

27th February 2015

Dr. Jim Young Kim
President, World Bank Group
1818 H Street NW
Washington, DC 20433

Dear Dr Kim,

Re: World Bank Safeguards Consultation

TRL welcomes the opportunity to comment on this current initiative by the World Bank to introduce safeguards to minimise a range of potentially negative social and environmental impacts.

We strongly suggest that the following requirements are included in order to strengthen accountability for road safety.

Our first recommendation is to include a requirement that states:

- The borrower will ensure Road Safety Audit is undertaken at an early stage of project design before detailed designs are produced. In addition for all schemes, Road Safety Audit should be undertaken at one stage before construction and one stage post construction but prior to scheme opening.

Road Safety Audit (RSA) is a proven approach that can greatly improve the long term operational safety of new roads. Research in developed countries suggests that the benefit to cost ratio of undertaking RSA can be around 20:1 and the measures that are recommended can have a benefit to cost ratio of up to 250:1 (Macaulay and McInerney, 2002). Road Safety Audit when applied correctly should take into account the safety of all road users (not just occupants of motorised vehicles), including pedestrians, cyclists, motorcyclists and even animal drawn vehicles.

It is extremely encouraging to see the inclusion of this technique in ESS4 Community Health and Safety Item 16, though it is noted that this may appear to be optional to borrowers and it is also unclear at what stage(s) RSA needs to be undertaken.

Road Safety Audit is most effective when applied at the early stages of scheme feasibility and preliminary design; this is because potential road safety problems are more easily solved when there is some flexibility remaining on the nature of the scheme. By detailed design stage, and certainly by the time a road is undergoing construction, a lack of safety has often been built into the road such that road safety treatments can only really make a limited impact. In our experience, even when Road Safety Audits are undertaken they are often done so late in the project-cycle following detailed design or construction.

Instead we believe that RSA should be required at an early stage in project planning and that it should be compulsory on at least one stage prior to construction and one stage post construction before the road is open to the public. Ideally RSA would be undertaken at many more stages than this, but we believe this suggested requirement to offer a pragmatic approach.

Our second recommendation relates to a requirement to assess road safety prior to project commencement:

- Prior to road construction, rehabilitation or upgrade the borrower shall obtain and analyse crash data to understand any pre-existing crash patterns and locations. This shall be supplemented with the collection of intermediate indicators of road

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safety performance. This information shall be used in the design process to reduce or eliminate current road safety issues.

Before a scheme is designed and implemented it is recommended that the borrower should undertake crash data analyses. In addition, various road safety data should be collected and assessed (e.g. speed surveys, seatbelt wearing rates, mobile phone usage etc.). These activities will allow current patterns of crashes and road safety performance levels to be understood so that they can be taken into account in the design and implementation of a scheme. Crash and intermediate indicator data can also be complemented by approaches that provide a measure of the inherent safety of the infrastructure (e.g. iRAP star ratings).

Although this will require the upgrading and enhancement of monitoring systems, in reality it costs very little to compile and analyse crash and intermediate indicator data. Not only does the collection of the data allow tailoring of the scheme to ensure existing issues are dealt with, but it also will facilitate monitoring and evaluation.

Our third recommendation relates to a requirement on monitoring and evaluation:

- Following road construction, rehabilitation or upgrade the borrower shall provide evidence that the road is being operated in a safe manner. This shall include regular monitoring of crash data and a formal evaluation of crashes before and after the project. All injury crashes will be reported to the World Bank.

Safe operation of a road is best demonstrated by the transparent monitoring of road traffic crashes that occur on a road, and also formal evaluation of crashes before and after a project. This can be supported through the regular monitoring of intermediate indicators of road safety (e.g. speed, seatbelt wearing rates etc.). Moreover, it may be appropriate to assess the safety of infrastructure following construction using approaches such as iRAP.

Our fourth recommendation relates to a requirement for a road safety plan beyond road safety engineering:

- The borrower will provide a multi-sector road safety plan detailing a range of measures to mitigate road safety risk (in accordance with the findings of crash data and intermediate indicator analyses). Such plans may include (but may not be limited to) measures to enhance enforcement, maintenance arrangements, communication campaigns and post-crash response.

It is noted that ESS4 Item 16 includes reference to the undertaking of Road Safety Capacity Reviews. Our understanding is that capacity reviews are typically undertaken as special road safety projects, rather than a requirement for all road construction projects. It is our recommendation that all road construction projects should have a project specific multi-sector road safety plan including measures that are known to be effective in the mitigation of road safety risk.

We trust that these suggested requirements are helpful and look forward to seeing a revised version of this safeguarding document.

Yours sincerely,



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TRL supports the Decade of Action
for Road Safety 2011-2020