

FEEDBACK ON DRAFT ROAD SAFETY STUDY POLICY



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Foreword

Streets Alive Yarra is a non-profit, volunteer, resident and ratepayer action group with a [vision](#) for more trees, wider footpaths and vibrant businesses in thriving [neighbourhoods](#). We see our streets being used by people from [all ages](#), irrespective of whether they walk, roll on a wheelchair, cycle, use public transport or drive. Residents and shoppers should be able to move safely, comfortably, and conveniently around Yarra; and park near shops.



Image credit: OCULUS Landscape Architecture and Urban Design

Streets Alive Yarra was founded in 2017 and now has over 2,800 followers on Facebook. A network of local champions develops concepts and proposals for how to improve their local street or precinct. Streets Alive Yarra is also a member of the Victoria Walks Walkability Action Group network.

Further information is available at: streets-alive-yarra.org/about.

Summary

The draft Road Safety Study Policy (RSSP) should not be adopted in its current form. The intent of the policy is admirable, i.e. a flexible, rapid, low-cost method of sourcing external funding to improve road safety. Unfortunately, the body of the policy does not reflect best practice, and thus fails to deliver on the intent.

The deficiencies in the draft can be corrected by:

- Stating how the proposed policy fits into a coherent set of policies that deliver the Community Vision 2036 and the Council Plan 2021-2025.
- Stating that the aim is to deliver infrastructure so that people of all ages and abilities can access any property in Yarra without being exposed to hazards that carry the risk of serious injury or death, irrespective of whether they walk, roll on a wheelchair, cycle, use public transport or drive. More specifically, to deliver local streets (i.e. streets that aren't DoT arterials or streets that don't have protected bike lanes) that have an 85th percentile traffic speed of less than 30 km/h and a traffic volume of less than 2,000 vehicles per day.
- Stating that safety is prioritised higher than traffic speed or traffic volume.
- Stating that safety is prioritised higher than direct connections for motor vehicles.
- Explicitly including traffic volume within scope.
- Highlighting that reducing traffic volumes and traffic speeds on local streets is the best way to maintain people's ability to drive and park, despite increasing population density, traffic congestion and parking congestion.

Policy context

The draft Road Safety Study Policy (RSSP) fails to clearly articulate how it integrates with the more than 50 existing adopted council policies, strategies and plans, to deliver a coherent set of documents that describe how council will deliver policies and services. One option is replicate the diagram from the draft Place Making Framework, showing that for the Road Safety Study Policy is subsidiary to, and must support, council led place making.



The Road Safety Study Policy could be shown as subsidiary to council led place making. Image credit: draft Place Making Framework.

Another example is from the City of Moonee Valley, who offer a coherent narrative of using 20-minute neighbourhoods to deliver the council vision, policies and services.



An example from the City of Moonee Valley; showing a coherent narrative of using 20-minute neighbourhoods to deliver council policies and services. Image credit: City of Moonee Valley.

