

Response to *A Safer Way: Consultation on Making Britain's Roads the Safest in the World*

from CTC, the national cyclists' organisation

CTC, the national cyclists' organisation, was founded in 1878. CTC has 70,000 members and supporters, provides a range of information and legal services to cyclists, organises cycling events, and represents the interests of cyclists and cycling on issues of public policy.

Overall approach

- We support the proposed Vision statement, but propose some additional words, namely that Britain should aim to have “the safest roads in the world *for all road users*”. Although we are presently one of Europe’s better performers on overall road safety – especially for motor vehicle occupants – we have a relatively poor safety record for pedestrians, cyclists and especially children. *A Safer Way* needs to focus on these groups in order to maximise its contribution to wider health, environmental, accessibility and quality of life objectives.
- We welcome the recognition that *A Safer Way* should aim for more as well as safer cycling, and that the past use of simple casualty reduction targets may have created perverse incentives for road safety professionals not to encourage cycling (or even to actively discourage it) on the basis that more cycle use could mean more cyclist casualties, contrary to their casualty reduction targets.
- We therefore strongly support the move to adopt “rate-based” targets based on exposure to risk (i.e. to halve the risk of serious and fatal cyclist and pedestrian casualties *per 100,000 km travelled*), rather than simply aiming to reduce casualty numbers. CTC has presented good evidence that more and safer cycling can and should go hand in hand, through the “safety in numbers” effect. The new rate-based targets should help ensure that this happens.
- However we recognise the concern that rate-based targets will be difficult to monitor at the local level, due to the difficulties of obtaining reliable local data on cycle use. Hence there is still a risk that the overall simple casualty targets could come to dominate at the local level. We therefore urge that pedestrians and cyclists should be excluded from the overall casualty targets, particularly for local target-setting.

- We also propose the adoption of targets to improve the perceived safety of walking and cycling. Such a target could be easily monitored at the local level, as data could be collected through the existing survey of public perceptions of the safety of public transport travel. It would also focus local authorities' attention on tackling the fears which deter people from walking and cycling. By encouraging people to cycle more, this would in turn lead to real improvements in pedestrians' and cyclists' safety, through the "safety in numbers" effect.
- The main sources of fear which need to be addressed by the road safety strategy are speed and speeding, irresponsible driving, hostile roads and junctions, and lorries.

Interventions

- The strategy is heavily dependent on technological solutions (especially vehicle-based) yet these technologies are mainly beyond the control of the Department. We believe that the Department's strategy should include more policy levers within its control.
- We strongly support the move to make 20 mph the speed limit in 'town of city streets... where pedestrian and cycle movements are high'. We feel that this could be achieved more easily through the commitment to make 20 mph the default speed limit in 'built-up areas', whilst allowing local authorities to adopt higher limits on appropriate roads.
- We believe that the national speed limit should be changed to 50 mph, but that for many rural roads a more appropriate speed would be far lower than this. A hierarchy of rural roads would be a sensible approach, whereby lanes or roads which provide routes for vulnerable road users or leisure have lower limits to other, more strategic roads.
- More attention needs to be given to ensuring traffic engineers and planners have the skills and training required to deliver good cycle-friendly street design, in accordance with the principles set out in Cycle Infrastructure Design and the Manual for Streets. Local authorities should be strongly encouraged to make greater use of procedures like cycle audits and cycle reviews. Lessons should be learnt from continental best practice, particularly in creating attractive urban street designs which enhance the urban environment and strengthen the urban economy, which encourage more walking and cycling, and which promote a style of driving which respects the presence of non-motorised road users.
- Much more needs to be done to improve the general standard of driving. The measures taken to update the driving test will be insufficient on their own. More priority needs to be given to the enforcement of road traffic

offences by police forces, and the CPS and courts need to adopt a more consistent approach to prosecution and sentencing. The definitions and sentences for the core bad driving offences (i.e. those involving “dangerous” and “careless” driving) should be reviewed, as there are serious inconsistencies in the definitions and the sentencing powers available, as well as the way these are applied in practice. Too many drivers who cause serious danger or harm escape with prosecutions and/or convictions for relatively minor offences, and sentencing often fails to reflect the seriousness of the offence.

