

Report to the Chief Officer (Highways and Transportation)

Date: 01 March 2016

Subject: 20mph scheme – Meanwood Park and Woodlea, Meanwood – Objection Report

Capital Scheme Number: 32350 and 32405

Are specific electoral Wards affected? If relevant, name(s) of Ward(s): Middleton	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Are there implications for equality and diversity and cohesion and integration?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Is the decision eligible for Call-In?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Summary of main issues

- 1 The Best City ambition is to improve life for the people of Leeds and make our city a better place. The provision of twenty miles-per-hour (20 mph) speed limits contribute to this ambition by improving the safety and quality of life of Leeds residents by enabling safe pedestrian and cycling journeys in local communities. They also help reduce traffic collisions to make a specific contribution to the Best City for Communities and a Child Friendly City.
- 2 As part of the ongoing 20mph schemes programme, following guidance and recommendation from the Department for Transport (Dft), the introduction of 20mph zone and traffic calming features in the Meanwood Park and Woodlea area of Moortown Ward has been proposed and advertised but received objections.
- 3 This report seeks approval of the Chief Officer (Highways and Transportation) to consider and over-rule the reported objections associated to the proposed 20 mph Speed Limit Order, Leeds City Council (Traffic Regulation) (Speed Limit) (No.21) Order 2015 and associated traffic calming.

Recommendations

- 2 The Chief Officer (Highways and Transportation) is requested to:
- i) Note the contents of this report;
 - ii) Consider and over-rule the objections to Leeds City Council (Traffic Regulation) (Speed Limit) (No. 21) Order 2015 and the section 90c notice;
 - iii) Request the City Solicitor to make, seal and implement Leeds City Council (Traffic Regulation) (Speed Limit) (No. 21) Order 2015;
 - iv) Request the City Solicitor to write to the objectors informing them of the Chief Officer's (Highways and Transportation) decision; and
 - v) Give authority to incur additional expenditure of 24,000, on top of the original approval of £36,000, all to be funded from the LTP Transport Policy Capital Programme.

1 Purpose of this report

- 1.1 This report details the objections received against the proposed Speed Limit Orders and the associated traffic calming that form part of the CityConnect programme, and requests the Chief Officer (Highways and Transportation) considers these objections and the recommendations.
- 1.2 The purpose of the report is to obtain authority to over-rule the objections received and seeks approval to implement and seal the speed limit and traffic calming features as per the advertisement.

2 Background information

- 2.1 The Department of Transport provides guidance on 20mph schemes and setting local speed limits. The guidance encourages local authorities to introduce more 20mph speed limits and 20mph zones and clearly highlights a flexible approach to using 20mph speed limits, particularly where pedestrian and cyclist movements are high, such as around schools, shops, markets, playgrounds and other areas which are not part of any major through route.
- 2.2 The objective of 20 mph speed limit schemes is to enhance the local environment by reducing vehicles speed to create a safer road environment for all, but with a particular emphasis on children. By introducing 20mph zones in the vicinity of schools and their surrounding residential areas, it is intended that as well improved road safety the slower speeds may also encourage children to engage in walking and cycling to school.
- 2.3 The 20 mph schemes programme is now a well-established element of the Leeds City Council's programme of road casualty reduction and sustainable travel in residential areas.

