

Draft Pedestrian Safety Action Plan

Consultation report
June 2014

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1 Background

Safe Streets for London, the Road Safety Action Plan for London, was launched in June 2013 and set a target to reduce killed or seriously injured (KSI) casualties by 40 per cent, from the 2005-2009 baseline period, by 2020. In 2012, a total of 1,123 pedestrians were killed or seriously injured on London's streets - the largest number for a single transport mode. Over a third of all killed and serious injury casualties in London are pedestrians and so reducing the number of pedestrian casualties will be key to achieving the 2020 target.

Extensive data analysis has helped identify the places where pedestrians are at greatest risk in London, the groups of pedestrians that face a disproportionate risk, as well as how and when casualties happen. This draft Plan draws upon all of this evidence, and outlines actions and interventions designed to improve their safety on London's streets.

2 Introduction

The draft Pedestrian Safety Action Plan, compiled by TfL working with key stakeholders, will look to address the concerns and challenges faced by pedestrians across London, helping to turn the capital's streets into a safer, more pleasant place for all.

- The draft plan outlines 30 key actions which will directly target the key factors in collisions and help further reduce pedestrian casualties across London. The actions include:
- By 2016, TfL will double the number of pedestrian crossings operating Pedestrian Countdown from around 200 to more than 400, roughly 10 per cent of all pedestrian crossings in London. TfL will also be strongly encouraging boroughs to adopt Pedestrian Countdown as standard to reduce pedestrian uncertainty at crossings.
- Building on its innovative crossing technology trials, a new 'gold standard' for all new and upgraded pedestrian crossings will be developed. This would look to include far-sided pedestrian indicators on all crossings, with Pedestrian Countdown timers to give pedestrians a clear indication of how much time they have to safely cross the road, as well as ensuring that all pedestrian crossing times take account of national safety standards and the level of pedestrian demand.
- Producing the first London Pedestrian Design Guidance (LPDG) to plan and design for safe and comfortable walking environments. TfL will then use this guidance for all TfL funded streets and public realm schemes and strongly encourage London boroughs to adopt these guidelines for their schemes.
- The Mayor and TfL will continue to lobby the DfT for changes in legislation to improve the safety of pedestrians on London's roads, calling for a stronger emphasis on pedestrian priority over turning vehicles at side roads in the Highway Code. They will also push for the creation of an up to date national digital speed limit map, building on the revised London Digital Speed map which will be released later this year, to revolutionise speed management and information technologies.

3 The consultation

The consultation ran from 31st March to 9th May 2014. Members of the public and stakeholders were asked to comment via TfL website.

The consultation reported here sought the views of a wide range of stakeholders and members of the public who either benefit or will be impacted by the draft plan.

4 Overview of consultation responses

The consultation generated 102 written responses. 84% (86) of the responses were online. 16% (16) were received by email or post.

The responses were received from stakeholders and members of the public. A breakdown of the number of responses received by respondent type can be seen in Table 4.1 below.

Table 4.1: Consultation responses by respondent

| Respondent | Number |
|-----------------------|--------|
| Members of the public | 75 |
| Stakeholder | 27 |

The open question responses from general public have been coded and analysed within each of these groups. Individual comments were coded to one or many of the codes within the code frame as relevant. Those comments not relevant to the consultation were coded as 'Not scheme related'.

There were 135 comments about the draft plan from general public. Many respondents commented about more than one issue. As a result, there are more comments than the total number of respondents.

There were 21 comments concerning about cyclist behaviour in pedestrian environments. This is most frequently raised issue from the consultation response.

There were 19 positive comments about the draft plan. These comments supported the draft plan.

There were 13 comments about reducing car use to create better pedestrian environment. These comments indicated the respondents would like fewer cars on street which creates more attractive pedestrian environment.

10 comments were about 20mph speed limit. These comments were generally supportive about 20mph speed enforcement.

There were 10 comments about having stricter enforcement. The respondents indicated cyclists should not be on pavement but also there should be stricter penalties for lawbreakers.

Table 4.2 below shows the most common issues raised by respondent, sorted by cited frequency.

