

A SAFER WAY—CONSULTATION ON MAKING BRITAIN’S ROADS THE SAFEST IN THE WORLD (Department for Transport, April–July 2009)

RESPONSE BY THE RAMBLERS

Introduction

1. The Ramblers welcomes this consultation. Without a fresh approach to road safety, all the signs are that the dangers faced by pedestrians and other legitimate but vulnerable users of the highway network are set to increase.
2. The Ramblers is Britain’s largest charity working to promote walking and to improve conditions for all walkers. Founded in 1935, we have 139,000 members in England, Scotland and Wales.¹ We work to promote everyday walking to everyone, of all ages, backgrounds and abilities, in towns and cities as well as in the countryside, as part of a healthy lifestyle. This response is certainly not confined to rural recreational walking; where below we use the words ‘walker’ and ‘pedestrian’, we mean anybody walking for any reason, including urban or rural residents *en route* on foot to work or local amenities
3. Each of our members belongs to an ‘Area’, roughly corresponding to local government boundaries. Areas elect their own officers. This response is prepared by staff at the Ramblers’ central office, but incorporates input from Area officers among whom in draft it was circulated. A survey some years ago showed that most of our members own cars. We trust that this response will not be taken as a piece of anti-vehicle polemic.
4. The Ramblers has been campaigning on transport issues for many years. We have not forgotten the evening of Thursday 20 May 1976, when five of our members were killed by a Ford Cortina travelling at 55–70 mph in a Northamptonshire lane. Taking part in a led walk organised by the association, they were walking in single file, correctly on the right hand side of the road. The car appeared suddenly over the brow of a hill; the driver swerved to avoid an on-coming vehicle, and hit the walkers.
5. Back in 1968, we published *Rural Transport in Crisis*, a booklet which set out the problems faced by people trying to go for a walk in the countryside without a car, and how things needed to be improved. Its contents are depressingly even more valid today, since the issues are now yet more complicated since car ownership rose so massively. In 1978 we published a pamphlet, *Roads fit to walk on*. It called for a heightening of consciousness among road users of the status of pedestrians and of the importance of walking as a means of transport in its own right. But virtually all the experience over the intervening 30 years is that pedestrians are still seen, at best, as people to be tolerated on sufferance rather than as people with rights. It is to be

¹ The Ramblers’ Association was founded in 1935 and is a registered charity (England and Wales no 1093577, Scotland no SCO39799) and a company limited by guarantee, registered in England and Wales (no 4458492). Registered office: 2nd Floor, Camelford House, 87–90 Albert Embankment, London SE1 7TW.

hoped that the reference in the present consultation to ‘attitudes’ and ‘beliefs’ is a sign that the DfT at last means to tackle this unjust and dangerous misapprehension.

6. More recently we have published a campaign document, *You’re either quick or dead*, which illustrates the absence in many places of a safe or convenient crossing for non-motorised users of roads where they intersect with lesser highways such as footpaths, bridleways or minor roads.
7. We should mention as well certain other aspects of our work which make us especially aware of road-safety issues. Our work on everyday and urban walking, and on encouraging everyday physical activity through walking; our membership of the Travel Actively consortium and the Get Walking Keep Walking project; our involvement with the National Institute for Health and Clinical Excellence (NICE) as an expert consultee on their Guidance on Physical Activity and the Environment. We have a presence on such advisory panels as the former Mayor of London Walking Advisory Panel, and the current Department of Health panel on walking; and we are members of the emerging Physical Activity Alliance mooted in the Department of Health’s Physical Activity Strategy.
8. Recently we have worked on developing children’s walking materials, part funded by DH, where walking safely is one of our themes – we have worked closely with a design agency, dbda, with extensive experience in creating road safety materials for children, and have tried hard to balance responsible safety messages with avoiding the discouragement of walking. And we have a role as a source of best practice in walk leading (through our own Areas and Groups) and route development (through our Get Walking Keep Walking initiative).
9. We are one of the dozens of organizations who are signatory to Take Action on Active Travel,² which calls for realistic investment of at least 10% of transport budgets in walking and cycling; for the creation of safe, attractive walking and cycling conditions ‘with coherent high-quality networks linking all everyday destinations so that walking and cycling are faster and more convenient than motor travel’; and for making 20 mph or lower speed limits the norm in residential streets. It also calls for the menace of bad driving to be tackled, and for ‘health-check’ of all decisions about transport and land-use, to bring about focus on potential impacts on levels of walking and cycling, and other aspects of health, and for the rejection of proposals whose impact on those considerations will not be positive.
10. Above we have touched on, and below we will return to, our concern about the erosion over many years of the pedestrian’s right to use the highway, and its domination by drivers with no appreciation of that right. This culture needs to be challenged by a broad and imaginative approach to road safety which should start with the principle that it is about creating a safe environment for everyone to go about their legitimate business but weighted in favour of the most vulnerable – notably walkers, and especially walkers with disabilities, children and old people. This is particularly important when set against wider policy objectives such as the need to encourage everyday physical activity, to promote health and better lifestyles, and to