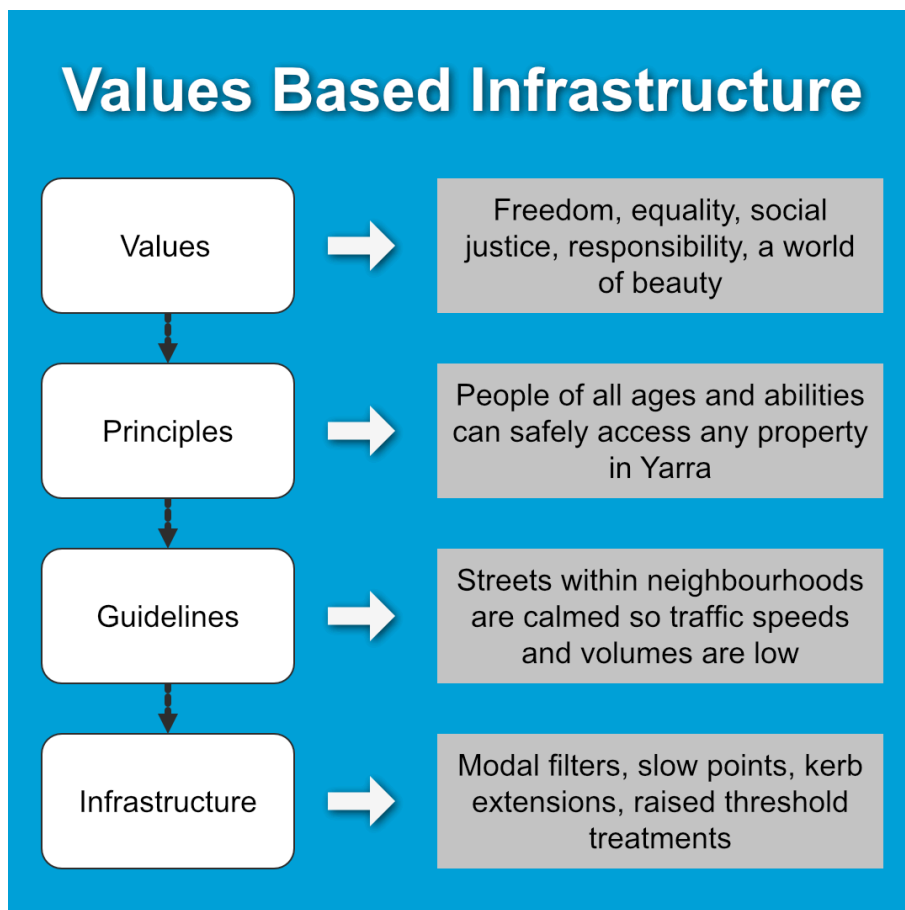
Policy aims

The draft Road Safety Study Policy (RSSP) fails to offer aims that relate to road safety outcomes. Instead, they focus on road safety process. Only the last of the five dot points indicates an outcome, i.e. increasing vegetation and permeable surfaces.

The policy should offer aims that relate to road safety outcomes, such as:

- Deliver infrastructure (streets, kerbs, treatments) so that people of all ages and abilities can access any property in Yarra without being exposed to hazards that carry the risk of serious injury or death, irrespective of whether they walk, roll on a wheelchair, cycle, use public transport or drive.
- Deliver local streets (i.e. streets that aren't DoT arterials or streets that don't have protected bike lanes) that have an 85th percentile traffic speed of less than 30 km/h and a traffic volume of less than 2,000 vehicles per day.
- Deliver local streets that have an iRAP star rating of 5 stars for all modes.

If the policy wishes to include a high level aim, it could aim to deliver infrastructure treatments that are derived from intrinsic human values.



Example of how the Road Safety Policy could aim to deliver road safety treatments that are derived from intrinsic human values. Image credit: Streets Alive Yarra.

