



Consultation on A Safer Way by the Department for Transport

A response by the English National Park Authorities Association July 2009

General Comments

1. The English National Park Authorities Association (ENPAA) welcomes the opportunity to comment on the Department for Transport's A Safer Way, aimed at making Britain's roads the safest in the world. As you will be aware ENPAA exists to provide a collective voice for the nine English National Park Authorities. It is governed by the Chairs of the nine Authorities. Our response represents the collective view of officers who are working within the policies established by the National Park Authorities (NPAs). Any comments submitted by individual National Park Authorities will draw on the specific issues for their particular area.

2. ENPAA welcomes the overall aim of the Consultation in seeking to reduce the number of deaths and serious injuries on Britain's Roads. The consultation is particularly pertinent to ENPAA because, according to the EuroRAP results for 2009, six of the persistently higher risk roads pass through National Parks. Of these six roads, five are in the top six highest risk roads for motorcyclists¹. Therefore ENPAA is particularly keen to see this issue addressed in order to reduce the risk to those who travel within National Parks. However, notwithstanding the importance of reducing risk upon all Britain's roads, ENPAA would wish to emphasise the importance of National Park designation. Therefore there is a need to ensure that any measures undertaken to address road safety issues within National Parks, are undertaken in a way that is sympathetic to the surrounding landscape, and has regard to the purposes of National Parks.

3. ENPAA recognises that the Consultation is primarily based upon the provided at the end of Chapters 2-8, and this document contains our response to these questions. However it should be noted that this response is given from the perspective of ENPAA representatives whose authorities are planning authorities but not highway authorities.

Consultation Questions

Chapter 2 – Background and Context

Question This consultation sets out the current evidence on the key road safety challenges. Do you agree with our analysis? Would you highlight any others?

Answer ENPAA is pleased to see that the consultation recognises the disparity between the number of KSI casualties compared with vehicle kilometres of particular classes of vehicle. The prevalence of motorcycle casualties within some National Parks is apparent from the latest EuroRAP report. However

¹ EuroRAP (2009), EuroRAP 2009: GB Tracking Results, http://www.eurorap.org/news_item?search=y&ID=240

the report does not take account of the potential impact of the forecast increased traffic volumes on rural roads, and its impact on road safety.

It is also noted that the Consultation makes no mention of the potential impact of future road user charging schemes on road safety, particularly on rural roads. Because of the long timescale for the strategy, road user charging schemes, particularly on the Strategic Road Network are a possibility. Such measures may cause vehicles to divert to rural A and B roads, increasing traffic flows, and potentially the number of accidents.

Vision and targets (Chapters 3 and 8)

Question 1 Do you agree that our vision for road safety should be to have the safest roads in the world? (Chapter 3)

Answer Whilst this is a challenging vision, ENPAA would agree that this is a laudable aim.

Question 2 Do you agree that we should define a strategy running over twenty years, but with review points after five and ten years? (Chapter 3)

Answer The reasons given for advocating a twenty year time-frame for the strategy are valid, and may lead to the achievement of longer term goals. However, it is important that the Strategy can remain flexible to react to changes in government policies, technologies, lifestyle choices and travel patterns. Establishing five or ten year reviews should enable the strategy to be reactive to such change.

Question 3 Do you agree that our targets should be to reduce:

- **road deaths by at least 33 per cent by 2020 compared to the baseline of the 2004–08 average number of road deaths;**
- **the annual total of serious injuries on our roads by 2020 by at least 33 per cent;**
- **the annual total of road deaths and serious injuries to children and young people (aged 0–17) by at least 50 per cent against a baseline of the 2004-08 average by 2020;**
- **by at least 50 per cent by 2020 the rate² of KSI per km travelled by pedestrians and cyclists, compared with the 2004–08 average? (Chapter 8)**

Answer ENPAA would support any targets aimed at reducing the number of people killed or seriously injured on Britain's roads.

Question 4 We are proposing a set of indicators in order to help us to monitor performance (Appendix A). Do you believe these cover the right areas? (Chapter 8)

Answer We would suggest that Indicator 8 is amended to include the number of people seriously injured on rural roads, or that an additional indicator is added. It would also be useful to ascertain the split across age range of casualties on rural roads, the seasonality of such casualties, and general weather conditions. This is of particular interest for rural roads, because they are

² Expressed as a three-year rolling average

generally more prone to the affects of seasonal movements, and adverse weather conditions.

Context (Chapters 2, 3 and 4)

Question 5 We have identified a number of factors that may affect our ability to deliver road safety improvements in the future world we are planning for. Do you think we have taken account of the key risks and opportunities? Are there others you would add? (Chapter 3)

Answer As mentioned previously the potential impact of increased traffic on rural roads may lead to more casualties than currently predicted. Such an increase in traffic may in itself divert traffic from rural A and B roads onto the C and unclassified network. This may require a need for remedial action to be taken on the wider rural road network.

