

London Councils Response to Department for Transport's A Safer Way: Making Britain's Roads the Safest in the World

London Councils Transport and Environment Committee (TEC) is a statutory joint committee representing all 32 London boroughs and the City of London. It is the main voice of the London boroughs and of their electorates on a wide range of issues relating to transport and the environment in London and related matters of concern to Londoners. It also carries out a number of statutory functions and works closely with the Local Government Association and with many private, voluntary and public sector bodies.

In order to formulate this response, London Councils has consulted with the London Boroughs and has chosen to respond only to those questions which are of particular relevance to London

A table containing responses to the questions contained in appendix A of the consultation that are considered to be of particular relevance to London is attached to this response in appendix 1.

The main points we would like to highlight from our response are:

- London Councils welcomes the consultation paper on Making Britain's Roads the Safest in the World, and agrees in principle with the proposal to run a road safety strategy over twenty years, in order to create a long term vision for the UK.
- London Councils agrees that a better and more systematic delivery would be more effective than major policy changes, although we recognise there may be the need for new legislation to facilitate the use of new technology. There is a need to focus on partnership working, particularly in London between Transport for London, the London Boroughs and the Metropolitan and City Police.
- Additional resources for the boroughs to target specific groups, such as socially excluded children, with road safety education and to focus on specific engineering measures are also required, as well as more effective processes for funding for road safety engineering.
- London Councils proposes that more resources should be targeted at enforcing compliance with 30 mph limits as the majority of fatalities in London are on main roads. We would also like more flexibility to introduce 20mph zones in residential areas and town centre roads, without the need for physical engineering measures.
- London Councils is concerned about the difficulties in measuring accurately the percentage rate of road death and serious injury per kilometre travelled. This would present particular difficulties if data is to be broken down to borough level, when smaller numbers might 'skew' data. London Councils proposes that whole numbers be used for calculations rather than rates per km.
- Of particular relevance in London is the number of socially excluded children killed or seriously injured. Therefore, London Councils believes that there should be an indicator for child deaths and serious injuries for the next national road safety strategy. Given a significant over-representation of children from Black, Asian and Minority Ethnic (BAME) backgrounds among those killed and seriously injured in the Capital, we should also like to see an ethnicity profile for such an indicator.

Table containing London Councils response to questions contained in the consultation considered to be most relevant to London

Vision and targets (Chapters 3 and 8)	London Councils Response
2 Do you agree that we should define a strategy running over twenty years to 2030, but with review points after five and ten years? (Chapter 3)	Yes, with well publicised reviews of the strategy every five years, to ensure it reflects changes in travel and casualty patterns
3 Do you agree that our targets should be to reduce: <ul style="list-style-type: none"> • road deaths by at least 33 per cent by 2020 compared to the baseline of the 2004–08 average number of road deaths; • the annual total of serious injuries on our roads by 2020 by at least 33 per cent; • the annual total of road deaths and serious injuries to children and young people (aged 0–17) by at least 50 per cent against a baseline of the 2004–08 average by 2020; • by at least 50 per cent by 2020 the rate¹ of KSI per km travelled by pedestrians and cyclists, compared with the 2004–08 average? (Chapter 8) 	<ul style="list-style-type: none"> • London Councils agrees with the areas for which targets are proposed and particularly supports the target for reducing pedestrian and cyclist casualties. However, we are concerned about the difficulties in measuring accurately the percentage rate of road death and serious injury per kilometre travelled as this would present problems if broken down to borough level, when smaller individual numbers might ‘skew’ data. • London Councils proposes that whole numbers be used for calculations rather than rates per km. • London Councils recommends a five-year ‘rolling’ average be used to measure progress, given that the baseline is a five-year average (2004 – 2008). Also, because fatalities are few in number, a five year average would present a more effective measure as it would address the random fluctuation in annual figures. If five-year averages are not to be introduced it may not be possible to consider deaths and serious injuries separately as the numbers involved may be very small.
4 We are proposing a set of indicators in order to help us to monitor performance (please see below). Do you believe these cover the right	

areas?