² http://www.sustrans.org.uk/assets/files/AT/Publications/Take_action_on_active_travel_2009.pdf

counter the rise in obesity.³ There has until now been a certain narrow road safety approach with a focus purely on accident avoidance, often at the expense of limiting pedestrian trips and causing walkers inconvenience, sending them on long detours behind barriers and across inconveniently-placed crossings, or scaring them off the highway, rather than seeking to control the movement of motor traffic more effectively. This must be resisted.

11. Praise is due for the enlightened approach of several proposals in *A safer way* directed at improving conditions for walkers. It is pleasing to note from paragraph 6 of the Executive Summary that a positive impact on public health is desired, from which we infer that increased walking is projected; and that in paragraph 8 it is proposed to address the appalling inequalities in accidents involving death or serious injury ('KSIs') as correlated to social deprivation levels.
12. It is especially pleasing to note amid the proposals for reducing pedestrian casualties measures which should enhance not only pedestrian safety but public *perception* of safety, so as to encourage more walking. Better road and street design, the designing-out of high speeds, the provision of 20 mph zones and of safe and convenient crossings are recognised throughout as being of importance. For our part we would attach greater importance to driver liability.
13. Road safety is partly an issue of dynamics. We submit that promoting walking will actively promote safety as well. As pedestrian numbers increase, they will become more visible to motorists and their rights are likely to become better respected. 'A motorist is less likely to collide with a person walking and bicycling if more people walk and bicycle. Policies that increase the numbers of people walking and bicycling appear to be an effective route to improving the safety of people walking and bicycling.'⁴

Vision and Targets (Chapters 3 and 8)

14. Safety of pedestrians on roads and footways is a central concern of our aims. The road-holding capacity of cars has increased since the Northamptonshire tragedy (see paragraph 4 above). Consequently, so has their speeds. When walking on any road now it is common to be passed by vehicles going in excess of 60 and 70 mph, worrying enough when walking on a pavement; but thousands of miles of country roads have no pavements, and pedestrians must walk in the carriageway with cars inches away. This has led to fewer and fewer journeys in rural areas being taken on

³ A report published by the NHS Information Office, *Statistics on Obesity, Physical Activity and Diet: England*, January 2008, shows that in 2006, 24% of adults (aged 16 or over) in England were classified as obese, this being an overall increase from 15% in 1993. 37% of adults had a raised waist circumference in 2006 compared to 23%. Three in ten adults had not participated in active sport in last 12 months in 2005–06. The main reasons for not participating were 'health isn't good enough' (47%) followed by 'difficulty in finding the time' and 'not being interested' (both 18%). It also shows (perhaps not surprisingly) that men and women with low physical activity levels were more than twice as likely as to have a raised waist circumference than those with high levels of physical activity.

⁴ P L Jacobsen, 2003, 'Safety in numbers: more walkers and bicyclists, safer walking and bicycling', in *Injury Prevention* 2003:9

foot,⁵ more people considering it safer to drive for even short distances and for everyday errands and journeys than to walk.

