

APPENDIX A: Consultation response

Southwark Council's response to TfL's consultation on their Road Safety Action Plan for London 2020

Southwark welcomes the opportunity to comment on the Road Safety Action Plan for London 2020 and our response is set out below.

General comments

Southwark welcomes TfL's new Towards a Road Safety Action Plan for London 2020 document and our chance to comment on it. We support the plan's statement that "safety on our roads is an absolute priority". We also welcome the particular attention given to the vulnerable user/overrepresented modes, as well as the need to look at the social and economic cost of road casualties.

However we feel that in its present state it is not user friendly. The length and format of this plan particularly in addressing individual topics in different places in the plan is confusing and makes the document difficult to read. For transparency, it is suggested that when an action is already carried out the wording should reflect this, and new actions should also be highlighted. If we continue to do what we have always done then we are unlikely to see improvements in road safety.

The plan states that TfL will "embrace changes in technology". This is welcomed, especially intelligent speed adaptation systems. However this is not being used to its full potential and it is suggested that use of this technology in London's buses would be a great advancement.

We welcome work to tackle inequality in road safety and the proposal to develop more of an evidence based approach. Care should be taken not to target the wrong people when using data from the STATS19 form as only a limited number of categories are recorded, and there should be recognition that the category chosen is the view of the investigating officer.

Target

The plan highlights the key remaining challenges including the disproportionate number of pedestrian, motorcycle and pedal cycle casualties in London. There is a significant focus on interventions relating to these transport modes. However there are no individual casualty reduction targets for these modes. In 2011, there were fewer car occupants killed or seriously injured, but more pedestrians and cyclists, vehicles are getting safer, but roads are not. Southwark would prefer to see targets for individual modes so that problems with particular road user groups are clearly identified.

TfL proposes a new overarching target to reduce number of people KSI in London by 40% by 2020 from the baseline of the 2005/9 average. It does not propose any targets focussed on particular groups of road users, but highlights the need to monitor and report data to track progress in reducing casualties among key groups (cyclists, pedestrians, motorcyclists and children). It should be noted that the previous London cyclist and powered two wheeler casualty reduction targets were not met by 2010. Southwark would prefer to see targets for individual modes so that problems with particular road user groups are not masked.

It should also be noted that TfL's chosen baseline of 2005/9 is at odds with the council's baseline of 2004/8 used in its own road safety targets in the Council's Transport Plan.

Not mentioned in the plan is the possibility of changing the way road safety targets are measured to take into account the increases in the number of people using a particular mode, and would show the relative risk of different forms of transport. This is particularly relevant for cycling. This would mean measuring the casualties among cyclists as a rate; casualties per journey or distance travelled. The borough

acknowledges the difficulty of such a measure given the data currently available but believe it should be highlighted in the RSAP as an aspiration. Presenting the figures in this way would show more clearly the challenges that need to be addressed.

Cycling

The council supports the mayoral target 400% increase in cycling by 2026 although we feel that this should be coupled with improving road safety for cyclists. The council is immensely disappointed that in 2011 there were 2 cyclists killed and 39 seriously injured in the borough with cyclists forming 25% of all road casualties in the borough in 2011. More needs to be done to improve road safety for cyclists and this plan does not suggest any substantial new measures to do this. The cycle safety action plan was written in 2010 and this recent upward trend in cyclist KSIs supercedes it.

The cycling specific actions in this plan are too few and too vague. We would therefore expect there to be more detail in TfL's Cycle safety action plan (2010) which is often referred to in the plan. However upon review, it seems to have many actions which although wide ranging and worthwhile, do not have timescales attached to them. This plan refers to the 52 actions within the cycle safety action plan as being "ongoing". This is too ambiguous to be accountable. This raises the question about the need to update the cycle safety action plan.

The RSAP provides an opportunity for new radical measures to combat this trend to be set out. They are however absent from the document.

20mph zones

The plan supports 20mph zones and limits, as long as they are "in keeping with the wider functions of the local road network". This suggests that road safety is not as important as the function of the road network.

