

A Safer Way:
Consultation on Making Britain's Roads the Safest in the World
Royal Automobile Club Foundation Response

Vision and targets (Chapters 3 and 8)

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

The stated vision of securing the safest roads in the world is a laudable aim, but achieving this outcome relies on issues beyond the direct control of British Government, such as the road safety performance of other countries. Depending on what happens in other countries, this vision could either be extremely challenging or easily achieved. The Foundation would recommend that if this vision is to be used, it should be filled out, for example by adding 'by the biggest margin we can' and 'for every kind of road user' and 'by cost-effective and publicly acceptable means'.

The vision as it stands may meet the requirement to challenge those required to deliver it, but it contains less substantive content than some other road safety visions.

2. Do you agree that we should define a strategy running over twenty years to 2030, but with review points after five and ten years? (Chapter 3)

It is important that the road safety strategy in the UK is set over the period of time upon which it can have most effect. From the analysis of challenges and potential solutions identified, a vital one being vehicle technology, the RAC Foundation supports the approach to have a longer term strategy, with nearer sighted reviews and targets for the five and ten year horizon, to allow the strategy to be developed progressively. The consultation recognizes that situations change, and therefore there needs to be flexibility built in to allow the strategy to be reviewed at more regular intervals should it be appropriate.

3. Do you agree that our targets should be to reduce (Chapter 8):

Ideally the Foundation would like to see more tangible and clear targets, which have practical applications for the profession. It is vital that the targets set are easy to understand. The basis of a stretching target could be to reduce deaths on the road by say 1,000 a year. This would then need to be quantified with the policy measures (e.g. Voluntary ISA, greater numbers of traffic police, reduced drink driving limit etc.) required to achieve this reduction. Targets alone are not useful unless they provide meaning and galvanize action amongst key groups responsible for road safety.

In additional to this and the other points already raised under Q1, the Foundation has the following comments on the targets, as proposed in the consultation report:

- a. **road deaths by at least 33 per cent by 2020 compared to the baseline of the 2004–08 average number of road deaths (YES);**
- b. **the annual total of serious injuries on our roads by 2020 by at least 33 per cent (YES);**
- c. **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 (NO);**

The under-16s and the over 16s have very different casualty patterns and therefore it seems more sensible to separate children from young people. The KSI rates per 100,000 population for children are much lower than for 16 and 17 year olds; furthermore, the major modes contributing to the child KSIs are pedestrian and car passenger, but major additional modes for the 16 and 17 year olds are motorcycle riders and car drivers. It would almost always be necessary to separate the under-16s from the 16 and 17 year olds to interpret progress towards the target.

- d. **by at least 50 per cent by 2020 the rate of KSI per km travelled by pedestrians and cyclists, compared with the 2004–08 average? (YES)**

But this target might be difficult to implement at a local level. It might also be better to quantify this target by using hours of exposure rather than km travelled.

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)

The RAC Foundation on the whole agrees with the performance indicators set out within the consultation, but believes the greatest test of their effectiveness will depend on how useful they are to practitioners in the field. The thirteen indicators, with Foundation comments where appropriate are detailed below:

1. Road deaths per 100 million vehicle-km. (This should possibly be motor vehicle-km rather than all vehicle-km. Currently this measure would include pedal cycles, but as they make up such a small proportion of all vehicle kilometers this might not matter)

2. KSI pedestrians per 100 million km walked. (There could be a problem with this indicator due to the little distance covered by pedestrians in comparison to motorized transport. The point raised in question 3d above, about using per hour travelled rather than km travelled to measure exposure might also be appropriately applied for the suggested indicators).

3. KSI pedal cyclists per 100 million km cycled. (Same as 2. above)

4. KSI motorcyclists per 100 million vehicle-km. (It is possible that this measure should be per 100 million motorcycle user-km otherwise the KSI will be affected by changes in average vehicle occupancy.)

