

Southwark Council Draft Road Safety Plan Response from CTC, the national cyclists' organisation

This response to Southwark Council's Draft Road Safety Plan is submitted on behalf of James Barber, local "Right to Ride" representative of CTC, the national cyclists' organisation. It has been prepared on James Barber's behalf by Roger Geffen, resident at Southwark Bridge Road, London SE1 and a member of the staff at CTC.

CTC is the national cyclists' organisation, has 70,000 members and supporters, provides a range of information and legal services to cyclists, organises cycling events, and represents the interests of cyclists and cycling on issues of public policy. CTC recently celebrated its 125th birthday in August 2003.

Summary of key issues

We very much welcome this Draft Road Safety Plan, and especially the focus on implementing 20mph zones throughout the borough. The aim to be "the first 20mph borough in London" is truly visionary, and will have huge benefits not only for road safety, but also for sustainability, freedom of movement for children and other non-motorised road users, and the quality of life in our communities.

Our main comments are as follows:

1. The strong commitment to make Southwark the first 20mph borough in London deserves to be given much greater prominence in the Road Safety Plan. At present it is buried away in the second half of the fourth sentence of the third paragraph of section 2.3! This visionary aim should be proudly proclaimed right at the outset of the document as its central proposal.
2. We note that the aim is to be the default speed limit for most streets, yet the map on page 11 shows many residential streets not covered by 20mph zone proposals, particularly in the north of the borough. Even if it is not practical to set out a plan for the whole of the borough at this time, we believe it should be stated that the Council intends to develop further 20mph zones covering the remainder of the borough beyond the timescale shown on the map.
3. At the same the Plan needs to spell out how the Council and police will collaborate to secure improved compliance with existing 30mph limits. This applies particularly on major roads which are not expected to be included in 20mph zones – neither those proposed on the map at page 11, nor others which may be implemented beyond the time-horizon covered by that map.
4. The Plan should acknowledge the growing body of evidence that pedestrians and cyclists gain from "safety in numbers"¹. In other words, encouraging more walking and cycling can benefit safety for pedestrians and cyclists – cycling (and indeed walking) gets safer the more people do it. It follows that improved pedestrian and cycle safety should be pursued in a manner consistent with (and not contrary to) the aim to increase walking and cycling activity. This too should be explicitly acknowledged in the Plan.
5. The Plan should acknowledge that the design principles of home zones are not only applicable in residential streets but can also be used in shopping areas etc. The Walworth Road project should be referred to in this context.
6. There is confusion in the draft Plan's discussion of when it is appropriate for different road user groups to be segregated and when to opt for solutions involving sharing space – this needs to be clarified in the final Plan.

¹ See Appendix to this submission.

7. The Plan should include a commitment to adopt cycle audit and review procedures, respectively to maximise the benefits to cyclists from new highway and traffic schemes, and to prioritise improvements to existing conditions.
8. The references to cycle training should make it clear that training provided should comply with the national standard for cycle training now jointly adopted by Government, the National Cycling Strategy Board, cycling and road safety organisations, to drive up the standard of cycle training provided for people of all ages.
9. The section on partnership with the police needs to say more about their role in influencing attitudes and awareness. In particular, it would be useful to set out how the police will use speed awareness courses and driver retraining courses to influence attitudes of those who commit driving offences.
10. Similarly there is more to be said in the final Plan about the role of the local NHS trust both in supporting road safety awareness campaigns and in promoting cycle training.
11. There needs to be more extensive discussion of the role of road maintenance in supporting the Plan's objectives.
12. The document structure could be rearranged in ways which would simultaneously improve its coherence and achieve consistency of numbering between the text sections of the document and the actions listed in the action plan.

Document structure

We start by explaining how the document might be restructured. Our suggestions are as follows:

- Move the text for the existing Chapter 5 ("Towards safer and more sustainable transport") to section 7.2 "Co-ordination with other strategies", which should have a subsection for the proposed Walking and Cycling Plans.
- Retitle Chapter 7 as "Making the Links".
- Move the main discussion of 20mph zones into Chapter 3, "Safer environments", which should have a section on "20mph zones and traffic calming" alongside the existing section on "home zones" and a proposed additional section on "streets for people" (to describe how home zone principles can be extended to non-residential contexts such as Walworth Road). The actions on 20mph zones in the Action Plan (Chapter 9) should be renumbered accordingly.
- Chapter 3 should also have sections for other topics listed in the Action Plan, such as "Maintenance" and "Cycling".
- Actions in the Action Plan relating to speed other than 20mph zones (e.g. partnership work with the police on awareness initiatives – including speed awareness courses, driver retraining courses) should be numbered in relation to the existing chapter 2.
- This in turn might require the text on partnership work with the police to move from its existing location in section 7.3. The remainder of Chapter 7, retitled as above, would make the links with other strategies and partnerships, but would (as presently) not have any associated "Actions" in the Action Plan chapter.
- The "Introduction" sections at the start of each chapter should be renumbered "2.0", "3.0" etc. Meanwhile the "Introduction" chapter (currently chapter 1) and the sections which comprise it should be unnumbered. This would make it possible to achieve consistency between the chapter and section numbers of the document and the actions listed in the Action Plan.

Detailed comments

Our comments below generally follow the numbering of the existing draft Plan. The exception is Chapter 3, which would require a good deal of restructuring according to our proposals above. In this case we have followed our own proposed structure.

Section 1.1 paragraph 3

After "...the UK Government's targets for road casualty reduction set out in..." add the words "...its Road Safety Strategy..." and put inverted commas around "Tomorrow's Roads – Safer for Everyone". Break the sentence at this point, adding the words "These targets were..." before "...reaffirmed..." Also add "...of that strategy..." after three year review.

Section 1.1 paragraph 5

We welcome Southwark Council's support for the Road Danger Reduction Charter.

Section 1.3, Table 1 and following text (page 7)

There is duplication between two of the targets in Table 1 and those listed in the following bullet-points. Both lists contain a target for total fatal and serious injuries, and another for children's fatal and serious injuries (the "duplicate" targets aim to achieve reductions over different time periods, but deal with the same indicator). It is also puzzling why there should be a target for total fatal and serious injuries in the second list, if this relates to "safety on children's journeys to school" as stated. The duplication should either be explained or eliminated.

We welcome the inclusion of targets to reduce the number of children reporting dangerous incidents (e.g. bullying) or reports from children and parents alike that their (or their children's) journey was "unsafe". It is vital to tackle personal security and perceptions of safety, as well as actual casualty numbers, if the Road Safety Plan is to support the aims of encouraging walking and cycling and related health, community, sustainability and other benefits.

Section 2.1 Last sentence

We welcome the commitment to research and analyse causation factors of crashes.

Section 2.2

We generally welcome this section, particularly the recognition that "with more motor traffic comes more danger," and the commitment to reduce overall motorised traffic in accordance with the Mayor's Transport Strategy and the Road Danger Reduction Charter. However, we recommend that the second sentence of this paragraph should be amended. We have suggested elsewhere that the Plan should recognise that increased walking and cycling is linked to reductions in the rate of pedestrian and cyclists casualties, and that in some cases absolute reductions in pedestrian and cycle casualties can occur (the "safety in numbers" argument). This point should be referred to here – if need be, this could be by way of a cross-reference. So should the fact that a shift from motor vehicles towards increased walking and cycling represents a reduction of danger on the roads, as pedestrians and cyclists present very low risk to other road users.

Section 2.3, first sentence

Reword the first sentence to say "In the UK as a whole, at least one third of road deaths (around 1,300 per year) can be attributed to excessive or inappropriate speed". Whilst the figure of one third comes from the Government's Road Safety Strategy and is widely quoted, it is based on the subjective estimates of investigating police officers. It is highly arguable that the proportion should be higher; indeed one could go so far as to say that the great majority of road crashes could be prevented (or their severity reduced) if the driver(s) involved were travelling at lower speeds.

Section 2.3, paragraph 3

As noted, we believe the aim to be London's first 20mph borough and to make 20mph the default speed limit for most roads should be given far greater prominence.

Section 2.3 generally

We also believe that this section should include discussion of partnership work with the police to achieve good enforcement of speed limits. This should include not only the 20mph limits as they are introduced, but also the existing 30mph limits, whether on roads yet to be subject to 20mph limits or on main roads which are expected to remain subject to the 30mph limit.

It should refer to the role of speed awareness courses in influencing driver attitudes.

We accept that these matters are primarily police (rather than Council) responsibilities. We nevertheless propose their inclusion in the Plan, given the importance of demonstrating that the police are behind the Plan.

Section 2.4

Like section 2.3, this section should refer to partnership working with the police. Specifically it should refer to driver retraining courses.