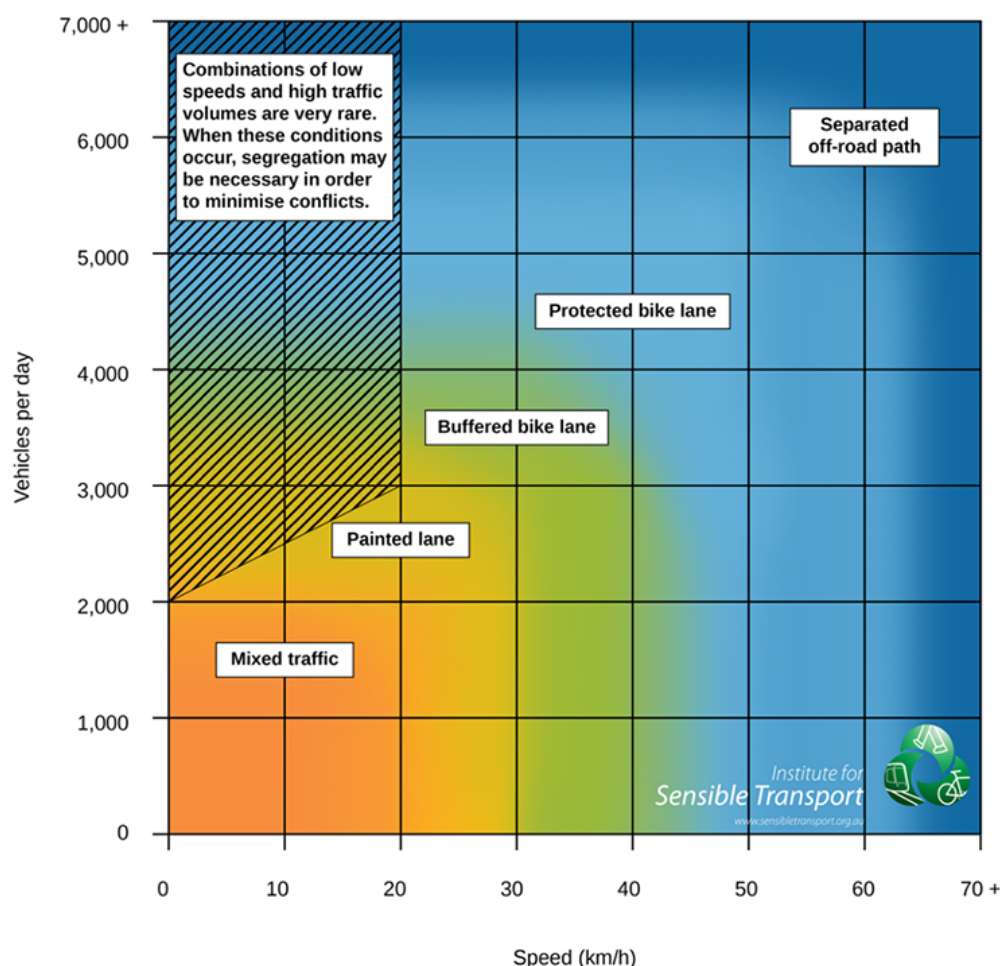
Policy scope

The draft Road Safety Study Policy (RSSP) fails to define a coherent scope that reflects best practice principles of traffic engineering. Specifically, it proposes to exclude traffic volume.

It is understood that the volume of vehicles using local streets is an issue for some members of the community. However, restrictive measures to address vehicle volumes such as road closures have not been supported by the community (as a whole) particularly where this results in restricted access to local facilities or neighbouring suburbs; increased travel times and a potential redistribution of traffic onto another street in the neighbourhood (i.e. transferring the problem elsewhere).

Excerpt showing attempt to define traffic volume as out of scope. Image credit: draft RSSP.

This fails to acknowledge that road safety on local streets is inextricably linked to traffic volume. Multiple best practice design guides clearly state that the required treatment is a function of both motor vehicle speed and motor vehicle volume.



Example diagram showing how to design safe streets as a function of traffic volume and traffic speed. Image credit: Institute for Sensible Transport.

