

# **ROAD SAFETY ASSESSMENT POLICY AND PROCEDURE**

## **SOLIHULL MBC**

**JUNE 2020**



### **Highway Services**

**'Engineering the future'  
To keep people moving safely**

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## **Solihull MBC Road Safety Assessment Policy & Procedure**

### **1 Introduction**

- 11 Road safety audits are undertaken on highway schemes at various stages of their design, construction and completion to ensure that they will not create future highway safety problems.
- 12 In 2003, the Highways Agency published revised guidance for carrying out Road Safety Audits on Trunk Roads and Motorways in document HD 19/ 03. This document was also recommended for use by local authorities on their roads but was not a mandatory requirement.
- 13 The Institution of Highways and Transportation (IHT) published Road Safety Audit Guidelines in 2008. The guidelines gave advice on where road safety audits may be approached in a different way to the requirements set out in HD 19/ 03 in order to fulfil the objectives of all authorities undertaking Road Safety Audits. The advice was based on a practical and reasonable response to the issues facing local highway authorities.
- 14 The European Commission (EC) produced Directive 2008/ 96/EC on Road Infrastructure Safety Management. The aim of the EC Directive was to ensure that safety was integrated into the planning, design and operation of all road infrastructure on the Trans-European Road Network (TERN).
- 15 HD 19/ 03 was reviewed and guidance note, HD 19/15, was published by Highways England in March 2015.
- 16 GG 119 was issued in October 2018, by Highways England, to replace HD 19/15 and is the latest guidance.

### **2 Purpose of Policy**

- 21 The purpose of this document is to set out the road safety assessment policy and procedure adopted by Solihull MBC following the issuing of the above guidelines.

### 3 Policy

- 31 The Institution of Highways and Transportation Guidance indicates that it is essential for each local highway authority to review its internal works programme and its development schemes, and assess the level of audit which is appropriate.
- 32 The assessment can include the cost of a scheme but should not be restricted solely to cost. Issues such as the impact of the scheme in terms of traffic levels and mix, the status of the road within the road hierarchy and the exposure to risk for vulnerable road users should also be taken into account.
- 33 The following definitions set out the seven levels of safety assessments adopted by Solihull MBC. These are the basis for ensuring that the level of safety assessment is appropriate to the scale, complexity and nature of the proposed works:-
- A.** A full safety audit carried out in accordance with GG 119.
  - B.** A safety assessment at the three main stages: 1 - Preliminary Design, 2 - Detailed Design, and 3 - Pre-Opening. On occasions Stages 1 & 2 may be combined if necessary.
  - C.** As A or B above with a safety assessment prior to a traffic signal installation being switched on (Stage 3a) and a further assessment after the traffic signals are operational (Stage 3b).
  - D.** As A, but in addition a quality audit will be required. (*Section 9 outlines the process for undertaking a quality audit*).
- (*Section 5 outlines the procedure for Level A, B, C, & D safety assessments*).
- E.** An independent road safety review carried out by an experienced Road Safety Engineer. (*Section 6 details the road safety review process for Table 1 schemes and Section 7 gives the process for Table 2 schemes*).
  - F.** Self Certification where a Design Engineer will certify that the design has been assessed by him/ herself. (*Section 8 details the self-certification process*).
  - Q.** A Quality Audit that includes a Road Safety Champion will be required. (*Section 9 outlines the process for undertaking a quality audit*).
- 34 If the engineer undertaking either a Level E or F assessment considers at any time that the scheme necessitates a different level of safety assessment they are to refer the project to the Solihull

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MBC Highways Management team who will determine the appropriate level of road safety review which is required.

- 35 The Solihull MBC Highways Management team undertakes a review of the collision data within the borough every two years. The two yearly collision analysis may be used as a substitute for the Stage 4 safety audit. Consequently, only larger schemes will require a Grade A assessment.
- 36 The following two tables indicate the **minimum** level of safety assessment. Table 1 includes works that are generated by Solihull MBC and the complexity of the scheme indicates which level of assessment should normally be used. Table 2 includes works funded by other sources, such as developers. The type of assessment of these schemes is determined by the level of impact that the scheme or development has on the immediate road network in terms of increased usage by all road users.