There should be inverted commas around the words "persecution of motorists" in the second paragraph. This paragraph should also note that, despite this media-generated perception, the majority of the public support the use of speed cameras – surveys consistently show support at around the 75% level.

Chapter 3

As previously noted, this chapter is the logical place for a section on 20mph zones and traffic calming. This chapter needs additional sections for topics listed in the Action Plan such as "Streets for People", "Cycling" and "Maintenance."

Chapter 3 – Urban safety management

The section on Urban Safety Management (currently section 3.2) should come first. This section should set out the overarching principle that the Council is seeking to give priority to non-motorised users, who have historically been marginalised on our highway network by the growth of traffic volumes and road danger and past policies which have sought to accommodate this. It should include the existing text on road user hierarchies (this is currently the fourth paragraph of section 3.1 on "Home zones", but the principle of road user hierarchies should not be limited to home zones!) It should go on to commit the council to adopt pedestrian and cycle audit procedures, to ensure that consideration of these modes is given top priority in the planning of all highway and traffic management schemes, in accordance with the road user hierarchy.

A couple of drafting points:

- The final sentence of page 14 ("It should help...") should be reworded to say "This should help all road users to take the appropriate precautions to ensure that they can be seen".
- On page 15, point 3 should read "The cost effectiveness, or 'first year rate of return' (FYRR) ...". This makes it clear that "first year rate of return" is a clarification of "cost effectiveness", not an alternative to it!

Chapter 3 – 20mph zones and traffic management

This section should include text currently included in section 2.3. It should also say more about the types of physical and/or enforcement measures which will be used to maintain low speeds in these zones. Specifically it should make clear that the Council will ensure that physical traffic calming features are cycle-friendly. It should state that cushions will be preferred to humps where the road layout permits them to be used without encouraging

drivers to make more dangerous manoeuvres to try to avoid the cushion. Alternatively where humps are used, they should have an approximately sinusoidal profile (i.e. they should have a tapered ramp) to reduce the discomfort to cyclists. Horizontal deflections should have cycle bypasses where space and parking permit, and should not be used where they will create pinch-points for cyclists. Such pinchpoints, far from improving safety, can have the opposite effect by encouraging drivers to race into the pinchpoint ahead of a cyclist, overtaking dangerously in the process.

Chapter 3 – Streets for People

After this should come the sections on Local Safety Schemes and Home Zones, followed by one on “Streets for People”. This should describe how Home Zone design principles can be applied in non-residential contexts, in the way that Dutch took the “Woonerf” (living zone) principles and applied it to create the “Winkelerf” (shopping zone). This section should include coverage of the Walworth Road project.

Chapter 3 - Cycling

The Cycling section should come next. It should acknowledge the evidence that cyclists gain from “safety in numbers”², hence that measures to encourage more cyclists will improve cyclists’ safety, as well as reducing overall road danger by promoting a shift away from motorised transport.

The Cycling section should include discussion on how to decide, for a given set of circumstances, whether cyclists should share roadspace with other road users or whether separate provision is required. This should replace the existing third paragraph of section 3.1, which deals with the topic in a confused way. Decisions about the appropriate form of cycle provision should be based on the table from the Dutch Cycling Design Manual³, showing what measures are appropriate depending on the speed and volume of traffic. At low speeds (e.g. 20mph) cyclists can safely share space. Separate facilities are not required at low speeds – conversely, on roads which are not wide enough to provide adequate cycle lanes (minimum 1.5 metres) the speed limit should be reduced. (The exception is on narrower roads where traffic volumes are sufficiently light, such that drivers can easily overtake without being impeded by oncoming traffic from the opposite direction. However in London, such roads would be residential roads in any case and this Plan will generally call for them to be 20mph zones for other reasons). On moderate speed roads (30mph), cycle lanes (1.5m minimum width) should be provided, or cycles permitted to use bus lanes (which should be at least 4.2m, preferably c4.6m) to allow safe overtaking. Segregated on-road facilities are rarely appropriate in the London context as they result in cyclists losing priority at junctions, which is where around three-quarters of cyclists’ collisions occur.

The Cycling section should also refer to the adoption of cycle audit and review procedures⁴. These procedures, applied respectively to new highway/traffic management proposals and to existing provision, aim to highlight where improvements could be made to benefit cyclists. In this respect they differ from safety audit, which aims merely to avoid unwittingly creating hazards for cyclists and other road users.

