

PACTS RESPONSE TO
A SAFER WAY: CONSULTATION ON MAKING
BRITAIN'S ROADS THE SAFEST IN THE WORLD

THE PARLIAMENTARY ADVISORY COUNCIL FOR TRANSPORT SAFETY (PACTS)

Response to the Department for Transport (DfT) consultation document:
'A Safer Way: Consultation on Making Britain's Roads the Safest in the World'

The Parliamentary Advisory Council for Transport Safety (PACTS) welcomes the publication of "A Safer Way" by the Department for Transport (DfT). It recognises that this is the third and final consultation document building on the earlier "Learning to Drive" (May 2008) and "Road Safety Compliance" (November 2008). In this response, PACTS, for the majority in support of proposals offered in "A Safer Way", sets out some high level statements responding to specific matters raised during the consultation process.

PACTS is encouraged to see a holistic approach being introduced into road safety, as all stakeholders have the same overarching objectives. By integrating road environment, road user behaviour and vehicle design where appropriate, road safety could make a step change in the right direction.

THE VISION, TARGETS AND CHALLENGES

The aspiration to have the safest roads in the world is clearly laudable. However, this vision is insufficient on two counts. Firstly, this target, dependent on variable conditions, is largely reactive, reflecting on the achievements, frameworks and delivery of other countries. As such, the target does not necessarily offer the challenges to achieve a worthy vision. As a result, PACTS supports a 'pegged' vision, which aims for Great Britain to have the safest roads in the world by at least ten percent better than its nearest counterpart, however well that counterpart is performing.

Secondly, the vision does not enhance its sustainable objectives by supporting more active or greener travel options. As a result, PACTS suggests that the vision be altered to "the safest roads in the world, by at least ten per cent, for all classes of road user".

PACTS fully supports the notion of a holistic vision for road safety, and would thus further propose a vision which aimed to achieve a reduction in road risk to not more than twice that experienced elsewhere in everyday life. This was the vision set out in our report "Beyond 2010 – a holistic approach to road safety", published in October 2007.

We recognise the case for a national target for deaths since this is a clear and unequivocal figure from which progress can be measured. However, a percentage-based target has more relevance to Local Authorities. A reduction of 1/3 is insufficiently stretching; targets should remain at 40% for 2020 and again for 2030, with national death targets at 2000 and 1000 respectively. PACTS would also urge that the DfT reconsider the removal of slight injuries from the targets as the figure, despite the perception of being an arbitrary distinction from serious injuries, is a substantial indicator of the trends in road safety.

While we recognise that the data on slight injuries is subject to both under-reporting and under-estimating of severity, the absence of a target for slight injury reduction is likely to result in a significant reduction in the quality of data collection and reporting. In this context, it is vital that the police are helped to achieve easier and less time-consuming methods of data collection, especially through the widespread adoption of computerised devices. PACTS would also like to see an annual report monitoring casualty rate disparities between health and transport. This could be in the form of a statement to the Transport Select Committee.

PACTS would like to see casualty figures presented by parliamentary constituency as well as by local authority and by police district. It is felt that this would encourage further political interest and support in road safety framework, delivery and development.

PACTS wholeheartedly supports the use of evidence to formulate policy, and appreciates that challenges cannot be too specific, but prefer would like to suggest a rewording of some 'key challenges' (executive summary, 8):

- Achieving faster progress in reducing the number of deaths **using rate-based statistics for each mode in order to gain a more realistic year-on-year comparison. (1)**
- In the anticipation of a modal shift for economic, environmental or health reasons, the challenge to protect more vulnerable road users should be met head on, focusing on pedestrians, cyclists and powered two wheelers. (2)
- Protection of **all road users** in deprived areas. (3b)
- Protection of children.(3b)
- Protection of young people (3b) since these represent different groups with differing challenges.

PACTS would like to add the following 'key challenges'

- Focus on driving for work (<http://www.drivingforbetterbusiness.com/>).
- Focus on young drivers.