- 2.4 Dft figures indicate that 20 mph speed limit schemes, where there are safety issues, give good rates of return and typically pay for themselves within two years. There is now a greater need to deal with area based schemes, as the worst individual locations have been tackled previously. This approach has now been adopted for a number of phases and this report details one of the sites.
- 2.5 The majority of roads within the proposed zone are residential estate roads, with the exception of Tongue Lane, Parkside Road, Stainbeck Lane and Church Lane which serve as local distributor roads.
- 2.6 Both St Urban's Catholic Primary School and Cardinal Heenan Catholic School are located and accessed from Tongue Lane. Along this route there is already a short section of 20mph speed limit, two humped zebra crossings, a speed table and two Speed Indicator Devices (SIDs) covering the schools frontages. On Stainbeck Lane there is an existing short section of 20mph speed limit that covers the southern entrance to Carr Manor High School. These locations and features will be incorporated within the proposed zone.
- 2.7 The accident history within the proposed zone in the past five year period shows fourteen injury collisions, thirteen being recorded as 'slight' and one having a severity rating of 'serious'. Despite the number of accidents there is no distinct pattern.
- 2.8 Historically Leeds City Council has received several complaints that Tongue Lane and Church Lane are both well used by through traffic trying to avoid the King Lane/Ring Road junction to access Meanwood Road and the Ring Road. Changes in vehicles flows as a result of this scheme being introduced are difficult to predict, because traffic flow patterns continually change. Some research predicts reductions in traffic flows of up to 20% where traffic calming has been introduced. If this is the case, it will mean more traffic will use more strategic routes such as the B6157 Stonegate Road.
- 2.8.1 In September 2015 a report was approved by the Chief Officer (Highways & Transportation) giving authority to advertise a Speed Limit Order and associated 90c Notice for the proposed 20mph zone.
- 2.8.2 From the 9 October 2015 to the 9 November 2015 Leeds City Council (Traffic Regulation) (Speed Limit) (No.21) Order 2015 and the associated 90c notice were advertised, see attached plan and a copy of the notice for further information.
- 2.8.3 A total of 40 responses were received, which is an exceptional level of feedback for a scheme of this nature. Twenty-nine replies were expressions of support for the scheme and the remaining 11 were objections.

3 Main issues

3.1 Design Proposals and Full Scheme Description.

3.1.1 The area that is to be included within the 20mph zone is shown on drawing TM-24-2220-CON-01b. The majority of roads are residential estate roads within the proposed zone, with the exception of Tongue Lane, Parkside Road, Stainbeck Lane and Church Lane these serve as local distributor roads.

3.1.2 The package of works comprises:

Introduction of a 20mph speed limit, all necessary signage and limited traffic calming features where surveys and the design process have shown that they are required. Speed limit repeater signs will be introduced in combination with strategically placed traffic calming features to highlight the restriction and ensure speeds are managed. Entry and exit signs along with 20mph roundel markings will also be introduced.

3.1.3 The scheme has been revised following a meeting with all those that made representation to the onsite notice. The changes include the removal a set of cushions on Tongue Lane, 2 sets of cushions on Parkside Road, and 2 sets of cushions on Stainbeck Lane. These changes do not compromise the aims of the scheme, do not require re-advertisement but are subject to post implementation surveys. Once the scheme has been introduced speeds surveys will be undertaken to determine if a mean speed of 24mph or below has been achieved. If this has not been realised on Tongue Lane, Stainbeck Lane and Parkside Road, consideration will be given to introducing these features back into the scheme.

3.1.4 The advertising of the scheme generated some recommendations to use alternative traffic calming features as an alternative to vertical measures, these have been summarised below along with reasons why they are not being implemented;

- **Speed Indicator Devices' (SID's)** – There are already two SID's present on Tongue Lane near the schools, along with existing traffic calming features, and speed surveys confirm this combination has been effective in reducing vehicle speeds and highlight the need for a change in driver behaviour. If this type of measure was overused there is potential that it could devalue and dilute the impact of the existing features. It is also worth noting, recent analysis by the Institute of Transport Studies has highlighted that 'dynamic' signs have an impact life of between 3 – 4 months and recommend the signs are regularly relocated. This scheme is seeking a more long term solution.
- **Permanent Speed Cameras** – Speed cameras are an effective form of speed management in the appropriate circumstances. The Council is part of the West Yorkshire Casualty Reduction Partnership which has agreed consistent evidence based criteria for selecting and operating camera sites to ensure cameras can be most effectively deployed for casualty reduction. Evaluation of this area has indicated that the operational criteria would not be met and alternative measures would be more appropriate.

- **Removal of centre lines** - Current guidance does not state that a centreline must be used and recommends omitting them when the carriageway is in a rural environment and is less than 5.5 metres wide. Research and trials by TRL Limited suggest that removing centre marking can reduce vehicle speeds. However, the report is unclear on the after-monitoring period and on what the long term reductions are, if there is in fact any. A similar trial was carried out in Leeds and although short term speed reductions were recorded, over a longer period of time speeds increased and the site experienced a series of collisions leading to reinstatement of the centreline. On this basis this approach has not been preferred for this scheme, pending greater certainty from continued monitoring of ongoing trials across the country.