- More attention must be given to the threat posed by lorries. Nationally they typically account for 20-25% of cyclist fatalities in any given year, and are the major killers of cyclists in urban areas. They were involved of 9 out of the 11 cyclists killed in London in 2008 and we understand they have been involved in all but one of the 6 adult cyclist fatalities in London so far this year. Attention needs to be paid to the design and safety features fitted onto lorries, to both driver and cyclist training, to fleet management and to lorry management and routing strategies. Research and monitoring are required to assess the most effective interventions.
- Cycle training is a highly effective measure for encouraging more as well as cycling which has received considerable attention from Government in recent years. The strategy should commit to making it widely available not just for younger children, but also for teenagers (to support the retention of the cycling habit as they approach driving age) and for adults wishing to discover or rediscover cycling later in life. There is anecdotal evidence that people who have undertaken cycle training make better progress when learning to drive, and become safer drivers. This should be researched with a view to incorporating cycle training into the training of young drivers. The value of cycle training for bus and lorry drivers should also be more fully explored.
- We are pleased to note that the document for the most part employs the term ‘collision’ rather than ‘accident’. This is a more appropriate term for events where the exact level of culpability of the parties involved in the collision is not determined. We suggest that the final text is consistent in its approach to this issue.

A response to the questions posed by the consultation follows below.

1. *Do you agree that our vision for road safety should be to have the safest roads in the world?*

We support the suggestion of the Parliamentary Advisory Council for Transport Safety (PACTS) that alters the vision to “the safest roads in the world... for all classes of road users”.

Whereas Britain lies 5th internationally when it comes to lowest overall road deaths per million of the population, for pedestrians and under 14 years old road users this falls to 11th, whilst for child pedestrians it is a weak 17th. The position for cyclists is rather more complex, due to the very different exposure rates between countries (see below).¹

It is vitally important that the mediocre record on pedestrian, cyclist and child road safety in Britain is not overshadowed by the rather better performance when it comes to occupants of motor vehicles. Nor do we wish for improved performance on road occupant casualties in future enable the vision to be met, even though conditions on the road for vulnerable road users may continue to deteriorate.

Public health and safety

CTC is pleased with the framework suggested in *Delivering a Sustainable Transport System* (DaSTS) to integrate approaches to public health and safety. *A Safer Way* could do more to support this integration. There are many more people that die from the results of motor traffic than those who are killed in collisions.

Public health is affected by urban air pollution, the vast majority of which derives from motor traffic, and from the impact of fear of injury on rates of walking and cycling, which has partly resulted in the current obesity epidemic and contributes to hundreds of thousands of premature deaths annually from physical inactivity. Physical activity is associated with 37% of deaths from coronary heart disease – more than any other source.²

The approach also suggested that there were significant synergies between other goals – such as the need to increase levels of active travel not only to benefit health, but also to contribute to economic development and to help reduce emissions.

¹ NAO, *Improving road safety for pedestrians and cyclists in Great Britain*. HC 437 Session 2008-2009, 8th May 2009. pp. 35 - 36

² BHF Factsheet on Economic Costs of Physical Inactivity.
<<http://www.bhfactive.org.uk/downloads/Economics%20factsheetD.pdf>>

The strategy could do more to reflect the DaSTS approach. There is nothing in the strategy to suggest that reduced motor vehicle traffic can help to reduce casualties at the same as meeting other goals, particularly those around climate change and quality of life in urban areas.

2. Do you agree that we should define a strategy running over twenty years to 2030, but with review points after five and ten years?

Whilst it is admirable to envisage a strategy that runs until 2030 and we applaud the desire to think in the long-term, we have concerns that such a strategy may prove to be unambitious or unrealistic by 2020 and will need considerable reassessment.

In addition we feel that given the scale of the environmental challenge and the greenhouse gas emissions cuts mandated by 2050, a strategy that runs until 2030 would need to address these long-term issues more fully than it currently does.

The current strategy also appears heavily dependent on secondary safety technology to deliver safety benefits, particularly with regard to the vehicle fleet. Given the changing nature of this technology, and the need for its development to come from manufacturers, 20 years appears too long a timescale.

