



The Association of British Drivers

London Region: PO Box 62, Chislehurst, Kent, BR7 5YB; Tel: 020-8467-2686; Web: www.abd.org.uk

Transport for London
Road Safety Action Plan Consultation

Via email: STEngagement@tfl.gov.uk

28 September 2012

London Road Safety Action Plan Consultation Response

Dear Sirs,

In response to the above consultation, we have the following comments. Our general comments are given first, followed by answers to the specific questions raised.

1. The major problem with the consultation document is that there are no budgets given for overall expenditure on road safety in London, and certainly no allocation between the proposed areas for action. Therefore it is impossible to determine whether the prioritization between those various areas, based on likely expenditure, is sensible or not.

This makes it enormously difficult to comment intelligently on the proposals. Neither is there any information on the possible cost effectiveness of the different proposals contained therein.

In summary, this consultation document is therefore grossly defective because respondents will be commenting on it without any understanding of the associated costs or benefits.

2. The document does of course demonstrate the relatively poor safety record of both pedal cycles and powered two-wheelers, versus other modes of transport. For example pedal cycles generated 20% of all KSIs, when they only make up 2% of daily journeys (see page 15). One has to question the enthusiasm for encouraging more cycling when their safety record is known to be so poor. This issue is not even discussed in the document.

3. It is also clear that the risk to pedal cyclists is particularly acute in young adults (see page 16 and 17), and it is a well known phenomenon of late that such cyclists now frequently travel at high speed and ignore traffic signals. With cycle helmets providing little protection against injury above 15 mph, this is particularly dangerous.

4. The "Key Policy Proposals" (given on pages ii onwards of the document) are a very mixed bag of ideas. Some are sensible and some are not.

For example, we certainly support the proposal to "Invest in London's roads to make them safer" where it is suggested that engineering measures can be very helpful in reducing accidents, particularly at identifiable high risk locations. But it then goes on to support the installation of 20-mph zones which in our view are not the panacea that that many people claim. There is no evidence that imposing 20-mph speed limits by themselves has any significant benefit whatsoever. Although there is evidence reported on the benefits of 20-mph zones in London, most of the benefit is surely associated with the associated engineering measures that are often undertaken at the same time.

The second key proposal is "Commit to and improve London's safety camera network". There is no evidence of any benefit from speed cameras whatsoever so why spend more money on them? The ABD has published a review of the evidence on the benefits, or otherwise, of the use of speed cameras - see: www.freedomfordrivers.org/Effectiveness%20of%20Speed%20Cameras%20Review.pdf

It basically shows that the evidence is very doubtful and more evidence has come to light subsequently which indicates to us that expenditure on the installation and operation of such systems is simply wasted. In any case, the Consultation Document does not even attempt to provide any evidence of the benefits versus costs for such expenditure.

We are not opposed to lobbying for improvements in vehicle design and other proposals covered in that section. But we question the idea of lobbying the Government for "changes to national regulations to allow the trial of innovative new approaches". We would be very concerned if different or unique road signage or regulations were established in London that only Londoners might know about. In addition, we do not support local authorities having the ability to do things differently to the rest of the UK, and London should not be an exception to that rule. The result of such ability is simply to allow local politicians, or unelected officials (such as those in TfL or in the London Boroughs), to introduce regulations that are not widely supported and for which there is little evidence of any benefit. We already have such exceptions in London - for example, the use of camera enforcement for yellow box junctions, not permitted anywhere else in the UK, and for which there is no obvious benefit in reducing traffic congestion.

Another "key proposal" is to "Run an ongoing programme of communications campaigns". Is there any evidence of their benefit? None is provided. The ABD is certainly keen on the promotion of road safety education, but we are not convinced that simple publicity campaigns exhorting the public to behave in a certain way have any impact.

The other key proposals are generally sensible, and learning from others is certainly wise, but again there are no costs attached to these proposals.

5. Pages 22 and 23 of the consultation document cover the contributory factors in road accidents. We do not dispute the data, but the conclusion drawn that "this indicates that attention should focus on reducing speeds to reduce more severe injuries" is way too simplistic and is not obviously deducible from the evidence supplied. Many fatal collisions involve criminal acts or the use of alcohol or drugs. To try and tackle those by focusing on speed will have no impact whatsoever. Likewise it is clear from the data supplied that failing to look properly or careless/reckless driving are much more important contributory factors and yet there seems to be little attention proposed to those issues.