3.1.5 Please see attached a summary of all the objections and the response form Highways.

3.0 Programme

3.1 It is anticipated that the proposal will be implemented within the 2015/ 2016 financial year.

4 Corporate Considerations

4.1 Consultation and Engagement

4.1.1 Ward Members: Ward Members were consulted by email on the 21st May 2015, only one response was received confirming their support but also requesting the zone to be extended. Following further investigation this request was incorporated into the scheme. Members were informed of the changes on the 13th August 2015, no further comments have been received.

4.1.2 Ward members have been made aware of progress on a regular basis via email, ward and scheme specific meetings. They also helped facilitate and chair a meeting with stakeholders that responded to the legal notice. Throughout this process they have always expressed their full support for the scheme.

4.1.2 Emergency Services and West Yorkshire Combined Authority were consulted by email on the 21st May 2015 and informed of the amended scheme on the 13th August 2015. To date no objections have been received.

4.1.3 The general public were consulted via notices on street lighting columns during the public advertisement phase, along with an advert in the Yorkshire Post newspaper. Members of the Meanwood Valley Partnership were made aware of the scheme during a public meeting that took place on the Tuesday 11th August 2015. Some concern was raised about the introduction of vertical traffic calming features but the general concept of the introduction of a 20mph zone was supported.

4.1.4 The scheme was presented to Leeds Cycle Forum on 9th September 2015. The feedback expressed general support for the scheme and 20mph zone but also highlighted some of the issues experienced by cyclists when negotiating speed cushions.

4.1.5 A meeting was held on the Tuesday 9th February 2016 for all 40 stakeholders that had responded to the legal notice. A total of 12 people attended in addition to two ward members. The meeting had a mixture of people that were for and against the scheme and generated positive discussion about the proposals. The scheme has since been amended to reflect the outcomes from this process without compromising the aims of the scheme.

4.1.6 Ward Members have been informed of the level of objections and are still keen for the scheme to be progressed.

4.2 Equality and Diversity / Cohesion and Integration

4.2.1 A full Equality, Diversity / Cohesion and Integration impact assessment has been carried out for 20mph schools schemes.

4.2.2 Positive Impact: Making 20mph the normal speed limit would:

- Provide safer passage whilst crossing the road to all pedestrians, especially those with mobility issues, disabled people, parents supporting pushchairs and young and old people
- Greater independence and choice for children travelling to school
- Dramatically increases chances of survival if hit by a car to 97%
- Make it more pleasant to walk or cycle, encouraging a more healthy lifestyle
- Reduce pollution and noise.
- Improve quality of life for the local community

4.2.3 Negative Impact: Making 20mph the normal speed limit would:

- Have the potential to provide a slight increase in vehicle emissions due to lower speeds. It is expected there will be a reduction of between 1- 2mph for the average speeds across the zone and that the potential air quality implications will be negligible and offset due to more uniform driving behaviour and potential increased modal shift to more sustainable travel choices.

4.3 Council Policies and Best Council Plan

4.3.1 The proposals contained in the report have no implications for the council constitution.

4.3.2 By providing a safer road environment where needed and justified, the ongoing 20mph zone programme is helping to achieve Leeds' ambition to become the Best City by reducing the number of pedestrians killed or seriously injured on the city's roads, by fostering links between the communities and local facilities, especially where the highway forms a considerable barrier, and by enabling more sustainable travel choices for local journeys, including for new developments within the city.

4.3.3 Environmental Policy: The reduction in speed limit to 20mph will not have any significant impact on carbon emissions; air pollutants should remain similar to that of 30mph.

4.3.4 Local Transport Plan 3: **Strategic Approaches:**
Travel Choices: P10. Promote the benefits of active travel.
Connectivity: P18. Improve safety and security
P22. Develop networks and facilities to encourage cycling and walking.

4.3.5 Transport Policy Approval: The design instruction for this scheme was received in April 2015 and the proposed scheme is approved in principle by Transport Policy.