Table 4.2: Common themes arising from consultation

| Issues | Number of comments |
|--|--------------------|
| Concern about cyclists behaviour in pedestrian environments | 21 |
| Positive comments | 19 |
| Reduce car use to create better pedestrian environment | 13 |
| 20mph speed limit | 10 |
| Stricter enforcement | 10 |
| Call to improve pavements and make them safer | 7 |
| More needs to be done | 6 |
| Not enough time given for pedestrians to cross street | 4 |
| Call for better signposting | 4 |
| Pelican crossings should respond quicker after button pressed | 3 |
| Concern about the document itself/ graphs/ wording etc. | 3 |
| Cycle paths should be segregated | 3 |
| Call for a campaign against irresponsible driving | 2 |
| Change countdown timers to show time to WAIT until light turns green | 2 |
| Call for all junctions to have traffic lights/green man crossings | 2 |
| Call to creat better relationship between cyclists and pedestrians | 2 |
| Should be more control over large vehicles e.g. lorries | 2 |
| Concern about pedestrian arrangements at roadworks; dangerous | 1 |
| Encourage walking more | 1 |
| Behaviour change: focus on those posing the most risk | 1 |
| Better design of junctions needed | 1 |
| Call for more average speed cameras | 1 |
| Call for parking restrictions near crossings | 1 |
| Call for: advance warning to pedestrians of dangerous crossings ahead | 1 |
| Call to make pedestrian more aware of danger | 1 |
| Concern about air quality | 1 |
| Countdown timers do not taking into account partially sighted pedestrians | 1 |
| Imbalance between driver convenience and pedestrian safety/convenience | 1 |
| Incoporate with Health Action Plan | 1 |
| Install green man crossings at all arms of traffic light controlled junctions | 1 |
| More attention needs to be paid to the risks of pedestrians being hit by overtaking vehicles | 1 |
| More people walking improves personal security | 1 |
| More research about speed limiters in vehicles | 1 |
| More research needed as to why pedestrians don't use formal crossings | 1 |
| Needs to be balance between safety by driver caution and safety by design | 1 |
| Not scheme related | 1 |
| Refers to "Feet First' Report | 1 |
| Should be a long term strategy to develop new highway corridors | 1 |
| Update Highway code: Pedestrians always have priority over turning vehicles on side roads | 1 |

5 Responses from statutory bodies and other stakeholders

27 responses were received from stakeholders. Table 5.1 below gives list of these stakeholders. The detailed summary of these responses to the draft plan is in appendix A.

Table 5.1: Summary of comments from stakeholders

| Organisation |
|------------------------------------|
| 20s Plenty for Merton |
| 20's Plenty For Us |
| Brewery Logistics Group |
| EUROMIX CONCRETE |
| GLA |
| GLA Conservatives |
| Go-ahead London |
| Guide Dogs |
| Hackney Living Streets |
| Housing for Women |
| Leonard Cheshire Disability |
| Living Streets (National branch) |
| Living Streets (Sutton) |
| Living Streets (Westminster) |
| London Borough of Camden |
| London Borough of Croydon |
| London Borough of Hackney |
| London Borough of Southwark |
| London Councils |
| London Cycling Campaign |
| Olde Hanwell Residents Association |
| Road Danger Reduction Forum |
| RoadPeace |
| Royal borough of Greenwich |
| Sustrans |
| The Centre for London |
| Vision Zero London |

6 Conclusion

The draft plan was largely supported by the respondents from general public. Many respondents indicated their concern about cyclists' behaviour in pedestrian environment.

Most stakeholders also supported the draft plan, however, many indicated the plan must have clear targets and commitments. They also gave lists of recommendations. Those are summarised in appendix A.

