

**A Safer Way:
Consultation on Making Britain's Roads the Safest in the World
Response from Sustrans
July 2009**

INTRODUCTION

Sustrans welcomes the opportunity to respond to this consultation paper. The initial sections deal with certain broad issues, but the bulk of our response addresses the specific questions posed on the consultation document.

Whilst the consultation is published by the Department for Transport, we are pleased to see that 'the Westminster, Scottish and Welsh administrations will jointly publish the delivery plan, setting out how we intend to meet these targets, how we intend to deliver on the measures in this strategy and how we will make British roads the safest in the world'. Sustrans has a strong presence in Scotland and Wales and last year submitted a response to the Scottish Road Safety Strategy Consultation.

ABOUT SUSTRANS

Sustrans is the UK's leading sustainable transport charity. Our vision is a world in which people choose to travel in ways that benefit their health and the environment. We work on practical, innovative solutions to the transport challenges facing us all. Sustrans is the charity behind the 12,000-mile National Cycle Network, Connect 2, Safe Routes to Schools, Bike It!, TravelSmart, Active Travel and Liveable Neighbourhoods.

These are a mixture of 'hard' and 'soft' measures to enable more people to walk and cycle more often. However, a perceived lack of road safety by the general public makes the work of promoting walking and cycling more difficult. At the same time, at national, regional and local level, it also hinders achieving Government goals to reduce carbon emissions, promote personal health and reduce the adverse impacts of motorised traffic (PACTS, 2007). Thus we hope this consultation will successfully broaden policy linkages to several key areas.

WHAT IS 'SAFETY'?

We are encouraged that the consultation document recognises that reductions in absolute number of casualties – though welcome – do not always constitute 'safety'. This is illustrated by the accepted phenomenon that some busy roads may appear 'safe' with respect to accident records as no cyclists or pedestrians will use them on account of the very high levels of perceived danger. Measurements of public perception of 'safety' need to be developed, and integrated into the official approach.

At the same time more work needs to be done on comparative rates of safety for different modes which can be applied on the local as well as the National level. Measurements can be made by:

- Absolute casualty numbers
- Relative to distance travelled
- Relative to trip numbers
- Relative to time exposure

Further debate is needed on which are the most appropriate measurement, both for time series comparisons where the amount of travel by a mode may change and for comparisons between modes.

Another important category of comparative assessment can be summed up as 'Who Hits Whom?' For example, driving a lorry may be relatively safe – but lorries are disproportionately recorded in relation to cyclist fatalities. Pedestrians and cyclists may have relatively high casualty numbers – but in themselves are responsible for very few fatalities or serious injuries.

Thus it follows from the above that altering the modal mix can in itself be seen as a means of improving safety. Policies to increase the amount of walking, cycling and public transport can inherently work towards greater safety. It should be noted, though, that countervailing policies which increase levels of motorised transport through the closure of local facilities (e.g. Post Offices) adversely impact on Road Safety.

Also of concern is that road safety budgets may be cut, due to the current economic climate. It would be welcome to have the final strategy re-affirm the need to maintain, if not increase, funding for road safety work as a matter of priority for local, regional and national Governments.

A NEW VISION

Vision Zero

Most radical of new visions of better safety is Sweden's 'Vision Zero' (SWA, 2006). Introduced in 1995, it is based on the ethical standpoint that 'no-one should be killed or seriously injured for life in road traffic'. For the first time safety took priority over mobility, with reduced speeds seen as the key intervention. We would encourage more discussion of this concept within the current Road Safety consultation process.

Scotland's Framework

In June 2009 the Scottish Government published Scotland's Road Safety Framework to 2020 (Scottish Government, 2009a). Included in the vision is that there will be 'a steady reduction in the number of those killed and seriously injured, with the ultimate vision of a future where no-one is killed on Scotland's roads, and the injury rate is much reduced' (Section 2.1). Sustrans submits that this level of ambitious thinking should be extended across the UK, if we are aiming to make Britain's roads the safest in the world.

Sustainable Safety

'A Safer Way' mentions the Dutch concept of 'sustainable safety'. We welcome this, but feel more could have been made of the main principles here, particularly on the relationship between road functionality and appropriate vehicle speeds.