Boroughs are now limited in delivery of speed reduction as vertical traffic calming can no longer be used, plus of course most of the 20mph zones in areas of greatest need have already been implemented.

The plan states that TfL will work with boroughs to use new engineering and traffic management approaches to manage speeds. The council has promoted new technology including both averaging speed cameras and Intelligent Speed Adaption as alternatives to traditional traffic calming. The council believes that both these technologies have a role to play in reducing vehicular speeds and should be supported. They could also contribute to a better understanding of the use of emerging road safety technologies in London. However to date TfL have been reluctant to support the implementation of these measures.

There should be recognition of the need to reduce speeds on the TLRN and TfL should provide more of a commitment for action. Instead the RSAP contains an ambiguous statement regarding speed reduction on the TLRN which doesn't commit TfL to any action; "The complexity of the TLRN means that in considering lower speed limits on these routes, the benefits in terms of both safety and liveability of town centres needs to be taken into consideration alongside the other functions the TLRN performs, including the movement of people and goods."

Safety cameras

The council is unclear of the current and future role of the London Safety Camera Partnership and more could be done to work with boroughs in this area.

It would be useful for the RSAP to discuss effectiveness monitoring of safety cameras.

Enforcement

Among behavioural factors linked with collisions on the roads, inappropriate speed is a primary concern for the council; not only can excessive speed cost lives, but it can also make for unpleasant, intimidating streets that act as psychological as well as physical

barriers to movement. Most collisions in Southwark occur on busy roads and at junctions on roads where the speed limit is 30mph. There is not enough mention of enforcement by traffic police of road rules, in particular speeding. This would greatly assist road safety and should be made more of in the document.

Children

Risk of casualty by age and mode as well as risk of KSI by age and mode is discussed in detail in the plan. For example pedestrian casualty risk is highest for 11 and 12 year olds and pedestrian KSI risk is highest again in children particularly 10 to 14 year olds. The RSAP section on children doesn't state specific measures for children most at risk – those at the transition age (11-12) from primary to secondary schools. In addition to this some action wording is too vague to be held accountable. There is a need for greater support for pedestrian training in schools as well as cyclist training. There is also no mention in the plan of School Travel Plans and the associated safety engineering measures which have been implemented over the years.

Walking

The RSAP contains limited new action to improve safety of pedestrians and a heavy reliance on a new, yet to be written pedestrian safety action plan. We do however welcome the forthcoming pedestrian safety action plan but it must contain actions which are specific and time bound, so that they can be measured and held to account. It is disappointing that this new pedestrian safety plan has not yet been written. The road safety plan does not contain enough new pedestrian specific actions.

Powered two wheelers

Powered two wheeler (P2Ws) accounted for 1% of daily journeys but 21% of KSIs in London in 2011. More must be done to improve the safety of those riding P2Ws. There is very little mention of anything new to tackle this problem. More regional based working should be done to identify measures to address this issue. A separate motorcycle safety action plan is also being written, again it is disappointing that this was not available at the same time as this new road safety action plan. One area where improvements for P2Ws could be made is through the better junctions review process (see below).

Better junctions review

The borough was encouraged to learn of the £15m secured by TfL for the review of 500 junctions, however, we would reiterate the concerns expressed at the discussion held on 12 July that “tackling too many junctions would also result in an un-focussed approach, rather than improving the worst junction”.

We are concerned that this is not a transparent process and that the council has not been involved in the development of proposals affecting the borough when located on the TLRN. This has created a position where local cycling groups are more closely involved in the process than the council.

While Southwark Council is taking steps to improve safety for cyclists on roads we manage, a very large and growing proportion of collisions involving cyclists occur on main roads controlled by TfL. The council is very keen to engage with TfL to bring about the required improvements on these roads.

Many of the junctions identified in the borough are highly complex locations and a multifaceted (and if appropriate a phased) approach will be necessary. The junction review program of work and this funding stream alone will not deliver the aspirations to address the needs of the junctions identified.