3. Do you agree that our targets should be to reduce:

- *road deaths by at least 33% by 2020 compared to the baseline of the 2004-08 average number of road deaths;*
- *the annual total of serious injuries on our roads by 2020 by at least 33%*
- *the annual total of road deaths and serious injuries to children and young people (aged 0-17) by at least 50% against a baseline of the 2004-08 average by 2020;*
- *by at least 50% by 2020 the rate of KSI per km travelled by pedestrians and cyclists, compared with the 2004-08 average?*

CTC supports the move to measure risk of serious injury or deaths as a rate per kilometre rather than a total figure. We are happy with the target to reduce the risk of cycling by half – this is the level we called for in our *New Vision for Cycling*.³

We believe that the change by which the Department measures progress will reduce the perverse incentive that sometimes confronts local authorities whereby they are instructed to reduce overall casualties whilst at the same time promoting walking and cycling – vulnerable modes with higher overall rates of casualties.

³ CTC. *New Vision for Cycling*. 2009. <www.ctc.org.uk/newvision>

We have slight concerns however that combining pedestrians and cyclists together within a single target will muddy the value of this target in the eyes of the public. We appreciate that the data quality on cycling and walking levels necessitates the use of a three-year rolling average to determine performance against the baseline. However this may mean that the public and media return to using the overall number of casualties (rather than an adjusted rate) in their coverage of cycle casualties.

To explain our concerns it is worth looking at the recent coverage of the simultaneous publication of two DfT transport statistical bulletins on the 25th June: *Road Statistics 2008: Traffic, Speeds and Congestion* and *Road Casualties in Great Britain: Main Results 2008*. The latter reported that cyclists were the only road user group showing an increase in casualties – a less than 1% increase in serious and slight over the previous year, but a substantial fall in deaths (a low figure with high annual variability).

At the same the Road Statistics revealed that cycling levels had increased by 12% over the previous year, whereas motor traffic fell by less than 1%. Although we are conscious that the National Road Traffic Survey data on cycling isn't wholly robust, the increase in cycling corresponds with anecdotal and local authority traffic count evidence of cycling increases due to the combination of the fuel price spike in 2008, the beginning of a recession, and the combined effects of successful cycling promotion activities.

Although this is the first year that publication of these two documents has coincided, no link was made between the two in either report, or, consequently, by the media. Reporting of the cycle casualties only mentioned the fact that casualties had increased, and failed to report the increased levels in cycling.

Mutually contradictory targets

We fear that the current targets may remain internally inconsistent – thus a substantial increase in cycling and walking may lead to more deaths and serious injuries (albeit at a much lower rate) but these deaths and injuries may still make the 33% reduction target harder to achieve. We suggest that the 33% reduction figure excludes pedestrians and cyclists and it should be restated as 'motor vehicle user deaths and serious injuries'.

Safety in Numbers

CTC suggests that increases in cycling tend to coincide with increases in cycle safety. Whether or not there is a *causal* relationship is still open to debate, however, there is abundant evidence to suggest that increased cycling and

reduced cycling risks go hand in hand.⁴ Evidence from towns in England to support this suggestion has been produced by CTC, together with a short explanation of why this relationship may exist.⁵

That a relationship between the two exists has been acknowledged in the draft work on the Cycle Safety Study, the findings of which CTC has seen as a member of the steering group.

We suggest that this relationship, together with other findings from the Cycle Safety Study, are incorporated in the any approach to cycle safety adopted in *A Safer Way*. The decision to adopt both rate-based targets and indicators will help draw attention to the fact that increased cycling usually coincides with reduced risks of cycling.

We also suggest that the Department acknowledge that material ostensibly used to promote cyclist safety may actually be doing more harm than good if the overall message puts off potential cyclists. Thus campaigns to promote cycle helmet use (often using unreliable evidence) help to erect barriers to entry for new or returning cyclists. With the risks of cycling being far lower than the public health benefits of taking up cycling, the message from the Department should be to restrict 'cycle safety' advertising in favour of positive messages about the effect on health.

Note also that the "safety in numbers" effect appears to have less of an effect for powered two-wheelers, possibly because a higher proportion of the injuries to those users occur without the interaction with another vehicle.

4. We are proposing a set of indicators in order to help us to monitor performance. Do you believe these cover the right areas?