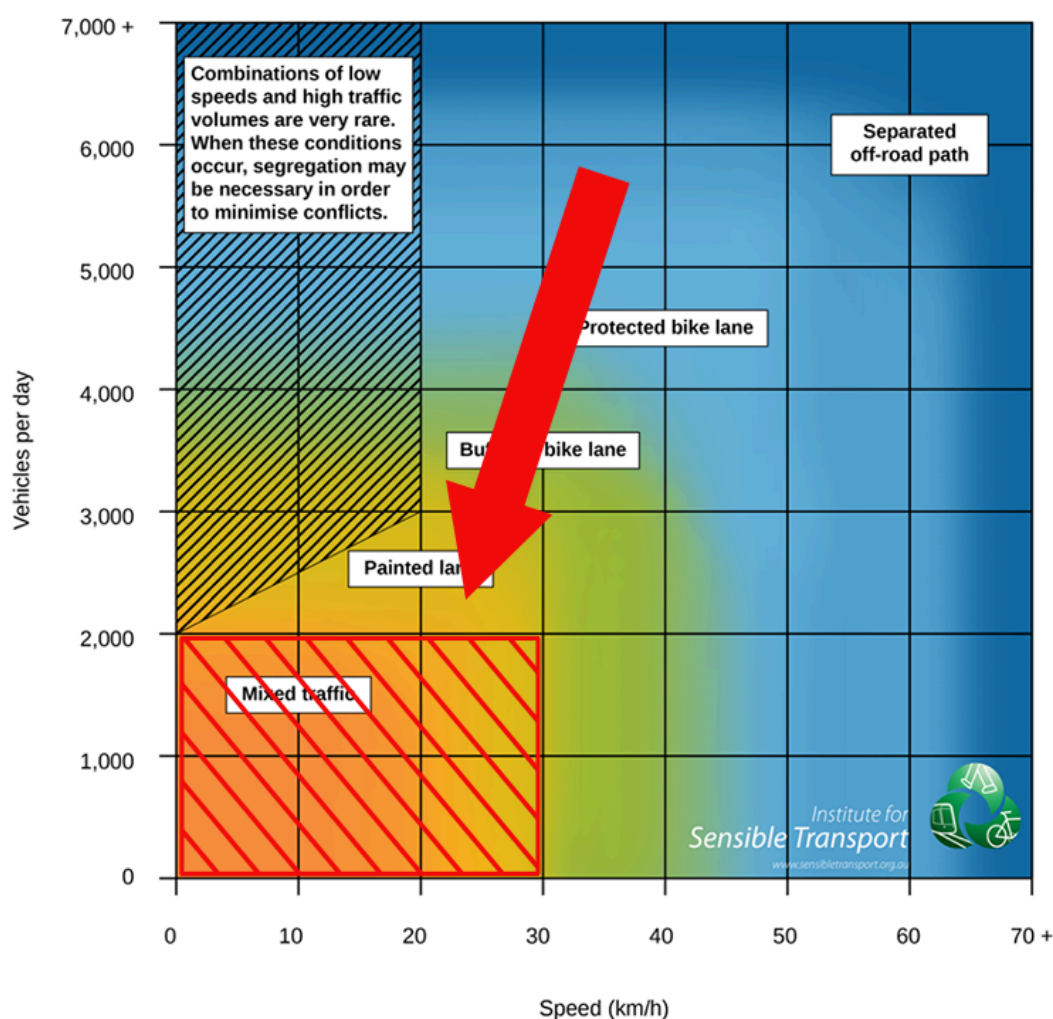
Selection Table for Bicycle Facilities in Built-Up Areas					
ROAD CATEGORY	SPEED LIMIT MOTORIZED TRAFFIC (km/h)	VOLUME OF MOTORIZED TRAFFIC (per day)	BICYCLE NETWORK CATEGORY		
			Basic (< 750 bikes per day)	Main (500 - 2 500 bikes per day)	Bicycle highway (> 2 000 bikes per day)
Residential road	30	< 2 500	MIXED TRAFFIC	MIXED TRAFFIC / BICYCLE STREET	BICYCLE STREET (with priority)
		< 2 000 - 5 000		MIXED TRAFFIC / BICYCLE LANE	BICYCLE LANE / BICYCLE PATH (with priority)
		> 4 000		BICYCLE LANE / BICYCLE PATH	
Distributor road	50 70	All volumes 2x1 lanes		BICYCLE PATH	
		All volumes 2x2 lanes All volumes			

Adapted from Table 5-2 In CROW (2016) Design manual for bicycle traffic

Diagram from Netherlands design manual, showing how to design safe streets as a function of traffic volume and traffic speed.

Attempting to define volume as out of scope for road safety is bordering on professional malpractice. It's as if the road safety learnings from the Netherlands over the last 50 years have just been ignored.

The draft Road Safety Study Policy is to be applauded for acknowledging that council has both funding restraints and regulatory constraints, such as requiring DoT approval for 30 km/h zones. Rationally, these facts should lead the policy to conclude that the most effective way to deliver road safety on council controlled streets is to calm traffic to deliver reductions in traffic speed and volume so that the street is considered acceptable to support mixed traffic.



Given funding constraints and regulatory constraints, the Road Safety Study Policy should aim to calm council controlled streets so mixed traffic is considered acceptable, i.e. deliver streets in the red hatched area. Image credit: Institute for Sensible Transport, modified by Streets Alive Yarra.