5. KSI car users per 100 million vehicle-km. (As above this should be per 100 million car user-km otherwise the KSI will be affected by changes in average vehicle occupancy and this could be important if sustainability policies lead to higher occupancies)

6. Number of KSI casualties resulting from collisions involving young drivers under 25. (This measure should be per 100,000 population under 25 and should either be for the population aged 17-24 or, probably better, car-licensed drivers under 25)

7. Number of KSIs over 70 per 100,000 population over 70. (This is how measure 6. above should be laid out).

8. Number of people killed in road collisions on rural roads. (This would be better expressed as per 100 million vehicle-km on rural roads)

9. Number of pedestrians killed and seriously injured per capita in 10 per cent most deprived Super Output Areas (SOAs) compared with 10 per cent least deprived.

10. Number of people killed where at least one of the drivers involved was over the legal blood alcohol limit. (It would also be good to get the numbers where at least one of the drivers had a BAC between 50 and 80 and between 20 and 50 respectively. This would provide relevant evidence in relation to debates about lowering the limit)

11. Number of car occupants killed who were not wearing a seatbelt. (This would be better expressed as a proportion in the context of, hopefully, quite steeply falling total car occupant deaths)

12. Proportion of vehicles exceeding speed limits. (The RAC Foundation hopes that a set of proportions would be provided for different speed limits)

13. Cost of road traffic casualties. (This should probably be for accidents as well as casualties. It will also be necessary annually to re-price past costs using some index to allow for inflation, so that comparisons over time are in real terms. It might also be good to express the values in valuation of prevention terms).

The consultation document also states that it will compare GB safety to that of other leading nations by reference to the number of deaths per 100,000 population. The Foundation believes that it would be better to use deaths per million population (and in case of numbers per unit of traffic, per billion vehicle-km).

This is because in case of deaths per number of people, deaths/million results in numbers that can almost always be dealt with as integers (say between 25 and 150 for the foreseeable future in Europe), whereas for deaths/100,000, one decimal place is usually needed. Million and billion are also simpler to write and read than 100,000 and 100 million. Simpler communication is important to help with media, public and political understanding. A change of units may seem trivial at first sight, but is likely to be worthwhile, and the transition to post 2010 is an ideal opportunity to make it across the road safety community. This approach has already been implemented in the ETSC PIN programme by Professor Richard Allsop, UCL, London.

Context (Chapters 2, 3 and 4)

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)

The consultation report describes the potential risks and opportunities, which could arise in the future. There are however a number that could be added. Under environmental issues, there is likely to be a certain challenge for new and existing infrastructure to be robust in light of a changing climate, which may have implications for road safety. Equally as vehicle technology is advanced to help meet sustainability challenges (e.g. reduced rolling resistance tyres or light frames which use less energy), there are likely to be important consequences for road safety. The Foundation is pleased to see that the increased prevalence of older drivers has been identified as an important issue deserving attention in future planning. The Foundation has raised this issue and the lack of planning for this demographic over a number of years and believes that the concerns this raises and the action required should be addressed as a matter of high priority. The Foundation will be publishing two reports in the Autumn of 2009 which will address the mobility and driving performance of older drivers, the impact of infrastructure on older driver risk, licencing procedures for older drivers, comparisons between male and female drivers as well as education and refresher training for older drivers. The Foundation would be pleased to talk to the department about these report findings later in the year.

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)

Consistent action on road safety over many years has meant that the legal and regulatory environment for ensuring safe travel is, overall in place. This, as the consultation states, paves the way for a more systematic delivery of services to take centre stage, through the joining up of service provision and thinking. The challenge for road safety remains as improving compliance with road safety law in areas such as drink driving, speeding and seat belt wearing all of which require a systematic approach to education and enforcement along the lines described in the recent consultation 'Road Safety Compliance'.

The Foundation agrees with the proposition that the legal and regulatory framework which governs safe road use is now broadly fit for purpose, but would have liked to have seen more radical policy options set out. The consultation reads as if policy makers believe that all relevant delivery options have been explored. It appears that no thought has been given to whether a more radical approach would be more worthwhile. With a 20-year timescale under consideration, the Foundation believes more radical thinking should have been exercised.