We recommend that further indicators are included that measure the 'perception of danger' on the roads for vulnerable road users, such as cyclists and pedestrians. A similar view was taken by the House of Commons Select Committee in their report on road safety.⁶

Such indicators are already included when assessing access to the public transport network. They show high levels of overall feelings of safety when using

⁴ Jacobsen P. *Safety in numbers: more walkers and bicyclists, safer walking and bicycling*. Injury Prevention vol. 9 pp 205-209, 2003 (see <http://ip.bmjournals.com/cgi/reprint/9/3/205>); Vandenbulcke G et al. 'Mapping bicycle use and the risk of accidents for commuters who cycle to work in Belgium' *Transport Policy* 16. 2009. pp 77-87; Elvik R. 'The non-linearity of risk and the promotion of environmentally sustainable transport' *Accident Analysis and Prevention* 41. 2009. pp 849-855

⁵ CTC. *Safety in Numbers*. 2009 <www.ctc.org.uk/safetyinnumbers>

⁶ House of Commons Transport Select Committee. *Ending the Scandal of Complacency: Road Safety beyond 2010*. 11th Report of Session 2007-08. HC 460. Paragraph 31

the public transport network, with 84% feeling safe on and accessing public transport.⁷

By contrast the little evidence we have of similar feelings for cycling shows much greater 'safety barriers' to taking up cycling - 74% of people agree with the statement that 'the idea of cycling on busy roads frightens me'.⁸

We need better, regular data on the perceptions of danger which prevent more people from cycling. Copenhagen, the world's foremost cycling city, where 36% of the population cycle to work, includes the perception of danger as one of the key measures of the effectiveness of their policy.⁹

Although over a third of people say they could easily make short car trips by cycle, only 2% of trips are. Measuring the perceptions of safety, especially at a local level, will help to reveal where major barriers exist. We urge that this is included as a regular survey as part of an Omnibus survey, in a similar fashion to that conducted to make an assessment of public transport accessibility.

None of the indicators refer to children, even though one of the targets is specifically related to children.

5. *We have identified a number of factors that may affect our ability to deliver road safety improvement in the future world we are planning for. Do you think we have taken account of the key risks and opportunities? Are there others you would add?*

As discussed in the answer to question 2, we believe that a long-term strategy must take into account the possibilities for a very carbon constrained future. This should be seen as a major opportunity to substantially reduce motor traffic volumes. A reduction in traffic volumes will inevitably lead to improvements in public health not only from reduced collisions but also from increased physical activity from active travel alternatives from walking and cycling.

A risk that has been acknowledged in the consultation is the reliance on vehicle safety technology to deliver casualty reductions. As the consultation notes, this lies within the power of vehicle manufacturers, and as such presents a risk to the success of the strategy.

⁷ DfT. *Experiences and perceptions of anti-social behaviour and crime on public transport*. 2009. <<http://www.dft.gov.uk/adobepdf/162469/221412/221513/antisocialcrime/antisocialcrime.pdf>>

⁸ DfT. *Cycling Personal Travel Factsheet*. 2007 <<http://www.dft.gov.uk/pgr/statistics/datatablespublications/personal/factsheets/cyclefactsheet.pdf>>

⁹ City of Copenhagen. *Copenhagen City of Cyclists: Bicycle Account*. 2006. <http://www.vejpark2.kk.dk/publikationer/pdf/464_Cykelregnskab_UK.%202006.pdf>

6. *We think that the key challenge for road safety from 2010 is better and more systematic delivery, rather than major policy changes. Do you agree?*

Whilst 'better and more systematic delivery' is desperately required, we still believe that there is a requirement for fundamental changes in policy, particularly around traffic law enforcement, on which the current strategy proposes little other than minor shifts already discussed in the previous *Road Safety Compliance*.

As in the answer to question 2, it seems improbable that a 20 year strategy can rely solely on 'more of the same'.

We suggest that the aim to support physically active travel behaviour, which benefits public health, should be an obligation upon the Government. We suggest that paragraph 4.2 be amended to include 'providing a safe and welcoming road environment that encourages physically active travel', while paragraph 4.4 include 'to encourage physically active travel'.

7. *This consultation document sets out the current evidence on the key road safety challenges. Do you agree with our analysis/ would you highlight any others?*

The main 'road safety challenge' we believe remains the perception of safety of the roads for vulnerable road users. As stated in the answer to question 4, despite evidence suggesting that over a third of people feel they could make short trips by bike, just 2% of trips are made on cycles. The main reason appears to be the fear of traffic, whether a fear for personal safety, or discomfort due to hostile behaviour of inconsiderate motorists.