**Table 1 – Level of Safety Assessment of Solihull MBC Schemes**

Type of Scheme	<£10, 000	£10, 000- £125, 000	£125,000- £249, 000	>£ 249, 000
Bridge Assessment & Strengthening	F	F	F	B
Highway Efficiency Measures	F	F	N/A	N/A
Highway Improvement Schemes	F	B	B	A
Local Safety Schemes	E	B	B	A
New/Improvements to Pedestrian Crossings or Traffic Signal Installations	F	B/C	B/C	A/C
Road Maintenance schemes which involve significant changes to the existing highway layout	F	F	F	B
Schemes in Areas of Special Interest *(see paragraph 3.7)	Q	Q	D	D
Streetscape Schemes **( see paragraph 3.8)	E	Q	D	D
Vulnerable Users	E	B	B	A

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**Table 2 – Level of Safety Assessment of Externally Funded Schemes**

Type of Scheme	Impact 1	Impact 2	Impact 3
Section 38 – New estate roads	E	B	D
Section 106/ 278 – Works	E	B	A or D ( as appropriate)

*Impact 1* – Where daily increased vehicle movements of less than 500, and/or less than 100 vulnerable road user movements (pedestrians or cyclists) are predicted to be generated by the development.

*Impact 2* – Where daily increased vehicle movements of between 500 and 5000, and/or between 100 and 500 vulnerable road user movements (pedestrians or cyclists) are predicted to be generated by the development.

*Impact 3* - Where daily increased vehicle movements of over 5000, and/or more than 500 vulnerable road user movements (pedestrians or cyclists) are predicted to be generated by the development.

- 37 In Table 1, schemes in the following areas of special interest may require a Grade Q, Quality Audit. The final decision will be made jointly by the Solihull MBC Highway Management and Transport Planning teams:
- Rural road in a village with frontage/pedestrian movement.
  - Strategic urban roads with frontage/pedestrian movement.
  - Centre's of all scales including parades of shops.
  - Conservation areas.
  - Built up areas with major pedestrian movement.
- 38 In Table 1, "Streetscape" is a term used to describe the natural and built fabric of the street. Streetscape schemes improve the design quality of the street and its visual effect, particularly how the paved area (carriageway and footway) is laid out and treated. Such schemes may also include buildings, the street surface, and also the fixtures and fittings that facilitate its use – from bus shelters and signage to planting schemes.
- 39 Generally, temporary traffic arrangement schemes will not be audited as the design of such schemes should be considered as part of the CDM process used to monitor the proposed construction/ installation of a highway improvement. Furthermore, the Department for Transport publication's "Safety at Street Works, A Code of Practice", and "Chapter 8 of the Traffic Signs Manual 2009", contain guidance on the safe planning and execution of this type of scheme. However, for schemes with a complex temporary traffic arrangement or that will

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affect the network for a considerable period, particularly on high speed roads, an audit may be required at the discretion of the Solihull MBC Highways Management team.

- 310 It may only be necessary to undertake a quality audit and not a full safety audit for a Level D assessment. The final decision will be made at the discretion of the Solihull MBC Highways Management team.
- 311 Although, generally, Tables 1 & 2 will be followed the Solihull MBC Highways Management team reserve the right to request a different level of road safety assessment to be undertaken if it is considered appropriate.
- 312 A decision on what level of safety assessment is required for future schemes which are received and not covered by the general descriptions given in Tables 1 & 2 will be made on an individual basis by the Solihull MBC Highways Management team.
- 313 Stage 3 road safety audits should be carried out within 1 month of the scheme opening unless otherwise agreed with the highway authority.
- 314 Stage 4 rsa report shall be produced where road traffic collisions have been recorded in the vicinity of the major highway scheme over the post 12 month period of validated road collision. Such a report is not required if there have no reported incidents over this period. The decision shall be recorded and kept in the project file if the highway authority decides not to proceed further with the Stage 4 rsa.
- 315 The Highways Management team shall decide whether to undertake an interim rsa. An interim rsa can provide the benefit of early identification of potential road safety problems leading to savings in both programme and design costs. An interim rsa is particularly beneficial to larger projects with accelerated programmes, such as highway schemes involving early contractor involvement. An interim rsa supplements the rsa at stages 1, 2 and 3. The interim rsa does not replace a particular stage of rsa. The rsa process for an interim rsa shall be completed in accordance with the requirements of the relevant rsa stage. It may be undertaken during the construction process with the agreement of the highway authority. Elements of the constructed scheme may be subjected to interim rsa, when works are partially complete or when individual elements or sections of the scheme are complete and opened to road users in stages.
- 316 Section 4 of this document details the auditor requirements for Grade A, B, C, & D assessments. Sections 5, 6, 7 & 8 of the policy document detail the separate levels of safety assessments and outline the procedure for each. Section 9 details the procedure for undertaking Quality Audits.