Finally it should include a reference to cycle training for people of all ages. It should state that, whilst cycle training for adults and teenagers can have direct safety benefits by encouraging them to ride with greater confidence and skill, it will also contribute to the safety benefits which cyclists gain from “safety in numbers”. Cycle training has been shown to be

² See Appendix to this submission.

³ CROW. *Sign up for the bike. Design Manual for a cycle-friendly infrastructure*. CROW, 1993.

⁴ The officially recommended guidelines for Cycle Audit and Review are those published by the Institution of Highway Engineers and Transport, *Guidelines for Cycle Audit and Review* IHT, London, October 1998. However it is widely accepted that these procedures are overly time-consuming and data-hungry, and simplified methodologies also exist. These include Manchester City Council’s *Concise Pedestrian and Cycle Audit Technique* (CoPeCAT) and the *Vulnerable Road User Audit* technique developed by Babtie for Oxfordshire County Council.

highly effective in encouraging people to cycle more frequently, for longer journeys, throughout the year, and to feel more confident while doing so⁵.

Chapter 3 – Highway Maintenance

This section should acknowledge that non-motorised road users suffer disproportionately from poor highway maintenance, and that their needs should therefore be given particular priority in determining procedures and plans for inspection and repair. These procedures should give priority to routes heavily used by cyclists or designated cycle routes, and must include off-carriageway cycle routes. On roads with light or restricted parking, priority for surface repairs should be given to the 1.5 metres of the carriageway closest to the kerb. Procedures should be in place to ensure that maintenance contractors avoid using smooth metal plates, leaving debris or other slip hazards, and that they repair cycle route markings (surface colouring and/or logos) on a like-for-like basis. These procedures should also seek to avoid (or, failing that, to minimise) obstruction to cycle routes.

Chapter 4 – paragraph 3 and following list

From the second sentence of this paragraph, it would appear that Southwark Council has no road safety officer. If this sentence is supposed to mean that a road safety officer will be appointed to work on child road safety and developing better links with schools, this should be stated more clearly.

Whilst the list of issues on page 18 could doubtless be useful in determining priorities for action on children's safety, the sentence introducing this list ("The following factors need to be closely monitored and detailed targets set") does not inspire confidence that the list will actually be used in practice. The sentence should be revised to make its purpose clear.

In point 3 of the list, delete the words "to best practice guidelines or any other higher standards" and replace with "at least to the national standard agreed by Government, cycling and road safety organisations and the National Cycling Strategy Board.

Point 5 should have "and adequacy" after "Adequacy".

Point 6 should be reworded to say "Availability and adequacy of walking and cycling facilities associated with other locations which children would visit ...".

We particularly support points 8 on 9, which emphasise the value of seeking children's views and prioritising socially deprived areas in determining child road safety priorities.

Chapter 5

As noted previously, this chapter could be placed as a subsection of section 7.2.

Chapter 6 paragraph 2

The sentence "This is not the result that Southwark wants to achieve" is not adequate – it needs to be clearer that the Council wants to achieve the opposite result. We propose replacing this sentence with the words "On the contrary, the Council strongly believes that the pursuit of road safety objectives should complement (and not contradict) its wider objectives to increase walking and cycling, in accordance with the 'safety in numbers' principle (see page xx)."

Section 7.2

As previously noted, this section should refer to the proposed Walking and Cycling Plans. This could be achieved by incorporating chapter 5 into this section.

Section 7.3 – Transport for London

It appears that the words “trunk road casualties” should read “casualties on the TLRN”.

Section 7.3 – Southwark Primary Care Trust

We propose the addition of the following words:

At the same time the PCT can work with the Council to raise awareness of the health costs of the dangers on our roads, and the health benefits of walking and cycling more often. In particular it can work to promote cycle training, especially for people whose health could benefit from increased physical activity.

Action 1.1.1

Partners for this action should include Southwark Cyclists and Living Streets.

Action 1.3.1

We suggest this should be reworded: “Produce proposals for the use of new powers created by the Traffic Management Act to use cameras and council-employed traffic officers to take enforcement action against infringements and obstructions of bus and cycle lanes, pedestrian and cycle crossings or other traffic offences.” These are the offences now enforceable through the Act which have the greatest road safety implications (other offences relate more to traffic capacity).

Action 1.3.7

The action on cycle training should be divided into two actions, one relating to children and the other relating to adults and teenagers. These should be moved to the sections of the Action Plan currently numbered 3.3 and 2.8 respectively. Cycle training should not be seen primarily as a response to “dangerous behaviour” but as a means of improving child cycle safety, and increasing safe and responsible cycle use among adults and teenagers. In both cases, the actions should refer to the agreed national standard for cycle training.