The draft Road Safety Study Policy attempts to defined traffic volume as out of scope for two reasons:

- Road closures have not been supported by the community
- Increased travel times and a potential redistribution of traffic onto other streets

Both of these justifications are wrong.

Road closures and community support. First, a road closure is not the only treatment that can reduce traffic volumes, as Section 9 of the draft describes. Council can significantly reduce traffic volumes by using slow points, removing/consolidating turn lanes, and lane narrowing. Using the lack of support for one treatment to claim lack of support for all treatments is a sign of crooked thinking.

Second, experience from the UK, via the “Gear Change: One Year On” report shows that opposition to road closures (or Low Traffic Neighbourhoods) is from a vocal, passionate minority, not the broader community. Support for road closures crosses the political spectrum, from the conservative UK Prime Minister to the socialist Mayor of Paris. It is not acceptable for council to continue to expose residents to street designs with hazards that carry the risk of serious injury or death, simply because of opposition from a minority.



Department for transport

Gear Change: One Year On

I support councils, of all parties, which are trying to promote cycling and bus use. And if you are going to oppose these schemes, you must tell us what your alternative is, because trying to squeeze more cars and delivery vans on the same roads and hoping for the best is not going to work.

Cycling and walking schemes can create passionate opposition, but there is now clear evidence that neither the opposition – nor the passion – reflects public views.

We will reduce funding to councils which do not take active travel seriously, particularly in urban areas

This includes councils which remove schemes prematurely or without proper evidence, and councils which never installed them in the first place. As *Gear Change* said, an authority's performance on active travel will help determine the wider funding allocations it receives, not just on active travel. We will require more from all local authorities, urban or rural, but we will not take a one-size-fits-all approach.

The public does support road closures in Low Traffic Neighbourhoods. Image credit: UK DfT, Streets Alive Yarra.

Third, if officers are hinting at Trenerry Crescent, it's not correct to extrapolate the community feedback from that proposal to all future proposals, because Trenerry Crescent was one of very few links between two neighbourhoods, whereas most other neighbourhoods have multiple links.

Fourth, the community has supported road closures in the past, e.g. Somerset Street in Richmond and the outdoor dining area for the Warm Hug Cafe in Richmond.



It's great to see council build traffic calming



The public does supports road closures to create Low Traffic Neighbourhoods, e.g. Somerset Street in Richmond and the Warm Hug Cafe in Richmond. Image credits: Streets Alive Yarra.

Indeed, the most recent, comprehensive assessment of community views was the community engagement for the Community Vision 2036. Results matched prior surveys, showing strong support for the reallocation of space to support walking, cycling, trees and place making:

- 12% for more cars and parking (comprising a lot more, mostly, and I lean)
- 85% for more active transport (comprising a lot more, mostly, and I lean)

Room for active and sustainable transport

Using a slider scale with the two statements at either end we asked you which you agreed with more. Responses are grouped here into seven categories.