Southwark has a number of junctions where urgent safety improvements are required, particularly for cyclists. For example, Elephant and Castle northern roundabout has the worst collision record in London. There should be recognition that some of these

junctions will require significant intervention that may need to be delivered alongside other initiatives, for example Duke Hill Street j/w Borough High Street is being delivered alongside the redevelopment of London Bridge Station.

In addition to improvements in cyclist safety we are keen to see improvements to the safety of other road users – particularly powered two wheelers come out of this review process.

Whilst we welcome the better junction review process we are concerned that physical improvements should follow each review and not just comprise a wish list of enhancements for which funding is not available. It is noted that there is an action to deliver improvements at 50 junctions by end 2013, but what timescale is there for improvements to the other junctions that are to be reviewed?

TfL have placed a strong focus on both the Better Junctions and Cycle Superhighway (CSH) program, this focus runs the risk of allowing link improvements away from the CSH being a low priority.

Consultation questions

Q.1 *To what extent do you think this consultation document reflects the road safety challenges currently experienced in London?*

The way that road safety targets are measured is crucial to understanding the challenges currently experienced in London. Casualty rates in the RSAP are presented as casualties per 100,000 population in each road user group. However, to take into account the increases in the number of people using a particular mode it might be better to express rates as risk per kilometre travelled per group. This would show the relative risk of different forms of transport. This is particularly relevant for cycling. This would mean measuring the casualties among cyclists as a rate; casualties per journey or distance travelled. The borough acknowledges the difficulty of such a measure given the data currently available but believe it should be highlighted in the RSAP as an aspiration.

Q.2 *How well does this consultation document set the balance between the needs of all of London's road users?*

The RSAP does on the whole strike a good balance between the needs of all London's road users. Vulnerable road users are given particular attention. However actions which are strong enough to address these needs are often lacking.

Q.3. *Are the problems facing vulnerable road users (pedestrians, pedal cyclists and powered two-wheeler riders) addressed sufficiently?*

More new measures, further to what is set out in the RSAP are needed to reduce casualties to vulnerable road users, particularly cyclists and P2Ws. If we continue to do what we have always done then we are unlikely to see improvements in road safety.

More needs to be done to improve road safety for cyclists and the RSAP does not introduce any substantial new measures to do this. The cycling specific actions in this plan are too few and too vague. We would therefore expect there to be more detail in the TfL Cycle safety action plan (2010) which is often referred to in the plan. However upon review, it seems to have many actions which although wide ranging and worthwhile, do not have timescales attached to them. This plan refers to the 52 actions within the cycle safety action plan as being "ongoing". This is too ambiguous to be accountable. This raises the question about the need to update the cycle safety action plan.

The plan's section on children doesn't state specific measures for children most at risk – those at the transition age (11-12 year olds) from primary to secondary schools. In addition to this some action wording is too vague to be held accountable.

There is limited new action to improve safety of pedestrians and a heavy reliance on a new, yet to be written pedestrian safety action plan.

More must be done to improve the safety of those riding P2Ws. There is very little mention of anything new to tackle this problem. One area where improvements for P2Ws could be made is through the better junctions review.

Q.4. *What is your view on a London-wide casualty reduction target?*

Southwark is supportive of a London wide casualty reduction target. However, TfL's chosen baseline of 2005/9 is at odds with the council's baseline of 2004/8 used in its own road safety targets in the Council's Transport Plan.

Southwark would prefer to see targets for individual modes so that problems with particular road user groups are clearly identified.

Q.5. *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?*

As previously highlighted the council believe that more needs to be done to recognise and address collisions involving P2W. In addition, there is limited mention of the role of enforcement. The plan would benefit from a review by the police and clarity of roles, responsibilities and expectations when it comes to enforcement.

Q.6. *Are there any groups / stakeholders who should be given stronger recognition in this consultation document?*

The plan's section on children doesn't state specific measures for children most at risk – those at the transition age (11-12 year olds) from primary to secondary schools. In addition to this some action wording is too vague to be held accountable.

We are concerned that the better junctions review process is not transparent and that the council has not been involved in the development of proposals affecting the borough when located on the TLRN. This has created a position where local cycling groups are more closely involved in the process than the council.