RAC
Public Affairs

ORR CONSULTATION: MONITORING HIGHWAYS ENGLAND

ABOUT THE RAC

With more than eight million members, the RAC is the oldest and one of the UK's most progressive motoring organisations, providing services for both private and business motorists. As such, it is committed to making driving easier, safer, more affordable and more enjoyable for all road users.

The RAC, which employs more than 1,500 patrols, provides roadside assistance across the entire UK road network and as a result has significant insight into how the country's road networks are managed and maintained. The RAC's position as a breakdown service provider means we are well placed to report on safety findings from our vehicles across the UK Motorway Network.

The RAC is separate from the RAC Foundation which is a transport policy and research organisation which explores the economic, mobility, safety and environmental issues relating to roads and their users.

The RAC website can be found at www.rac.co.uk

CONSULTATION RESPONSE

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

The RAC welcomes this document outlining the ORR's role as a regulatory body for Highways England. The RAC believes the roles of the ORR, as outlined in the document is clearly defined for the most part. In particular, we welcome proposals to measure safety, user satisfaction, the smooth running of traffic and helping other road users.

The RAC would welcome greater clarity regarding the ORR's role on the safety of both users of the strategic network and those for whom the strategic network is their place of work. The RAC recognises the valuable contribution ORR has made in monitoring and improving the safety of the rail network. We recognise that the ORR's role on safety on the SRN is less prescriptive but never the less feels ORR has an important role in this area. According to official KSI data, in 2013, motorways carried around 20 per cent of GB motor traffic, but accounted for just 6 per cent of road deaths (100 deaths) and 3 per cent of serious injuries (660 serious casualties) which means they are the safest road type. Mile-per-mile, the risk of death on motorways was around 5 times lower than the equivalent figure for rural roads and 3 times lower than for urban roads. Highways England has casualty reduction targets but this is prompting them to take decisions that might not be in the best interests of national casualty reduction objectives.

By way of an example, Highways England has elected to apply the "all lanes running" configuration to all new sections of managed motorway even though their own risk assessments indicate that the "dynamic hard shoulder" configuration in use on M1, M6, M42 etc. carries a lower risk to users. The choice of the all lanes running configuration is justified by Highways England on the basis that the safety benefits are not required to deliver their casualty reduction targets and the operating costs of the dynamic hard shoulder configuration are slightly higher

than the all lanes running configuration. However, such a decision needs to be prioritised based on national road safety improvement objectives and not against a relatively short term target for Highways England.

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

Broadly speaking, the RAC is supportive of the ORR's strategic objective for its highways monitoring role. We are pleased to acknowledge that the ORR has clearly recognised the importance of stakeholders in the process and the role of feedback from road users. It is important that reviewing processes of road user feedback plays an important role in continuing to drive up standards for improving user experience of the SRN.

The RAC is also pleased to see the commitment to transparency from Highways England, ORR and Transport Focus. We believe that it is essential for confidence in the system that information compiled by Highways England is publicly available and we're pleased that the ORR continues to receive assurances that this will be the case going forward.

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

The RAC believes engagement with ORR both on a bilateral and a cross-industry basis has got off to an excellent start. The role of Transport Focus is well defined in providing feedback and evidence on road user satisfaction but road user representative groups such as RAC can contribute on a broader front on matters such as safety, longer term priorities etc. We believe that it is in the interest of all stakeholders that both the cross-industry forums and, where appropriate, bilateral discussions, continue so that key stakeholders can continue to support the ORR in monitoring the broader performance of Highways England and the network for which they are responsible.

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?

The RAC believes further information is required, but has outlined this below in our responses to questions 5 and 6.

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?

Motorway clearance times: Whilst the ORR has set a target aim of 85% of all motorway incidents being cleared within 1 hour, the RAC is concerned that the other 15%, which fall outside the KPI and are not cleared within the hour are those of greatest concern to road users. We recognise that the 85% target is set because this typically represents those incidents where clear-up times are entirely within the control of Highways England. The other 15% typically involve the Police Service and other emergency services and therefore clear-up times are not

entirely under the control of Highways England. Nevertheless, the RAC expects Highways England to be working with the Police Service and others to reduce clear-up times on the 15% with equal vigour to that applied to reducing clear-up times for the 85%. The performance indicators to not support such an approach.

Road user satisfaction: A target of 90%, whilst welcome, should be more closely linked to year-on-year improvement targets. The absolute measure of customer satisfaction is somewhat subjective (i.e. it reflects how it is measured) and what really matters is that satisfaction improves, as opposed to a prescribed number being achieved. Linked closely with this is the need for road users to better understand what constitutes the strategic network under the management of Highways England, something on which currently there is a very low level of understanding amongst road users.

Making the Network safer: the RAC welcomes targets to reduce KSIs on the SRN but we have already stated in our response to Question 1 that the RAC continues to have concerns about the operation of the 'all lanes running' configuration of smart motorways. Our patrols tell us that this configuration is less safe than the dynamic hard shoulder configuration in the event of an incident or breakdown with drivers are less willing to obey the lane closure signs. This supports Highways England's own risk assessment. The first sections of "all lanes running" hard shoulder have only been open for barely 12 months and it is therefore essential that Highways England make available incident and casualty data sufficiently quickly and with sufficient granularity to enable a true comparison of the performance of the two smart motorway configurations. The RIS assumes that all new sections of smart motorway will be "all lanes running" but this decision can only be justified if the incident and casualty data justifies this decision.

Keeping the network in good condition: whilst we welcome an emphasis to the make the condition of the SRN better, the percentage of 95% is open to question. It implies that 5% of the network or some 220 miles of road may be unsatisfactory with poor quality road surfaces that are a threat to the safety of users and may be damaging to users' vehicles. RAC therefore believes that either a more stretching target is needed or the condition of the 5% is defined in such a way that the majority of the 5% is in a condition that does not represent a safety risk or a risk of damage to users' vehicles.

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?**

The RAC believes Highways England is generally open and transparent. The implementation of the Road Investment Strategy will provide road users with a guarantee that the network will benefit from a sustained period of investment.

As previously mentioned, for the ORR and other stakeholders to be able to understand the performance of Highways England and the running of the SRN, it is important that performance data is made available in a sufficiently timely and granular manner. This is essential so that the need for corrective actions is visible outside Highways England before it is too late to influence performance over the latter half of the RIS cycle. The need for early data on the comparative performance of all lanes running and dynamic hard shoulder configurations of smart motorway is a good example of

where early data can influence the choice of configuration on further sections on smart motorway included for construction in the latter half of the current RIS cycle.

Similarly, it is noted that the ORR has not had any targets imposed for helping cyclists, walkers and other vulnerable users of the network. This might be because there is a lack of data available on which to base a target but we would encourage the ORR to consider this matter further, possibly with a view to defining performance measures and targets in future RIS documents.

Next steps

The RAC is happy to provide clarification or further detail on any of the points raised in our responses to OSRR's questions. Please feel free to contact any of the below.