Active Travel

Linking improved road safety with sustainable transport is central to increasing physical activity and improving many aspects of personal health. Take Action on Active Travel is a joint effort by the UK's leading public health organisations, to bring about a population-wide shift from sedentary travel to walking and cycling (Sustrans, 2008). To do this, decision makers at all levels – UK, devolved governments, regional and local authorities – need to:

- set ambitious targets for a growth in walking and cycling
- invest at a realistic level
- create safe, attractive walking and cycling conditions
- make 20mph the norm for residential streets
- tackle bad driving
- 'health check' land and transport decisions, to create safe conditions for walking and cycling

Use of Targets

Setting demanding targets is an excellent way of creating a vision for a safer future. These are a feature of the Cycling Action Plan for Scotland (Scottish Government, 2009b) and of recent statistical analysis in Scotland (Scottish Government, 2009c). These help to monitor trends and progress towards casualty reduction targets.

We urge that a similar form of analysis be applied to the recently stated intentions of the English Department for Transport to produce a National Cycling Strategy and an Active Travel Action Plan, jointly with the Department of Health. This work should be cross-referenced with the new Road Safety Strategy when completed.

NATIONAL AUDIT OFFICE

In May 2009 the National Audit Office published Department for Transport: Improving road safety for pedestrians and cyclists in Great Britain (NAO, 2009). This is an interesting document, although apart from statistics it focuses almost exclusively on England.

This gives a clear picture of the current situation, which is rather mixed. Whilst good work is being done, the Department does not appear strong in evaluating some of it. Among the report's key recommendations are:

- numbers of killed and seriously injured should be separated, and these further subdivided between different groups of road user
- the Department should require local authorities to adhere to prescribed evaluation standards
- the Department should more systematically identify local highway authorities that have introduced effective measures – such as 20mph zones – successfully, and share the lessons with other local authorities

The report underlines the Department's success in casualty reduction. Comparing 2007 with the 1994-98 average, KSIs for cyclists are down 31%, for pedestrians 41%, with little or no decrease in usage.

The report emphasises:

- the disproportionately high level of casualties in deprived districts
- the very successful casualty reduction record of 20mph areas
- the very high level of child pedestrian casualties between 3pm and 7pm
- that 23% of all cyclist fatalities resulted from a collision with a lorry

Sustrans commends this report, and urges that its findings and recommendations be absorbed into the new Road Safety Strategy.

RESPONSES TO QUESTIONS

Vision and Targets

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

This is a laudable aim, though as we have said we need to be clear about the meaning of 'safety'. We also suggest using the term 'safest for all road users'. This will avoid the problem of having apparently 'safe roads' which pedestrians and cyclists are frightened to use.

We further suggest using the term 'on all types of road'. This is to avoid problem areas being hidden within an overall acceptable average.

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?

Yes.

3. 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;

Yes

- the annual total of serious injuries on our roads by 2020 by at least 33 per cent;

Yes

- 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;

Yes

- 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? (Chapter 8)

Appendix A notes that this would be a combined rate for both modes. We would prefer this target to apply separately to each mode (walking and cycling) otherwise it may hide an outcome where one of those modes improved substantially whilst the other had little or no change.

These targets are proposed at the national level, for which National Travel Survey data is available to provide trip distance. However, this data source is not suitable for use at the local level and collection of such data at that level would not be cost effective. Whilst para 4.13 refers to the responsibility for setting local targets being devolved to local authorities, we nevertheless suggest that some guidance be given to local authorities as to how they might develop targets that have some consistency with other local authorities and with those at the national level. We expect that the most feasible measure (at least for cycle rates) would be KSIs relative to the number of trips by that mode, since most local authorities already collect data on cycle use in some form.

Additionally, we want to set targets for improving public perception of safety. Locally this would be trialled using citizens panels and local focus groups, and could help extend 'ownership' of targets adopted. Also, Denmark has a special scheme to promote road safety among recent immigrant communities. Research should be done to see if a similar scheme is needed in the UK.

4. 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?

We suggest adding:

'Number of killed or seriously injured casualties resulting from collision involving:

- a) HGVs
- b) LGVs
- c) Bus/Coaches
- d) Taxis
- e) Fleet cars'

Context

5. 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?

Key risks and opportunities, we suggest adding:

'Environmental and Economic:

- peak oil and increases in the price of fossil fuels.'

'Social:

- higher levels of active travel, particularly related to measures to reduce obesity.'