4.4 Resources and Value for Money

4.4.1 The original Design and Cost report that was presented and approved by the Chief Officer (Highways and Transportation) 13th September 2015 detailed a total scheme cost of £36,000 to be funded from the LTP Transport Policy Capital Programme. The original approval was based on outline figures provided by Transport Policy. The scheme costs have since been revised based on current contract rates with a total scheme cost of £60,000, consisting of £47,000 works costs, £11,000 staff costs and £2,000 legal fees. The potential casualty reduction savings means the scheme represents value for money and justifies the additional expenditure.

Item	Previous Approval	Revised Costs
Civils	£26k	£47k
Staff costs	£8k	£11k
Legal Fees	£2k	£2k
Total	£36k	£60k

4.5 Capital Funding and Cash Flow

Previous total Authority to Spend on this scheme	TOTAL £000's	TO MARCH 2015 £000's	FORECAST				
			2015/16 £000's	2016/17 £000's	2017/18 £000's	2018/19 £000's	2019 on £000's
LAND (1)	0.0						
CONSTRUCTION (3)	0.0						
FURN & EQPT (5)	0.0						
DESIGN FEES (6)	0.0						
OTHER COSTS (7)	0.0						
TOTALS	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Authority to Spend required for this Approval	TOTAL £000's	TO MARCH 2015 £000's	FORECAST				
			2015/16 £000's	2016/17 £000's	2017/18 £000's	2018/19 £000's	2019 on £000's
LAND (1)	0.0						
CONSTRUCTION (3)	47.0		47.0				
FURN & EQPT (5)	0.0						
DESIGN FEES (6)	11.0		11.0				
OTHER COSTS (7)	2.0		2.0				
TOTALS	60.0	0.0	60.0	0.0	0.0	0.0	0.0
Total overall Funding (As per latest Capital Programme)	TOTAL £000's	TO MARCH 2015 £000's	FORECAST				
			2015/16 £000's	2016/17 £000's	2017/18 £000's	2018/19 £000's	2019 on £000's
Government Grant - LTP/TSG	60.0		60.0				
Total Funding	60.0	0.0	60.0	0.0	0.0	0.0	0.0
Balance / Shortfall =	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Parent Scheme Number: 99609
Title: LTP Transport Policy Capital Programme

4.5.1 There should be no additional revenue costs as a result of this capital scheme.

4.5 Legal Implications, Access to Information and Call In

4.5.1 The scheme is in the Annual Programme and subject to resolving any objections received it is anticipated to be completed within the 2016/2017 financial year.

4.6 Risk Management

4.6.1 If no action was taken then access to the schools for pedestrians and cyclists will not improve and the potential of injury to pedestrians and cyclists will not be addressed.

5 Conclusions

5.1 The provision of this 20mph scheme will contribute to the Council's ambition by improving the safety and quality of life of Leeds residents by enabling safe pedestrian and cycling journeys in local communities. It will also provide a safer environment around the school and residential areas thus encouraging more sustainable travel behaviours for all users.

6 Recommendations

6.1 The Chief Officer (Highways and Transportation) is requested to:

- i) Note the contents of this report;
- ii) Consider and over-rule the objections to Leeds City Council (Traffic Regulation) (Speed Limit) (No. 21) Order 2015 and the section 90c notice;
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- v) Give authority to incur additional expenditure of £24,000, on top of the original approval of £36,000, all to be funded from the LTP Transport Policy Capital Programme.

7 Background documents ¹

7.1 None.

¹ The background documents listed in this section are available to download from the Council's website, unless they contain confidential or exempt information. The list of background documents does not include published works.