Joining up the delivery of road safety is a laudable aim, but in the past has proved an elusive goal. Serious consideration will need to be given to how this 'more systematic delivery' can be achieved. Developing targets, which fit with and complement other service providers such as the police, to provide a common basis for discussion would be helpful. Working solely on individual issues in isolation is long known to be detrimental to road safety and other policy working, and if a safe systems approach is to be developed, which the Foundation believes it should, it is essential that working across the disciplines be achieved. Little consideration is given in the document to the role of traffic police for improving road safety performance. The Foundation would like to have seen some radical options at least proposed for discussion in this area, such as a centralized traffic police force or the expansion of Highways Agency Traffic Officer Roles – neither of which the Foundation is in particular support of, but we believe it is these types of options that the Department should be suggesting.

The Foundation believes developing both the road infrastructure and vehicles, with human behaviour in mind is essential going forwards, but would like to see greater thought given to how vehicles and groups of road users (e.g. older or younger drivers) can be better accommodated by both vehicle and road design and equipment, which would also be of benefit to the population as a whole.

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)

The consultation document is right to indicate that the last two road safety strategies have been very successful at reducing road casualties. Improvements in vehicle safety and the engineering of road surfaces have played a large part in improving road safety, but significant improvements are still required where individual attitudes to road safety are concerned, such as drink driving. Shortcomings in maintenance have to some extent undermined road surface improvements. The proliferation of potholes and other defects is a growing threat to safety.

Not as much progress has been made on reducing road deaths, in comparison to serious injuries and the Foundation believes this should be an area of focus for the next road safety strategy period. The modes most at risk, such as motorcycling and cycling, should be targeted for intervention.

This should particularly be the case where uptake of the mode is growing, cycling being a case in point. Motorcycles present a particular challenge and the DfT should be clear about what stance they take on the mode. To put the motorcycle fatality rates in perspective, the fatality rate per hour in Table 1 is almost one order of magnitude higher than the maximum rate per hour that would be permitted in the most risky occupations.

Table 1: Passenger fatality rates for road modes: GB: 2006

	Fatalities per 100 million:		
	Passenger-kilometres	Passenger-journeys	Passenger-hours
Car	0.25	3.3	9.8
Van	0.06	1.3	2.8
Motorcycle	11	190	430
Pedal cycle	3.1	12	38
Pedestrians	3.6	0.26	15
Bus or Coach	0.03	0.75	0.63

Source: Road Casualties Great Britain 2007, Table 7a, page 82

The fatality rate per motorcycle journey is less than, but of a similar order of magnitude to, that of a rock climb (motorcycling about 1 fatality per 530,000 journeys in Table 1; rock climbing about 1 fatality per 320,000 climbs according to the HSE¹). Motorcycles also have higher rates of involvement in accidents involving casualties to other road users than most other types of vehicle. Clearly motorcycles are a valued mode of transport; they are cheaper and less space-demanding than cars. They also generate less CO2 per person-km. So there may be no question of discouraging motorcycle use, but research that establishes the risk of death and injury from different kinds of motorcycling would be of value. Any policy that promotes motorcycling with good intentions, such as access to work, should be scrutinized to make sure that the benefits really do outweigh the loss of life and lifelong disablement that may result, as well as the associated costs for the police, NHS and the economy. The Consultation Document contains proposals to improve the safety of motorcycling. Motorcycles will also benefit from general strategies, especially those improving the safety of rural roads. However, it is hard to see how the motorcycle risks in Table 1 could be reduced to levels similar to other modes. Serious consideration needs to be given to this issue.

There is a great deal that can be learnt from road safety work ongoing internationally, and therefore the Foundation is very supportive of the Government's efforts to learn from best practice elsewhere. The Government should work closely with and where appropriate learn from the Scottish Government's road safety strategy. The fact that children and young people are disproportionately at risk on British roads is unacceptable and further effort in this area should be supported.

¹ Health and Safety Executive (2001). Reducing risks, protecting people. HSE Books, page 71.

Equally, the fact that young adults between the ages of 16-29 account for a third of all deaths, makes this group an important one to focus on to achieve future road safety improvements.

Rural roads, commonplace in the UK, due to their elevated levels of collision warrant specific treatment. Road user behaviour, and speed as a specific issue, are important areas to focus on, but they are not the only ones. Road surface and design changes that provide a more forgiving environment for errors, mistakes and misjudgments are also needed. Changing both ingrained attitudes and road surface design provides a challenge, but these approaches are vital for ensuring a safe systems approach.