Appendix A – Summary of response from stakeholders

| Organisation | Summary of comments |
|--------------------------|---|
| 20's Plenty for Merton | 40% target reduction is weak. More adventurous and radical ideas would need to be included. |
| 20's Plenty for Us | <p>20's Plenty For Us welcomes 20mph initiatives on TLRN, and recommends following:</p> <ul style="list-style-type: none"> - more use of evidence to illustrate where accidents occurred must be encouraged in Pedestrian Safety Action Plan - the plan must have more explicit timetables and expressing a clear desire must be presented - the plan should target specific locations - pedestrian waiting time at crossings must be minimised - TfL should take more responsibility for the behaviour of vehicles through mandatory ISA to ensure compliance with the posted speed limit - average speed camera technology should further be installed. |
| Brewery Logistics Group | <ul style="list-style-type: none"> - "town centre pedestrian safety pilots" must take into account deliveries in these areas and not just appear with no consultation with the freight industry - with all new technology being brought in for both cyclists and now pedestrians, driver has to be aware of what is going on in front as well as the side and back of the vehicle - doubling the number of pedestrian crossing is a good idea as long as delivery points are again taken into account in the areas affected - with the introduction of 20 mph being increased in large areas it is important not to get London gridlocked especially when the population is to grow to 10 million by 2026, and these people will need to be fed and watered - the issuing of data and maps of high pedestrian risk locations should be extended to freight operators |
| Euromix Concrete | <ul style="list-style-type: none"> - Traffic congestion should be eased as it causes more air pollution. This also increases cost of delivery which causes an adverse effect and asthma. |
| Greater London Authority | The Draft Pedestrian Safety Action Plan is an excellent document with much to recommend it. Nevertheless there are a number of areas where the GLA Conservatives feel that it could go further. |

- **Action 3: Gold standard crossings**
the PSAP should include an action on waiting times (even if it is relation to research to better understand what could be done) to deter dangerous pedestrian behaviour.
- **Action 5: pedestrian ‘town centre safety pilots’**
There has to be a commitment to undertake a town centre pedestrian safety pilot, not just explore the potential.
- **Action 7: Intelligent Speed Adaptation (ISA)**
With the development of a new digital speed limit map, London has the potential to lead the way nationally in the adoption and trialling of ISA and further reduce speeds and consequently deaths on our roads. We feel that the document should go further and include a firm commitment to trial ISA as well as a specific date when the trial will start.
- **Action 13: Operation Safeway**
It would be useful to have more details about future enforcement activities and how they will focus on pedestrian safety. TfL should commit to publishing a programme of activity i.e. by location and including an explanation of what the focus will be.

The Greater
London
Authority
Conservatives

The GLA Conservatives made following four recommendations to the draft Pedestrian Safety Action Plan:

- **Gold standard crossings**
the PSAP should include an action on waiting times (even if it is relation to research to better understand what could be done) to deter dangerous pedestrian behaviour
- **Pedestrian ‘town centre safety pilots’**
There should be a commitment to undertake a town centre pedestrian safety pilot, not just explore the potential
- **Intelligent Speed Adaptation (ISA)**
the document should go further and include a firm commitment to trial ISA as well as a specific date when the trial will start
- **Operation Safeway**
There should be a commit to publishing a programme of activity i.e. by location and including an explanation of what the focus will be.

Go ahead
group

Go ahead group concerns following:

- There appears to have been a lack of bus engagement
- Existing toad speed limits should remain force. The work of the Roads Task Force will result in a reduction in average speed and bus service reliability. It also raises issues around how best to manage predicted congestion. It is therefore important that traffic has the ability to travel faster than 20 mph
- 20 mph zone would be enforced and the knock on effect it might have on inadvertently encouraging motorists to speed elsewhere in a bid to make up for perceived lost time
- Reducing attractiveness of buses, whether by introducing 20 mph zones or re-allocating road space in favour of pedestrians or cyclists are retrograde steps and should be resisted. Therefore, Go Ahead group suggest not to remove any existing bus priority measures or traffic signal priority for bus users
- The impact of population growth

- The overall tone appears biased against road users
- Initiatives such as Operation safeway need to be on-going and not media led. Information collated from this exercise should also be shared.

Guide Dogs The response to Draft Pedestrian Safety Action Plan was published by Guide Dogs on behalf of the Visual Impairment sector including RNIB, NFB, Visionary, Sense, Deafblind UK and JCMBPS.