15. CPRE's recent Rural Traffic Fear Survey showed that two-thirds of people feel threatened by motor traffic all or some of the time on rural roads. And Chapter 3⁶ of the DfT's *Personal security issues in pedestrian journeys* points up these concerns. Observations by participants in the focus group speak for themselves—

'cars go so much faster along side roads and little roads these days, much faster than they used to ... there's a general disregard for speed compared to ten years ago' [woman in urban group]

'the countryside has changed. There is a lot more traffic and it travels very much faster ... one of the differences with the village now is that we get a lot of cross commuting ... people driving to and from Exeter to work' [man in rural group]

'what really puts me off walking during the day is the traffic and especially the large lorries ... we are getting much larger lorries coming through the village, some even with trailers...' [woman in rural group]

'the scale of farming has changed. In the past, produce like potatoes or milk was picked up in much smaller containers ... but now it's all in much larger containers and much larger lorries.... They have to go through the village which was never made for them ... there should be a length restriction really' [man in rural group].

The survey with parents at a rural school on their journey to school revealed the perception of added traffic dangers from inconsiderate motorists driving too fast along narrow country roads: 'the biggest problem for a child walking to school where there are narrow roads and no pavement or path is the lack of awareness by motorists. Most display a total disregard for pedestrians, crossing the road is very difficult. Car drivers tend to see other cars but they forget about pedestrians.'

16. This is unsustainable, and this gradual suppression of the pedestrian's right to use the highway (which existed centuries before the car was invented) should trouble any government concerned about protecting the rights of all individuals, not just motor-powered ones, to travel about, whether for work or pleasure.
17. We believe that very many of the problems caused to pedestrians and other non-motorised users are underpinned by motorists' lack of understanding as to what pedestrians' rights actually are. The conduct of many drivers shows that they think that pedestrians' use of roads, whether in walking along them (e.g, where there is no pavement) or in crossing them, is (at best) by tolerance only, and are unaware that pedestrians have rights too. We will amplify this at paragraphs 19–23 below. Education of all road users as to the nature and extent of all types of users' rights needs to be a key tactic in the DfT's tackling of the issues which it has so usefully identified.

⁵ Between 1985–86 and 1997–99, the proportion of journeys by foot fell by 21% nationally and by 17% in rural areas, figures from *Rural Transport – an overview of key issues* (UK Commission for Integrated Transport) (2001).

⁶ DfT website: at <http://www.dft.gov.uk/pgr/crime/personalsecurity/>

Context (Chapters 2, 3, 4)

18. Education of all types of road user is needed. As we will try to show below, we believe that many drivers do not appreciate that pedestrians or equestrians have the right to be on roads at all, let alone that their rights are equal to those of motorists, and this needs addressing.
19. At paragraph 1.13 the consultation makes a welcome reference to 'the attitudes and beliefs which underlie [users'] behaviour'. Many motorists evidently think that they have precedence over pedestrians merely by reason of being in a vehicle; there is an assumption that motorists have the 'right of way' over pedestrians, rather as at sea there is a rule that a vessel under sail has precedence over a vessel under steam. All are supposed to be equal in highway law; but the 'kerb-drill' has skewed people's understanding of this.
20. In 1942 the government, concerned by the number of pedestrian casualties, children in particular, introduced this 'kerb-drill'. The message is that you should not cross the road until it is 'safe' to do so. 'Safe' is generally understood to mean when no vehicle is in sight, or is far enough away as not to need to slow down. The code is not a law that gives motorists precedence, it is a code of action to cut down the number of deaths and injuries.
21. But the result of it is to have made generations of children grow into adults who think that once they are behind the wheel, they have the legitimate expectation that pedestrians will subserviently keep out of their way – that they can expect to drive along any road, from a trunk road to a town street or a country lane, without ever being impeded by the passage of pedestrians, whether crossing roads or walking along them. We have all seen slow-moving pedestrians who started crossing the road when it was 'all clear' hooted at by motorists who approach them without reduction of speed; and it is the reported experience of walkers on roads without footways, rural ones in particular, to be given abuse merely for being on them. This is a lamentable contrast with the situation in, for example, Switzerland, where the onus is on drivers to give way to pedestrians on most roads.
22. And where two roads meet at a T-junction, a pedestrian who has started to cross the lesser road at the *debouchment* is (by Rule 170 of the Highway Code) specifically given precedence in the Highway Code over any vehicle turning into it, so a driver who wishes to turn must give way till the pedestrian has crossed. One sees this contravened virtually all the time, with drivers completing their manoeuvre as if the pedestrians were not there and forcing them to wait in the middle of the junction or be hit, meanwhile putting them at risk of being hit by vehicles coming the other way. We think, in this matter at least concerning the relationship between vehicular and

non-motorised users, that the consultation is wrong at paragraph 7.1 in saying that 'most road users ... understand the rules of the road'.⁷