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### 4 Auditor Requirements for Levels A, B, C, D

- 41 This section shall apply to all highway schemes meeting the requirements for Road Safety Assessments – Levels A, B, C and D, in Tables 1 and 2, in section 3. 6.
- 42 The Road Safety Assessment ( Levels A, B, C, & D) Team for each stage of audit will comprise of at least two safety auditors with the levels of training, skills and experience defined in Table 3.

**Table 3 –Road Safety Auditors Experience and Training Requirements**

T i t l e	E x p e r i e n c e / T r a i n i n g R e q u i r e d
<b>Audit Team Leader*</b>	<ul style="list-style-type: none"> <li>• A minimum of at least 4 years Accident Investigation and Prevention or safety engineering experience.</li> <li>• Completion of 10 days formal collision investigation or road safety engineering training.</li> <li>• Undertaken at least five road safety audits in the last twelve months as a team leader or member.</li> <li>• Undertaken at least two days formal Continuous Professional Development road safety training in the last twelve months.</li> <li>• Hold a Road Safety Auditor Certificate of Competency. **</li> </ul>
<b>Audit Team Member*</b>	<ul style="list-style-type: none"> <li>• A minimum of at least two year' s accident investigation/road safety experience.</li> <li>• Completion of 10 days formal collision investigation or road safety engineering training.</li> <li>• Undertaken at least five road safety audits in the last two years as either team leader, m ember or observer.</li> <li>• Undertaken at least two days formal Continuous Professional Development road safety training in the last twelve months.</li> <li>• Hold a Road Safety Auditor Certificate of Competency. **</li> </ul>
<b>Audit Team Observer</b>	<ul style="list-style-type: none"> <li>• A minimum of one year' s accident investigation or safety engineering experience.</li> </ul>
<b>Specialist Advisor</b>	<ul style="list-style-type: none"> <li>• Be an experienced professional with a background in road safety, for example, police officer or be a person with a specialist interest such as a wheelchair user or a partially sighted person.</li> </ul>

*\*Experience should be relevant to the type of scheme being subject to rsa and identified in the proposed rsa team member's curriculum vitae.*

*\*\*At least one member of the road safety audit team, either the team leader or team member, should hold a road safety auditor's certificate of competency which has been acquired in accordance with Appendix G of GG 119.*

- 43 In schemes where it is felt appropriate the Audit Team Leader can ask advice from a specialist advisor, e.g. a traffic signal engineer, highway maintenance engineer or police officer (preferably a traffic officer). The advisors should not be considered as part of the Audit Team.



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- 44 The road safety audit team and its advisors should not exceed six individuals. Larger groups can make the road safety audit process more complex and may increase the likelihood of health & safety issues. Site visits shall be carried out by all members of the rsa team together.
- 45 The Council' s Highway Management team may require organisations/ auditors that wish to undertake audits within the borough to provide evidence that they meet the necessary standard.
- 46 It is essential that the members of the road safety audit team are independent and have had no previous involvement in the design of the scheme.
- 47 For external organisations, such as independent engineering consultant's, suitability will be determined by the submission of their curriculum vitae to the Solihull MBC Highway Management team. Requests may be made for copies of previous road safety audit reports which have been undertaken by the organisation to allow the Council to satisfy itself that the organisation has the experience and expertise to undertake the audit. The previous safety audits will also be used to determine if the necessary quality required by the Council can be met.
- 48 The organisation undertaking the audit may be required to submit a record of the CPD training undertaken by its members during the last twelve months to demonstrate that they meet the requirements stipulated in Table 3. The CPD record should include road safety audit, collision investigation and road safety engineering training. It may also include other relevant areas such as highway design, traffic management and highway maintenance.

