

DfT Roads Policing Review, October 2020Submission by Reading Borough CouncilQuestion 1Why do you think road casualties have remained fairly constant?

The fall in road casualties achieved prior to 2010 reflect the casualty reduction targets, investment and resources achieved by previous government policy. For example, the money generated through speed cameras was reinvested through local government and partnership arrangements with their respective police service. These resources were then invested in casualty reduction initiatives with clear targets.

The Safer Roads Partnerships brought together local highway authorities and police with a common focus on partnership working to reduce road casualties. Disbanding the Safer Roads Partnerships in 2010 and the lack of any clear road safety policy (with targets) set by central government has stalled the reduction in road casualties. We believe road casualties have remained fairly constant due to advances in car safety and the protection offered to drivers and passengers. This has been at the expense of other, more vulnerable, road users who previously benefitted from the investment made by local highway authority and police resources. The casualty data speaks for itself in that pedestrian and cycle casualties have increased within in urban areas with serious injuries increasing overall.

Question 2what does the evidence suggest has the most impact on reducing deaths on the road?

The evidence suggests any lack of clear government policy with inadequate resources. This limits the effectiveness of what local highway authorities and police can achieve independently. The overall reduction in public funding has led to a fragmented approach to road safety. For issues such as speeding the evidence prior to 2010 indicates that a partnership approach between local highway authorities was effective in reducing casualties. This is seen particularly within the urban environment where speed management through effective traffic management and enforcement has the most significant impact on reducing road deaths. The evidence is obvious where urban areas have a greater mix of users than the rural environment. This leads to a greater risk to the most vulnerable of road users. Casualty statistics show that the urban environment is high risk to the most vulnerable road users. The impact of COVID, resulting in less traffic and increased speed, has led to more serious injury particularly in the urban environment. Complaints, particularly of speeding, have also risen with reduced traffic and quieter roads.

Question 3

what evidence led initiatives demonstrate what could be done to help reduce road traffic casualties.

The evidence of improved road safety up to 2010, and lack of progress since then, demonstrates the value of funding and partnership working. Influencing behavioural change can be achieved through consistent enforcement. Compliance with traffic law and traffic regulations, resulting in behavioural change, will have the greatest impact on reducing traffic casualties. Ultimately this will be achieved through technology and advances in driverless cars. But in the meantime, the use of technologies such as CCTV increases the chances of being caught and this will improve behaviour. Longer term, with the vehicle programmed to comply with traffic restrictions and speed limits, human error and bad behaviour can be much reduced if not entirely eradicated.

Question 4

can you provide examples or empirical evidence demonstrating a relationship between road traffic law enforcement and compliance with road traffic law?

Bus lane enforcement using CCTV with Automatic Number Plate Recognition (ANPR) is a good example of how compliance and behavioural change can be achieved. Reading Borough Council's latest published report:

<https://images.reading.gov.uk/2020/01/Parking-Services-Annual-Report-2018-2019.pdf> shows a steady decrease in bus lane contraventions of 25% from the previous year. This a pattern that we have seen year on year within established bus lanes with CCTV enforcement. Newly introduced bus lanes with CCTV enforcement does see an initial high point in contraventions that falls significantly after the first year.

We also have very specific example of CCTV enforcement of a school keep clear marking. This shows how behaviour of regular users can be influenced very quickly by enforcement action resulting in very high compliance in a short time period.

It is also quite evident that the Highways Agency secures considerable compliance with reduced motorway speed limits through the use of average speed camera enforcement.

Question 5

can you provide any examples or empirical evidence identifying the causal relationship between enforcement and road collision casualty numbers?

As a local highway authority, we are not able to evidence this today. This was one of the advantages of the properly funded safer road partnerships where the sharing of data led to evidence-based initiatives that made a difference.

Question 6

can you provide any evidence or examples that road traffic enforcement can disrupt or detect other non-motoring criminality?

As a local highway authority, we are not party to the information to show such linkages. However, we believe ANPR and barrier managed car parks significantly reduces vehicle crime within car parks.

Question 7

what else alongside enforcement such as education or examples of use of technology and signage has been evidenced to increase compliance?