Higher levels of cycling: in 3.3 and 3.4 there is the apparent suggestion that higher levels of cycling could increase casualty numbers. Recent evidence, however, suggests the opposite. Cycle use in London has been rising steadily for nearly a decade, but cycle casualties (in absolute numbers) have been falling. In May 2009 TfL announced that cycle trips had risen 107% since 2000, but that fatalities had fallen 21% (since the mid-90s).

This is in part due to the 'Safety in Numbers' argument, which suggests that motorists drive more carefully when they observe high numbers of cyclists and pedestrians (Jacobsen, 2003). CTC has done a useful recent summary of this topic (CTC, 2009).

Additionally, the Dutch Government has just published *Cycling in the Netherlands* (Fietsbaraad 2009). Pages 12-18 discuss 'safety in numbers', and state unequivocally that '1.6 More traffic and a high bicycle use do not automatically mean more traffic danger ... Figure 8 shows clearly that the risks for cyclists are lower in countries with a higher bicycle use ... the same is true when Dutch municipalities are compared'.

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?

Not entirely.

We have noted above that for health, climate change, carbon reduction targets and peak oil reasons major alterations in travel patterns are likely.

Equally, policies from most other Government Departments need to be brought within a road safety orbit and integrated accordingly. The same is true at local level. Misplaced notions about road safety often result in highly expensive programmes for school bus travel, currently costing £1 billion annually in England alone (HoC, 2009).

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?

We agree with most of this analysis. We propose two further key challenges:

- removing untaxed and unlicensed vehicles and their drivers from our roads (as both feature disproportionately in traffic violations).
- refining and tackling the degree of danger posed to other road users by UK and foreign lorry operators.

Also increasing use of sustainable travel modes with a corresponding decrease in use of private motorised transport could have substantial safety benefits.

New Performance Framework

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 there would be much gained through a better understanding of how road safety officers at the local level are interpreting road safety policy. It is our experience that on a day-to-day basis, recommendations of road safety auditing of highway design are based on out-of-date evidence. An example of this is the Manual for Streets recommendation that road

safety audits are replaced by a quality auditing process – something Sustrans does not see happening at a local level (DfT, DCLG & WAG, 2007).

A thorough review, leading to targeted retraining of staff with these responsibilities could have a considerable impact. Furthermore, seeking out best practice examples (where road safety is considered pro-actively and based on evidence at the outset of projects, rather than re-actively in the final design stages) and publicising these would be of considerable value.

Finally, Government guidance on issues of liability around highway design and maintenance – an area of considerable concern and inaccurate information at the local level – would be welcome. The most comprehensive guidance currently available on this topic is the little known *Highway risk and liability claims: A Practical Guide to Appendix C of the Roads Board report "Well Maintained Highways – Code of Practice for Highway Maintenance Management"* (UK Roads Board, 2005).

Better liaison is required with local police forces, in order to make them less hostile to signed-only 20mph zones

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

Yes – provided that it is open-minded, willing to include road-users and NGOs, and able to suggest corrective policy action if it appears targets are unlikely to be met.

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. Also, it is particularly important that other stakeholders as well as Government are held to account.

Roads and Local Authorities

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?

Yes – provided guidance from Government is firm and clear enough.

For non-strategic rural roads we believe a 40mph maximum is required.

For cyclists and pedestrians we believe that much more can be done by a 'Safe Routes' approach, especially for schools. Our recent 'Rural Safe Routes to Schools' programme in Northern Ireland increased levels of cycling, raised the percentage of pupils walking to school from a fifth to a third, and cut the number of pupils driven to school from 64% to 49% (for more, see www.sustrans.org.uk/nischools).

12. 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?

a) 20mph zones: Given the clear road safety and other societal benefits outlined by the draft strategy, we strongly suggest that the Government strengthens its call for the introduction of such schemes. At the moment, this reads "...we will encourage local authorities to consider introducing 20mph limits..." (p.52). Once the results of the research from Portsmouth are known (and assuming it is positive), we would call on

Government to part-fund the implementation of town-wide 20mph projects across England. This would be the most effective way of promoting their implementation.

The approach adopted elsewhere in Europe where 30kph is widespread in residential areas is more pragmatic and appears to be based around implementing an area-wide restriction with limited traffic calming and then monitoring it and adding additional measures where they are seen to be required. Much of the speed reduction can be achieved by the careful layout of car parking areas and junction design so as to have a traffic calming effect (CfIT, 2005).