We believe that this combination of safety fears and the lack of care shown by fellow road users are the two main causes that prevent more people from cycling. These barriers to greater cycle use have led to further problems – more car use, leading to deteriorating perceptions of safety, declines in physical activity and increased levels of air pollution and greenhouse gases.¹⁰

Holistic road safety should be more than simply adding up the tragedies on our roads. It should contribute to wider objectives, such as climate change, public health, accessibility, and it should ensure that the road network is an acceptable, safe and welcoming place for all road users.

We often hear about concerns expressed by pedestrians about the danger presented by cyclists on pavements and shared use paths. In the narrow definition of road safety as outlined in the consultation by the Department the

¹⁰ Davis A, Valsecchi C and Fergusson M. *Unfit for Purpose: How Car Use Fuels Climate Change and Obesity*. Institute for European Environmental Policy. 2007.

impact of cycle-pedestrian collisions is tiny – only a few hundred pedestrians are injured in collisions with cyclists each year and there is an average of about 3 deaths of pedestrians.¹¹

Yet the fear of a collision with cyclists does appear to be an issue for some pedestrians, especially those with impairments and some older people. It is a similar fear of injury on the road network which leads the cyclist onto the pavement or shared use path in the first place, or prevents people cycling at all.

We suggest that the strategy needs to do much, much more to tackle the causes of these fears which remain the barriers to making roads safer and more attractive for vulnerable road users.

Under-reporting

There is significant under-reporting of crashes – particularly those involving cyclists. A comparison between Hospital Episode Statistics and police reports indicate a substantial disparity amongst cyclists. Cyclists contributed 17% of total road injury emergency admissions but only 8% of the total serious injuries reported to the police in 2005/6. We understand that most of these unreported injuries occurred to young children and did not involve a crash with a vehicle.¹²

We suggest that many these crashes will be a result of poor handling skills and higher risk cycling and therefore should be seen separately from injuries which result from crashes with vehicles.

However, there are important messages that emerge from the level of under-reporting amongst cyclists. One particular source of under-reporting amongst adults may be crashes which result from road defects. Informal research conducted by CTC suggests that 7% of CTC members' injuries result from road defects. The role of road maintenance in ensuring a comfortable and safe road environment should figure more prominently in *A Safer Way*.

8. *We are proposing a number of measures to support the effectiveness of the road safety profession. Do you think they will be effective? What else might need to be done?*

We believe that much more needs to be done to improve the effectiveness not just of the road safety profession, but also of other local government officials and contractors. In particular the approach taken to road design needs greater attention. Local authorities are still failing to take into account cyclists needs when redesigning roads and junctions, and fail to adhere to the Government's guidance on provision of cycle infrastructure.

¹¹ DfT. *Road Casualties Great Britain 2007*. 2008. table 23c

¹² DfT. *Road Casualties Great Britain 2006*. 2007. pp 68-71

9. *Do you agree that an independent annual report on road safety performance, created on an annual basis, would be a worthwhile innovation?*

We firmly support the idea of an independent annual report on road safety performance. Such a report should go further than the simple presentation of road injury data – it should also make the links between enforcement, action taken by the courts against bad driving and the perception of safety held by vulnerable road users.

We also hope that the data presented succeeds in overcoming the problems of under-reporting of casualties, particularly amongst cyclists (see above).

10. *Do you agree that the Road Safety Delivery Board should be tasked with holding Government and other stakeholders to account on the implementation of a new national road safety plan?*

Yes.

We have concerns, however, that the development of the 'new national road safety plan' will not be subject to proper consultative processes. From a dialogue with an official at the Department for Transport we understand that the plan will be developed from the responses to *A Safer Way*. This approach is far from adequate for a plan that may determine much of the immediate policy on road safety matters. Similarly we have concerns that the very recently released *Advice about Local Road Safety Strategies* (DfT, July 2009) has no formal consultative process, and the decision to release it occurred just a few days before the close of the consultation on *A Safer Way*.

11. *Do you agree that highway authorities reviewing and, where appropriate, reducing speed limits on single carriageway roads will be an effective way of addressing the casualty problem on rural roads? Are there other ways in which the safety of rural roads can be improved?*

The Department should do more to ensure that speed limits can be flexibly reduced on rural roads whilst ensuring that the expense and clutter of signing is not too great. The national speed limit should be reduced to 50 mph, with local authorities given the flexibility to adopt higher speed limits on roads where they are more appropriate.