Signing of average speed camera enforcement at motorway road works is a good example of creating a situation where drivers are uncertain as to where enforcement is active. Due to the distance of average speed enforcement the only certainty for the driver is to not exceed the speed limit to avoid any enforcement action. There is a well-documented case of road works on the M4 at Reading where average speed enforcement infrastructure and signing existed but without the use of cameras. Despite the lack of enforcement, driver behaviour was influenced by the presence of the signing and camera infrastructure. During this time compliance with the temporary speed limit was similar to that expected if cameras had been installed and used. Fixed point speed camera housings which are highly recognisable have the same effect on driver behaviour where there is no way of knowing if a camera is installed.

The educational courses offered as a result of speeding helps individual drivers understand and appreciate the impact of their behaviour and what may happen as a result. These courses are largely seen as being positive but there appears to be a lack of evidence to support any long-term behaviour change.

There is much evidence that physical traffic calming features improves driver compliance with speed limits. However the highest impacting traffic management measures (such as full width road humps) are also the least popular and limited in where they can be used. This is due to their impact on public transport vehicles and emergency services.

Physical width restrictions are effective in preventing oversized vehicles from reaching restricted areas. However, the effectiveness of some of these measures is lost with larger cars with improved safety features and comfort. For example, speed cushions are less effective today in deterring drivers in large family vehicles, such as SUVs.

Width restrictions can also be of limited effectiveness against the most determined of drivers. Additional measures, including protecting footpaths and verges, are often needed today to ensure width restrictions are not abused.

Question 8

how have improvements in design and technology of vehicles such as collision avoidance systems impacted upon road safety?

The casualty statistics show how safer vehicles have reduced casualty rates. Side impact protection systems and airbags have resulted in fewer driver and passenger road deaths and less serious injury. Many cars have improved information systems through technology but this can be ignored or disabled by drivers.

Question 9

in respect of commercial vehicles can you provide any evidence or examples that current levels of enforcement by police and or DVSA* and the sanctions that follow are an effective deterrent to encourage compliance?

As a local highway authority we are not party to this information.

* The Driver & Vehicle Standards Agency (DVSA) also cover MOT tests, driving & operator licences, vehicle recalls - therefore they have a significant role to play in enforcement activities.

Question 10

If not can you provide any evidence or examples of how enforcement or sanctions could be changed to achieve improved compliance.

Enforcement of many HGV restrictions should become a moving traffic offence enforceable by the local highway authority. Initial penalties should be the responsibility of the driver and should not be picked up by the operator. More serious offences should remain with the police and DVSA but with the ability of sharing information and data with the local highway authority in partnership.

Question 11

can you provide evidence or examples of where enforcement of road traffic law can benefit congestion management and air quality?

The ability of London authorities to enforce against moving traffic offences has shown improved traffic flow and less congestion. Enforcement of yellow box markings is an obvious example. There are many situations where junctions become blocked resulting in increased congestion. This will knock on to road based public transport resulting in it becoming a less attractive travel choice. If public transport is left to sit in the same congestion as all other road users, there is little point in leaving the car at home and getting on the bus. An effective public transport service can and will improve both congestion and air quality.

We warmly welcome the confirmation by the DfT in 'Gear Change' (Sept 2020, p30) that "we will commence the remaining elements of the Traffic Management Act 2004, allowing local authorities, rather than the police, to enforce against moving traffic offences....."

It is urgent and essential that these powers are commenced as soon as possible.

Chargeable congestion and low emission zones, backed up by effective enforcement, can be a major factor in reducing congestion and improving air quality. However, without an effective national policy towards road charging schemes there is a real risk that ad hoc schemes will undermine local economies.

Question 12

is there evidence to show how prosecutions contribute to road safety?

As a local highway authority, we are not party to this information.

Question 13

can you provide evidence or examples in particular the use of technology of what could be done to better enable and equip those charged with enforcing traffic laws?

Moving traffic offence enforcement in London is an example of what can be achieved if local highway authorities were able to do the same in the rest of England. We reiterate that we warmly welcome the confirmation by the DfT in 'Gear Change' (Sept 2020, p30) that "we will commence the remaining elements of the Traffic Management Act 2004, allowing local authorities, rather than the police, to enforce against moving traffic offences....."

