To: Road Safety Consultation, 2/13 Great Minster House, 76 Marsham Street SW1P 4DR
From: Roland Graham, a trustee, Cycling Projects – particulars at end

Dear Sirs

A SAFER WAY

We welcome the opportunity to comment on this draft strategy. We are very pleased to see that it notes links with encouraging active travel.

We answer positively and have nothing to add in response to questions 1-2, 7-10, 13, 16-20, numbered as in Appendix C.

Roads and local authorities

Paragraph 5.2 states

"We are concerned that road safety engineering schemes are rarely appraised on the same basis as other transport schemes. They tend to be justified in terms of first year rates of return rather than the whole-life benefit-cost ratios and to take little account of their wider impacts, for example on travel time, or of regression to the mean – whereby sites are chosen for engineering action on the basis of short-term increases in casualties that may be expected to reduce without intervention."

We consider that schemes should be justified in terms of whole-life benefit-cost ratios. While many schemes involving road markings have a short life, yet can produce a high benefit-cost ratio, other schemes have a longer life with a good ratio. Even if many more schemes could be justified through their ratios, they should be implemented, and even in times of shortage of funds an annual programme of road-safety schemes could include some that would not be justified by the current criterion.

Accident rates should be estimated on records over a long period, as is often used in research, of over 3 years, unless there has been a significant change in circumstances. Allowance should be made for any long-term trend in accidents rates as would be found at a range of casualty sites.

Urban roads. A question for Chapter 5 is "What other measures should we be encouraging to reduce pedestrian and cyclist casualties in towns?". Cycle lanes have a role in helping cyclists, but they are not well understood by drivers – most lanes, and in particular, contra-flow ones, are often parked in. Policing has a role here to encourage proper use of road space, and explanatory signs, hopefully for a limited period, might be usefully deployed.

In implementing facilities for cyclists, safety reasons should often lead to giving priority to treating junctions. It should be realised that safety reasons for incorporating advanced stop lines and lead-in lanes are to help cyclists turn right or to go straight on where a major flow turns left, and this requires suitably designed lead-in lanes. On the other hand, a cycle track or perhaps a cycle lane that would be little used and could be expected to be abused because of low policing and other reasons, should perhaps not be implemented until cycling demand increases, though space should be left for implementation when the time is ripe.

Rural roads. Many speed limits seem to be erratically set. On windy narrow lanes it matters little that the speed limit is 60 mph because traffic goes much more slowly. On main roads, however, a lower speed limit or an advisory speed would help drivers to adjust their speed to a much safer level. On main roads the speed limit in some villages is 60 mph, in others it is lower, and the extent of the limit often appears somewhat arbitrary. Dealing with these anomalies could bring about more respect for limits and a significant reduction in casualties.

Some speed-limit signs can come into the view of a driver so that there is a very short time for the speed to be reduced. Since some drivers appear to be reluctant to brake where this occurs, it would help to move the speed-limit sign or to use a warning sign of the limit.

Vehicles

To secure greater road-safety benefits from vehicles, one helpful feature would be to make fronts less injurious to pedestrians.

Crash avoidance systems could have great potential and we expect them to grow in importance. Attention also needs to be given to automatic forms of transport, which are now under development. These could help a greater number of users than can drive cars. It is more generally worth noting that greater use of public transport will usually lead to reductions in road casualties.

Behaviours

The first point of paragraph 7.8 is:

"We want to support responsible road-user behaviour so that expectations are clear for all age groups".

We suggest that road-user types are as important categories as age groups, and would expand this by adding "and road-user types".

There has been some discussion about the minimum age at which a driving licence can be held. Because behaviour can be improved by realising some consequences of bad behaviour, which is common among young drivers, we would encourage very young drivers to obtain cycling experience. E.g., the age at which the test may be taken could be raised by at least a year except for those who have attained Bikeability level 3.

Targets and indicators

It is often better to set similar targets cumulatively, otherwise they might be achieved by attaining a worse outcome, e.g., some fatalities instead of a like number of serious injuries. Thus, along with one target "to reduce the number of people killed in road collisions by at least 33 per cent", the second would be "to reduce the number of people killed or seriously injured in road collisions by at least 33 per cent".

One fifth (20%) of fatalities are to motor cyclists, and it is possible that effective remedies (e.g., suitable publicity) are found to reduce this substantially, to, say, less than 45% of the base number. This would contribute one-third of the 33% aimed at for all road users. So for all other road users it would be better to have a separate target, e.g., 25% or 30%. This would mainly benefit car occupants, since pedestrians and cyclists have a target of their own. The change need affect only the main target for fatalities; that for KSI can remain unchanged at 33%.

We consider that it would be better to have separate targets for cycling and walking. The reason is that it is possible for each mode to achieve its target, but for the totals of casualties and usage not to achieve the corresponding target (see the appendix).

The proportions of cycle accidents that do not involve another road user is high. This reflects on riding skills, whereas accidents involving another road user reflect on traffic behaviour by at least one party. It might be useful, therefore, to have separate key performance indicators for cyclists injured in single-vehicle and in other accidents.

Appendix

This is an illustration of the way that a peculiarity that can result when casualty rates per distance travelled change over time. The rates for cycling, walking, and the two together are compared.

The casualty numbers used are an illustration for fatal and serious injuries. The initial ones are approximately correct for 2006:

cyclists 2,500, pedestrians 7,000,

and the initial distances are taken as:

cyclists 50×10^8km pedestrians 200×10^8km.

These give casualty rates of:

cyclists $50/10^8$km, pedestrians $35/10^8$km,
combined = $9{,}500/(250 \times 10^8\text{km}) = 38/10^8$km.

Suppose that the final data are:

casualties: cyclists 2,640, pedestrians 3,612;

distances travelled: cyclists 110×10^8km, pedestrians 210×10^8km.

Then the corresponding casualty rates are:

cyclists $24/10^8$km, pedestrians $17.2/10^8$km;
combined = $6{,}252/(320 \times 10^8\text{km}) = 19.5375/10^8$km.

Both the cyclist and pedestrian rates have been reduced by more than half, but the combined rate has decreased by less than half.

Yours faithfully,

Roland Graham,
On behalf of the trustees, Cycling Projects.
(Home telephone: 0151 – 625 9094)

Cycling Projects, 1, Priory Court, Buttermarket Street, Warrington WA1 2NP
Tel: 01925 – 234213; www.cycling.org.uk
Charity no. 1003309. A company limited by guarantee, registration no. 2618968