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Dear Sir / Madam,

**TFL CONSULTATION ON THE DRAFT PEDESTRIAN SAFETY ACTION PLAN –
LONDON COUNCILS' RESPONSE**

London Councils is committed to fighting for resources for London and getting the best possible deal for London's 33 councils. Part think-tank, part lobbying organisation, and part service provider, London Councils formulates policies, organises campaigns and runs a range of services all designed to make life better for Londoners.

As member of the Road Safety Steering Group and the Pedestrian Safety Working Group, London Councils welcomes the draft Pedestrian Safety Action Plan and the work that is being done through these groups to ensure boroughs and other stakeholders are fully involved in securing the safety of London's most vulnerable road users.

Our response has been developed following consultation with London boroughs. It seeks to answer the four questions of consultation.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "N Malde".

Nishma Malde

Head of Transport and Environment, London Councils

TfL's consultation on the Draft Pedestrian Safety Action Plan

London Councils' submission

Introduction

London boroughs welcome the clear ambition to improve pedestrian safety and the broad range of initiatives that are set out within the Pedestrian Safety Action Plan ('the Plan') to achieve this. Measures to improve pedestrian safety should be seen in the context of a balanced package of measures and programmes for highways and public realm that addresses the requirements of the entire community.

In particular, London boroughs welcome the focus on older people, the emphasis on the benefits of walking to improve public health and the specific actions aimed at improving driver and vehicle standards. Members of the public need to be reassured that London has a safe environment for both walking and cycling. However, some other issues seem to be missing in the draft Plan:

- The Plan does not put enough emphasis on accessibility and risk for disabled people.
- The Plan does not refer to the growing problem of cyclists using the pavement or campaigns aimed at stopping cyclists riding over zebra crossings.
- TfL does not seem to use any NHS data or highlight the issue of under-reporting of casualties/injuries.
- Given the focus on older pedestrians, the Plan is missing a specific action on education and communication targeted to older pedestrians. Such resource would ensure they are aware of road safety issues specific to their age group.

The following three sections of our response include comments on particular chapters and paragraphs, figures and pictures, and the specific actions included in the Draft.

1. Comments on specific chapters and paragraphs

- Chapter 2.1 (page 6): When discussing London's ageing population, it needs to be made clear that whilst older pedestrians may be more likely to be involved in collisions, older people are also less likely to recover from injuries as quickly as younger individuals and are likely to suffer severity of injury. It should also be noted that the word ageing is misspelt.
- Section 3.1.1 (page 11): It would be useful to expand on the paragraph on Black, Asian and Minority Ethnic (BAME) road users by adding some figures on BAME KSIs and variations across London. TfL should include a specific action to work with BAME communities which have been identified as being overrepresented in casualty data to ensure that road safety messages are being received. TfL should also develop innovative methods to ensure that access to road safety resources and information is available to all.

- Section 3.1.2 (page 12): This section describes the pedestrian risk during the hours of darkness, especially for young people, and when pedestrians have been drinking alcohol. However, the plan does not identify any action aimed at communicating this issue to pedestrians.
- Section 3.1.3 (page 13): It should be acknowledged that some boroughs, if not all, also produce 'priority lists' of borough roads with a high number of KSI casualties. Also TfL should acknowledge that in some occasions engineering measures also require an education and enforcement element to be effective in changing behaviour.
- Chapter 3.2 (page 17): TfL should consider whether the two first sentences under the heading distraction need to be amended to state that a distraction of any road user (or maybe just drivers and riders, including cyclists) was the most commonly recorded contributory factor for vehicles involved in fatal collisions, instead of just mentioning drivers.

2. Comments on figures and pictures:

- Picture on page 4 should be replaced by another one that illustrates walking in a more positive light.
- All figures should include references to the data sources.
- Figure 1 should include the label for the vertical axis as it is unclear.
- Figure 3 could compare risk paths for various road users (pedestrians, cyclists, cars, buses, etc.).
- Figure 4 is not very readable in electronic and paper version of the document. As for its content, it shows a higher rate of pedestrian KSIs in North West and South East London. However, on page 13, the document states: "in terms of absolute numbers, there are significantly more casualties in inner London." Whilst this discrepancy between the two might be as a result of using different metrics (the map uses casualties rates per Billion Passenger Kilometres and the text refers to absolute numbers), it can be confusing for readers. We would therefore suggest using the same metric for both the map and the reference on page 13.