It is urgent and essential that these powers are commenced as soon as possible.

Bus Lane enforcement is a good example of how consistent enforcement can change driver behaviour.

The use of CCTV/ANPR technology for parking offences prior to 2010 also improved compliance when used responsibly. Areas that generate a large turnover of vehicle through deliveries and customers saw improvements with CCTV enforcement, for example, reducing abuse of loading restrictions.

Average speed enforcement should be developed for use in more complex road networks as managed by local highway authorities. Any enforcement must be consistent, or for drivers to believe there is a very real risk of being penalized, for it to be fully effective in influencing behaviour.

Due to the more complex nature of the local road network average speed camera technology may be more difficult to achieve. But, average speed camera technology does have a role within the local road network to help meet local concerns where speeding occurs.

Thames Valley Police do not prioritise 20mph enforcement as 20mph is expected to be self-enforcing. Unfortunately, even with traffic calming where it exists, driving in excess of 20mph is commonplace. The local road network could benefit from extensive average speed enforcement which would have a positive impact on other and more vulnerable road users. Speed enforcement technology (and many other speeding initiatives) benefitted significantly through hypothecation of speed

camera fines. Further benefits could be achieved with a similar model where technology has moved on significantly in the last 10 years.

Moving traffic offence enforcement in London by local highway authorities have achieved higher levels of enforcement than police resources could achieve. The obvious use of technology is CCTV and ANPR technologies. This is already widely used in London for moving traffic offences, and across the rest of England for bus lane enforcement. Red route enforcement can also be done using CCTV.

What CCTV/ANPR enforcement succeeds in doing is providing a total and consistent approach where there is a strong likelihood of being caught in contravention of the restriction. Where there is a real risk of being caught drivers will comply and behaviour is changed. Parking enforcement through civil enforcement officers is more ad hoc and leads to continued abuse where resources are limited. Within this context the use of CCTV/ANPR enforcement is far fairer where there is a higher likelihood of being caught than the ad-hoc civil enforcement officer approach. The local highway authority should have a role to play enforcing traffic order contraventions and through technology this will be effective.

Question 14

can you provide evidence of existing approaches to enforcement or available technologies that could inform the future shape of road traffic enforcement by police and other agencies?

Speed enforcement technology (and many other speeding initiatives) benefitted significantly through hypothecation of speed camera fines prior to 2010. Involving local highway authorities in speed enforcement, particularly for urban speed limits, could achieve results such as those delivered through bus lane enforcement.

Moving traffic offence enforcement in London, by local highway authorities, has achieved higher levels of enforcement than police resources can deliver.

Local highway authorities such as Reading could play a much more active role in speed enforcement, particularly in enforcing 20 mph speed limit zones.

Local authorities, like Reading, are under continuing and understandable public pressure to extend the number of 20mph zones. We wish to do this but it obviously results in increased need for effective and regular enforcement.

However, it is clear that Thames Valley Police has a declared policy of not supporting 20mph speed enforcement. This may be justified by the police in terms of reduced resources and the need to focus on higher policing priorities, but it leaves an entirely unacceptable situation for locally elected representatives. We need therefore to have the powers to devise more effective methods for enforcing 20mph zones.

Whilst we are not calling for a total decriminalisation of speed enforcement we believe that there is considerable scope to enable local highway authorities to enforce contravention of speed limits up to a certain threshold, e.g. 40mph.

With improved technology and the availability of average speed enforcement through ANPR technology we would wish to take forward initiatives within Reading.

We believe that local authorities such as Reading that are willing and keen to pilot local speed enforcement should be allowed to bring forward such measures. As part of this we would require the fines to be reinvested in further enforcement and environmental measures, as is currently required from bus lane penalties and parking contraventions.

By enabling local highway authorities to become more involved in speed enforcement the police are released to pursue more serious crimes.

Reading Borough Council therefore calls on the Department for Transport, Home Office, Thames Valley Police and the Police and Crime Commissioner for the Thames Valley to work with us to take forward such speed enforcement initiatives in Reading.

5th October 2020