1. Rate of road deaths per 100 million vehicle kilometre.
2. Rate of killed or seriously injured pedestrians per 100 million kilometres walked.
3. Rate of killed or seriously injured pedal cyclists per 100 million kilometres cycled.
4. Rate of killed or seriously injured motorcyclists per 100 million vehicle kilometres.
5. Rate of killed or seriously injured car users per 100 million vehicle kilometres.
6. Number of killed or seriously injured casualties resulting from collisions involving drivers under the age of 25.
7. Number of people aged over 70 killed or seriously injured in road collisions per 100, 000 population aged over 70.
8. Number of people killed in road collisions on rural roads.
9. Number of pedestrians killed or seriously injured per capita in 10 per cent most deprived Super Output Areas compared with 10 per cent least deprived.
10. Number of people killed where at least one of the drivers or riders involved was over the legal blood alcohol limit.
11. Number of car occupants killed who were not wearing a seatbelt.
12. Proportion of vehicles exceeding speed limits.
13. Cost of road traffic casualties.

London Councils believes the targets cover the right areas but has some concerns about the way in which they will be measured. Per km rates may be difficult to measure in London and may be of less significance than in some other areas, particularly rural areas, as journey distances are likely to be shorter and roads are more congested. It would be better to compare boroughs in whole numbers.

There should also be an indicator for child deaths and serious injuries. There is a significant over-representation of children from BAME backgrounds among children killed and seriously injured in the Capital, and we should also like to see an ethnicity profile for such an indicator.

Context (Chapters 2, 3 and 4)	
6	<p>We think that the key challenge for road safety from 2010 is better and more systematic delivery, rather than major policy changes. Do you agree? (Chapter 4)</p>
	<p>London Councils agrees that a better and more systematic delivery would be more effective than major policy changes, although we recognise there may be the need for new legislation to facilitate the use of new technology. There is a need to focus on partnership working, particularly in London between Transport for London, the London Boroughs and the Metropolitan and City Police. Effective enforcement is vital and requires additional resources. Also, more effective use of funding for engineering (addressed in further detail under Q13.), as well as additional resources for the boroughs to target education and training at specific groups.</p>
Roads and local authorities (Chapter 5)	
12	<p>How can we most effectively promote the implementation of 20 mph zone schemes in residential areas? What other measures should we be encouraging to reduce pedestrian and cyclist casualties in towns? (Chapter 5)</p>
	<p>Currently, rules for 20mph zones include traffic calming measures and 'self-enforcement'. A relaxation of the regulations for the introduction of 20mph zones would facilitate their implementation. The London boroughs would like more flexibility, for those boroughs which wish to use it, to introduce 20mph zones in residential areas and town centre roads, with individual boroughs able to use whatever measures they consider appropriate, and without the need for physical engineering measures, if the borough feels they are unnecessary.</p> <p>There is also reluctance by the police to enforce 20mph limits and this should be addressed.</p> <p>London Councils proposes that more resources should be targeted at enforcing compliance with 30 mph limits as the majority of fatalities in London are on main roads. Also, consideration should be given to devising legislation that supports the emerging design principles of shared space, to enable priority to be given to pedestrians and cyclists over motor vehicles.</p>

<p>13 How can we provide better support to highway authorities in progressing economically worthwhile road safety engineering schemes? (Chapter 5)</p>	<p>Presently the focus of funding for road safety engineering measures is on sites with existing road safety issues. We would like DfT to consider an approach to funding which also allows for specific sites and routes to be risk evaluated. Although ‘prevented collisions’ cannot easily be measured, this approach would allow experience to be used for introducing preventative measures at comparable locations. Such an approach should be introduced on a pilot basis initially and the impact of the initiatives introduced as a result assessed with targeted monitoring on site before it is introduced more widely. It is likely that additional funding would be necessary for such an approach. However, we believe that such schemes and road safety schemes more generally should also be evaluated in terms of their contribution to sustainable transport, crime reduction and environmental objectives.</p>
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