



Submission to Department for Transport on “A Safer Way”

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The campaign for 20 mph to become the default speed limit for residential roads.
20's Plenty for Us has local campaign groups throughout the country and this submission is based upon a “grass-roots” perspective from working with local communities on road danger reduction.

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Executive Summary

In the UK parents consistently cite the high speeds of vehicles and the volume of traffic as the reasons why they do not allow their children to walk or cycle to school. At the same time public opinion is recognising that we are creating roads designed and operated for motorists first, rather than equitably for all users. It is our vulnerable road users who are “hardest hit” by urban and residential vehicle speeds which are 60% higher than those in Northern Europe. Whilst our pedestrians account for 21% of all road fatalities in the UK, in the Netherlands it is just 9.4%. A road fatality in the UK is more likely to be a pedestrian than in any of our West European neighbours.

For an equitable use of our roads and streets as shared public spaces it is imperative that we create a safe environment that recognises the vulnerability of pedestrians and cyclists.

There is clear evidence that the public is very much in favour of a 20 mph speed limit on residential roads. Portsmouth is the first city to implement such a scheme on an authority wide basis. In doing so it initiated a “community-wide” debate linking road safety to restraint and equitable use of its roads. By doing so it also maximised the benefits for drivers who now also gain the “family” benefits of living on a 20 mph street and therefore also increased compliance levels.

If we are to move to a society that is less dependent upon the motor car then it is imperative that we maximise the opportunity for people to walk or cycle instead. In reality this will not happen unless a major shift road safety is made in support of vulnerable road users. 20's Plenty For Us believe that the following should be key factors in that initiative :-

- 20 mph as the default speed limit for all residential roads and urban roads
- Macro-engineering of 20 mph speed limits on a borough-wide basis
- Random and covert use of speed checks for enforcement of 20 mph and other speed limits

There is evidence of an increasing awareness by the public to such issues, especially in large towns. An honest recognition of these issues and firm action to change the way we use our roads and streets is now required. The benefits will be increased modal shift, lower noise and pollution, transport enablement of those who cannot or choose not to drive and lower road casualties.

2. Background and context

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?

20's Plenty for Us welcomes the fact that DfT has recognised both that the UK is falling behind other countries in increasing road safety and also that current safety levels are biased against vulnerable road users, in particular children, cyclists and pedestrians, especially those living in urban and deprived areas.

However the report does not highlight what we believe is a particularly damning statistic concerning the UK pedestrian road deaths as a percentage of all road deaths compared with other EU countries. The comparison between the UK and the EU average from 2002 to 2006 is as follows :-

| | 2002 | 2003 | 2004 | 2005 | 2006 | 2007 | 2008 |
|-------------------|-------|-------|-------|-------|-------|--------|--------|
| EU average | 15.3% | 14.0% | 13.9% | 14.1% | 14.4% | | |
| GB | 24.8% | 23.8% | 22.3% | 23.0% | 23.0% | 21.9%* | 22.5%* |

Pedestrian road deaths as %age all road deaths (Source European Road Safety Observatory, Annual Statistical Report 2008, Table 4 and 3, * Source DfT Road casualties in Great Britain 2008))

A road death in the UK is more likely to be a pedestrian than in any other Western European country. GB has consistently a far higher skewing of road deaths towards pedestrians than most EU countries and the EU average.

Also from the same ERSO report we note that :-

- For 2006, UK has one of the highest %age of road fatalities in urban areas across Europe (40% compared to an EU average of 36%). The only countries worse than UK were Malta¹, Greece, Portugal, Poland and Italy. Fig 26, Table 46.
- For 2006, UK has one of the highest %age of pedestrian fatalities in urban roads across Europe (74% compared to an EU average of 65.9%). The only countries greater than UK were Malta, Greece, and Italy. Fig 27, Table 47.

Hence we have a very clear picture that :-

- In the UK road deaths are skewed to pedestrians more than most EU countries and well above the EU average.
- In the UK road deaths are skewed towards urban areas more than most EU countries and well above the EU average.
- In the UK pedestrian road deaths are skewed towards urban areas more than most EU countries and well above the EU average.

20's Plenty for Us believe that this is caused by the "haste and pace" of motor vehicles in urban areas compared to other countries. Our current default speed limit of 30 mph results in high inter-junction vehicle speeds which do little to reduce journey times and only create the illusion of fast flow coupled with the frustration of inevitable stopping at junctions and congestion points. What is needed is a "paradigm shift" in the way we not only share our urban roads and recognise the needs of vulnerable road users, but an objective debate and understanding that speed between junctions has few benefits to society but deplorable consequences in both casualties and the reduction in the quality of life of vulnerable road users and those who would become vulnerable road users if that vulnerability were reduced.

