

Objections/Suggestions on Draft Delhi Road Safety Policy



Policy Para	Suggestion/Objection	Reason/Reference
3	Mission should include reference to both fatalities and severe injuries .	Internationally it is recognized that both deaths and injuries need to be reduced
4	Vision should talk about reducing fatalities and severe injuries but not necessarily reduction of road accidents	Road safety experts will distinguish between the need to reduce crashes on one hand and the need to reduce or prevent deaths and injuries as a result of the crash. The intent of the public policy is to prevent death and injury, not crashes per se. This is a subtle but important distinction.
ALL	Replace the word “accident” by “crash”	The internationally accepted term used by road safety experts is crashes not accidents. The word “accident” conveys a sense that the incident happened by chance. However, since it is now believed that all road crashes can be prevented – it is no longer termed an accident. See https://www.nytimes.com/2016/05/23/science/its-no-accident-advocates-want-to-speak-of-car-crashes-instead.html
5(i)	The emphasis on creating awareness amongst citizens, masses, school children, road user groups etc. should be re-considered and carefully re-phrased. <u>Add</u> Awareness campaigns – especially if they are publicly funded – should have carefully set objectives and should be subject to post-implementation evaluation – to determine if the campaign worked and if so to what extent.	There are several reasons to de-emphasise the need for “road safety awareness campaigns”, (1) There is very little evidence to show that awareness campaigns work unless they are very carefully and scientifically designed (2) Awareness campaigns may increase awareness but may not actually induce any behaviour change (3) They can be very resource intensive and may divert resources that could be used for more effective measures that will actually reduce deaths and injuries

		(4) They are typically based on the underlying belief that accidents are caused by “imperfect” drivers and if everyone became a “perfect” driver then there would be no accidents
	Delete “Raise awareness . . . persons with disability”	The young, elderly and persons with disabilities are victims on roads. Awareness campaigns (subject to the suggestions above) should be targeted at the other road users.
5(v)	In addition to undertaking the exercise of star rating all arterial and sub-arterial roads certain objectives should also be set in this regard.	Targets may include the following: <ol style="list-style-type: none"> 1. All arterials shall be made 3-star or better within 5 years (see https://www.irap.org/3-star-or-better) 2. All new roads shall be 3-star or better 3. 90% of all travel (vehicle km travelled VKT) shall be on roads 3-star or better by 2025
	<p><i>“Safer roads and free mobility cannot be achieved unless sufficient parking spaces are made available. Development Authorities are already entrusted with responsibility to create more parking spaces. Parking policy will be notified to impress upon vehicle owners to have parking space before vehicle is purchased”.</i></p> <p>Delete the above.</p>	<p>This paragraph is problematic at many levels:</p> <ol style="list-style-type: none"> 1. The phrase “free mobility” has been introduced here but has no basis or relevance for “safer roads”. Free mobility implies that the city will be free of congestion – presumably for private motorized vehicles – and this in turn implies wider roads, flyovers and signal-free junctions, all of which lead to more vehicles, increased speeds and less safe conditions for everyone but more so for Vulnerable Road Users (VRUs). Hence the policy document should delete this phrase. 2. Sufficient parking has absolutely no relevance to road safety whatsoever. In fact, it is known worldwide that one of the key tools to reduce the growth of private vehicle usage is to reduce parking and make parking prohibitively expensive. Parking is like an aphrodisiac for vehicles. Buildings with huge parking spaces not only make them unsafe for people, especially women, but also make real estate construction more expensive and the city less competitive. It is also a myth that more off-street parking will reduce the demand for on-street parking. On-street parking management has to be implemented first – both to ensure that street space is better utilized and for creating better footpaths and cycle tracks – and also to ensure that off-street parking is used by long-term parkers.

5(vii)	<p>Issuance of licenses from Automated Driving Training Centres</p> <p>This may be deleted</p>	<p>It is seen in all countries that have managed to reduce road crash trauma (death and injuries) that licensing of drivers is very strict and focuses on ensuring that all drivers are fully aware of road rules and drive in a manner that is safe – including giving right of way to pedestrians. The emphasis is on “defensive driving”. Automated Driving Centres are being promoted as a way to ensure that corrupt RTO officials do not give licenses without taking the driving test. However, a proper driving test that includes a road test and an evaluation of the driver’s sense of road safety is necessarily a subjective evaluation. An automated test can test the skill of the driver and her ability to manoeuvre or control the vehicle but cannot test whether the driver practices safe driving.</p>
5(viii)	<p>NMT Policy</p> <p>This is may be changed to a Non Motorized Transport or Active Transport ACT.</p>	<p>While it is very welcome that the Gov’t of Delhi has proposed the creation of an NMT Policy, it may be far better to consider making an Act. An Act would have far greater ability for effective enforcement and bind the various authorities.</p> <p>It should be kept in mind that “<i>vehicles other than mechanically propelled vehicles</i>” come under List II (“State List”) of the Seventh Schedule of the Constitution and hence the State Legislature has exclusive rights to enact legislation on this matter. It could include pedestrians, cyclists and cycle-rikshaws.</p>
5(x)	<p>Enforcement of Traffic Laws/Rules and Regulations</p> <p>Add speeding and distracted driving to the list of offences (overloading of passenger vehicles, drunken driving, non-wearing of helmets and seat-belts). Driving without a valid license should be added as a serious traffic crime and should lead to immediate confiscation of the vehicle and prosecution under the Motor Vehicles Act and Rules.</p> <p>In addition to spot penalties, the suspension and/or revoking of licenses should also be mentioned.</p> <p>The State may also consider setting up mobile Traffic Courts which can effectively deal with traffic violations and suspension of licenses.</p>	