23. The whole misunderstanding by road users that pedestrians are supposed to defer to motorists, even to the expectation that they must force themselves into the roadside hedge, climb into the ditch, or, apparently, levitate or dematerialise while vehicles pass, is to be deplored not only from the safety point of view. It seems to be forgotten that pedestrians as well as motorists pay taxes for highways to be maintained. Perhaps the fact that some drivers also pay 'road tax' entrenches the position; they think it is some form of toll which has somehow bought them precedence over non-drivers.
24. The time has come to address this misunderstanding fairly and squarely. The consultation mentions examples of other irresponsible use of roads – at paragraphs 30 and 31 of the Executive Summary, for example, it lists such deplorable matters as driving under the influence of drink or drugs, failure to wear a seatbelt, careless driving, dangerous driving, and excessive speeding (it should mention use by drivers of mobile 'phones, too) – but is silent on this widespread presumption by motorists that it is they who have the 'right of way' over others, and certainly over pedestrians.
25. What is needed is education of all highway users so that they recognise these points and that drivers recognise the full extent of pedestrians' rights, and that they must expect to find them walking in the carriageway where no footway exists, and that slower-moving pedestrians crossing roads are entitled to the legitimate expectation that drivers will see them and will slow down and stop if necessary, and not display impatience or give abuse.
26. It is pleasing to note at paragraphs 29 and 30 of the Executive Summary that DfT intends to raise awareness of road user behaviour issues, and to develop a suite of road safety educational materials, for 'everyone from toddlers to young adults'. But about the latter we must express a *caveat* – it must not be education of a kind which 'educates' them (like the kerb-drill did) that roads are meant for motorists. Of course children must be made aware of the dangers of roads, but not so as to think that once they have become drivers it is they who rule the roads. We advocate a balanced approach, not an approach which scares children off the streets and deters them from walking – a thing which in the past has contributed to plummeting levels of everyday physical activity and the resulting growth in obesity and other health problems.

⁷ On 9 May 2009 the publication of the present consultation was reported in *The Times*, whose online 'Have your say' site provoked the contribution, 'If you [as a pedestrian] are hit on the road, what on earth were you doing there?', which in our view glaringly reflects the misunderstanding that pedestrians should not be on roads even when on rural roads there is often no footway. See http://business.timesonline.co.uk/tol/business/industry_sectors/transport/article6244729.ece So does the comment, in a similar web-article (*The Times*, 16 May 2008), 'What are pedestrians doing on the road to be hit by a car at *any* speed? Drivers hitting pedestrians on pavements, crossings, etc should be prosecuted to the limit of the law – agreed. Pedestrians being hit otherwise should be treated likewise, in the event of their survival.' (That entire column is worth attention for illustration of the widespread nature of some drivers' attitude to pedestrians and to their lack of appreciation of the problems pedestrians face.) See http://business.timesonline.co.uk/tol/business/industry_sectors/transport/article6244729.ece

27. It should be made a key feature of the driving test that candidates fail if they cannot recognise that they can expect to encounter pedestrians on roads with no pavements *using them by right*, just as they, the driver, is using them by right. And it should be a key feature that they fail if they cannot recognise that pedestrians cross roads *by right*, not through some concession which makes drivers tolerate it.
28. Years ago there used to be 'public information films' shown on television and in cinemas. They taught people of such things as the dangers of driving too close to the vehicle in front, and of dazzling the driver in front with headlights. It seems to the Ramblers that similar material could be shown to illustrate the nature of the rights that non-motorised users possess on roads, and to teach drivers that they should treat them as if they were slow-moving vehicles and not to expect that they will automatically move out of the way, whether by squeezing into a hedgerow, stepping on to uneven and possibly dangerous verge, or other means.
29. We see this approach as a major and necessary ingredient in encouraging more people to walk in rural areas. There is already a major asset for walkers in many parts of the countryside: the network of lesser highways made up of footpaths, bridleways, restricted byways and byways open to all traffic. The government continues to recognise this immense asset and its value for recreation and exercise, and as a form of transport: see, for example, paragraphs 1.4 and 1.5 of DEFRA's lately-issued *Rights of Way Circular 1/09 – Guidance for Local Authorities*,⁸ which says that