Targeting intervention linked to socio-demographic factors, deprivation and other forms of targeting is a very useful way to progress. Vojtech Eksler, working with Sylvain Lassarre and others, has shown that at regional and subregional levels in various EU countries a great deal of such variation can be accounted for by differences in population density. Therefore it would be a useful exercise to model casualty numbers in Highway Authority areas in terms of characteristics of the area (socio-demographic, geographic, topographic, transport, climatic) to help to identify better- and worse-performing areas.

The Foundation agrees with the analysis presented on road safety challenges. Targeting interventions to those groups, modes and areas which are disproportionately involved in collisions is the most sensible approach going forwards, and a great deal of research and analysis is available to indicate which groups can be usefully targeted. The DfT however, must not forget to 'future proof' these road safety challenges. Issues such as the use of technology behind the wheel (e.g. mobile phone, texting, email and satellite navigation use) have risen up the agenda in recent years. It is vital that the Government have one eye on what the emerging road safety challenges over the next 20 years might look like. Evaluation of what works, especially in the education, training and publicity arena is also urgently needed to inform local authorities what interventions provide the greatest benefits at the least cost. The RAC Foundation believes that central government should take a lead with this analytical work, to provide guidance to those working at local level, often with limited budgets.

New performance framework (Chapters 4 and 8)

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)

Sharing best practice is essential for developing cost effective road safety measures and campaigns. Too often the wheel is reinvented at a significant cost to individual projects. Central Government, with its overall view, is the right forum to develop the approaches required for information sharing, and the Foundation strongly supports the proposal to extend this across the education, enforcement and engineering disciplines.

Providing data, in a way that can be mined and analysed at a local level, to help with the targeted implementation of campaigns should be a priority. The Department should recognise that supporting the effectiveness of the road safety profession is not simply about facilitating the sharing of best practice. There is also a need to ensure those working in this area are trained up to a professional and skilled standard, which is a training and retaining skills issue.

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)

The RAC Foundation believes that a completely different approach is required for road accident investigation. A recent paper for the RAC Foundation titled 'Transport safety – Is the Law an Ass' (See: http://www.racfoundation.org/index.php?option=com_content&task=view&id=665&Itemid=35) authored by Dr Chris Elliott concluded that road safety investigation should be brought in line with the Accident Investigation Branches in place for other transport modes. This is not to say that the police forces do not do an effective job at collision investigation, but with their investigations being focused on attributing blame, rather than investigating the underlying causes of collisions, the opportunity to achieve better understanding of the systematic causes of accidents is missed, despite the use of Stats 19 forms.

The Foundation believes that the department is wrong to state that 'a separate investigatory body would be an unnecessary duplication of effort' and just because the sheer number of collisions dwarfs other categories, this should not be used as a reason to dismiss the need to systematically investigate collisions, using an approach similar to that used by other modes. The Foundation believes it to be insulting to both road casualties and their families that the scale of the problem is given as the reason for not having a Road Accident Investigation Board (RAIB), when this fact provides the absolute justification for having one. It is not only the RAC Foundation who has called for an Accident Investigation Board. The Transport Select Committee and both main opposition parties have also supported a move to this approach. The 'On the spot' analysis currently completed at a handful of collisions provides vital information, and work should be done to investigate how this approach can be expanded to the mainstream in a cost effective and representative way.

The Foundation does not believe an independent annual road safety report on performance will on its own be a useful endeavor, as it would simply duplicate the efforts of the DfT and ONS, who already produce good quality statistics on Road Safety on an annual basis. Developing a Government quango to report without any additional investigatory powers is likely to be a costly and ineffective venture, especially if there was no way for the body to hold the Government to account. There are already a number of audit bodies associated with Government activity and thought should be given to how these existing mechanisms could be used to assess performance in road safety cost effectively.

There are also a number of bodies already working in this area, such as the Parliamentary Transport Select Committee, who might be able to provide a form of audit.

The Foundation believes an understanding of 'real collisions' is vitally important. This cannot be achieved without a change in the current approach, which focuses too heavily on attributing blame, rather than establishing and recording the underlying cause of collisions. The Foundation would therefore emphasize the need for accident investigation and reporting to focus to a greater extent on the underlying causes.