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### 5 Policy and Procedures for Levels A, B, C & D

- 51 The Design Team Leader is responsible for providing the Audit Brief and should send a formal request for any of the Safety Assessment Levels. The Brief should include the following (where appropriate):-
- A description of the proposed highway scheme which identifies its objectives.
  - A full set of scheme drawings.
  - Any departures from standard.
  - A statement clarifying the elements of the scheme to be included within the scope of the road safety audit.
  - Associated information such as design speed, speed limits, traffic flows, forecast flows, queue lengths, NMU flows, desire lines and possible environmental constraints.
  - Any risk assessments undertaken as part of the design process.
  - Other relevant factors such as nearby developments, schools, care homes etc. Police sector contact details should be provided.
  - Highlight if the site should be visited during a particular period, for example, school times.
  - Most recently available three year personal injury collision history of the site.
  - Details of any changes to the scheme since the preceding stage audit was undertaken or which are not shown on the design/ as built drawings.
  - Appropriate scale plans for the audit team to use for inclusion in the report.
  - Previous road safety audit reports, interim road safety reports, road safety audit response reports, exception reports and highway authority adjudication responses.
- 52 The Audit Team shall prepare a written report using the template provided in Appendix D, of GG 119, for Stage 1, 2 & 3 rsas and Appendix 4 for Stage 4 and include details of: -
- the scheme being audited.
  - the stage of audit.
  - the documents and drawings examined.
  - the identity of the Audit Team Members as well as the names of other contributors such as the police or highway maintenance/traffic signal engineers.
  - the site visit (date and time, weather and traffic conditions).
- 53 Furthermore, each road safety problem identified should be referenced as follows:
- Location of problem.
  - Specific casualty problem defined (i.e. which road user is at risk).
  - Detailed explanation of the problem with the type of collision or incident likely to occur if the issue is not addressed stated.
  - Quantify the level of concern.
  - Each problem must be followed with an associated recommendation. The audit team should aim to provide a

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proportionate and viable recommendation to either eliminate or mitigate the identified problem.

- Each problem should be separately referenced and identified on a location map. Photographs of the problem should be provided if they are available.

- 54 A statement signed by both the audit team leader and member should be provided at the end of the report.
- 55 In addition, the findings of the audit are then to be summarised in a “table” format which gives the Problem, Designers Response and the Highway Authority’ s response. The table will allow the subsequent processes following the road safety audit to be more easily tracked. A specimen copy of the table format which is to be used is given in Appendix 2.
- 56 The completed report should be sent to the scheme designer/ developer for his consideration and responses to the issues raised.
- 57 The design team/ developer is required to respond to each of the issues raised by the safety audit by completing the relevant column in the table. They should state whether they intend to undertake the recommendation made by the road safety auditor. A reason should be provided explaining why a particular recommendation is not to be accepted. The designer may offer an alternative solution to resolve the problem.
- 58 The Solihull MBC Highways Management team will consider the road safety auditor’s recommendation together with the designer’ s response and where there is a difference of opinion indicate a way forward.
- 59 The highway authority decision will be recorded in the appropriate column in the table and kept with the other documents associated with the particular audit, such as drawings etc., on the “ electronic” road safety audit file. The highway authority will then advise the designer of the decision. It will be the designer’s responsibility to forward the decision of the highway authority to the road safety auditors/developer’s as appropriate.
- 510 The scheme should not commence on site until all the highway authority comments have been received and any modifications that are required incorporated into the design. With regard to external developments, a Stage 1 rsa report should be undertaken before planning consent is applied for as this demonstrates that potential road safety issues have been addressed.
- 511 The completed audit together with the developer’s/designer’s responses, the Council’ s decision, and scheme drawings will be kept on file for a period which complies with the Council’s corporate retention schedule. It is currently five years for the category of road safety auditing.

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### **6 Road Safety Review Level E (for Table 1)**

- 61 This section shall apply to all highway schemes meeting the requirements for Level E Road Safety Review in Table 1.
- 62 An Engineer from the Council's Highways Management team is considered to be an appropriate officer to undertake the road safety review. The independent engineer from the Council's Highways Management team will review the drawings submitted and may undertake a site visit. The necessity for a site visit will be made on an individual scheme basis at the discretion of the engineer.
- 63 The Engineer will send an email highlighting the problems identified and the changes that the designer is recommended to make.
- 64 The designer should respond to the email by either:-
- accepting to undertake the changes requested or
  - accept the problem raised but suggest an alternative proposal together with the background reasoning or
  - disagree with the road safety engineer's recommendation and submit appropriate reasoning for not undertaking the change.
- 65 The Solihull MBC Highways Management team should then reply to the designer stating whether or not it accepts the answer.
- 66 The email trail will be kept on the electronic road safety audit file for the project.
- 67 The scheme should not commence on site until all the highway authority comments have been received and any modifications that are required incorporated into the design.
- 68 If the engineer undertaking a Level E assessment considers at any time that the scheme necessitates a different level of safety assessment they can refer the project to their line manager who will determine the appropriate level of road safety review required.