Other countries recognise the need for motor vehicles to slow down to appropriate speeds where they share roads with vulnerable road users by imposing a 30 kph (18 mph) speed limit in residential and urban roads.

Some comments on Speed

The report points out the relationship between the speed of a crash and the impact – and therefore the likely severity of any injuries. However it does not sufficiently bring out the relationship between speed of vehicles before an incident takes place, and the ability of the drivers and road users to take action to avoid a collision. We know that speed can be a cause of a percentage of collisions and we know the effect of impact speed on the survivability of collisions. However, we do not believe that the ability for reductions in "before incident" vehicle speed to increase the avoidability of collisions has been sufficiently highlighted in this report.

We also note that the benefits of lower speeds in terms of lower noise, lower pollution, amenity or general urban calm have not been sufficiently highlighted. A public awareness and aspiration for these benefits are key considerations in gaining compliance for lower speeds.

3. A vision for the future

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

This seems to be laudable when we are clearly lagging behind such countries as the Netherlands in actual performance.

However, we would argue that this could lead to the same complacency as resulted from us previously having the safest roads in the world. Hence by experience we see that such an aspiration will not in itself provide sufficient motivation to maximise the achievable safety on our roads.

Therefore we would prefer the Swedish model which states that all road deaths are avoidable and aspires to achieve that aim through an appropriate combination of engineering, legislation and appropriate road user behaviour.

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

¹ Malta only had one pedestrian death in 2006 and this was in an urban area

Yes, we believe it does need that timescale. However in recognizing the seriousness of our divergence from the safety levels that other countries deliver for vulnerable road users we should work very urgently to make fundamental changes in the way that our roads are shared.

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?

3.2 We believe that it is wrong to view increased vehicle safety systems as only being delivered through the use of new cars. We have already seen that a large %age of cars now have SatNav systems as a retrofit accessory. Such accessories with the self-contained ability to provide all the functional capabilities of advisory ISA systems could warn a driver of exceeding the speed limit. Such devices would take away completely any ambiguity on speed limits and the necessity for much of the signage currently used around speed limits.

We also note that many safety improvements for motor vehicle occupants have made drivers feel more confident in their risk-taking and therefore actually increased the danger to vulnerable road users outside the vehicle.

3.3 We believe that it is important to be realistic about whether increased demand for road travel is desirable or achievable. It is important that government should recognize that hyper-mobility has a serious detriment to society on many fronts, including environmental, health and amenity.

There has also been no objective debate on the relationship between maximum speed and vehicle journey times in urban and congested environment. It is almost universally accepted that higher speeds proportionately reduce journey times and therefore have an economic benefit. In today's urban areas journey times are almost totally a function of how long you are stopped at congestion and junction points in a journey and not a function of the maximum speed attained between those points.

4. Delivering our goal – the overall approach.

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?

We agree that it is important to work on systematic delivery. However, many EU countries (with safer vulnerable road users than the UK) have some sort of “driver” or “no-blame” liability that protects vulnerable and young road users. Currently in the UK the debate about “stricter” or “driver” liability has confused *criminal guilt* with *civil liability*. We believe that any “visionary” review of road safety, with particular reference to vulnerable road users, must address the imbalance between the vulnerability of road users and their ability to claim compensation in proportion to their vulnerability.

We therefore believe that driver or “no-blame” liability is an important factor in delivering better road safety for vulnerable road users and should be included in government plans.

We also believe that there should be a major policy change in enabling traffic authorities to more cost effectively set the default speed limit to 20 mph rather than the built-up national speed limit of 30 mph.

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 voluntary bodies such as 20's Plenty for Us do have valuable role to play in providing a different perspective from the “professional” road safety profession. Hence we believe that such information should be placed in the public domain.

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

Yes

5. Strengthening the weak links in our road network.

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?

We see little benefit from the national speed limit being 60 mph on such roads and would welcome a blanket reduction to 50mph.

On speed limit enforcement we believe that the use of overt fixed speed cameras is counter-productive to the safety debate. Most consistent speeders use camera location devices which alert them to the location of fixed cameras and enable them to speed with impunity on the rest of the road network. Hence those cameras tend to catch a large percentage of “casual” rather than “consistent” speeders. A far greater use of covert, randomly placed speed cameras would take away this effect and far more fairly discriminate against anyone and everyone who speeds. The randomness would also lead to far greater compliance on the complete road network rather than just those locations with speed cameras.