On many rural roads, however, speed limits considerably lower than 50 mph might be more appropriate. 30 mph should be the maximum acceptable speed limit in villages, whilst quiet lanes should be 20 mph. We also believe that the greater consideration should be made of the needs of vulnerable road users on

rural roads. As above, perceptions of safety often provide a major barrier to the use of rural roads by vulnerable road users.

12. How can we most effectively promote the implementation of 20 mph zone schemes in residential areas? What other measures should be encouraging to reduce pedestrian and cyclist casualties in towns?

Making 20 mph the speed limit in 'town of city streets... where pedestrian and cycle movements are high' (p. 52) is a very encouraging step. However, there has been a lack of consistency in the message that **all** urban streets where cycle or pedestrian movements are high should be considered. As in the phrasing of this question, this has too often been contracted to just 'residential areas'.

We also suggest that restricting advice to streets 'where pedestrian and cycle movements are high' may mean that streets where cycle and pedestrian traffic is suppressed by high traffic volume/speed will be left out. Thus a key route may have low cycle usage because of concerns about dangers on the route from fast moving traffic. Lowering the speed limit may encourage more pedestrian and cycle usage, but under the suggested policy would not be prioritised.

We believe this would be better undertaken by a wider move to making 20 mph the default urban speed limit, with local authorities varying the speed up to 30 mph on roads which are predominantly used for traffic movement, and where accessibility by physically active modes is not compromised. Such an approach would be far less costly than that proposed and has been successfully trialled in Portsmouth.¹³

The Department should allow a relaxation of the requirements on local authorities to implement both 20 limits and zones – both are over-prescriptive.

Concerns over impact assessment assumptions

The impact assessment for the consultation suggests that changing 50% of streets ('of a residential nature') to 20 mph limits would involve a one-off cost of £867 million in road engineering, marking, signs and media campaigns. In addition the DfT assumes that reducing speeds to 20 mph would result in an increase of emissions costing £11.35 million per year.

We have several concerns with regard to these assumptions.

- **Costs of engineering/signing.** The assessment does not explain how many streets are involved – we do not know whether it assumes 50% of ALL streets that currently hold a 30 mph limit, nor what proportion would require 're-engineering' to make them self-enforcing or what proportion would simply require signs.

¹³ <<http://www.portsmouth.gov.uk/living/9727.html>>

- **Modal shift not included.** It is not clear to what extent modal shift will be achieved by the creation of these zones/limits. In paragraph 5.23 the document asserts that 'limited evidence' suggests more walking and cycling from 20 mph zones/limits. Why, then, does the impact assessment fail to include any modal shift to walking and cycling, with the substantial health benefits which would accrue?
- **Increased fuel consumption and emissions.** The assessment accepts the myth that 20 mph would lead to an increase in fuel and emissions. We dispute this.
 - i. As already stated (and accepted by the DfT) 20 mph zones/limits would lead to modal shift. Modal shift from car to cycle or pedestrian trips would inevitably lead to reduced emissions.
 - ii. It has also been suggested that when 30 km/h zones were implemented in Germany, drivers braked less often and used 12% less fuel.¹⁴
 - iii. Finally a recent engine efficiency study of 5 cars concluded that 2 were at their most efficient at speeds of 20 mph.¹⁵

13. How can we provide better support to highway authorities in progressing economically worthwhile road safety engineering schemes?

Better support can be provided by granting greater flexibility to local authorities in their approach to road engineering schemes, whilst at the same time providing guidance in areas where local authority knowledge is weak. As suggested above, 20 mph limits and zones could be much more flexibly implemented - these are mainstream approaches which most authorities have trialled and where approaches have been mostly successful.

By contrast the Department needs to tighten the standards and provide better training when it comes to areas where knowledge and skills on engineering is poor. The area where we feel this knowledge gap is most severe is in facilities for cyclists. CTC members expressed their intense disregard for the facilities currently provided for cyclists in several thousand responses to the revised Highway Code in 2006-07 which appeared to suggest that cyclists should use those facilities 'where they are provided'.

¹⁴ RoadPeace briefing on 20 mph default speed limit, <<http://www.roadpeace.org/documents/RoadPeace%2020mph%20Information%20Sheet.pdf>>

¹⁵ As reported in *The Times*, 11/06/2008 <<http://www.timesonline.co.uk/tol/driving/article4107764.ece>>

Although the Department's recently published *Cycle Infrastructure Design* provides fairly helpful advice, the principles in the document are very rarely adhered to by local authorities in designing for cycling. The Department needs to be sure that capital spending on cycling measures is actually beneficial and meets existing and future cyclists' needs. In the vast majority of cases those needs can be met on the carriageway, firstly by reducing traffic volume and speeds.