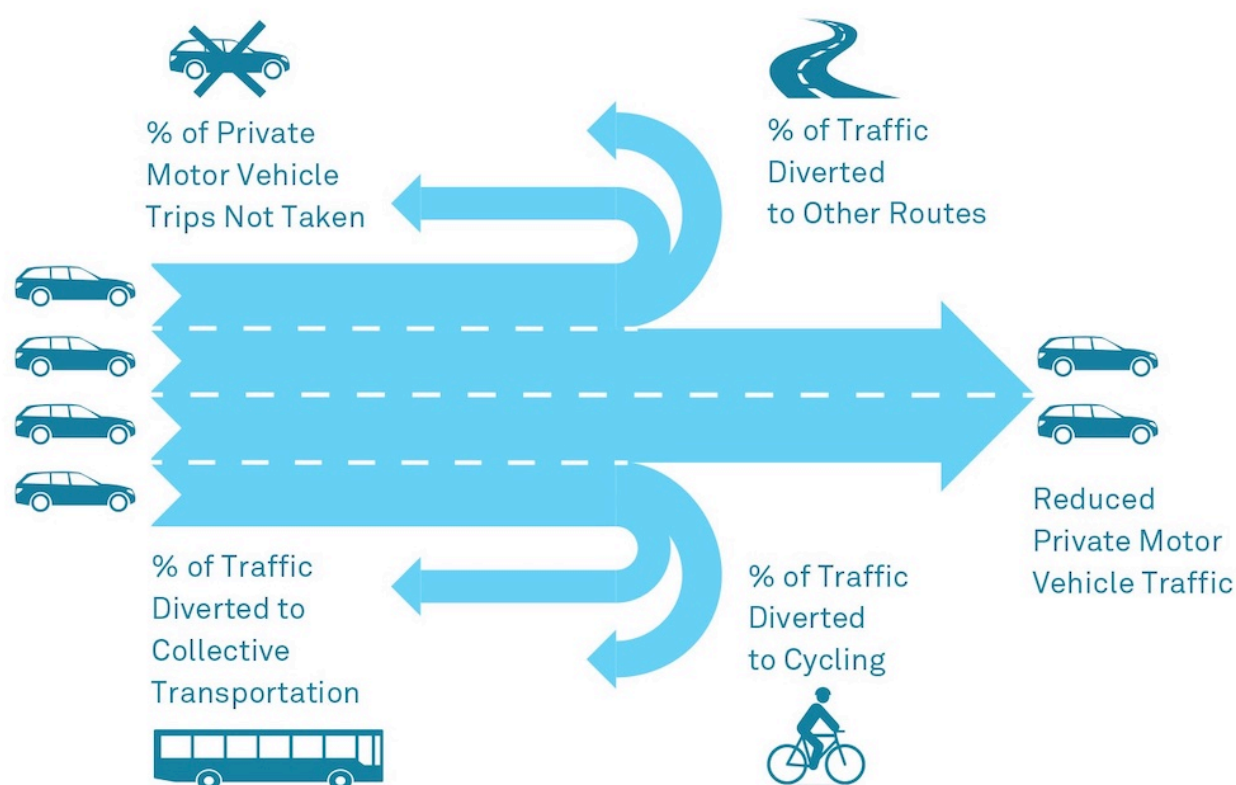
“By the year 2035
it will be more
important to use
Yarra’s streets
for:”



5%	A lot more cars and parking spaces
1.7%	Mostly lean more towards this option
5.7%	I lean somewhat towards this option
1.7%	Not sure
20%	I lean somewhat towards this option
11.6%	I mostly lean towards this option
53.9%	A lot more active and sustainable transport options

Community Vision 2036 shows strong support for changes to the transport network. Source: Engagement Report on Community Vision 2035

Increased travel times and redistribution of traffic. Yarra's population is increasing fast, and so is traffic congestion and parking congestion. In contrast to the assertion that treatments to reduce traffic volume would lead to increased travel times, it is “business as usual” that is delivering increased travel times. The only effective solution is to enable people to choose walking and cycling, by calming streets to reduce traffic speed and volume. When faced with traffic congestion, and when offered safe and effective alternatives, many people will choose walking, cycling and public transport, or simply not travel, i.e. a portion of the traffic will evaporate.



Traffic Evaporation. Research shows that when road capacity is shifted to other modes, some peak-period traffic disappears from the network. Drivers shift to other modes, make trips at other times, or shift destinations.

Image credit: [NACTO](#)

Overall, if officers are concerned with traffic congestion, the solution is to build great neighbourhoods, which means calming traffic and reducing traffic volumes.



Image credit: [Strong Towns](#)