On the production side, that is, output rather than outcome, PACTS would recommend including the following:

- Focus on the delivery, evaluation and maintenance of research and policy within road safety.
- Focus on issues of enforcement.

THE DELIVERY BOARD, PARLIAMENT AND LEGISLATION

PACTS endorses the need for two public bodies with responsibility for road safety monitoring: an enhanced Road Safety Delivery Board and a high level Independent Panel.

- The new Road Safety Delivery Board should be compact but wide-ranging, and have the power to call on expertise where required. This board would ideally report to the Transport Select Committee who in turn could hold enquiries or perform 'checks' on the department where necessary.

The Road Safety Delivery Board would take on a two sided responsibility. First, it would assess the performance of the government's partners in the public sector. Secondly, it would look at the government's performance within the context of those partnerships: how research is disseminated and used to inform local policy and activity and how good practice and performance are shared, The Board would then be in a position to highlight areas of good practice and areas of underperformance.

In such a format, the Road Safety Delivery Board, now subject to enhanced responsibility, should acquire greater authority, included in its terms of reference, and the content and provenance of its budget would need to be considered.

Although the road safety regulatory framework is sound, it is also the result of several substantial pieces of legislation, including the 1988 Road Traffic Act, the Road Traffic Offenders Act of the same year, the 1991 Road Traffic Act and the 2006 Road Safety Act. PACTS believes that there is a strong case for the consolidation of these pieces of legislation into a single Road Traffic Act, which would also include a duty to be placed on the Road Safety Delivery Board to report annually to parliament and a duty on public authorities and employers to reduce road risk to as low as reasonably practical. The board must be given the ability to influence local decision making.

- The Independent Panel should first and foremost be genuinely independent. Members should be elected periodically with terms in line with the recommendations from the Committee on Standards in Public Life¹ (formerly the Nolan Committee). The chair should be selected by the Transport Select Committee. The panel should take a statutory position, and have terms of reference – the Australian National Road Safety Council sets a commendable model for reference. Structurally, the Panel could reflect a body such as the Commission for Integrated Transport.²

Where the delivery board reports to the Transport Select Committee, the Independent Panel should report to parliament. The outputs of the panel could, in effect, offer another layer to information found in Road Casualties Great Britain by insisting on smarter use of data and offering specific insight into particular focus areas. PACTS would urge that the

¹ http://www.public-standards.gov.uk/Library/Seven_principles.doc

² <http://www.cfit.gov.uk/>

panel's focus is placed in a large part on investigating road deaths reflecting the fatality investigation team of the Swedish Road Administration (SRA)³.

A PERFORMANCE FRAMEWORK

PACTS believes that better and more systematic delivery should be considered a key challenge; gaps in delivery may well be preventing more rapid improvements in UK road safety. The DfT should aim to improve delivery internally, with their network of partnerships, and externally. Internal developments should be furthered and made more effective through greater links between policy and research and an insistence on research-led policy. This should be extended to links with and between local government, where partnership efficiency should be encouraged in both directions and communication made more rigorous and reliable.

PACTS supports a holistic approach to road safety and encourages a focus on behavioural change. However, there are three aspects of this method which require more attention before a strategy can be put in place: secure revenue funding, increased skill level and 'good practice' examples.

A road safety strategy which focuses on behavioural change through education and integrated action, rather than engineering, is likely to require more revenue as opposed to capital spending: therefore funding must be assessed and secured before the strategy for delivery is considered.

Increased skill level: In order to instigate and encourage behavioural change, the skill set required by the delivery team, that is, the DfT's partners, will need to be augmented if the strategy is to be effective. Employment of specialists and retraining of existing staff will be necessary – again this will demand more revenue.

Good practice should be highlighted by the DfT, and communicated to its partners. PACTS believes that a database of educational interventions accompanied by evaluation of their effectiveness must be established to reinforce this message.