Rights of way are both a significant part of our heritage and a major recreational and transport resource. They enable people to get away from roads used mainly by motor vehicles and enjoy the beauty and tranquility of large parts of the countryside to which they would not otherwise have access. Rights of way provide for various forms of sustainable transport and can play a significant part in reducing traffic congestion and harmful emissions. They are becoming more important as increases in the volume and speed of traffic are turning many once-quiet country roads into unpleasant and sometimes dangerous places for cyclists, equestrians, walkers and carriage drivers.

In many areas, rights of way help to boost tourism and contribute to rural economies. They can also provide a convenient means of travelling, particularly for short journeys, in both rural and urban areas. They are important in the daily lives of many people who use them for fresh air and exercise on bicycle, on foot, on horseback or in a horse-drawn vehicle, to walk the dog, to improve their fitness, or to visit local shops and other facilities.

30. But not every public right of way links with another off-road route. If that undoubtedly good resource is to be used to the full, the roads on which walkers must sometimes go will need to be made safe as well.

Quiet Lanes

31. At least partly to this end, we think that the concept of Quiet Lanes should be revisited. The DfT supported this initiative by what was then the Countryside Agency; but it seems to have been quietly dropped. The aim of the Quiet Lanes initiative was to achieve positive changes in user behaviour on minor rural roads, without reliance on speed limits or traffic calming.

⁸ <http://www.defra.gov.uk/wildlife-countryside/pdf/access/prow/rowcircular1-09.pdf>

32. While we recognise that there may have been some flaws in the original project (for example, the definitions were not helpful, and the signage was minimal and drivers did not understand it), we continue to champion the principle that walkers and other non-motorised users should again feel safe and welcome on country roads, which, for vulnerable users, really have become 'weak links' through the sheer danger of them. We propose a fresh look at the Quiet Lanes model.

Road and Local Authorities (Chapter 5)

33. Paragraphs 5.18–5.23 set out excellent proposals for reducing pedestrian casualties in urban areas. But we wish there was more on educating drivers so as their mindset as to the presence of pedestrians is concerned. Measures for calming traffic in side-streets are important. But there is no doubt that many motorists expect the same freedom to travel at the full permitted speed along, say, the high street of a market-town on a busy shopping day as they would along an unimpeded major road, when in our view they should be interacting with the needs of pedestrians, driving on the expectation that shoppers may cross the street at any point according to what errand they have next, and so on. This does not happen, and education to that end is needed. And there is too much official about 'journey times' when the imposition of speed limits is being considered. Time and economic factors should not be governing issues when speed limits on routes which vulnerable users can use are being set.
34. The Ramblers believes that there is much 'suppressed demand' for walking on rural roads. Above we have referred to the road-holding properties of modern cars which allow high speeds even on winding lanes. Moreover an increase in vehicular use (partly through the enticement by sat-nav of many more drivers on to country roads than ever went on them in the past) has left potential walkers fearful for their safety.⁹ The result is the pernicious suppression of a sustainable form of transport (as well as of recreational walking), and roads appear safer than they are because people are afraid to walk on them.
35. In consequence the consultation pays too little regard to this problem of danger on rural roads to non-motorised users.
36. Education – again, of road users of all kinds concerning the relationship between vehicles and vulnerable and non-motorised road users – is needed. It is notable that many (if by no means all) drivers will slow down for horses and give them a wide berth. This is in remarkable contrast to the dangerously narrow margin left by drivers between themselves and pedestrians.
37. We suspect that some drivers are genuinely unaware of what other types of use they may properly expect to encounter on rural roads, like sheep or cattle being herded. This, again, is something which many drivers appear to think is a nuisance verging

⁹ In its 2004 *State of the Countryside* report, the then Countryside Agency reported that average growth in vehicle movements was 2.4%, but on minor roads it was 4.7%. The Department for Transport reported in February 2008 that for 2006 the growth in vehicular use was as follows: on rural A roads, 1.8%; on rural minor roads, 2.5%; on urban A roads, 0.6%; on urban minor roads, 0.1%; on motorways, 2.2%; the average of all types being 1.4%. Minor roads are seeing the fastest rise in traffic volumes.

on an infringement of their own rights, rather than the legitimate exercise of the right to drive animals on most carriageways.