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### **7 Road Safety Review Level E ( for Table 2)**

- 7.1 This section shall apply to all highway schemes meeting the requirements for Level E Road Safety Review in Table 2.
- 72 Initial comments regarding all highway matters, including road safety issues, will be made on the planning application by an Engineer from the Council's Transportation Policy team. The Transportation Policy Engineer who undertook the primary review will take responsibility for the road safety aspects of the scheme.
- 73 The planning application drawings should be forwarded to the Council's design team if they result in a highway improvement which is likely to impact on road user behaviour to determine if a road safety review is required. If necessary, the Road Safety Review should be undertaken and any issues which arise resolved prior to the granting of the planning consent wherever possible.
- 74 Low level/impact schemes may only necessitate the Road Safety Review to be undertaken during the Technical Approval process or be self-certified by the Design Team during this check.
- 75 Any further issues that are raised by the road safety engineer should be emailed to the Transportation Policy Engineer to make a decision as to whether they are to be forwarded to the designer/developer to resolve.
- 76 The Transportation Planning Engineer should provide an explanation, by return email, for the reasons why a particular point is not to be forwarded to the designer/ developer. The email trail will be kept in the electronic road safety audit file for the scheme.
- 77 Any issues that the Transportation Planning Engineer feels do require further investigation should be passed to the Council's Design Team to forward to the designer/developer.
- 78 The designer/ developer should provide a response, by email, to all the points that have been forwarded by Council's design team stating whether they are to be implemented or giving the reasons if they are not.
- 79 The Council's design team will seek guidance from the Highway Management team, when the reasons for not undertaking a recommendation are given, and make a decision advising the designer/ developer of the outcome. The email trail will be filed in the electronic scheme folder.
- 7.10 If the Transportation Planning Engineer undertaking the initial review at planning stage considers that the scheme necessitates a different level of safety assessment they can refer the project to the Council's Highway Management team who will determine the appropriate level of road safety review required.

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### **8 Self Certification Level F**

- 81 This section shall apply to all highway schemes meeting the requirements for Level F, Self Certification, in Tables 1 and 2, in section 3.6.
- 82 A design engineer will certify that the design has been assessed by him/her.
- 83 The design engineer may use the checklists, in Appendix B, of G G 1 1 9 .
- 84 The design engineer will record that they have undertaken the self-certification by initialling the project drawings and providing a written statement, preferably by email, to the Solihull MBC Highways Management team stating that they have undertaken the self-certification process.
- 85 The Solihull MBC Highways Management team will place the design engineer' s self-certification statement together with copies of the scheme drawings and documents on the electronic road safety audit file.
- 86 If the engineer undertaking a Level F assessment considers at any time that the scheme necessitates a different level of safety assessment they can refer the project to the Solihull MBC Highways Management team who will determine the appropriate level of road safety review required.

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### **9 Quality Audit Definition and Process Level Q**