6. It is interesting to examine the data on page 29 concerning pedestrian accidents, where it is clear that many of these accidents are "self inflicted" due to alcohol impairment or failing to look properly. It is good that more research is being done in this area, but it is unclear what the solution might be.

7. As regards the rise in accidents to pedal cyclists (see pages 32 onwards), we would certainly like to see more education of cyclists, more enforcement to stop illegal and risky behaviour, and more separation of cyclists from motorized traffic by the use of off-street cycle paths.

8. With regard to the coverage of the use of speed cameras on pages 51 to 52, this is grossly inaccurate and misleading. We have indicated above that there is no evidence of any benefit from speed cameras. The claim on page 52 that cameras "help prevent about 500 deaths and serious injuries each year" on London's roads is simply wrong. It is an estimate based on bad evidence and poor statistical science.

We suggest it would be much better to spend the money currently wasted on speed cameras on other road safety measures – such as Vehicle Activated Signs (VAS) which are known to be more cost effective than speed cameras – there is scientific evidence to support this of course.

As regards the comments on page 53 regarding 20 mph zone limits and average speed cameras, we are absolutely opposed to the use of average speed cameras in both 20-mph and 30-mph zones. They make compliance exceedingly difficult and enforcement is both difficult and expensive. Again there is no evidence on a cost/benefit basis that supports them.

9. There are of course lots of examples in the past of ineffective expenditure on road safety measures. For examples, speed humps are one such, of which of course there is no mention whatsoever in the consultation document – a surprising omission.

According to some recently reported data, it is of interest to note that Islington and Camden in London have some of the worst figures of KSIs per vehicle mile travelled. Those boroughs do of course have more speed humps than many other London boroughs and lots of 20 mph zones. Islington overtook Camden to have the highest rate of KSIs per vehicle mile of all the London boroughs, after KSIs rose from 81 to 100.

Of course speed humps were, and are still being installed, based on simplistic arguments for their merit with no good scientific evidence to support them. They also create lots of problems for disabled drivers or those with certain medical conditions, apart from the routine pain and suffering they inflict on all drivers. We suggest that one proposal that should be included the road safety plan is a positive recommendation not to spend any more money on them.

10. Another example of possible wasted expenditure is the support for Action N3 on page 105 which is the development of a digital speed limit map to enable the use of Intelligent Speed Adaptation (ISA). The ABD has studied the evidence on the use of ISA and in our view it does not show that it has any significant benefit. Developing and maintaining such a digital map will be very costly (but as usual, no costs are supplied).

11. In summary, the Road Safety Action Plan Consultation looks more like a public relation exercise than a serious attempt to outline options, and associated costs, for improving road safety. It looks more like an attempt to gain support for policies already decided upon by TfL rather than a real exercise in public consultation. This is borne out by the specific questions, posed to respondents – particularly in the on-line consultation.

We give our responses to those questions below which we have also provided on-line:

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

Answer: It explains what the challenges are but the proposals seem to be a rag-bag of ideas with no logical grounding in cost/benefit analysis and often based on no scientific evidence of their likely effectiveness.

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

Answer: There is no "balance" indicated as there is no data on the expenditure to be applied to different road users.

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

Answer: There are some useful suggestions but overall we do not feel that these are likely to significantly tackle many of the reported problems.

Question 4: What is your view on a London-wide casualty reduction target?

Answer: Targets are only useful if it is clear how the proposed actions are going to enable those targets to be met. But there is no data supplied at all on the likely impact of the proposals contained in the plan.

Question 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?

Answer: It's generally rather weak on the issue of education of younger road users.

Question 6: Are there any groups / stakeholders who should be given stronger recognition in this consultation document?

Answer: No specific comments although it does have a large emphasis on cyclists and pedestrians as opposed to car users even though private cars are used in a very high percentage of trips in London.

Yours sincerely

Roger Lawson
London Co-Ordinator
Email: roger.lawson@abd.org.uk

About The Association of British Drivers (ABD)

The ABD is the leading independent organisation which represents the interests of private motorists in the United Kingdom. We campaign to protect the rights of individual road users and believe that road transport is a beneficial and essential element in the UK transport infrastructure. We oppose excessive taxation of motorists and are against tolls and road usage charging. We also campaign for more enlightened road safety policies. The Association is a "not for profit" voluntary organisation which is financially supported primarily by its individual members. More information on the ABD is available from our web sites at www.freedomfordrivers.org and www.abd.org.uk

ABD_London_Road_Safety_Action_Plan_Consultation_Sep2012.doc