AVAILABILITY OF INFORMATION THAT IS RELIABLE AND INDEPENDENT

Whilst welcoming a target to reduce the rate of KSI per km travelled by pedestrians and cyclists, PACTS also notes the unreliability of the current walking and cycling data, especially at local

³ http://publikationswebbutik.vv.se/upload/1483/88654_in_depth_studies_of_fatal_accidents_save_lives.pdf

authority level. It will be important to ensure that the data used to monitor this target are robust. The difficulty of gathering data should not be underestimated.

APPENDIX A

Understandably, the number of Key Performance Indicators (KPI) must be limited to an extent, and the KPI's suggested will reveal a great deal. PACTS proposes the following in reference to appendix A:

- A reconsideration of the target for over 70's. PACTS believes that a rate based target (per mile travelled) will be more effective in achieving a better picture of the risk exposure to car occupants over 70 years old.
- Insertion of % increase in numbers of people walking and cycling (not only distances travelled)
- An indication of other 'safe' behaviour changes – by looking at table 1.2 of OECD 'Towards Zero' strategy⁴; the DfT can gauge how safer behaviours are considered within the context of a holistic and sustainable vision.
- (9) Rather than looking at the two extremes of deprivation, research should consider the whole continuum of social classes.
- (10) 'or under the influence of drugs' – although this statistic is hard to gauge and of poor quality, it is important to start monitoring this growing trend early.
- The incidence of crashes involving more than one KSI.
- The incidence of KSI when driving for work.
- Percentage of roads subject to 20mph limit.
- Number of breath tests undertaken.

In addition, PACTS would encourage smarter use of the data collected. Professor Daniel Dorling at the University of Sheffield has done some interesting work in this area.

CHILDREN, TEENAGERS AND YOUNG PEOPLE

⁴ Transport Research Centre, OECD and International Transport Forum, 'Towards Zero: Ambitious Road Safety Targets and the Safe System Approach', 2008, p43

PACTS supports the extension of the definition in this context, but suggests that the DfT places this part of the strategy in line with the Every Child Matters (ECM) agenda, which works to promote the well-being of children and young people from birth to age 19.⁵ This group would include a significantly larger group of drivers and pre-drivers.

PACTS suggests that this group be split into two sections: children (0-12) and teenagers (13-19) so that measures can be more effectively focused.

Whilst the age of a young person has been extended, the consultation does not suggest any targets for the high-risk age group from 20-25. PACTS recommends that this age group also be assigned a target of at least 40% reduction of all KSI in cars and on powered two-wheelers.

ROAD ENVIRONMENT

PACTS urges the DfT to continue to encourage the implementation of engineering measures, and notes the absence of specific engineering directions within the consultation. While PACTS is aware that engineering measures have had a significant effect on many of the more obvious high risk road situations and are now beginning to show diminishing returns through cost-benefit analysis, we ask that the government continues to look to engineering as part of the road safety toolkit and give particular regard to the passive revolution when tackling the more random occurrence of today's collisions.

On the issue of 20mph zones, PACTS asks that the government reconsider guidance which requires 20mph zones to be supported by road engineering measures in all cases, and suggests that local authorities are asked to implement 20mph zones with physical measures only where necessary.

When considering the speed limit on rural single carriageways, PACTS believes that a blanket reduction would not suffice because on single carriageways, inappropriate speed is more of an issue than excess speed. As a result, PACTS supports a review of the suitability of speed limits on rural roads.

The ETSC have developed research which shows that collisions between vehicles on roads with unforgiving roadside objects such as signs, street furniture, trees too close to the roadside and others, account for a large proportion of fatalities.⁶

⁵ <http://www.everychildmatters.gov.uk/aims/>

⁶ http://www.etsc.eu/documents/bri_road5.pdf

Furthermore, these collisions often involve young drivers and drink-drivers. To that end, it would be appropriate to consider the presence of unforgiving objects, or look at options to have deeper roadsides. It would also be beneficial to understand the kinds of journeys (particularly by young/drink drivers) that are being made, and consider alternative transport options for them.

VEHICLE DESIGN

PACTS calls for greater government commitment to research and legislation of new vehicle technologies. The government should lead by example, fitting state of the art safety technologies into its own vehicle fleet.