3. Comments on the actions:

Action	London Councils' comments
1. TfL will produce the first London Pedestrian Design Guidance (LPDG) to plan and design for safe and comfortable walking environments. TfL will use this guidance for all TfL funded streets and public	<ul style="list-style-type: none"> • The Pedestrian Design Guidance should be developed in partnership with boroughs to ensure it is widely adopted. Instead of stating '<i>will strongly encourage the boroughs to adopt it</i>', this action should read '<i>will work with boroughs to ensure it is widely used for their schemes</i>'. • London Councils would like to see this guide being produced alongside the London Cycling Design

<p>realm schemes and will strongly encourage the boroughs to adopt it for their schemes.</p>	<p>Standards, currently being updated, to make sure they do not conflict with each other:</p> <ul style="list-style-type: none"> ○ Borough transport planners should not face the dilemma of not knowing what principles apply, whether the ones from the Pedestrians Guidance or the ones from the Cycling Standards. To this end, both guides should be complementary and cross-referenced. TfL should also give some consideration as how to ensure this continuity after initial release so that any amendments or updates made over time still have a clear linkage. ○ Potential conflicts between the two transport modes (pedestrians and cyclists) should be clearly identified and acknowledged in any designs so that the appropriate balance can be sought by those applying both guidance documents. ○ TfL should also ensure both the Pedestrian Design Guidance and the Cycling Design Standards are presented to boroughs jointly and in a coherent manner. At the moment, it looks like the London Cycling Design Standards are going to be more of a set of criteria that boroughs will be expected to follow when designing cycling schemes as opposed to simply “guidance”. Also, the revised draft for the London Cycling Design Standards has been extensively delayed. Boroughs would not like to see the publication of it being delayed much further whilst the pedestrian guidance is being developed.
<p>2. TfL will work with the boroughs to make safe, attractive and enjoyable streets a defining characteristic of new Opportunity Areas, such as Euston, Tottenham Hale, and Elephant and Castle. Streets will be assessed using the Road Task Force Street Types with a view to identifying the most</p>	<ul style="list-style-type: none"> ● Some of the developments in the Opportunity Areas mentioned are quite contentious locally and London Councils would prefer it if specific opportunity areas are not mentioned in Action 2.

appropriate interventions.	
<p>3. Building on its innovative crossing technology trials, TfL will develop a new 'gold standard' for all new and upgraded pedestrian crossings. This standard will look to include:</p> <ul style="list-style-type: none"> • far-sided pedestrian indicators on all crossings coupled with; • pedestrian countdown timers (PCaTS) to give pedestrians a clear indication of how much time they have to safely cross the road • pedestrian crossing times designed to take account of national safety standards as well as the level of pedestrian demand and other local circumstances; and • tactile cones and/or audible guidance to assist visually impaired people. 	<ul style="list-style-type: none"> • Achieving a 'gold standard' for crossing should be widened to include gradient of dropped kerb and evenness of surfaces in the vicinity of crossings. This is mentioned in Action 6 but it should also be included in Action 3. • Boroughs' communications with schools have shown that pedestrians are less familiar with puffin crossings and pedestrian crossings at signalised junctions leading to uncertainty as to whether they can start to cross or not. Education materials/ messages need to reflect new upgraded crossings.
<p>4. TfL will produce 'priority lists' of key junctions on borough roads (as is already the case for the TLRN) and will share these with boroughs strongly encouraging their use to target road safety engineering measures to those locations posing a higher risk to pedestrians.</p>	<ul style="list-style-type: none"> • As the boroughs are likely to already have identified priority junctions, instead of stating '<i>will share these with boroughs strongly encouraging their use to target road safety engineering</i>', this action should read '<i>will share and discuss these with boroughs so that we can collectively target road safety engineering</i>'.
<p>5. TfL will explore the potential for 'town centre pedestrian safety pilots' through discussion with stakeholders, with the aim of</p>	<ul style="list-style-type: none"> • Boroughs are responsible for town centre regeneration and this should be reflected in the wording of the action: '<i>TfL will explore the potential for 'town centre pedestrian safety pilots' through discussion with boroughs and other</i>

<p>delivering an integrated package of road safety measures in town centres with a relatively high pedestrian safety risk and will work to develop schemes through the borough LIPs.</p>	<p><i>stakeholders...’.</i></p> <ul style="list-style-type: none"> Also, 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. This shift is needed to reflect the fact that high streets are local places and not just highways for passing traffic.
<p>9. TfL will double the number of pedestrian crossings operating pedestrian countdown as part of its modernisation programme from 200 to 400. TfL will also be strongly encouraging boroughs to adopt PCaTS as standard to reduce pedestrian uncertainty at crossings.</p>	<ul style="list-style-type: none"> This action should clarify whether it relates to countdowns on all pedestrian crossings or to those crossings that are part of signalled junctions. It should also acknowledge that while there are locations that could potentially benefit from the introduction of PCaTS, there are also other locations where there is no clear need for it. TfL’s own guidance note¹ identifies a number of scenarios where the provision of PCaTS would not be appropriate. The feasibility of adopting this standard may also be dependent on signal slot availability, which continues to be an issue for many boroughs, and potential problems/delays on junctions that also have (if adopted/approved) the early cycle green light. This action does not provide enough detail as to how TfL expects boroughs to fund PCaTS and related maintenance costs. With reduced levels of LIP funding, it will be difficult for boroughs to fund PCaTS through this mechanism given their other competing priorities. In some occasions, when boroughs have installed PCaTS, it has been necessary to upgrade the controller unit as it was not the right specification for PCaTS. As a result, the costs of a signal scheme increased significantly, impacting on the available budgets. A targeted introduction of PCaTS, at least initially, on a site-by-site basis, would seem more appropriate. Some boroughs are willing to adopt PCaTs as standard on any new installations, modification schemes or modernisation schemes - subject to the suitability of a particular site and the

