatives worth considering. However, there is significant support for additional targets focused on the most vulnerable road users, or at least establishing a means of clearly tracking progress on increasing safety for these users.
- 1.19 Several boroughs highlight the challenging nature of meeting the 40% target given the significant reductions already achieved and that many of the “easier” gains have already been made, as well as the limited influence boroughs have on the TLRN where a high proportion of KSI casualties occur. Boroughs stress that a continuation of existing approaches is unlikely to bring about the necessary road safety improvements and radical approaches are needed – for example fundamentally rebalancing London’s roads towards more vulnerable users and taking a broader view of transport in London. Some boroughs also note that the baseline of 2005-09 used for the target in the RSAP is at odds with the 2004-08 baseline used by boroughs for road safety targets in LIPs, and also by DfT.
- 1.20 The consultation document acknowledges that boroughs have already set road safety targets focused on more-specific geographic areas in their second round LIPs. Therefore London Councils would not support additional sub-London targets. But the key point made by the boroughs is that additional pan-London targets to reduce casualties among the most vulnerable road users (pedestrians, cyclists and P2Ws) are needed or, if not, at least setting up a way of clearly tracking progress for these users – for example, establishing milestone reductions required over time. This would allow all stakeholders to check that the action being taken is making the necessary improvements for the most vulnerable users. For example, one borough questions how progress on casualty reduction among these groups – a key focus of the RSAP and its proposed reporting arrangements – can be adequately assessed without this additional check. Another states that there is a possibility that progress towards the target for a 40% reduction in KSI casualties could be achieved through improvements to transport modes that are already much safer. Another borough sees the RSAP as a key opportunity to embed specific targets or checks for these vulnerable users. Several boroughs also support a London-wide casualty-reduction target or check focused on children and, given the current upward trend, a target or check focused on reducing slight casualties.

Are there any road safety issues which you feel are not adequately addressed in this consultation document? What are they and how should TfL address them?

- 1.21 A number of boroughs highlight that there is little assessment, nor even mention, in the RSAP of key issues or Mayoral/ TfL policies that may potentially link to – or potentially conflict with – protecting the safety of vulnerable groups on the road network. Examples include work on reducing congestion and also on the policy of “smoothing traffic flow”, which may be making journey improvements for motorists – and we would be interested in the evidence that demonstrates this – but may also be adding complexity and danger to journeys made by more vulnerable road users. Without full consideration of the road safety implications of broader transport policies – although individual policies and actions in the RSAP may reduce the risks for particular groups of road users – it is extremely difficult, if not impossible, to weigh up the net effect.
- 1.22 One borough makes the point that agreeing how to tackle these linked and potentially competing priorities is important as it is one of the key challenges faced by delivery partners when implementing road safety initiatives. This borough also states that the balance between priorities is likely to vary depending on the location and function of the street. It may be that the recently established Roads Task Force may consider some or all of these issues. However, it would seem to be a significant omission for the RSAP not to acknowledge the potential conflicts with road safety aims and how these are being, or may be, addressed – for example through the Roads Task Force or elsewhere.
- 1.23 There is support from the boroughs for the Fleet Operator Recognition Scheme (FORS) and the planned extension of the work to operators of goods vehicles more generally to sign up to at least the bronze level of FORS. However, given that approximately one third of road collisions involve vehicles being driven for work, one borough suggests that TfL should widen the scheme to encompass work-related driving more generally. One borough felt that an emphasis on promoting “eco-driving” among professional drivers – as well as motor vehicle drivers more generally – would be useful in helping to save money during the recession and protect the environment, as well as reduce road danger.
- 1.24 A number of boroughs highlight the need for work to be undertaken to ensure the data relating to collisions recorded by the police is consistent, comprehensive and sufficiently detailed to aid a deeper understanding of why accidents occur and how we can prevent them. We suggest that the RSAP should include an action or actions covering how the process can be improved, with the Mayor/TfL taking the lead on facilitating this. London Councils would be willing to help facilitate boroughs’ input. Several boroughs consider that the identification of the contributory factors/ categories by the police is subjective. We note that the system was last updated in 2005 and that there would be value in TfL working with the police and central government to identify what improvements could be made – for example recording additional factors that may give insight into some of the new challenges we face such as walking or cycling whilst listening to music through headphones. Also the current definition of a “serious” casualty covers a broad range of injury severity. One borough notes under-reporting of accidents as an issue, and also data sharing between the police and the boroughs – the police should not charge boroughs for supplying detailed accident reports as this can be a barrier to improvements.
- 1.25 One borough notes that Action F3 in the consultation document suggests that boroughs should replicate TfL’s methodology for identifying high-risk locations on the road network. However, this would require substantial investment in a new monitoring programme, which boroughs will be unable to resource unless TfL can provide funding for non-scheme-based monitoring.

- 1.26 London Councils is aware that an international standard (ISO 39001) is being developed for road traffic safety to reduce KSIs. This standard is intended for use by any organisation that might have an impact on road safety through its operations. By adhering to the standard's principles, an organisation will mitigate its negative impact on road safety – for example procuring from suppliers with an excellent safety standard record and ensuring all drivers are properly trained. It would make sense for the RSAP to acknowledge this forthcoming international standard and consider how this could link to the overall aim. The standard would be of interest to TfL, the boroughs and other key stakeholders in terms of their own operations – improving their road safety record through their own activities and those of any contractors – as well as in terms of promoting this to others, such as private construction companies. The standard will therefore be a useful tool to help TfL and the boroughs to take a lead on road safety in the community.

Are there any groups / stakeholders who should be given stronger recognition in this consultation document?

- 1.27 A recurring point in the views expressed to London Councils by the boroughs is the need for TfL to ensure that it properly involves road user groups and other key interests such as health in the implementation of the RSAP and its actions. This manifests in several ways. For example a number of boroughs emphasise the need for organisations representing vulnerable road users to be included on the proposed Road Safety Reference Board. Representatives from these organisations should also be involved in designing communication and educational campaigns, and specific network improvements. One borough also thought that Road safety Great Britain and the Royal Society for the Prevention of Accidents should be given stronger recognition since they develop road safety campaigns and educational resources. It also highlighted that health authorities should have a greater role to play given the shorter-term benefits of accident reduction to the health service, and the longer-term benefits of encouraging people to lead a more active lifestyle by walking and cycling more.
- 1.28 In addition to the points made above in relation to the problems facing vulnerable road users (Paragraphs 1.12 to 1.17), several boroughs would also welcome a stronger focus on mitigating risks for ethnic groups exposed to higher risks, and/ or interested in taking up walking and cycling, than is currently evident within the RSAP. One borough also felt that the RSAP should state specific measures to protect children most at risk – those at the transition age from primary to secondary schools.