Living Streets response to the Office of Rail and Road 'Monitoring Highways England' consultation

Introduction

We are the national charity that stands up for pedestrians. With our supporters we campaign to make walking the natural choice for short journeys. We work with communities, professionals and politicians to make sure every community can enjoy safe, attractive streets and public spaces where people want to walk.

We started life in 1929 as the Pedestrians Association and have been the national voice for pedestrians throughout our history. In the early years, our campaigning led to the introduction of the driving test, pedestrian crossings and 30 mph speed limits. More than 85 years later we continue to influence decision makers nationally and locally, run successful projects to encourage people to walk and provide specialist consultancy services to help reduce congestion and carbon emissions, improve public health, and make sure every community can enjoy the benefits of walking.

Summary

In 2013, the Strategic Road Network (SRN) was 4.4 thousand miles long, making up 2.4 per cent of total road length in England but carrying 32.9 per cent of road traffic¹. Whilst it clearly plays a very important role in moving vehicular traffic, it is equally important that it is safe and easy to cross for those on foot. In some places the SRN is part of a local high street or residential area and in these locations roads should not only to be safe, but form part of the place by providing an attractive environment where people will want to walk and spend time.

We therefore support and believe it right that the SRN's performance be measured in terms of the level of service it provides to *all* users and to the communities affected by it, not just drivers.

The new Office of Road and Rail (ORR) will play an important role monitoring and enforcing the performance of Highways England in operating and maintaining the Strategic Road Network. We urge the ORR to pay particular attention to the needs of pedestrians who use the SRN, whose needs in the past have often been badly catered for.

We are pleased that the consultation commits the ORR to working closely with Transport Focus to prioritise its activity around the needs of all users including those walking:

"Transport Focus's new role as watchdog, surveying and representing the views of users, will provide an important input to our work. We will consider those aspects of Highways England's performance that are of greatest importance to users and those affected by the SRN when prioritising our monitoring and enforcement activities" (para 21, page 9).

¹ DfT (2013) Road Lengths in Great Britain: 2013.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/316680/road-lengths-in-great-britain-2013.pdf

As members of the Transport Focus Road User Stakeholder Advisory Board we will continue to champion the needs of pedestrians on the SRN through our engagement in that group.

We support the Government's recent announcement of an allocation of £100m in Highways England's budget to improve walking and cycling conditions on trunk roads and a further £45 million capital funding for integration between the strategic road network and other modes². We hope that the ORR will monitor closely to ensure this money is well spent to maximise its benefits to people walking and cycling on the network.

Response to consultation questions

1. Are you clear what our role will involve? Are there aspects of our role which you would like more clarity about?

Yes. We would like more clarity on the ORR's enforcement role but understand this will be covered in a later consultation.

2. Do you agree with our strategic objective for our highways monitoring role?

We have no objections to the strategic objective of the ORR's monitoring role.

3. Are there specific ways you would like us to engage with you beyond the industry forums already referred to in this document?

We are happy to be engaged as a member of the Transport Focus Stakeholder Group and Highways England's Vulnerable Road User Committee.

4. Have we identified the key areas that require monitoring? Are there particular areas of Highways England's performance and efficiency which you consider require specific focus or an alternative monitoring approach?

We have made the following comments relating to the Performance Specification as set out in Table 3.2 of the consultation.

Document	Component for monitoring	Living Streets Comment
Performance Specification	Making the network safer	We are pleased that network safety is being monitored. We would ask that monitoring against the 40% target is done by mode so that the ORR can monitor improvements in pedestrian safety specifically.
		Network safety should be monitored both in terms of perceptions of safety as well as casualty reduction. Often an area is avoided by

² Department for Transport (2014). Road investment strategy: investment plan.

	Keeping the	We welcome a KPI that monitors footway quality across the
		engaging with communities affected by the SRN and pedestrians affected by road works. We would like to see additional performance measures to ensure those communities living close to the network are not adversely impacted upon.
	Hetwork	We would like to see further performance measures used to monitor the network's performance in terms of creating safe and easy places to walk. There should also be recognition that the SRN performs very different roles at different parts of the network. In some places the network performs an important 'place' function (e.g. high roads in built up areas) and the quality of the pedestrian environment needs to be measured differently here than in locations where the network has very little place function (e.g. motorways). Highways England should also be monitored against their record in
	Helping cyclists, walkers, and other vulnerable users of the network	We are pleased this will be a component of monitoring. We support in principle a KPI to upgrade crossings. However, the effectiveness of this KPI will depend on what form that upgrade takes to ensure it really does deliver better conditions for people on foot.
	Delivering better environmental outcomes	Noise pollution can have a significant negative impact to those living close to major roads and so we are pleased this will be monitored. Air pollution should also be monitored.
	Encouraging economic growth	We do not believe the current Key Performance Indicator (KPI): 'average delay- time lost per vehicle mile' accurately measures the SRN's performance on 'encouraging economic growth'. A wider set of performance indicators are recommended to give a fuller understanding of the networks impact on the local economy.
	Supporting the smooth flow of traffic	Traffic should include all road users, including those walking. Pedestrians should be able to cross the network safely and without undue delay at locations convenient to them. This will be particularly important in places where there a lot of pedestrians (e.g. high streets).
	Improving user satisfaction	We would like to ensure the National Road Users Satisfaction Survey reaches out beyond traditional road users to include pedestrians and the communities affected by the network more widely (in line with Highway England's Strategic Objectives).
		pedestrians due to safety fears and so the worst locations are not always reflected in the casualty numbers alone.

3	network. We recommend some sort of Pedestrian Comfort Level assessment is used ³ .

5. We have set out our initial plans for reporting on Highways England's performance and efficiency. Is there further information or analysis that you think we should produce?

None at present.

6. Is there specific information relating to Highways England which is not currently in the public domain which you think should be prioritised for publication?

None at present.

For more details please contact: Tom Platt – Head of Policy and Research

³ TfL (2010) Pedestrian Comfort Level Guidance https://www.tfl.gov.uk/cdn/static/cms/documents/pedestrian-comfort-quidance-technical-quide.pdf