Vision Zero The Road Safety Strategy

Comments from: Maidstone Cycle Campaign Forum (MCCF)

Overall, MCCF thoroughly welcomes this document and its aspirations. The forum is particularly positive about:

1. The fact that vision zero has been fully embraced by KCC.
2. The recognition that the perception of danger as well as the danger itself need to be tackled on Kent roads.
3. The introduction of community engagement as a way of both identifying and resolving problems.

We think the following general improvements in the strategy could be made:

1. As government walking and cycling policy in 'Gear Change' calls for ' half of all journeys in towns and cities being cycled or walked by 2030', 2030 should be the longest timescale for achieving zero road deaths in Kent.
2. 'Shared responsibility' (1.4) should be framed in the government approved terminology around the ' Hierarchy of Road Users' found in the proposed Highway Code Rule H1.
3. It has been KCC's ambition to make walking and cycling an attractive and realistic choice for short journeys for decades. We need to see how this (and other Kent strategies) will be linked to the actual delivery of transport infrastructure. Currently design and investment on roads is focused primarily on supporting motor traffic. To achieve this safety and active travel balance the design and investment resources also need to be balanced.

The MCCF is happy to work with KCC and to be part of developing the community involvement which is necessary to realise this strategy.

The following are the detailed comments from the forum:

Forward
Agree with the forward which points out that there is strong support for improved safety and reduced speeds. It is pointed out that actual danger and fear of danger are both important. It would be good to link the fear of danger with the effect of limiting the likelihood of people cycling which in turn reduces Kent's ability to realise it's ambitions to balance more traffic into active travel modes.

The Safe Systems paragraph

Referring to crashes being sufficiently controlled to not cause a death or life-changing injury is very vehicle-centric. There needs to be a term which encompasses accidents involving combinations of all modes of travel.

Should Kent invest in fluorescent chevron arrows on country lanes to warn drivers of a sharp bend or does the existence of such driver support encourage excessive speed? It may be that such signs not only have unintended consequences but they represent extra clutter in the countryside and generate increased road maintenance cost.

The Vision
The first item is the only one that is measurable, the others are to some extent enablers and should be implemented at the start of the period.

The Strategy
The list is good but the items lack measures. If these things need to be done over the next 5 years, how will achievement be confirmed?

1.1 Vision Zero 2050
Very good.

1.2 Our approach - Safe Systems
These themes are already in place to a greater or lesser extent. What is it about the approach being proposed that is going to make a step change difference?

1.3 Community Circle
Sounds good. Can something be said about the organisation and funding that will be put in place to make this happen? Will KCC engage with Borough Councils and Parish Councils to draw out community concerns or will it be done as a centralised activity?

Will the Kent & Medway Safety Camera Partnership be responsible for average speed cameras as well as fixed cameras? What about ANPR? At the moment the whole system seems to be broken because borough councils don't even ask for speed cameras because they think they will be rejected on cost grounds. Problems that could be tackled with ANPR are not even considered because we are told there is no ANPR in Kent and it is too costly to install. To have any credibility this part of the enforcement strategy needs to show how the organisation and the funding is going to be put in place to make it happen.

1.4 Shared Responsibility
Good in theory but lacks substance. This section could mention existing schemes that could be bolstered such as bikeability and the KCC cycle training. The new version of the Highway Code helps with ensuring those who can cause the most harm also take the most responsibility, but where is the education that is actually going to influence car drivers? Could we have something like the Speed Awareness Course for road users who contravene rules other than speeding? We could use this to educate people on the danger and the risk they generate for vulnerable road users and give them a refresher of the Highway Code.

Is there any possibility of asking courier companies and supermarket delivery organisations to add KCC's driver awareness modules to their existing driver training programmes so that they are aware of the shared responsibility programme?

1.5 Links to public health
There needs to be a much greater list of KCC departments involved in the initiative to tackle the 'safety' challenges to walking and cycling listed.
● PROW team need to embrace their network as a travel network as well as a leisure network.
● The active travel team needs significantly more funding in order to catch up on the backlog of active travel links which have not kept pace with the development of the road network.
● KCC need to comment on planning applications which do not meet the NPPF in terms of their active travel connectivity into the neighbourhood or deliver substandard paths which are not wide enough or do not provide the segregation between walkers and cyclists that is necessary to achieve safe and efficient travel.
● Road schemes such as 'Keep Maidstone Moving' need to focus on the complete transport problem rather than just motor transport. These schemes are being proposed and implemented with reduced rather than enhanced active travel provision.

1.6 Links to walking and cycling
The comments above have been in part answered by this para however the lack of a practical implementation approach is missing:
● Safety is clearly a factor in discouraging walking and cycling and 20mph design speeds and limits on residential routes and new builds is very helpful in this regard. However cyclists will not venture onto the radial and interconnecting routes in any great numbers, even if speed limits are observed, without the investment in infrastructure. The Department for Transport LTN1/20 provides a framework for assessing the provision required based on the type, speed and flow rate of a road. How about assessing our road network and establishing an active travel gap closure plan?
● The point that local community acceptance will be imperative in achieving compliance is relevant, but it assumes that residential streets are used by mainly local traffic. This is not the case in a lot of rat run situations. There needs to be an assessment of rat runs and a tactical restriction of these routes so that traffic feeds onto the main routes rather through the local residential network.