They raised concerns on shared space, pedestrian crossing, streetwork, and management and maintenance.

Housing for Woman Housing of Woman would like to express the following issues:

- **Re Operation Safeway:**
speeding and illegal u-turns are a big problem on Cromwell Road, and they feel much stricter enforcement of the law using cameras and greater police presence is needed
- **20mph areas:**
they think that if London Bridge and Blackfriars Bridge can be made 20mph zones, then so can Cromwell Road. The area is always full of tourists who do not necessarily take care crossing the road and are used to vehicles travelling on the right
- **PCaTS:**
older people do not like these at all - they make you feel under pressure to move quickly. If you are slow on your feet, seeing that you only have 6 seconds left to get across is very frightening. Cars should wait for older people; they should not be required to sprint.
- **Priority list of key junctions:**
they think the junction of Cromwell Road and Ashburn Place needs to be a priority. TFL have been promising a scheme to improve this junction for more than 2 years and they are still waiting for a public consultation.
- The need to cross roads dictates some older people's choice of shops. They may go to the more expensive shop they can access without crossing the road, when they'd prefer the budget option across the road but they prefer not to take the risk of crossing
- They think there should be much better signposting of where the safe places to cross are
- They were very angry that this consultation was online because none of them have internet access. They feel excluded by the fact that everything happens on line these days. The consultation should have been more widely publicised in local media.

The Centre for London The centre for London raised following four issues:

- There is no clear target
- Lack of political ambition to promote walking
- The Action Plan does not currently provide clear definitions of pedestrian accidents, collisions or casualties, which could be useful to a non-technical audience. Furthermore it would be useful to caveat what is not included within the collision statistics.
- With an ageing population, recent campaigns have highlighted the

growing proportion of the population whose average walking speed is significantly lower than the speed used to calculate green man times. While the Action Plan commits to continue to review signal timings on its network, it makes no explicit commitment to engage in more research on this topic.

Leonard Cheshire Disabilities

Leonard Cheshire Disabilities concerns that a strategy that aims to improve the safety of pedestrians in London makes no mention of any specific measures to support people with mobility issues, or of anyone whose main method of travelling is not walking, but wheelchair or mobility scooter use.

Leonard Cheshire Disabilities makes following recommendations to draft Pedestrian Safety Action Plan.

- Increasing all traffic lights by at least 3 seconds
- Amend the Design Standards for Signal Schemes in London
- Use a distinct type of tactile pavement at informal crossings to ensure people with visual impairments are as well informed as possible as to the safety of crossing at that point
- Ensure accessible drop kerbs are located at regular intervals and at every junction throughout London and that they always correspond with a drop kerb on the other side of the road
- Ensure all pavements are smooth and wide enough at all points for disabled people to get through by 2020
- Develop a guide to London streets so mobility impaired people know where there are accessible traffic lights, drop kerbs and crossings and can be sure that pavements are wide enough to accommodate their wheelchairs. We would be happy to promote such a guide
- Consult with people with mobility issues involved at planning stages of major works
- Publish regular updates on the implementation of these commitments.

Living Street

Living Street concerns the lack of an explicit pedestrian casualty milestone, budget or a named senior champion responsible for its delivery, is likely to undermine its ability to deliver significant reductions in pedestrian casualties in London.

Living street also recommends the Mayor appoint a representative to champion walking and the interests of pedestrians at a senior level.. Such an appointment would immediately signal a renewed urgency within TfL to creating a safer, more walking friendly London.

Living street therefore suggests following:

- Actions need to be specific, targeted and measurable
- Focus on the locations of greatest need

- Traffic speed and enforcement
- Make London's crossings safer.

Living Street Hackney

Living Street Hackney would like to see a clearer, stronger vision articulated in the plan which should be a Zero Vision for pedestrian deaths in London. Living Street Hackney believes reinstatement of pedestrians to be at the top of the road user hierarchy.