- 91 Quality Audit is a process, independent of, but involving the design team, which through the planning, design, construction and management stages of a project, provides a check that high quality places are delivered and maintained by all relevant parties, for the benefit of all end users. Quality Audit is a process applied to highway, traffic management or development schemes, which systematically reviews projects using a series of evaluations and ensures that the broad objectives of place, functionality, maintenance and safety are achieved.
- 92 Any schemes that fall within road safety assessment Levels D or Q, in Tables 1 & 2 in paragraph 3.6, will require a Quality Audit to be undertaken.
- 93 Quality Audit for small schemes should be proportionate and may on occasions only involve one brief review meeting before construction commences. The final decision will be made jointly by Solihull MBC Highways Management and Transport Planning teams.
- 94 For larger schemes, a quality audit will include a review meeting( s) at outline design, detailed design, post construction and post opening stages where the project is reviewed against the design objectives set out in the brief.
- 95 All project briefs should include:
- Functional objectives
  - Streetscape objectives
  - Safety objectives
  - Maintenance objectives.
- 96 In addition, to the design team and appropriate council officers, the review meeting(s) should include a representative who is a Road Safety Champion. This individual should be independent and had no previous involvement with the scheme.
- 97 The Road Safety Champion should be familiar with the current version of Manual for Streets and be of the experience and standard required of a Road Safety Audit Team Leader detailed in Table 3 in paragraph 4. 2. The champion's role is to challenge the design in terms of highway safety and public realm quality.
- 98 The results of the user audit should be worked through. The discussion and agreed decisions should be recorded and action points for the detailed design agreed.
- 99 Further quality audits should be planned at the detailed design stage and on the completion of construction. A final user audit will be carried out when the scheme is completed and opened.

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## **Appendix 1 - Glossary of Definitions**

**Audit Brief** - The instructions to the Audit Team defining the scope and details of the Highway Scheme to be audited, including sufficient information for the audit to be undertaken.

**Audit Report** - The report produced by the Audit Team describing the road safety related problems identified by the team and the recommended solutions to those problems.

**Audit Team** - A team that works together on all aspects of the audit, independent of the Design Team. The team shall consist of a minimum of two persons with appropriate levels of training, skills and experience in Road Safety Engineering work and/ or Accident Investigation.

**Audit Team Leader** - A person with the appropriate training, skills and experience who has overall responsibility for carrying out the audit, managing the Audit Team and certifying the report.

**Audit Team Member** - A member of the Audit Team with the appropriate training, skills and experience necessary for the audit of a specific scheme reporting to the Audit Team Leader.

**Audit Team Observer** - A person with the appropriate training, skills and experience accompanying the Audit Team to observe and gain experience of the audit procedure.

**CDM** – The CDM ( Construction Design and Management) Regulations 1994 require clients to appoint a planning supervisor and principal contractor, and provide a health and safety plan & file.

**Design Team** - The team undertaking the various phases of scheme design, preparation and construction.

**Highway Authority** –Solihull MBC's Highway Services Division.

**Road Safety Audit** - The evaluation of Highway Improvement Schemes during design and at the end of construction ( preferably before the scheme is open to traffic) to identify potential road safety problems that may affect any users of the highway and to suggest measures to eliminate or mitigate those problems. The Stage 4 Audit will include the analysis and reporting of 12 and 36 months of completed personal injury accident data from when the scheme became operational.

**Road Safety Engineer** – An engineer from the Council's Highways Management team. Can be at Principal Engineer, Senior Engineer or Engineer level.

**Vulnerable User** – A pedestrian, a highway worker, or a person riding an animal, scooter or a bicycle on the highway.



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### Appendix 2 – Specimen Road Safety Audit Feedback Form

#### Title of Scheme - Road Safety Audit Feedback Form

Item No.	Problem identified by Auditor's and Recommended Measure	Designers' Response	Highway Authority Response
<p>RSA Para no.</p>	<p><b>PROBLEM</b></p> <p><u>LOCATION</u> The location of the problem (the problem item no. should be identified on an accompanying plan in the audit).</p> <p><i>Summary: A statement identifying the road safety issue.</i></p> <p>Problem Description: A description of the problem highlighted by the road safety auditor's and stating the type of collisions likely to occur if it is not addressed.</p> <p><u>Recommendation</u></p> <p>The measure(s) recommended by the road safety auditor's to alleviate the problem described above.</p>	<p><u>Problem Accepted &amp; Recommendation to be undertaken</u></p> <p><i>A statement by the designer accepting this particular road safety audit problem and agreeing to undertake the auditor's recommended solution.</i></p> <p><u>OR</u></p> <p><u>Offer an alternative solution.</u></p> <p><i>A statement by the designer to resolve the problem by an alternative measure together with the reasoning.</i></p> <p><u>OR</u></p> <p><u>Recommended Measure not accepted.</u></p> <p><i>A statement by the designer refuting that this is a problem together with the background reasoning.</i></p>	<p><i>A statement by an engineer in the Council's Road Safety Team adjudicating on whether the road safety audit problem is justified and if the designers' response is adequate. The highway authority comment can offer an alternative solution if it is considered appropriate.</i></p>