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)

As discussed in the response to Q.9 (above) the Foundation believes there is significant scope for an overall change in the way accidents are investigated, and how accountability for road safety is apportioned. The Foundation is seeking a more fundamental review than is suggested within the consultation document, but this to one side, it is important that an independent board hold Government and the other interests involved to account for the implementation of a new national road safety plan. The Foundation would go a further step to say that this board should have investigative powers, equivalent to the accident and investigation branches for other modes.

Roads and local authorities (Chapter 5)

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)

Road safety on rural roads is an important issue, which the Department is right to identify as a very serious problem. It is clear from the evidence available that speed has a role to play, but the actions suggested in the consultation are not adequate to deal with the overall safety problem in rural areas. It is vital that the systematic problems linked to collisions are identified and rectified in a local area.

The RAC Foundation supports the continued progress of the local authority led speed limit reviews, which are vital for deciding appropriate speeds on single carriageway roads.

The analysis by Richards and Cuerdon (2009)² demonstrating the decreased severity of head-on and side impact junction collisions at 50 miles/hr rather than 60 miles/hr makes a convincing case concerning the benefits of reducing the speed limit on selected rural two-lane roads. The impact assessment (Appendix E, page 102) of reducing the national speed limit on two lane rural roads from 60 to 50 miles/hr is also persuasive. It shows that the safety and environmental benefits from such a measure would be almost exactly counterbalanced by the value of the time losses if it were applied to all rural roads.

This impact analysis strongly indicates that selective reductions in speed limits would be cost-beneficial if these were chosen where the safety and environmental benefits were relatively high and/or the time losses were relatively low. The Foundation would support a selective approach to implementing 50mph speed limits on single carriage way rural roads, as this approach is more likely to gain widespread acceptance among drivers and thus achieve high compliance without over-onerous enforcement. Responsible drivers must perceive speed limits as credible and sensible if they are to comply on a regular basis. It is also important to achieve appropriate speeds within the limits, which is a bigger challenge than simply getting excess speeders to comply with limits. Research into how this can be achieved would be useful.

Inappropriate vehicle speeds are however not the only cause of casualties in rural areas. As with other roads, it is clear that environmentally sensitive engineering measures can be introduced into rural areas to reduce collisions. Forgiving infrastructure (e.g. infrastructure that lessens impact in the event of a collision and allows for driver mistakes), particularly due to the prevalence of single vehicle collisions in rural areas, should be fully investigated as part of any review. Systematically targeting the riskiest routes, as determined by the vast available data is a priority for rural as well as other types of roads. 50% of the deaths occur on just 10% of Britain's network length (EURORAP, (2009) GB Tracking Survey Results), which makes it clear that targeting measures to problem areas on the road network, particularly in rural areas can have a significant effect.

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)

20mph speed limits, implemented since 1991 have provided very successful, with average speed reductions of 9mph and annual accident reductions of 60%³. The development of this concept to more extensive zonal approaches is likely to have a similar effect, but the RAC Foundation would like to see further evaluation of the areas piloting a 20mph zonal approach, before it is rolled out further.

² D Richards and R.Cuerdon (2009). The relationship between speed and car driver injury severity. Road Safety Web Publication 9. Department for Transport

³ E. Dainton (2008) 20mph Zones, More Haste, Less Speed? Paper for the RAC Foundation

The Foundation also believes that towns and cities will still require 'roads for movement' and that further guidance should be provided to local authorities on how to effectively set speeds for different roads in their network hierarchy.

With the sustainability agenda featuring centre stage, walking and cycling trips are likely to be on the increase over the next 20 years, which has road safety implications. Shared space initiatives, which are the subject of a number of current research projects (with one of which the Foundation is involved), are likely to provide an environment conducive to encouraging more sustainable travel, and lower road traffic speeds will reduce the severity of collisions, but will also create an environment which encourages more walking and cycling, which could in turn have negative road safety implications. Education for all road users and road environment engineering are likely to be the key ingredients to creating urban areas which will provide for safer walking and cycling.