Furthermore, Living Street Hackney would like to see following measures:

- A 20mph default speed limit across Greater London
- Restriction of motor traffic volumes through more robust congestion charging, extending the current congestion charging zone and having a longer term plan to extend it across the whole of London
- Kerbside parking poses a significant danger to pedestrians, particularly to children, by obstructing sight lines for both pedestrians and drivers. There should be restrictions on parking to reflect increasing low car ownership in boroughs such as Hackney
- Strong enforcement of motor traffic regulations with dedicated traffic police, recording of motor traffic crimes in Metropolitan crime statistics extensive use of CCTV, ANPR, encouragement of ISA technology, more rigorous confiscation of vehicles for lack of insurance or licences with targets to reduce levels of uninsured driving that particularly affect boroughs such as Hackney, more rigorous tackling of careless and dangerous driving that affects pedestrian comfort and enjoyment levels if not personal security
- Engineering measures that prioritise and protect pedestrians
- Prioritising safety and comfort of pedestrians in all road schemes and maintenance
- Progressively reallocating space for walking away from the carriageway increasing footway widths and reducing car parking spaces and carriageway widths
- Reducing footway clutter and placing signage to assist motor vehicles elsewhere but not on the footway
- Extensive area-wide treatment of neighbourhoods to reduce through traffic rat runs, allowing restricted access to motor traffic by use of modal filters and other mechanisms
- More frequent and improved pedestrians crossings preferably zebra crossings but signalled if preferred by local users. If signalled these should prioritise pedestrian movement, with a max of 30 second waiting time and a crossing speed of max 0.8m/sec
- Allowing for pedestrians to cross anywhere along the carriageway in the majority of streets in London particularly shopping and residential streets by engineering and other measures.

Living Street Sutton

Living Street Sutton generally supports the draft plan.

They are concerned that the cycling lobby is powerful. However, the cycle lobby group does not take into account the problems faced on the streets by those with special needs. The Mayor and TfL should lobby DfT for changes in legislation to

improve the safety of pedestrians on London's roads, calling for a stronger emphasis on pedestrian priority over turning vehicles at side roads in the Highway Code.

Living Streets
Westminster

six recommendations have been made to the draft Pedestrian Safety Action Plan:

- Publish information about borough-controlled areas of high risk to pedestrians
- Use commercially-available anonymous mobile phone tracking data to calculate e.g. KSIs per distance travelled by each transport mode in each borough
- Set a pedestrian KSI reduction target on its 'red routes' in each borough
- Implement flexible bus ticketing to reduce traffic and save pedestrian lives.
- Ensure that all buses are fitted with prominent mid-side-turn indicators, and should apply to buses the most stringent pedestrian safety features proposed for HGVs
- Reduce its estimate of pedestrian speed at crossings from 2.66 mph to a more realistic figure.

London
borough of
Camden

The London Borough of Camden very much welcomes and supports the Mayor's commitment to improve pedestrian safety in the capital, and the actions outlined in the Action Plan. There are several gaps and opportunities to improve the Action Plan particularly:

- **Targets**
The draft Action Plan should set a specific target for reducing pedestrian KSI.
- **KSI data**
The Plan concludes that, even though there has been a rise in KSI in the most recent two years (2010-12), there was a 25% decrease in pedestrian KSIs across the whole period.
- **Distribution**
The Plan also highlights the distributional impacts of KSIs, including the disproportionate impact on particular groups such as older and younger people.
- **Perceptions of danger**
While the Road Safety Action Plan acknowledges that people also need to feel safe, Camden does not consider that the draft Action Plan adequately addresses the issue of perception, particularly among older and young people – the two most vulnerable groups.
- **Children**
The Action Plan should consider how local authorities and TfL could be encouraged to engage more effectively with children and young people, and establish a process for identifying and responding to their needs.
- **Deprivation**
The Action Plan fails to consider the disproportionate impact of KSI on deprived communities.