SUMMARY OF OBJECTION TO MEANWOOD PARK & WOODLEA AREA 20MPH ZONE

Leeds City Council (Traffic Regulation) (Speed Limit) (No.21) Order 2015

SUMMARY OF OBJECTION	NO. OF OBJECTORS	HIGHWAYS RESPONSE														
<p>Objection No.1</p> <p>Against the introduction of traffic calming measures, particularly on Church Lane, Tongue Lane and Parkside Road.</p>	<p align="center">9</p>	<p>Any roads included within the proposed 20mph zone must have an average speed at or below 24mph in order to satisfy current design requirements. Previously when introducing 20mph zones there was a requirement to introduce some form of traffic calming feature every 100m. This was excessive and often unnecessary. More recently, these rules have been relaxed so as not to be excessive, giving Highway Authorities the flexibility to focus their resources where features are required. Therefore, traffic calming features have only been proposed where speed surveys have confirmed they are required. In areas where speeds are already low small 20mph repeater signs will be installed using existing street furniture.</p> <p>Result from speed surveys;</p> <table border="1" data-bbox="902 884 2058 1256"> <thead> <tr> <th data-bbox="902 884 1305 954" rowspan="2">Road Name</th> <th colspan="2" data-bbox="1305 884 2058 954">Mean Speed (mph)</th> </tr> <tr> <th data-bbox="1305 954 1700 1018">Northbound</th> <th data-bbox="1700 954 2058 1018">Southbound</th> </tr> </thead> <tbody> <tr> <td data-bbox="902 1018 1305 1086">Church Lane</td> <td data-bbox="1305 1018 1700 1086">26.6</td> <td data-bbox="1700 1018 2058 1086">28.9</td> </tr> <tr> <td data-bbox="902 1086 1305 1155">Tongue Lane</td> <td data-bbox="1305 1086 1700 1155">29.2</td> <td data-bbox="1700 1086 2058 1155">31.2</td> </tr> <tr> <td data-bbox="902 1155 1305 1256">Parkside Road (East of Tongue Lane)</td> <td data-bbox="1305 1155 1700 1256">26.8</td> <td data-bbox="1700 1155 2058 1256">26.2</td> </tr> </tbody> </table>	Road Name	Mean Speed (mph)		Northbound	Southbound	Church Lane	26.6	28.9	Tongue Lane	29.2	31.2	Parkside Road (East of Tongue Lane)	26.8	26.2
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	Northbound	Southbound														
Church Lane	26.6	28.9														
Tongue Lane	29.2	31.2														
Parkside Road (East of Tongue Lane)	26.8	26.2														

<p>Objection No.2</p> <p>Against the introduction of a 20mph speed limit, particularly on Church Lane, Tongue Lane and Parkside Road.</p>	<p>6</p>	<p>When developing a 20mph zone engineers undertake onsite inspections, consider the road characteristics, review accident records and analyse speed surveys to help get a general understanding of traffic behaviour. This information is then used to help influence the design.</p> <p>Tongue Lane, Parkside Road and Church Lane are all very different, particularly in terms of the road characteristics, number of accesses and numbers of dwellings along them. For this reason the first draft of the zone didn't include the Tongue Lane or Parkside Road but did include Church Lane. However, further investigation, surveys and consultation resulted in the zone increasing to include these roads.</p> <p>One of the main driving forces for this change was the desire to protect the area around the two schools on Tongue Lane and support the large number of school children walking along it and Parkside Road. Road safety is one of the biggest barriers that prevents people for choosing more sustainable travel choices and this proposal should address these concerns.</p> <p>There was also a design requirement that needed to be adhered to. Current guidance set by the Department for Transport states 'the minimum length for a speed limit should generally not be less than 600metres to avoid too many changes of speed limit along the route'. If the section of Tongue Lane outside the schools was made 20mph but the remainder of the road stayed 30mph, this would lead to there being three very short sections of varying speed limits. Drivers heading southbound along Tongue Lane from the Ring Road would go from 30mph to 20mph outside the schools, then back to 30mph before entering the rest of the 20mph zone at the junction with Church Lane. Whilst it is agreed, as an isolated case, the southern section of Tongue Lane and Parkside Road might justify the 30mph to remain, but when viewed holistically and taking into account guidance there is a case for it to become 20mph.</p>
<p>Objection No.3</p> <p>Concerned that the scheme will increase pollution in the area.</p>	<p>2</p>	<p>Whether the scheme will increase pollution is difficult to quantify and is largely dependent on driver behaviour and driving style. The traffic calming features have been spaced in accordance with national guidance and should encourage a maintained and consistent driving style. As part of any scheme development colleagues who specialise in</p>