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

Progressing road safety engineering schemes which provide good value for money and have high cost benefit ratios is essential for advancing the road safety agenda. Many local authorities already have the information available to prioritise schemes in this way, and for those who don't, it is vital that the mechanisms are in place to allow the sharing of best practice information and evaluation methods. Individual 'hot spot' treatment is an approach that has been traditionally adopted by local road safety engineers. Although there are still good rates of return to be gained from this approach, providing information on whole route assessments, linked in with National and Internationally available information, such as EURORAP, would be a helpful progression. Where finance is limited, money must be spent on those schemes which can give the highest returns, and allowing road safety schemes to be weighed up against other more general transport schemes is an approach that the Foundation supports, as it allows finances to be spent in the best possible way. The Foundation would also encourage the development of demonstration projects in this field, to help share best practice and the engineering skills that currently exist. Organisations who have a greater knowledge and/or engineering base in this particular area, should be encouraged to share their skills, through demonstration, joint working and information sharing.

Vehicles (Chapter 6)

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

Significant improvements to road safety have been secured in past years through the development of primary and secondary vehicle safety systems, and the Government should do all that is possible to continue supporting these innovations.

The consultation document pledges to provide a regulatory environment that supports developments and organisations that help raise awareness amongst consumers about active safety measures such as ESC.

Technology will change rapidly over the 20-year time horizon that this strategy will cover, and therefore Government should do all that is possible to ensure lengthy legislation processes do not delay the route to market for important new road safety technologies. One way in which Government, both central and local, can help stimulate the market for emerging technologies is to ensure that the vehicles they buy, and the vehicles bought with grant or contract funding, are equipped with these new technologies. This approach is also applicable for encouraging environmental innovations in vehicles.

Government should also keep one eye on the emerging policy challenges and ensure vehicle developments are fully taking these into account. The focus on a low carbon economy and the changes in social demographics amongst others are mentioned as important drivers and Government has a key role in helping the industry to understand the implications of these trends. Further research and understanding will be needed in each of these areas. For instance, the Foundation questions whether older drivers will be travelling further in the future as suggested by the consultation document, because current trends show a reduction in distance travelled with age. This and other most likely trends need to be more fully understood. Working collaboratively, both in the UK and internationally will be essential, especially with the development of vehicle to vehicle, vehicle to infrastructure and ISA technology which require action from a number of organisations. In the short to medium term developing the map bases to introduce ISA technologies, initially on a voluntary basis, will be an important endeavor.

Increasingly, as stated in the consultation, there is likely to be a move towards technologies that take control away from the driver. This will undoubtedly have some safety benefits, but the full implications of this technology need to be understood before it is implemented across the vehicle fleet, as there may be unintended consequences, linked with people feeling diminished responsibility for vehicle actions. Government must also be aware of the road safety implications that arise from people taking personal technologies such as mobile phones and other emerging tools into vehicles. The Foundation is pleased to see that the Government has recently launched a campaign into the dangers of texting whilst driving, an issue first raised by the Foundation in February 2008 and subsequently in September 2008 with the publication of new research work on the subject. The 'mobile phone' type issues relevant over the next 20-year time span need to be identified and addressed in a timely fashion. This might not for instance just be linked with the behaviour of the road user, but the overall application of services. For example, with the rise of mobile phone ownership, public and other services are frequently sending text appointment notifications to phones, which may contribute to distraction behind the wheel.

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

Existing first generation crash avoidance systems such as ESC have provided very impressive reductions in the likelihood of individuals being involved in collisions, although there have been problems with the timely application of the technology into the overall fleet. It is certainly likely that crash avoidance systems will grow in importance, but the overall safety value of the technology and any unintended consequences, particularly linked to human behaviours (e.g. increased risk taking) need to be fully understood. The market will have a significant role in bringing these technologies forward and it is important that new road safety technologies are introduced into the overall fleet, and Government may have an important role for encouraging this.

It might also be appropriate for Government to aid with the stimulation of demand for particularly useful technologies, as it is well known that willingness to pay for safety technologies is not as high as other, often more cosmetic, vehicle attributes. Technology has a significant role to play, but its application must be viewed through a whole systems approach.

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

Good quality and easy to understand information is the key ingredient for encouraging consumers to consider vehicle safety performance in their purchasing decisions. The consultation document is right to pledge continued support for existing information provision, through initiatives such as EuroNCAP and the ESC campaigns. However, if information provision is to be truly effective at influencing purchasing decisions, it should be readily available in one forum for consumers, with very explicit illustrations of the impacts of technologies. This overall forum is currently missing, which makes the case for providing more coordinated information, which would allow for easy comparison between vehicles.