38. But undoubtedly there have got to be changes in the infrastructure. Highway authorities need to be required to review their spending and be prepared to change their priorities so that the needs of pedestrians are placed above the demand for faster traffic movement and motorists' misplaced belief in their entitlement to it. More footways should be provided on rural roads, in adjacent fields if necessary, so that walkers are not obliged to walk in the carriageway.
39. Where that is not possible, we suggest a new approach altogether similar to that in Holland, where rural roads, instead of a central white line, have a line each side leaving a metre margin. The result is that drivers must go slowly, being ready to negotiate with oncoming traffic; the option of driving flat-out is too reckless. The driver has full use of the central part of the road, but when other traffic approaches he has to cross a white line, causing him to consider whether there is a pedestrian in the margin.
40. Highway verge, where there is any, should not be seen as the ready solution. It can be of scenic amenity, and in many places there is a policy of 'managed neglect' for nature-conservation purposes.
41. For all we have said about education, we submit that highway authorities must introduce more speed limits and cause their enforcement. Even if that element of the driving lobby that insists that 'speed is not a factor' in many collisions is seriously correct, it remains a frightening experience for a pedestrian to be routinely passed on a country road by a car inches away going at 60 mph, and this obscene arrangement needs to be ended if people are to be encouraged to walk. The default national speed limit should be lowered to 50 mph on rural single carriageways; there should be more 40 mph limits on minor rural roads; there should be powers for authorities to introduce 20 mph zones on residential roads more easily. The police must enforce these measures, with some assistance from the infrastructure, by means of physical measures: chicanes, for example, or the reduction in carriageway widths with replacement by adjacent footways, but ideally by the Holland system we propose above.

The need for safe crossings

42. As noted above, we are much concerned with the danger to walkers, particularly in rural locations, caused by the absence of safe or convenient means of crossing roads. In hundreds of locations, lesser highways like footpaths or bridleways are intersected by heavily-trafficked roads carrying fast-moving vehicles. Often there is no way to cross except as follows: stand on the verge waiting for a gap in the traffic and then set off at a running pace, frequently to the accompaniment of furious hooting of car-horns as drivers express what they see as legitimate anger. It is impossible for anyone except fit people confident in their agility to cross this kind of road.¹⁰

¹⁰ Rule 7E of the Highway Code tells pedestrians this: 'When it is safe, go straight across the road – do not run.' But running or preparedness to do it is necessary in many locations.

43. The result is that most people dare not use some such crossing-places, and so whole sections of the network are lost to them. And some crossings are so dangerous nobody dare use them. Often, sadly, a bypass built in recent years to take traffic out of a village or town is at the core of it, effectively 'moating' that community and preventing enjoyment of nearby countryside by suppressing the demand of paths which but for the bypass would link the community with its surrounding countryside. Integrating urban walking routes with access to green space and surrounding countryside so as to encourage walking and health is of great importance for enhancement of health and amenity.
44. We are not clamouring for a bridge in every location where a footpath is severed by a new road. Other, cheaper, means exist of remedying this kind of situation when a new road is built, such as the diversion of several paths to a single crossing point like a bridge or underpass, possibly a farm accommodation bridge or underpass that would have been provided in any case. One current obstacle to such diversions is a belief in some authorities (a misunderstanding, we think) that highway legislation does not readily permit such diversions. If that is right, new legislation should be introduced to remedy it.
45. But while footbridges and subways may be acceptable in rural locations, at-grade crossings such as zebras and pelicans which correspond with pedestrian desire-lines are often the only realistic option in the urban environment. Long detours and unattractive grade-separated crossings inconvenience walkers and deter people from walking, and act as barriers to people with mobility problems. To quote another participant in the focus group associated with the DfT's *Personal security issues in pedestrian journeys*,

'crossing the roads round here can be a nightmare ... the traffic is going very fast and they don't expect the zebra crossing or pedestrians to cross ... the road junction is very complicated with more than two sets of lights, all on different circuits ... you can't just walk across one road but have to wait to use two or three separate crossings ... it's just designed for the traffic ... the whole areas been given over to traffic.... I don't think anyone has thought about the pedestrian at all' [man in urban group].