		environmental studies were consulted and responded advising that there may be potential for a slight increase in vehicle emissions due to lower speeds through the reduction of vehicle speed, approximately 2 - 8mph for the average speeds, but that the potential air quality implications will be negligible and could be more than mitigated and offset by a more uniform driving behaviour and potential increased modal shift to more sustainable travel choices.
<p>Objection No.4</p> <p>Against the introduction of traffic calming due to concerns that they cause vehicle damage.</p>	3	<p>This is often raised when introducing schemes that include road humps. Many studies and trials have been carried out in relation to this and the results have been used to form national regulations and design standards. National guidance states, vehicles travelling over road humps at appropriate speeds should not suffer damage, provided the humps conform to the Highways (Road Hump) Regulations. The features being used will conform to these regulations.</p>
<p>Objection No.5</p> <p>Against the introduction of traffic calming due to concerns that they cause discomfort.</p>	3	<p>Unfortunately for some vehicle occupants, for example those with back injuries, discomfort can be experienced when negotiating them at the appropriate speeds. This is why it is vitally important that the humps are carefully designed and built in a way that minimises the discomfort experienced. In order to mitigate this issue Leeds City Council has produced standard details that reflect the regulations associated to speed humps. These regulations have been derived from extensive research trials and specify tolerances and design criteria that ensure discomfort is minimised and the effectiveness of the speed humps is not compromised.</p>
<p>Objection No.6</p> <p>Concerns that the proposal will displace traffic from Tongue Lane and Church Lane onto</p>	3	<p>Changes in vehicles flows as a result of traffic calming being introduced is difficult to predict, because traffic flow patterns continually change. Some research predicts reductions of up to 20% where traffic calming has been introduced. Having reviewed</p>

neighbouring streets.		previous complaints for the area, there is concern a lot of the motorists using these roads are through traffic, trying to access Meanwood Road or the ring Road, and a 20% reduction is likely to result in them using more strategic routes such as B6157 Stonegate Road.
<p>Objection No.7</p> <p>The existing road characteristics and conditions mean that high speeds cannot be achieved and therefore there isn't a need for the scheme.</p>	1	<p>The vast majority of roads within the proposed zone do have characteristics and conditions that calm vehicle speeds. The proposed change in speed limit will provide further reductions and promote a culture of low speed that will benefit walking and cycling in residential areas.</p> <p>However, there are some roads within the zone that do require some form of traffic calming. See Highways response to objection 1.</p>
<p>Objection No.8</p> <p>Traffic calming is a hazard for cyclists, ambulances and motorists towing caravans.</p>	3	<p>Leeds Cycle Forum have been presented the scheme and consulted. Traffic calming can benefit cyclists through reducing vehicle speeds and reducing their dominance. The alterations are an opportunity to improve conditions for cyclists. A mixture of humps and cushions has been promoted due to site constraints and consultation feedback. Both features have their drawbacks in relation to specific highway users. Full width features assist pedestrian accessibility and minimises the impact to traffic if parking takes place next to them, but they aren't supported by bus operators and cause discomfort to cyclists. Whereas cushions are supported by the bus operators and allow cyclists to bypass them, but are unable to be straddled if parking takes place near them. Both features are recognised within national guidance and should not pose a risk to cyclists in the proposed locations.</p> <p>Emergency Services have been consulted and no adverse comments have been received.</p> <p>There is very little information about the impact traffic calming has on motorists towing a caravan. Refer to Highways response to Objection 4.</p>

<p>Objection No.9</p> <p>The scheme will introduce unnecessary disruption and street signage.</p>	<p>1</p>	<p>The construction of the proposals will require a permit before any works can take place on the highway. This permit will only be approved if satisfactory working methods, hours of operation and temporary traffic management are sufficient. This process ensures disruption to local residents, commuters and the road network are kept to a minimum and prevents clashes with other road works in the area.</p> <p>Once installed, traffic flows will not be interrupted, speeds will merely be reduced. No long term disruption will be caused.</p> <p>Signing will be introduced in accordance with current standards to ensure the speed limit is legal and enforceable. This will result in entry signs being introduced on the boundary of the zone and small repeater signs on the affected streets. Where possible signing will be placed on existing street furniture, such as lighting columns, to ensure the street clutter is minimised.</p>
<p>Objection No.10</p> <p>The proposals will make the roads more dangerous.</p>	<p>2</p>	<p>There is no evidence to support this claim. Current police records show there has been 14 recorded injury accidents in the past five years within the proposed 20mph zone. Reducing speeds has a direct correlation to improving road safety because it lessens the frequency and severity of accidents, and therefore should improve this current statistic, not make it worse.</p>