Behaviours (Chapter 7)

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

The RAC Foundation supports the Department's approach to targeting the irresponsible minority of road users, whilst keeping the responsible majority engaged in good road behaviours. In focusing on drink-driving, drug driving, speed, failure to wear a seatbelt and careless driving the Government is cracking down on the most dangerous driving behaviours as identified within the casualty statistics. Focusing on unlicensed and uninsured driving, which can also correlate with other irresponsible road activities, is also a sensible approach to take. The Department should also give additional thought about how to engage with the 'hard to reach groups' who have not historically been as receptive to education or enforcement measures.

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

63% of people consider driving 40mph in a 30mph unacceptable, but 70% of people speed at one time or another⁴. Persuading the motoring public as a whole that illegal and inappropriate speeds are not acceptable behaviours will require a major change in public opinion. Attitudes to seatbelt use and drink driving have successfully changed over time. It would therefore be useful to evaluate the reasons and mechanisms behind these changes to see if anything can be usefully learnt and applied for the problem of speeding. What is relatively easy to discern from past attitude changes is that a change in opinion often takes time, sometimes linked to the passing of generations. Research should be conducted into whether speeding also falls into this category, and, if it does, what can be done to accelerate the rate of attitude change in this area.

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

There are two aims for safe and responsible driving; to keep those who currently fall into this category engaged and compliant, as well as to draw those who currently display irresponsible road behaviours into more compliant behaviour. For those who are already compliant, more should be done to reward this behaviour, and education and awareness campaigns on the subject should not seek to preach to the converted, but must instead help develop a culture where safe and responsible driving is considered the norm.

For those who are non compliant, greater enforcement and therefore increasingly the likelihood of getting 'caught' would encourage many, possibly begrudgingly to conform. Once road users make a move to conform it is important that both the enforcement against irresponsible driving and the reward and 'social norm' for responsible driving are reinforced to encourage continued compliance. It is this lack of mechanisms to support current behaviour and behavioral changes, which might be acting as a limit to positive behaviour. For specific sectors, the Department is currently doing good work with partners such as RoadSafe on work related road safety issues. Going forwards greater thought should be given to whether road safety can be informed by the existing safety management systems in the public transport modes and other industries, an initial review of which can be viewed on the RAC Foundation's website⁵. Where speed is concerned, there are initial indications through motorway average speed monitoring that this form of enforcement is more acceptable to the public. Its current application is also proving to be effective.

⁴ Think Campaign

http://www.dft.gov.uk/think/focusareas/driving/speedurban?page=FAQ&whoareyou_id=

⁵ RAC Foundation (2009) Transport Safety – Is the Law an Ass? Prepared by Chris Elliott

http://www.racfoundation.org/index.php?option=com_content&task=view&id=669&Itemid=31

It is also important not just to focus on drivers, but also to encourage safe road behaviours for all modes. Education about the dangers associated with road use should continue to be taught from an early age, through schools and there should be a renewed emphasis towards encouraging young people to resist peer pressure to undertake reckless activities on the highway.

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

As stated in Q19 above, rewarding good driving is essential. Rewards can take the form of monetary benefits, such as better insurance premiums for those who exhibit safe driving behaviours monitored either through existing claims data or through real time monitoring as part of future ISA implementation. Rewards however, do not simply take the form of financial benefits, although these are likely to be influential and important. Rewards also come about through people conforming with a defined norm, and therefore creating an environment where friends and family praise good rather than bad driving, could be the most central change needed.

About the Royal Automobile Club Foundation

The Royal Automobile Club Foundation explores the economic, mobility, safety and environmental issues relating to roads and the use of motor vehicles, and campaigns to secure a fair deal for responsible road users. Independent and authoritative research for the public benefit and informed debate are central to the RAC Foundation's standing.

This consultation response has been prepared with advice from members of the RAC Foundation's public policy committee and independent comment from Professor Richard Allsop, UCL, London and Professor Andrew Evans, Imperial College London. This response is the RAC Foundation's view and does not necessarily represent the views of those who contributed to its development.

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