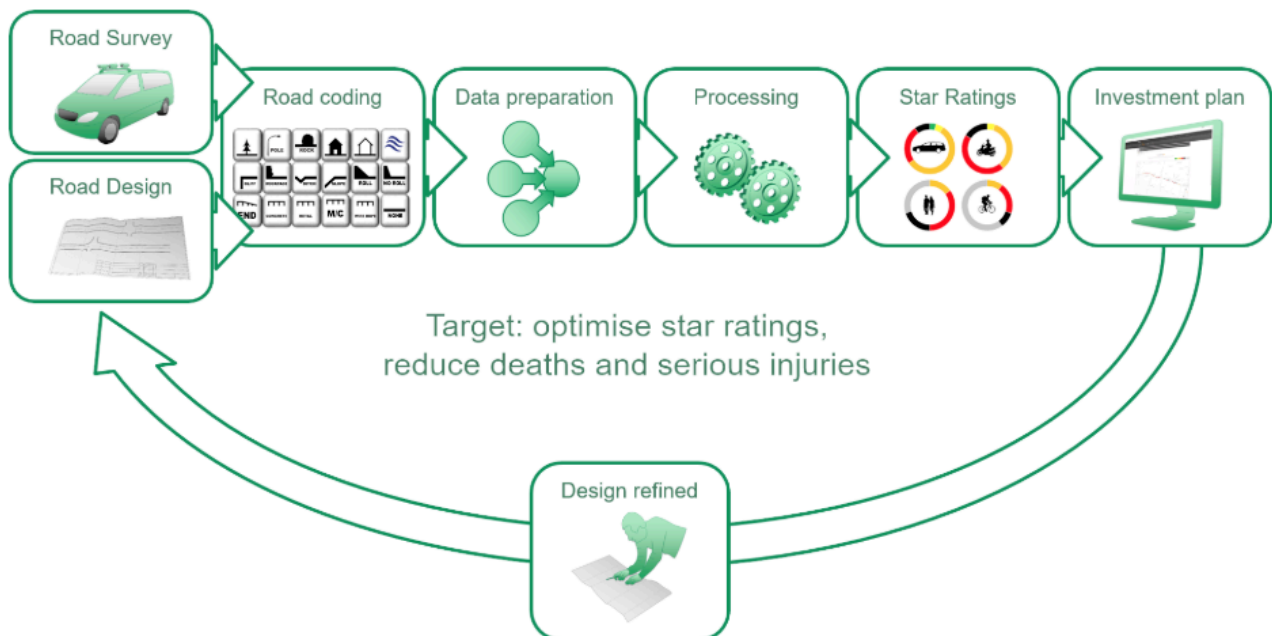
Prioritisation process

The draft Road Safety Study Policy proposes a nebulous, poorly defined “priority ranking list”, creating the opportunity for officers to be able to pick and choose without needing to justify their decisions.

The draft fails to suggest a best practice approach for prioritisation, which would be proactive instead of reactive. A example of a proactive process would be to assess every street and intersection in Yarra using iRAP, giving each a star rating, and prioritising the streets with the worst ratings. Considering the large number of streets and intersections in Yarra, this process can be simplified by collating streets and intersections into typologies, and conducting star rating assessments on this smaller set of typologies.

Another example of a proactive process would be to measure traffic speeds and volumes on all streets, and prioritise those streets with the highest speeds and volumes. Speeds can be measured with adequate accuracy using a \$200 ‘speed gun’.