A Safer Way recognizes that the success of secondary/passive safety measures is largely responsible for the dramatic improvement in casualty statistics during the later part of this decade. The document then implies a move away from secondary or passive safety towards primary or active safety technologies – this should not be the case since primary and secondary safety technologies should be considered as a partnership. Primary and secondary technologies are both more effective when in combination and this should be taken into account.

It would also be wise to launch some post-collision rescue research in relation to vehicle technology as exists in some other European countries. From such research, the vehicle design industry will be able to work to provide more safe environments in the occurrence of a crash. Equally, it would be beneficial to the emergency services if there was an obligation on vehicle manufacturers to provide detailed information of internal systems and materials in vehicles to make rescue missions more time effective.

The government would do well to devote more time to pan-European and international schemes (such as EuroNCAP which the consultation does mention) Increasing Britain's presence on the international stage, particularly in pan-European research projects, will both help the progression of vehicle design and push for greater safety standards across the board.

The terminology in chapter six is rather passive; it would be preferable to hear greater commitment from the government supporting vehicle safety systems; in the current climate, without sufficient government endorsement, vehicle manufacturers will not address safety issues. The industry needs legislative support if it is to continue and further the development of safety performance technologies. A lack of firm political backing for ISA, for example, could lead to the prevention of ISA's development on the market. The vehicle design industry is looking for

guidance from the government on 'which technologies to develop further', and 'which areas of transport safety to tackle now'.

At present, the insurance industry has significant influence on the direction which vehicle design is taking, and it may be more beneficial both for the government and for the consumer to take a more safety-led approach and influence industry. The government must look to vehicle manufacturers with specific direction on "which crashes we would like to prevent" and "which trade-offs we are willing to make". PACTS proposes that the government give particular consideration to enhancing the protection of pedestrians through vehicle design.

It is important for the government to invest in the evaluation of safety systems as, because of dramatic cost differences, some technologies could reach higher-risk drivers faster than others. It is also extremely important that the research into the safety performance of such systems continues as they become more readily available. By forging better links with the industry and with our European partners, the government can have a better sense of the potential outputs of technologies as they are developed. The standardization of crash avoidance systems is necessary at this stage in order to prevent confusion to the driver – the wide and rapidly expanding range of technologies available must be monitored and subject to the same evaluative framework. PACTS urges the government to build stronger links with our European colleagues, particularly on issues of vehicle design and vehicle legislation. By working with other countries we can both help to save our own resources through the sharing of information and impart our own good practice experience to others.

ROAD USER BEHAVIOUR

Some of the measures, such as the 'deal with the road user' imply some form of tacit consent which we do not have the evidence to suggest will be a real option. To expect the public to understand the 'deal' is rather abstract, particularly when the public is, at large, a de-politicised group, bombarded with stronger, more marketable and well-funded messages. This 'deal' is a useful internal message, but it is not a message the public have at their fingertips.

Increasing the interfaces with non-industry areas such as education and businesses sounds promising if giving consistent and understandable messages. However, when increasing awareness and augmenting stakeholdership, the department should be aware of the potential for misunderstanding or manipulation of messages, and the resulting necessity for dilution. The consultation fails to refer to the media and its influence in shaping public opinion: it would be prudent to address this in the strategy.

Driving for work is by far the most common cause of death and injury in the work place. Around one third of collisions on the roads involve drivers and vehicles at work. PACTS asks that the government tackle driving for work as a high priority in the new strategy.

CONCLUSIONS

The development of a new vision and strategy for road safety beyond 2010 offers an opportunity to engage with a wider set of stakeholders and to place road safety firmly within the transport policy framework. The earlier targets adapted in 1987 and 2000 have helped to cement professional and public support for casualty reduction at local authority, police force area, and national levels; they have also strengthened commitment from private and non-governmental sectors. The next round of targets will need to reach beyond the traditional road safety community to include urban designers, the health sector and land use planners as well as members from sectors already highlighted in the consultation if road safety is to meet its sustainable vision.