Concluding

46. Though we hope we have covered most of the points raised in them above, we will for completeness answer here the questions which are asked at various places throughout the consultation—

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?

47. We are troubled that the evidence ignores the suppression of walking on dangerous roads. As CPRE have put it, 'how can we even claim to aim for the "safest roads in the world", if people are still too scared to use them unless encased in a metal chassis?'¹¹

¹¹ CPRE website: <http://www.cpre.org.uk/campaigns/transport/rural-transport/safer-roads>

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

48. Yes, provided that vision is underpinned by the principle that it is about creating a safe environment for all users and weighted in favour of the most vulnerable – notably walkers, and especially walkers with disabilities, children and old people.

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

49. That seems reasonable, but we advocate swift introduction of the more radical proposals concerning speed limits and their proper enforcement, and consideration being given without delay to the Holland system to which we refer in paragraph 39 above.

We have identified a number of factors that may affect our ability to deliver road safety improvements 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?

50. It is said by some highway authorities (including the Highways Agency) that the legal provisions for realigning footpaths, bridleways and other lesser highways in the context of road schemes are unwieldy, with the result that walkers end up having to walk long distances beside the new road, instead of 'inland' from it on new routes to a safe-crossing point. The law should be amended if this impediment exists.
51. And as we have said, there needs to be better all-round education about the rights and status of non-motorised users of the highway.

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?

52. Some of what we advocate above – like the Holland system – will involve a change in policy, so we cannot agree in full.

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?

53. Broadly we think that these measures will contribute to the overall aim, but we believe that the proper enforcement of the lower speed limits we advocate above will be necessary and the consultation could have been more robust on this issue of enforcement.
54. This may be an apposite place at which to mention the scourge of drivers who unlawfully park partly or wholly on the pavement, apparently permanently escaping censure. Complaints to traffic wardens result in the explanation that since it is not a No-parking zone, it is a matter for the police and not for them; the police explain they have other pressing priorities. It may be under this heading that this undoubted problem (which makes use of the pavement difficult or impossible for wheelchair users and others with mobility problems) can be addressed. It is a clear, frequent breach of the law which is rarely tackled.

55. We know of no study on the subject, but we suspect that some vulnerable people are deterred from venturing even on to pavements because of the unchecked presence of pavement-cyclists. That there may be few casualties recorded could be, again, because of suppressed demand. This issue should be visited.

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

56. Yes, provided that it takes account of suppressed demand, and does not result in 'improved' figures which in truth only reflect the deterring of vulnerable road users from using the roads in the first place.

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?

57. Undoubtedly reducing speed limits on single carriageway roads will be effective *provided it is enforced effectively*; and it will enhance the experience, now a frightening one, of walking on them, since being passed by vehicles inches away going at 60 mph or more can be terrifying.
58. Above we have advocated the Holland system – no white line down the middle of the road, one each side instead leaving a metre for walkers. Drivers must go slower to negotiate their passage with oncoming vehicles, and must think before crossing a side-line.
59. There should be many more footways, but rarely at the expense of highway verge, which is important for amenity and conservation. More paths in adjacent fields, etc, would be better.

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

60. Not road-humps, sometimes called 'sleeping policemen'; these are disliked by the emergency services, making it more difficult for ambulances to transport casualties with certain types of injury, or fire-engines to transport large amounts of water. Chicanes, and cameras coupled with enough staff to enforce the law, police or otherwise, would be better.
61. But it is to be hoped that a shift in attitude tending towards a 'street culture', perhaps through the allied promotion of Home Zones, can contribute.