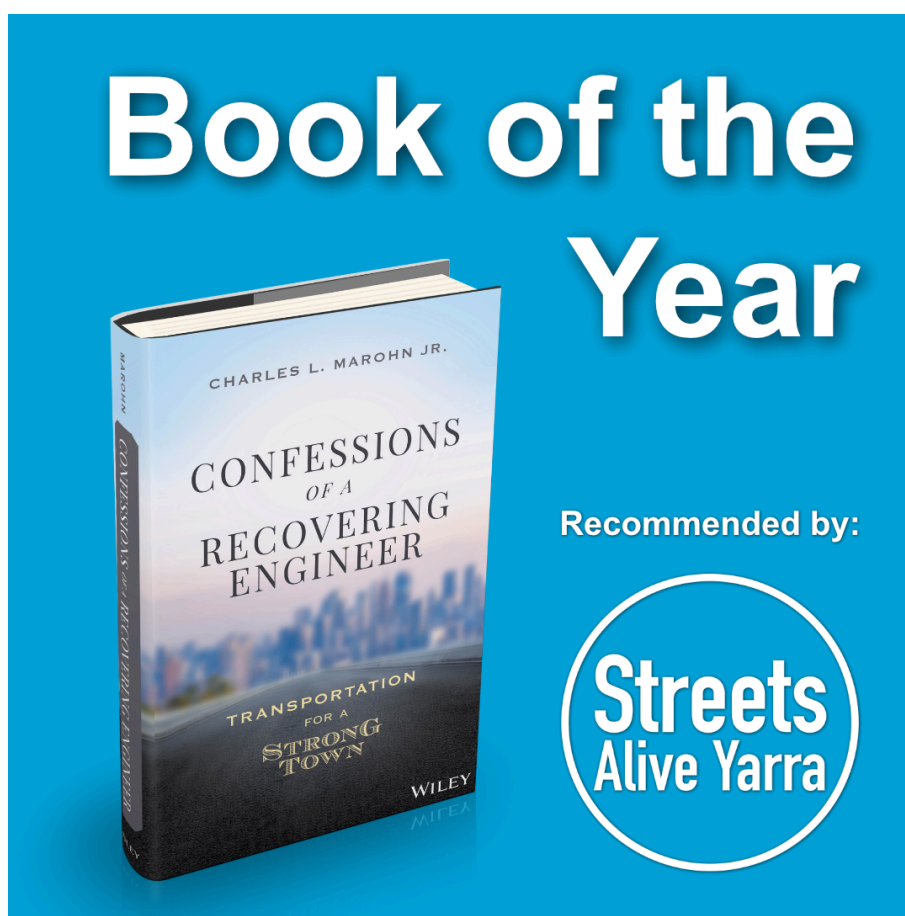
In contrast, the draft hews to the outdated, reactive approach of examining crash statistics, which is inconsistent with Safe System. If officers were assessing community requests for a bridge across a dangerous river, they would claim that there was no priority, because no one had died from attempting to swim across the river, neatly disregarding the obvious understanding that people weren’t swimming across the river because they could identify the hazard and associated risk.



Example of a proactive process to prioritise investments in road safety. Image credit: iRAP.

Similarly, the draft proposes to prioritise streets that have an 85th percentile speed that is more than 10% above the posted speed limit. The posted speed limit for local streets in Yarra is usually 40 km/h, which is not a definition or measure of safety. It's certainly not a threshold speed under Safe System, which is the core of Australia's and Victoria's road safety strategies. The draft claims to have been developed to be consistent with Safe System, but it isn't.

If a street has mixed traffic, then it needs to have an 85th percentile speed of less than 30 km/h, irrespective of whether the speed limit is posted as 40 km/h. The deficiencies of traditional engineering rules, e.g. comparing 85th percentile speeds with posted speed limits, have been fulsomely elucidated the book "confessions of a recovering engineer".



"Streets shouldn't be designed by engineers" says the author of "confessions of a recovering engineer", especially not those engineers who blindly follow outdated methods that don't align with Safe System. Image credit: Wiley / Streets Alive Yarra.

Community engagement

The draft Road Safety Study Policy claims to align with the best practice spectrum framework developed by the International Association for Public Participation (IAP2), as well as Yarra's adopted Community Engagement Policy 2020; yet fails to recommend community engagement on the content of the policy itself.

Officers should acknowledge that council as a whole delivers better decisions when councillors and officers have the opportunity to assess feedback from the community before putting a new policy up for adoption.

Officers even failed to ask for feedback from the Bicycle Advisory Committee or the Active Transport Advisory Committee. It's as if the elimination of council's primary policy for traffic management, road safety and place making, the LAPM process, was considered to be of no interest to residents.

Recommendations

The deficiencies in the draft should be corrected by:

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- Stating that the aim is to deliver infrastructure so that people of all ages and abilities can access any property in Yarra without being exposed to hazards that carry the risk of serious injury or death, irrespective of whether they walk, roll on a wheelchair, cycle, use public transport or drive. More specifically, to deliver local streets (i.e. streets that aren't DoT arterials or streets that don't have protected bike lanes) that have an 85th percentile traffic speed of less than 30 km/h and a traffic volume of less than 2,000 vehicles per day.
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Concluding remarks

Streets Alive Yarra would be delighted to provide further detail or explanation of the themes raised in this document.

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