In addition, we believe that speeding offences should be far more oriented to taking away the “privileges” of driving by the application of increased penalty points rather than fines. This would take away the “cash cow” arguments against speeding detection and also seriously affect those who do speed. We do not believe that the use of a motor vehicle for one’s job or profession should ever be used to mitigate against a driving ban being imposed. Both the choice of job and speed at which one drives at on the highway are individual choices and those who rely upon motor vehicles for their income should be as responsible for their actions as anyone else.

How can we most effectively promote the implementation of 20 mph zone schemes in residential areas?

In consideration of this question, we have to ask whether it is specifically addressed at 20 mph zones or limits as well. Whilst 20’s Plenty for Us recognizes the benefit of well designed 20 mph zones, the nature of pedestrian and cycling casualties on our roads is very random. Therefore it may be far more cost effective to deploy 20 mph limits on an authority wide basis as in Portsmouth, Oxford, etc.

We believe that promoting such locally driven authority-wide interventions will be far more effective than promoting 20 mph zones.

Aspects of compliance that are particularly beneficial if an authority-wide limit is set :-

Driver benefit

When 20 mph zones or limits are put in on an isolated basis, they often do not provide any benefits to the drivers on those roads who may still live on a 30 mph speed limited street. By implementing on an authority-wide basis then a far greater percentage of drivers will get the 20 mph benefit in their own street and for their own family. Hence their “ownership” of the initiative is greater and compliance will increase.

Collective Community Commitment to Road Safety

We believe that the decision to put in an authority-wide 20 mph limit is best left to local rather than central government. Hence, through debate and due democratic process the community can decide upon and “own” the initiative. This increases compliance.

Clarity

By having an authority-wide scheme with clearly identified gateways into the authority there can be far greater clarity regarding the speed limit on any road.

20 mph default rather than exception

With isolated 20 mph zones that are limited by expense and subsequently quite small in area, motorists get used to 30 mph as the prevailing speed limit in built-up areas. If complying with 20 mph limits they see this as a place to slow down from their “normal” speed. However, when they leave such an isolated zone they see a 30 mph sign which effectively tells them to “speed up”, even though they may still be in a residential area. This therefore endorses higher speeds. With current zones being primarily determined by cost then leads to a completely arbitrary boundary between different speed limited roads.

With a 20 mph default speed limit across the whole authority then this resets the “normal” speed limit for places where people share the roads with motor vehicles. One travels at a 20 mph maximum speed and only “speeds up” where it is safe to do so and indicated by a higher limit.

Central government should therefore take down some of the barriers to implementing 20 mph limits on an authority-wide basis. These include changing the signage requirements so that repeater signs are only required on non 20 mph speed limited roads, Hence the majority of roads in any area will be set at 20 mph and not require repeaters.

Another useful initiative would be to use the absence of a central white line in the middle of a single carriageway road to indicate a 20 mph speed limit.

In view of the national implications of this, the issue should therefore be included within the government's imminent review of road signage.

We also see no reason for the rights of residents for safety and amenity on their roads in rural villages to be any less than those in urban areas when considering the speed limit that is appropriate. Hence speed limits in villages should be set within the context of the community rather than the convenience of those driving through it. If we are to develop a "universal" respect for the rights of people to be able to walk or cycle without fear then rural residents must be included in the implementation of 20 mph limits. Enforcement of these is particularly important when considering that motorists may have to adjust from higher speeds on main roads outside the villages.

We would also suggest that there is merit from looking at the European model which sets speed limits at the gateway to any community rather than an arbitrary level of lighting. With such a gateway there is little need for repeater signage. Once again, an issue for consideration in the review of road signage.

What other measures should we be encouraging to reduce pedestrian and cyclist casualties in towns?

We believe that many traffic authority personnel are not sufficiently aware of the practical issues of walking or cycling on their roads. As a result, most traffic engineering is consistently viewed from a driving rather than a walking or cycling perspective. We would suggest that for all inspections, site meetings, etc that are less than 5 miles from their offices then officers should cycle or walk to such sites.

This should be extended to as many government agencies as possible. There is no credibility in asking the public to walk or cycle for the benefit of themselves and the community if at the same time health and government officers fail to practice what they preach.

Expenses for those cycling or walking on company, government or other business should be directly aligned with those for the use of motor vehicles, ie 40p per mile.