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

62. By encouraging highway authorities not to design road safety schemes in isolation without taking into account a holistic approach. For example, schemes to improve road safety should be developed with the promotion of active travel at their core. A full cost benefit analysis should be encouraged as standard which includes a robust assessment of the impact of the scheme on levels of physical activity, in particular walking.
63. The economic return of increased safety on the roads has its part to play, from several standpoints. Fewer, casualties, obviously. Encouraging more walking will promote better and healthier lifestyles, potentially causing savings in health care. The rural (in particular) economy will also benefit from more people being encouraged to take up recreational walking (village shops, pubs, tea-rooms, guest houses, 'outdoor' shops, as evidenced not least by the economic downturn caused by the foot-and-mouth outbreak of 2000-2001).

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

64. This is a little outside the scope of our technical knowledge, though above we have touched on the problem of high speeds made possible by the road-holding capabilities of modern cars, and we broadly support what is proposed in Chapter 6.

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

65. Yes, that seems probable.

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

66. Above we have extensively advocated education as one of the keys to addressing this issue. We know that this will not touch every individual, and that all the education in the world will not persuade some drivers that the roads are not for drivers alone, or that they do not have the 'right' to drive at threatening speeds. We do however think that education (concerning the rights of all users, coupled with environmental concerns) has a major part to play in encouraging most consumers to change their purchasing decisions in favour of safer vehicles, just as many already take environmental concerns into account in their decisions.

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

67. Nearly. But we have referred extensively above to the general misunderstandings of the rights of non-motorised users, and we ask the DfT to take full note of this. Many if not most drivers simply do not understand that they can expect to find pedestrians rightfully using the carriageway, and that needs addressing.
68. Above we also mention the nigh-on universal disregard of section 170 of the Highway Code, which requires drivers to give way at junctions to pedestrians who have started to cross. One sees this infringed all the time, to the added danger of pedestrians. The consultation has missed this, though it is an issue which needs addressing.

69. And the consultation omits reference to the use of hand-held mobile 'phones by drivers, though instances of this are frequently seen.

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

70. There needs to be a shift in attitudes away from the whole 'car culture'. We regret that this is somewhat beyond the scope of this response. But a programme of education concerning the rights of other users as mentioned above would contribute to this.

71. We have heard it argued that 'it is not speed that causes accidents'. Even if that were true, it has other ill-effects, like making walking along a road with no pavement a frightening experience and so suppressing people's right to use that kind of road, of which there are thousands of miles'-worth. It also suppresses opportunities to cross the road safely, with walkers having to wait until there is a sufficiently reassuring (i.e, enormous) gap in the traffic.

What more can be done to encourage safe and responsible driving? Should more be done to reward good driving? If so, what?

72. Education, with lower speed limits and their proper enforcement for those who are not reached by education-programmes.

Do you agree that our targets should be:

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

73. That would appear to be a realistic set of initial aims.

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

74. We submit that an increase in the number of vulnerable road users back on the roads would be another indicator of the success of the proposed strategy. Reductions in casualty-figures may otherwise be no more than a representation of suppression of use.

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?

75. That seems a reasonable proposal.

Closing

76. In closing this response, we note that at paragraphs 7.4 and 7.6 the DfT recognises that it faces two key challenges over the next 20 years: shifting the social norm in relation to dangerous driving speeds and 'minority behaviours' such as drink-driving and careless driving. We believe, as we have said above, that a process that educates people that pedestrians have a co-existent right to that of motorists to use roads and to be in the carriageway, and that drivers should expect to encounter them there are to drive in accordance with that expectation.

77. That, we submit, really is the key. There must be a general change of attitude; a heightening of consciousness of the importance of walking as a means of transport in its own right. All the evidence is that this is a fundamental point which is widely ignored: by drivers, by the DfT, by highway authorities. Many of us are motorists for some of the time, almost all of us are pedestrians for some of the time. Robustly prompted by the DfT, we – society – must make every effort to rid ourselves of the misunderstandings about status which create so many of the problems, which tacitly condone continual excesses by motorists, and which tolerate sufferings by pedestrians. Changes to the infrastructure are necessary, including lower speed limits and their proper enforcement; but what is really called for is a revolution in attitudes. Nothing less than that will be sufficient.