- **20mph speed limits**
The Plan should include wider consideration of the use of speed restrictions on the TLRN and SRN, especially in town centres or where there is very high foot fall such as at transport interchanges, and to ensure that the proposed Town Centre pilot projects will be successful.
- **Safe crossings**
Camden welcomes and supports the roll-out of pedestrian countdown. The black-out period at pedestrian crossings has been a long-standing source of confusion and anxiety, especially for older people. However, Camden is concerned about existing provision of formal crossing points on Euston Road.
- **HGVs**
The 2013 Road Safety Action Plan outlines the Mayor's intention to consider restricting HGVs at certain times. Not only should this be included as a specific Action in the current Pedestrian Safety Action Plan, this should be a commitment to a review, or even a trial, with deadlines for reporting back.
- **Training for drivers**
Camden requests that training for drivers on those routes that go through the high risk areas should be prioritised.
- **Greater use of Rule 43**
The Plan needs to commit to rebalancing the street environment in favour of pedestrians. This should include: a) Reinstating a road user hierarchy which prioritises pedestrians. b) Reducing the dominance of traffic and car use.

London
borough of
Croydon

Overall, the borough supports and welcomes the aims, details and proposals included in the draft Pedestrian Safety Action Plan. The borough made following comments:

- **LPDG - design guidance**
the position/view/current thinking on the issue of streetscape design and issues concerning the visually impaired (tactile lining/paving, no kerb upstands, etc.)
- **Gold Standard for crossings**
it is taken there will be thorough consultation with mobility impaired people. It is also welcomed that the standard will include for countdown timers as they remove uncertainty and confusion over the blackout/red man periods. With regards setting crossing times to reflect local conditions, we look forward to close liaison with Borough's Access Officers and Road safety teams
- **Borough Junction Priority Lists**
emphasise the importance of close and early liaison with Borough Highways teams
- **Monitoring of Data**
the numbers of accidents involving/affected by pedestrian sensory or mobility impairment should be recorded and reviewed
- **Numbers of crossings operating pedestrian countdown**
whilst the increase to 400 by 2016 is of course welcomed, will there be an increase from 400 in future years, and if so, what will be the roll out and

over what period?

- **Information to Met Police**

will any ANPR equipment/monitoring be part of the enforcement, to pick up those drivers that are uninsured or without MOT, and to provide a wider crime investigation/deterrent function?

London borough of Hackney

London borough of Hackney have raised following issues:

- **Action Point 1**

Whilst it is good to have a Pedestrian design guidance whose principal focus is designing for one group, it is necessary to have a clear linkage and relationship between this and the LCDS. They are a coherent suite of documents but there may be the potential conflicts between the mode specific pieces of guidance, which need to be clearly identified and acknowledged so that the appropriate balance can be sought

- **Action Point 3**

Achieving a gold standard for crossing should included gradient of dropped kerb

- **Action Point 4**

Hackney would prefer London Councils wording for this action

- **Action Point 5**

Removal of the Stoke Newington gyratory must continue. It also is essential to improve A10 for cyclist and pedestrian safety

- **Action Point 9**

The Council would like to adopt PCaTs as standard on any new installations, modification schemes.

- **Action Point 10**

Hackney favours expansion of 20mph trials on the TLRN

- **Action Point 13**

20mph limits must be enforced on TLRN

- **Action point 21**

the draft pedestrian action plan should include the issue of:

- a. cyclists on pavement and formal crossing facilities, and tighter enforcement
- b. mobility impaired people.

London borough of Southwark

Generally the Plan appears to be quite 'light touch' with little commitment to delivery beyond a few key projects, some of which may not even improve conditions for pedestrians. Pedestrian Countdown has been prioritised for investment however it is not clear if this been compared, in terms of both pedestrian safety and amenity, to other measures such as the implementation of pedestrian crossings on signals where there are none.

London Council

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 to achieve this.

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.

However, some other issues seem to be missing in the draft Plan:

- The Plan does not put enough emphasis on accessibility and risk for mobility impaired 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.