¹ <http://www.tfl.gov.uk/cdn/static/cms/documents/PCaTS-Note-7-Design-Guidance-V01.-docx.pdf>

	cost associated with installing PCaTS.
10. TfL, alongside the City of London, will trial 20mph speed limits on two stretches of the Transport for London Road Network (TLRN) across the City of London, including London Bridge and Blackfriars Bridge to reduce casualties associated with speed. The trials will be closely monitored with a view to rolling out similar schemes elsewhere on the TLRN in future.	<ul style="list-style-type: none"> This action should be more ambitious and aim at continuing expanding 20mph on the TLRN. This action should align with the categorisation of lengths of the TLRN under the Roads Task Force where these are high streets and high roads in town centres. Hackney, for example, has submitted to TfL, a priority list identifying those roads on the TLRN that should have 20mph limits.
11. TfL will continue to encourage London boroughs to deliver more 20mph schemes through their Local Implementation Plan (LIP) programmes, in order to create safer environments for pedestrians in London.	<ul style="list-style-type: none"> A number of boroughs have adopted, or are in the process of adopting, borough wide 20mph speed limits and many others have created more 20mph zones. However, borough efforts to encourage speed reduction will only work if appropriate enforcement regimes are in place. London Councils would like greater clarification on what support will be provided by TfL to implement 20mph schemes and enforce them. This action should therefore read as: <i>'TfL will seek to support those boroughs looking to deliver more 20mph schemes...'</i> TfL should also acknowledge that the boroughs' core LIP programme has the flexibility to be spent within the parameters and priorities set out in the Mayor's Transport Strategy. Therefore, for some boroughs delivering more 20mph schemes may not be as important as other Mayoral priorities such as cycling or smoothing traffic flows.
13. Building on the success of Operation Safeway, TfL will issue the Metropolitan Police Service Roads Policing Unit with maps and data highlighting the location of high pedestrian risk, in order to better target their enforcement activity. They	<ul style="list-style-type: none"> TfL should share these maps and data highlighting the location of high pedestrian risk not only with the Police but with the London boroughs to ensure we are all are working with the best information available.

will also focus on issues such as cracking down on mobile phone use whilst driving and educating drivers about flashing amber signals at pedestrian crossings.	
14. The Mayor and TfL will work with the police to embed the use of Speed Awareness Courses for motorists as an alternative to prosecution in cases of minor speed infractions, with a focus on 20mph limits. Greater enforcement of 20mph limits will ensure the safety benefits of lower speeds limits for pedestrians are fully realised.	<ul style="list-style-type: none"> London boroughs would also like to know how TfL plans to work with the Police on improving speed awareness courses. As boroughs are implementing 20mph limits on their main road network, this could be a good opportunity for TfL to work with boroughs and the Police on the enforcement of 20mph limits.
<p>21. To ensure a high standard of safety amongst bus drivers in London, TfL will:</p> <ul style="list-style-type: none"> Work with operators to develop a training module for incorporation into Driver CPC training such that every bus driver participates in the training by December 2015. This would include a better understanding of the broader street environment and behavioural patterns of pedestrians; Undertake further analysis of the common conflict types between buses and pedestrians to inform training materials and safety messages that need to be communicated to drivers; 	<ul style="list-style-type: none"> Given that a large number of buses and coaches come into London from outside, one sub-action should seek to expand this regionally if not nationally.

<ul style="list-style-type: none"> • Work with bus operators to identify best practice with regards to consideration of safety at recruitment stage. 	
<p>24. TfL will offer and promote the Junior Travel Ambassador (JTA) scheme to all schools in London and work with borough officers to encourage take-up. The JTA scheme promotes pedestrian safety, as well as other active and independent travel messages.</p>	<ul style="list-style-type: none"> • The Plan identifies those aged 12 – 19 as a high risk and addresses this in action 24 through the Junior Travel Ambassador scheme. Currently, this scheme is specifically aimed at Year 6 pupils. Schools would benefit from a resource that can be targeted to older pupils from secondary schools to ensure the messaging about travelling safely is not lost. This resource could focus on highlighting dangers on the use of mobile phones/headphones and crossing at appropriate places.