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

See signage above for 20 mph limits. The government could also offer funding for authority-wide implementation of 20 mph limits as a default for residential and other roads.

6. Supporting the choice of the safer vehicle

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

With such a high proportion of road deaths being the vulnerable road users who are outside the vehicle, then road safety for vehicles should be far more oriented to vulnerable road users than present.

An analysis of the Euro NCAP tests show that little regard is paid to pedestrian safety by motor manufacturers. Much higher minimum standards should be required, especially on larger and heavier cars. In view of the anti-social nature of cars with low NCAP pedestrian ratings, we should highlight far more the increased danger to the public of such vehicles. Hence a move to indicating comparative danger would be far more appropriate than comparative safety.

We also believe that the NCAP tests should take into account the poor visibility of child pedestrians in close proximity to cars. This is especially the case with high sided SUV's.

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

As already stated, the UK is already reducing car occupant deaths, but with increased levels of walking and cycling must address the needs of these users. Due to the principle of "risk compensation" increasing occupant safety may lead to increased driving speeds. This will reduce the impact of that increased safety for occupants, but for external vulnerable road users will increase the risk disproportionately.

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

The Euro NCAP tests should be used to show which cars have unacceptable levels of public pedestrian danger. It is somewhat ironic that many of the vehicles chosen by parents to drive their children to school are actually the most dangerous vehicles to drive in the vicinity of child pedestrians.

6.36 a) We note the reliance upon Pedestrian protection phase 2. However as the UK shows its road safety to be skewed against pedestrians in comparison to other EU countries, then such EU-wide interventions will not decrease this variation and hence cannot be relied upon to correct the current “safety apartheid” which exists on our roads compared to our European neighbours.

7. Responsible and irresponsible road use

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

We agree with the assessment, but feel that the whole tone of terminology is wrong. Most people who speed do not believe that they are doing anything dangerous. They may have been “speeding” for many years and still not have caused the accident which is alleged to be connected with such behaviour. Their assessment of the negative impact on the public is limited to a binary perception of whether they have caused a collision and created a victim or not. This is further complicated by the fact that collisions on our roads are actually rare events for any one driver. Indeed, most collisions do not actually result in anything more than a bruised vehicle.

Hence if we are to persuade people to change their driving behaviour we have to shift the focus away from the event, which they perceive is very unlikely (ie a collision and consequential injury of themselves or others), to one that has a direct and consequential difference to their every day life and other road users.

The positive benefits of reduced speeds should therefore be “sold” much more to the public, including :-

- Lower fuel consumption and costs.
- More relaxed driving.
- Praise for more responsible driving and politeness.
- Creating a more amenable street environment.
- Lowering community noise.

We must also educate drivers to recognise :-

- That driving “hastily” does not reduce journey times.
- That public roads that are shared with others are not the place for recreational risk-taking.
- That speeding without a collision is not a “victimless crime”. It erodes the public perception of our roads being “safe” to walk or cycle on and discourages modal shift. It takes away the possibility of independent travel for children and frightens the elderly and infirm off the roads.
- That **“Speed becomes Greed”** when it reduces the choice of others to walk or cycle.
- That unnecessary acceleration to higher speeds often has no benefit in reducing vehicle times.

On any objective assessment, and even ignoring road casualties completely, then there is little evidence of a benefit to society or the individual from maintaining higher maximum speeds.

Unfortunately such objective assessment and debate is rarely conducted. If we are ever to get the “paradigm shift” that is so required in order to reduce vulnerable road user casualties then we must address these issues. At every level in society we must question the dubious benefits of travelling faster on public streets. We must question the wisdom of motor vehicles that are designed for sport rather than transport as a practical utility. We must discriminate against vehicles who’s use on public roads is anti-social because of their needless size and weight.

Until we ask these questions then we will never obtain the levels of vulnerable road user safety that exist in our neighbouring countries.

In short we must :-

- Focus on the gains that come from more appropriate speeds and put them into perspective against the risks.
- Normalise our relationship with the use of motor vehicles and public roads for utility transport rather than recreational risk-taking.

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

behaviours?

See above

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

See above

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

See above

8. Measuring and ensuring success

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 rate²

of KSI per km travelled by pedestrians and cyclists, compared with the 2004–08 average?

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?

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?