Action Plan section 2.7

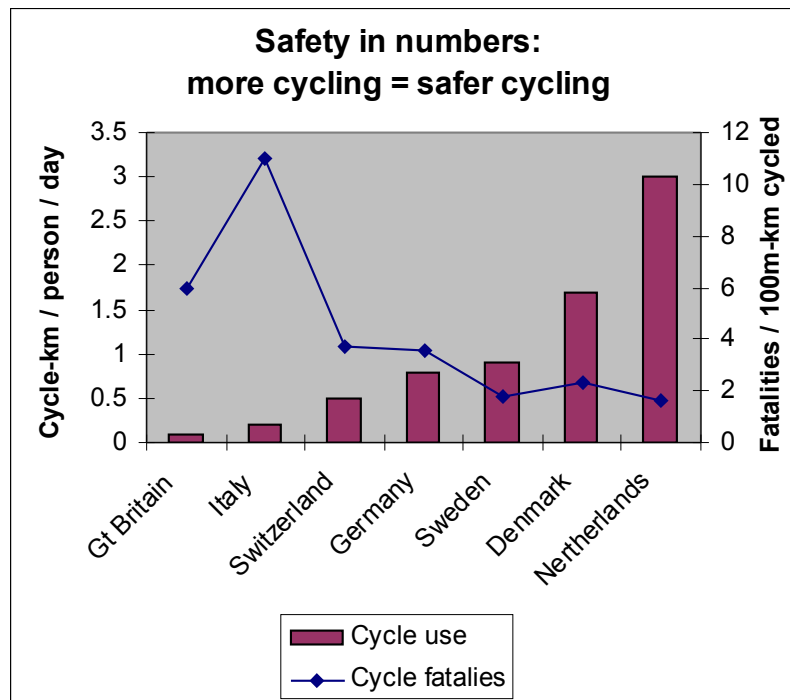
This should also contain an action to develop procedures to give due priority to the needs of pedestrians and cyclists in maintenance inspection and repair procedures.

Action Plan section 2.8

As well as the action proposed above on adult and teenage cycle training, this section should also contain an action to adopt cycle audit and review procedures.

Appendix: “Safety in numbers”

The most comprehensive evidence suggesting that cycling (and indeed walking) gets safer the more people do it is from a paper by Peter Jacobsen. This reviews data from comparisons between cities in USA, between towns in Denmark, between countries in Europe and over time in the Netherlands. In all these data Jacobsen found a consistent relationship – “the number of pedestrians or bicyclists struck by motorists varies with the 0.4 power of the amount of walking or bicycling.” This means that if cycling doubles, the risk per cyclist will fall by around 34%, conversely if cycling halves, the risk would increase by around 52%. A separate analysis has found the same power relationship in Australia.



There are, moreover, examples of cities and countries where cycle use has increased and cyclist casualties have decreased in absolute terms:

- National scale data:
 - > The Netherlands: between 1980-1998 there was a 30% increase in cycle use and a 54% reduction in cyclist fatalities⁶;
 - > Germany: between 1975 and 1998 the modal share of cycling increased from 8 to 12%, whilst cycle fatalities fell by 66%⁷;
 - > Great Britain: between 1993 and 2002 there was an increase of around 10% in cycle use, yet cycle casualties fell by 29% with a 35% fall in fatal or serious casualties⁸.
- City scale data:
 - > York: between 1991-3 and 1996-8, the modal share for cycling increased from 15% to 18%, yet the number of serious or fatal collisions fell from 38 to 15⁹.
 - > London: a “before and after” comparison of the effects of congestion charging showed a 30% increase in cycle trips into the central London charging area, yet there was a 17% fall in cycle casualties¹⁰.

⁶ Ministry of Transport (NL)(1999), “The Dutch Bicycle Master Plan, description and evaluation in an historical context”.

⁷ Pucher J. (1997), “Bicycle Boom in Germany: A Revival Engineered by Public Policy” in *Transportation Quarterly* 51 (4).

⁸ Department for Transport (2003), “Transport Statistics Great Britain 2003” and “Road Casualties Great Britain 2002”.

⁹ Harrison J (2001), “Planning for more cycling: The York experience bucks the trend”, in *World Transport Policy & Practice*, Vol 7, (4)

¹⁰ Transport for London (2003), *Congestion charging: 6 months on*”.