London Cycling Campaign

London Cycling Campaign raises following issues:

- **Specific target required**
The Plan must be accompanied by measurable outcomes and a clear strategy and timetable to reduce casualties
- **20 mph limit**
While the Plan appears to recognise the principle that reducing speeds reduces collisions and their severity it does not follow through by taking the logical step of introducing 20 mph speed limits on most TfL roads
- **Intelligent Speed Adaptation**
The plans should progress Intelligent Speed Adaptation. Average speed cameras must also be more commonly used.
- **Safer Urban Driving (SUD)**
All London boroughs now offer Safer Urban Driving (SUD) courses to lorry drivers and this must be made compulsory as a part of a lorry driver's Certificate of Professional Competence training
- **Better Junction programme**
The number of junctions has been reduced to 33. The implementation has been very slow. The Plan should express TfL's commitments to complete the Better Junctions programme. The programme should not be stopped because of concerns about alleged impact on motor capacity
- **Tinted windows**
The plan must include issues of tinted windows which causes the permitted levels of darkness.

Olde Hanwell Residents Association

- There should be many more roads subject to 20 mph limits
- The fines should be doubled so that dangerous use of phones becomes a talking point
- Fixed speed cameras must be further encouraged
- Bus driver behaviour must be strictly controlled
- KSI figure must be publically published frequently
- There is generally far too little direct engagement between RAs and TFL
- Zebra crossings are too close to roundabouts
- Pedestrian subway needs to be encouraged more as the pavements become less safe due to higher density of usage.

Road Danger Reduction

Road Danger Reduction Forum therefore recommends following:

Forum

- **An example: Speed**
Speed cameras are only located where a threshold of incidents has been recorded. They focus on the collisions rather than the background danger. Therefore, it is not an effective speed control strategy
- **Not just pedestrians**
The problem is that a “road safety” analysis of the PSAP type, by being victim based, tends to divert attention away from danger reduction. It should reduce danger at source.
- **What “works”**
The “road safety” approach does not recognise many reductions in road collision casualties have occurred because of changes in general levels of risk taking in society, such as changes in the quality of medical care, or other factors
- Road Danger Reduction forum concludes that an approach based on a more rational discussion of what safety on the road is, and the commitment towards reducing danger at source is the way forward.

Road Peace

The pedestrian safety action plan should:

- reaffirm TfL’s commitment to the Safe Systems approach
- adopt the London Assembly’s Transport Committee’s Feet First recommendations and ensure the plan is also consistent with the TL Health improvement plan
- be more transparent, with a defined budget, the evidence base and key performance indicators (KPI) agreed. Safety perception should be a KPI
- ensure that the justice system contributes to risk reduction for vulnerable road users (VRU) and promotes active travel.

Royal borough of Greenwich

Royal borough of Greenwich suggests:

- Attention should also be paid to the Cycling Design Guidance to ensure there is no conflict between the two and that the measures proposed in each are mutually beneficial. Producing both as a single guidance document would be a welcome way forward
- The council welcomes the introduction of more pedestrian countdown timers at junctions and would welcome the ability to determine which junctions within the borough should be prioritised. However, the increased cost of installing the countdown timers as standard is something that should be married to an increase in specific funding by TfL for such measures
- The support for 20mph zones in increasing pedestrian safety is welcomed and the council will continue to rollout such zones through the LIP
- Relating to several individual actions, the draft document proposes awarding significant weight to road accident statistics in determining areas to target additional measures which is broadly welcomed. However, there is a risk that using statistics based on percentage swings or per capita travelling distance may take the focus for interventions away from the areas where the most actual numbers of casualties are taking place.

Sustrans

Sustrans raised following recommendations:

- Direction should be provided by a clearer goal (for example, reducing pedestrians Killed and Seriously Injured (KSI) as a proportion of total

KSIs); and scope provided by an indicative budget

- With many actions centred on internal TfL and borough processes, there is a strong case for a high-level champion
- Funding should be allocated for local street improvements, to relieve the risk burden placed on the very young and elderly

Vision Zero
London

There are key interventions that are missing from the plan such as:

- Much more extensive use of zebra crossings (both at "informal" crossings and to replace button-operated signals)
- Maximum 15 seconds wait on button-operated signals
- Removal of most staggered crossings
- Operation Rule 170 by the Metropolitan Police, to change the mindset of motorists who do not yield to pedestrians when turning
- Publication of names of pedestrian victims of traffic violence,
- Redrafting of Bus Companies contracts emphasising safety rather than speed.