We welcome these targets, particularly the rate based targets for cyclists and pedestrians. However there are no targets which will measure the perceived road danger reduction for vulnerable road users which is so important for modal shift. Hence we would propose a “proxy” target by measuring the number of Y5 and Y6 children who travel to school unaccompanied by an adult. This is easily measured through school based monitoring and would provide a useful measure of the desired “output” from road safety improvement interventions.

Comment on Appendix E – Impact Assessment

We believe that the impact assessment for Policy Option 2 is misplaced as it only refers to 20 mph zones and not 20 mph limits.

We would criticise the Impact assessment if it refers only to self enforcing zones as follows :-

Whilst there is evidence that badly designed zones using speed bumps to enforce slower speeds do increase consumption if motorists speed up between bumps compared to travelling at a steady 30 mph, we would comment that :-

- a) Such speeding up is evidence that self-enforcement is not being achieved.
- b) Such increased fuel consumption is only due to motorists exceeding the desired speed.

Where such schemes are well designed then there is less opportunity for exceeding the desired speed. Hence speed will be far more constant. At 20 mph most cars will be within 10% of the fuel consumption at 30 mph. Dependent upon vehicle design this could be 10% more or 10% less. Hence on average there is no difference between a steady 20 mph compared to a steady 30 mph.

In addition, a steady 20 mph is far more achievable on a street than a steady 30 mph. Inevitable constrictions and obstacles mean that in practice anyone trying to progress at 30 mph will be varying between 20 mph and 30 mph due to such obstructions. Hence their fuel consumption for a 30 mph street will be determined by the intermittent acceleration rather than their steady state consumption. A 20 mph limit will in practice always reduce fuel consumption compared to a 30 mph limit.

² Expressed as a three-year rolling average.

There is also the fact that lower speeds increase modal shift from the use of motor vehicles to walking or cycling. Every such modal shift by an individual represents a 100% reduction in fuel consumed.

The figures also do not take into account the reduction in health costs to society from creating a modal shift to walking and cycling. Whilst certainly there will be a reduction in direct casualty costs, the benefits from a healthier, fitter that is far more able to promote healthy, active travel have not been included.

It should also be noted that a modal shift from motor vehicle usage to walking and cycling is one of the key factors that the government will be relying on to meet its recent G8 commitment to lower CO2 emissions.

However, there is ample evidence of most motorists believing that 20 mph is the right maximum speed in residential roads (2005 British Social Attitudes Survey).

An increasing number of authorities are following Portsmouth in introducing 20 mph limits on an authority-wide basis rather than isolated zones. These are being completed without expensive engineering measures and could be reduced even further with simpler Traffic Order administration and reduced signage requirement.

We believe that once the costs associated with these are taken into account then there is an overwhelming case for implementing 20 mph as the default speed limit for residential roads. Because main and arterial road speed limits will be set separately then there will only be a marginal (if any) increase in journey times.

In conclusion

In conclusion we do welcome this Consultation. In particular :-

- It recognises that the UK is falling behind other countries in making its roads safer.
- It recognises that this “falling behind” is for specific road user groups, ie pedestrians, children and those in deprived areas.
- It recognises that the measures are required to address this imbalance and appropriately looks to following the European best practice of 20 mph limits for residential and urban roads.

However, we would suggest that:-

- The government should make it easier for local authorities to implement 20 mph as a default speed limit for residential and urban roads.
- Whilst recognising the casualty reduction benefits of slower speeds, it should also recognise the wide and considerable advantages to society of lower speeds as well as more completely assessing their economic benefits.
- It should widen its road safety campaigning to include the direct benefits of slower speeds where motorists share roads with vulnerable road users and within communities.
- It should change its approach to speed enforcement by means of random and covert measures.
- It should implement “no-fault” driver liability when in collision with vulnerable road users.

We believe that there has been a major shift in public and driver opinion towards 20 mph being the appropriate speed limit for roads shared with vulnerable road users. This is evidenced in the recent British Social Attitudes Survey and also in the number of local authorities who have gone beyond DfT guidelines 01/2006 in implementing 20 mph as the default speed limits across their whole community.

There is also considerable establishment support for lower speeds from diverse organisations such as PACTS, Transport Select Committee, Association of Directors of Public Health, etc. This effects not only the safety of pedestrians where we have the highest skewing of road deaths to pedestrians in Western Europe, but also in the ability for people to choose to walk or cycle without undue fear or discomfort.

Now is the time for the government and the DfT to respond to this developing aspiration within the United Kingdom.

20's Plenty for Us would welcome further dialogue with the Department for Transport in implementing actions to enable our roads to be used in “A Safer Way”.

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