2.1 Targets
The target is set inconsistently through the document between zero deaths and zero deaths plus serious injuries. MCCF would like to see the 2030 target set at a more ambitious level. At this point all new cars sold will be electric and there will be a central government push to increase the rate of electric vehicle take-up. Significantly increased safety aids will be standard on these cars.
It would be good to see all the actions dated with clear KPIs so that a more direct link can be seen between the action and the reduced fatalities and serious injuries.

2.2 Risk Analysis

It is evident from work at public enquiries that only injury accident data is recorded and that this in no way relates to the perception of the safety of the road in the mind of the public. The reality may well be that there are 1000s of miles of Kent roads and many of them have numerous bumps and knocks. Arguably the only way to avoid (apparently random) injuries or fatalities would be to tackle the bumps and knocks. This would lead to an objective of safe and compliant roads in general rather than restricted by accident data targeting. Having said that the action plan does allow for community concerns to be factored into the dashboard so if this aspect is given sufficient weight this issue will be resolved.

3.1 Engineering - Vision Zero principles
The forum fully endorses the principles of this section but would suggest that there is nothing particularly special about Kent residents and therefore there is no need for a bespoke Kent solution.

3.2 Designing streets for walking and cycling
Thoroughly agree. MCCF would propose a default 20mph design limit and speed limit in all residential areas.

3.3 Safer Junctions Programme
Thoroughly agree. MCCF believes speed is rightly highlighted as an issue as well as rat running.

3.4 Safer rural roads and villages
Thoroughly agree that speed (and impatience) are primary issues. This safety issue also transfers to cyclists and walkers since it is unlikely to be cost-effective to implement dedicated cycle infrastructure on rural roads.

3.6 Safer walking and cycling
Thoroughly agree.

3.7 Review the cluster site approach
Would support the consideration of damage-only incident data as part of the cluster analysis if it is possible to collect that data. This para seems inconsistent with para 2.2 which indicates that the cluster approach will be supplemented with local people's perception of danger.

3.8 Safer children and young people
This is education of the vulnerable, but the next version of the highway code will place responsibility on other road users to behave. There needs to be consideration of how education and understanding is going to be achieved amongst existing motorists.

Actions 6 to 11 Would be useful to set the KPIs and indicate the funding streams that are going to support these actions.

3.9 Highways asset management
Very much support this item but there is a very limited role for line painting and short stretches of shared provision in expanding the take-up of cycling. These schemes will tend

not to comply with LTN1/20 and will also tend to be poorly used (due to their lack of convenience) and this often leads to additional conflicts between cyclists and motorists.

4.1 Engineering
Although MCCF is against whitelining for cycle provision, light segregation is well covered in LTN1/20 and could provide a solution for speed reduction as well as separation of cycle traffic at a much lower cost than fully engineered cycle lanes.

4.2 Enforcement
This is very important but there is massive lack of of confidence in all sections of the community including parish councils and borough councils about the ability of Kent to actually deploy technology-based enforcement. It is perceived that it is almost impossible to justify the cost of a speed camera; that there is (almost) no such thing as an average speed camera on Kent's non-motorway road network; there is no fixed ANPR capability in Kent and police have insufficient resources to carry out meaningful enforcement.

4.3 Implementing 20mph limits
MCCF believes that all residential roads should have a 20mph design and speed limit by default and that an enforcement regime should be in place which over time will intercept all drivers who habitually exceed the limit. If this enforcement was aligned with an education programme specifically aimed at demonstrating the importance of safe streets that people feel comfortable in, this could have a big impact on overall safety on our road network.

4.5 Visible enforcement
It is not sufficiently clear how communities can be engaged in helping identify high risk areas that need to be targeted. Could parish councils have a role in this?

5.2 Culture change
It is not clear what is envisaged by the network of organisation contacts but such a thing could provide a massive benefit to KCC in rolling out culture change. In the past the engagement with groups with the local knowledge and enthusiasm to work with their local communities such as voluntary groups, local charities and parish councils has been an untapped opportunity.

5.3 Motorist training
Can this be extended to delivery drivers including Royal Mail and commercial fleets such as those operated by the utility companies and supermarkets?

5.5 Enforcement
Very much support this.

5.6 Age group focus
Road safety education stops after you have passed your test and yet this is the period of time when most individuals have the most opportunity to be part of the road safety problem.

6.1 Kent driver policy
Support this and would call for it to be extended to a greater range of drivers on Kent roads.

6.3 Safer Freight
Fully support.

8.2 Key Performance Indicators for this Plan
Could we set some measurable KPIs for road safety and increased levels of walking and cycling?

Appendix 2 - Data pack
Is an additional document missing?

Appendix 3 - Full summary of Action Plans
Most of these actions lack measurable completion criteria and are therefore difficult to monitor.

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