14. What should Government do to secure greater road safety benefits from vehicles?

Although we are concerned that the overall strategy has too great a reliance on technological levers, we do believe that there are at least two technological interventions within the vehicle that could produce substantial safety benefits. Black box data recorders and Intelligent Speed Adaptation could provide significant benefits which the Department seems unwilling to support.

The Department's own research on ISA indicated that the benefit to cost ratios are much higher if a policy of implementing 'mandatory' ISA, rather than the current plan of voluntary ISA, is pursued.¹⁶ Mandatory ISA allows the implementation of appropriate speed limits without the need for speed limit signs or any form of traffic calming – a highly desirable long-term opportunity to improve streetscape and save a very large sum of money in engineering.

15. Do you agree that, in future, crash avoidance systems will grow in importance and will have the potential to greatly reduce casualties?

As above, we believe that the best crash avoidance system will be that which helps adherence to speed limits. Much more should be done to pursue a goal of full and mandatory ISA at the earliest possible stage.

16. How can we best encourage consumers to include safety performance in their purchasing decisions?

No response.

17. We have highlighted what we believe to be the most dangerous driving behaviours. Do you agree with our assessment?

We are concerned that the *Road Safety Compliance* consultation offered little that will actually alleviate the severe problems of bad driving. In particular the approach to dealing with the habitual speed limit infringement (and inappropriate use of speed) by much of the public is feeble.

¹⁶ Carsten O and Tate F. *ISA – UK: Implementation Scenarios*. 2008. p 52
<<http://www.dft.gov.uk/pgr/roads/vehicles/intelligentspeedadaptation/>>

Together with careless and inconsiderate driving, the ubiquity of speed related behaviour has done much to create the hostile and unwelcoming road conditions that have resulted in so few people making so few trips by cycle.

18. What more can be done to persuade the motoring public that illegal and inappropriate speeds are not acceptable behaviours?

More consistent enforcement of speed limits would reduce the perception that the current safety camera regime exists in part to raise revenue. Disregard for speed limits has occurred partly because of this.

As stated above, the engineering of our streets and roads often promotes speeding. Greater use should be made of surfaces which help to reduce speed without the need for deflection, either horizontal or vertical. In the long-run use of mandatory ISA could mean that the ability of the motoring public to drive above the speed limit would be curtailed.

19. What more can be done to encourage safe and responsible driving?

As discussed in our response to the *Road Safety Compliance* consultation, we believe that there needs to be a much greater enforcement of traffic law. Evidence presented in the *Road Safety Compliance* consultation suggested that the number or successful prosecutions for bad driving offences have fallen by 77% over the last 20 years.

We believe that more enforcement of traffic law by police is required, more cases need to be brought to court, and offenders must receive more significant punishment, particularly in the form of driving bans. Too many acts of bad driving are being committed without action being taken by the police and the courts.

Cycle training

Cycle training is a highly effective measure for encouraging more as well as cycling – and for improving driver behaviour. CTC has been pleased with the attention paid by Government to developing a high quality cyclist training programme in recent years. The strategy should commit to making cycle training widely available not just for younger children, but also for teenagers (to support the retention of the cycling habit as they approach driving age) and for adults wishing to discover or rediscover cycling later in life.

There is anecdotal evidence that people who have undertaken cycle training make better progress when learning to drive, and become safer drivers. This should be researched with a view to incorporating cycle training into the training of young drivers.

20. Should more be done to reward good driving? If so, what?

It is unclear what is meant by 'good driving'. If by good driving it means driving that stays within the law, we have no reason to see this as deserving of recognition, let alone something to which resources should be devoted. We do not, after all, reward those who manage to stay within the law when it comes to other types of crime. In any event, drivers already receive a 'no claims bonus' from many insurance schemes for avoiding damaging their vehicle. This should suffice.

Messaging to support 'modal shift' to vulnerable road users must be consistent – messages should be that using private motorised transport does still have an impact on others, even if the user is a 'good driver'. These externalities are in no way fully accounted for by the extra expenditure on taxation through fuel use.

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