Question 6 We think that the key challenge for road safety from 2010 is better and more systematic delivery, rather than major policy changes. Do you agree? (Chapter 4)

Answer We feel that the delivery of appropriate measures on the ground would be the better option than policy changes to address this challenge. However, as stated previously, where such measures are introduced within National Parks, they should have due regard to both the landscape and purposes of National Parks.

Question 7 This consultation document sets out the current evidence on the key road safety challenges. Do you agree with our analysis? Would you highlight any others? (Chapter 2)

Answer Please see the earlier comments with regard to the possible increase in traffic on rural roads.

New performance framework (Chapters 4 and 8)

Question 8 We are proposing a number of measures to support the effectiveness of the road safety profession. Do you think they will be effective? What else might need to be done? (Chapter 4)

Answer Paragraph 4.22 refers to a number of stakeholders involved with making decisions that affect the safety of roads. ENPAA would wish to see National Park Authorities included within this list. As Planning Authorities, National Park Authorities also make planning decisions that may affect the safety of roads.

Question 9 Do you agree that an independent annual report on road safety performance, created on an annual basis, would be a worthwhile innovation? (Chapter 4)

Answer This would be welcomed as providing an additional source of data, identifying those routes with poor safety records. As stated previously, some indication of casualty seasonality would be welcomed, particularly across different vehicle/mode types.

Question 10 Do you agree that the Road Safety Delivery Board should be tasked with holding Government and other stakeholders to account on the implementation of a new national road safety plan? (Chapter 8)

Answer This would appear to be an appropriate approach.

Roads and Local Authorities (Chapter 5)

Question 11 Do you agree that highway authorities reviewing and, where appropriate, reducing speed limits on single carriageway roads will be an effective way of addressing the casualty problem on rural roads? Are there other ways in which the safety of rural roads can be improved? (Chapter 5)

Answer Highway Authorities reviewing and reducing speed limits on rural roads may well prove effective in limiting casualties on rural roads. However, a reduction in speed limits does not necessarily equate to compliance with that limit. The problem of subsequent enforcement on some rural roads in National Parks has in the past been met with signage inappropriate in scale to the surrounding landscape. The consideration of other enforcement measures such as route specific average speed cameras may well prove to be an additional and effective solution.

Question 12 How can we most effectively promote the implementation of 20 mph zone schemes in residential areas? What other measures should we be encouraging to reduce pedestrian and cyclist casualties in towns? (Chapter 5)

Answer The promotion of the implementation of 20mph zone schemes in residential areas will possibly be best achieved through education. Physical measures, such as speed bumps and chicanes may best act to slow traffic in these areas, but can themselves have detrimental impacts such as increased noise levels and restricting access for emergency vehicles.

Question 13 How can we provide better support to highway authorities in progressing economically worthwhile road safety engineering schemes? (Chapter 5)

Answer There should be a proven need for an engineering solution to a problem, backed by strong statistical evidence. When a engineering solution is proposed within a protected landscape, such as in National Parks, then detailed consideration of the environmental impact of such a scheme is required. Highway Authorities should be provided with specific guidance to enable them to seek sensitive and appropriate solutions in such environments.

Vehicles (Chapter 6)

Chapter 14 What should Government do to secure greater road safety benefits from vehicles?

Answer This is not an area that ENPAA would wish to comment upon.

Chapter 15 Do you agree that, in future, crash avoidance systems will grow in importance and will have the potential to greatly reduce casualties?

Answer This is not an area that ENPAA would wish to comment upon.

Chapter 16 How can we best encourage consumers to include safety performance in their purchasing decisions?

Answer This is not an area that ENPAA would wish to comment upon.

Behaviours (Chapter 7)

Question 17 We have highlighted what we believe to be the most dangerous driving behaviours. Do you agree with our assessment?

Answer We would support your assessment of dangerous driving habits, but would suggest that the use of mobile phones whilst driving is a behaviour that should also be added. We would also suggest that more needs to be done to draw drivers' attention to the perils and risks of driving on rural roads.

Question 18 What more can be done to persuade the motoring public that illegal and inappropriate speeds are not acceptable behaviours?

Answer A combination of education and enforcement would appear to be the best solution to the problem of excessive speeding.

Question 19 What more can be done to encourage safe and responsible driving?

The education of drivers with regard to the perils of driving on rural roads would be useful. Very often the combination of the effects of geography, lack of street lighting, weather conditions and unforeseen obstacles (such as livestock) can make rural roads a challenge for drivers. This is particularly pertinent for those unused to such conditions. Any increase in road users on rural roads may well increase the likelihood of accidents.

Question 20 Should more be done to reward good driving? If so, what?

This is not an area that ENPAA would wish to comment upon.

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