We should permit the implementation of 20mph zones without extensive traffic calming subject to appropriate monitoring and further works as required. These could be on a trial basis initially.

We question why only residential areas are to be covered. Many mixed priority streets could also benefit from reduced speeds, encouraging greater use of local shops and service providers, with positive economic consequences.

We urge cross-reference of this section of the strategy with the Department for Children, Schools & Families (England)'s Play Strategy (DCSF, 2009), which recommends 20mph and other measures for children's safe and sustainable travel.

- b) Other measures to reduce pedestrian and cyclist casualties:
- cycle and pedestrian audit of existing streets
 - reallocation of road space to sustainable modes
 - ensure that town centres are permeable to cyclists (travelling into and through them)
 - tackle threats posed by lorries, vans, taxis, buses, PTWs
 - junction improvement programme
 - make most one-way streets two-way for cycling
 - all schools to have Safe Routes programmes and to report results
 - increase funding for Kerbcraft and child pedestrian training
 - maintain and expand funding for National Standard cycle training including rolling out Level 3.
 - have large-scale experiments with shared space (including home zones and measures such as Sustrans' DIY Streets) across a range of street types
 - ensure pedestrian and cycle facilities are of high design quality
 - have a Government research programme into possible 'driver liability' changes to traffic law
 - Government to adopt the National Cycle Network as a National Network and work in partnership with Sustrans on maintenance, planning and implementation of future growth, so as to provide a high quality and safe alternative route choice
 - ensure bus lanes and cycle facilities are not opened to use by motor-cycles/mopeds
 - ensure cycle and pedestrian facilities are of high design quality

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

- a) Ensure Road Safety in England is fully and effectively integrated into Local Transport Plans, Local Area Agreements and Local Strategic Partnerships, and to equivalent mechanisms in Scotland and Wales
- b) Ensure that the very high Cost Benefit Ratios achieved by many safety schemes are fully recognised within the various national transport appraisal systems and by local authorities

Vehicles

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

- a) Publish official graphs showing vehicle types and their respective relationship to all forms of road casualties
- b) Hasten large-scale trials of in-vehicle speed limiters/ISA, and provide a commitment to offer financial incentives to roll these out
- c) Work to EU setting a target date for all new vehicles to have speed limiters

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

This proposal needs breaking down more into different types of road user, and under differing sets of circumstances.

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

By helping them change their mind-sets, as a result of a new and holistic road safety strategy.

Behaviours

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

Yes, except that:

- We believe there is a case for re-examining the raising of the driving age
- We believe the drink-drive alcohol limit should be reduced to 50mg
- We believe there should be a proper debate about the benefits of moving the clocks forward one hour. Para 7.38 says this could save 80 deaths a year
- We strongly disagree with the section in Appendix E: Impact Assessment, 'Options not Taken Forward' that reducing the maximum speed limit to 60mph would result in 'benefits heavily outweighed by the economic costs of increased journey times'.

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

- a) Return to higher levels of traffic policing
- b) Have full and fair enforcement of existing traffic law
- c) Much wider use can be made of pro-health arguments. In January 2008 National Institute for Health & Clinical Excellence published recommendations on Promoting and creating built or natural environments that encourage physical activity (NICE, 2008). It stated that 'Transport planners should ensure pedestrians and cyclists should be given the highest priority when developing or maintaining streets or roads'. Sustrans also leads for 'Take Action on Active Travel' (Sustrans, 2008), as noted above.

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

- a) Bus company schedules should be realistic
- b) Bus, LGV and HGV drivers should have a greater emphasis on vulnerable road-users in their training
- c) Employers granting the use of company cars to staff should ensure extra driver training is given
- d) There should be a commitment for ongoing funding to provide Level 2 National Standard cycle training to all Year 6 pupils who want it, and to initiate funding for more Level 3 training.

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

This already occurs through the insurance system. The concept could be extended to company fleets. But, to place in context, we do not give awards for 'good walking'.

CONCLUSION

Sustrans believes that all levels of government throughout the UK face a new policy agenda, one which includes Climate Change, Energy Supply/Security, Localism, Active Travel, Housing, and Low Carbon Travel. Central to tackling these issues successfully will be a large increase in sustainable forms of travel. Real improvements in all aspects of road safety will be a crucial part of this change, and we hope the new Strategy will greatly facilitate this process.

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