



Road Haulage Association Ltd

RHA response to: “A Safer Way” (road safety strategy beyond 2010)

Key points in the RHA’s submission include:

- **We would like to see a greater emphasis on the development of a good driving culture, on driver skills and on driver responsibility. We fear that a growing degree of intervention and control may be mitigating against culture, skills and responsibility.**
- **Central government should set minimum road maintenance targets, which should be enforced in respect of local authorities through league tables for condition and safety.**
- **40% KSI reduction targets should be retained.**
- **There is a need for more information on causes of accidents and for that information to be made widely available among road users.**
- **60mph national speed limit should be retained.**
- **Need for a road safety campaign focused on rural roads.**
- **20 mph speed limits have a place but we fear excessive application, generated by mission drift.**
- **Highways Agency’s message boards should be for provision of specific information relevant to the road(s) ahead.**
- **HGV speed limit on suitable A-roads should be raised from 40 mph to 50 mpg to improve road safety.**
- **Clear road safety case for improving maintenance and condition of rural and urban roads.**
- **Road Safety Development Board should have greater breadth of opinion and membership and at any rate road haulage sector representation.**
- **We commend recognition of the contribution made by vehicle designers. This will continue to improve road safety as older vehicles are replaced.**
- **More should be done in respect of foreign trucks.**
- **There is a core culture of safety in the professional road haulage industry that can be both further strengthened and act as a role model for other road users, including van and company car drivers.**

Road Haulage Association Ltd

Roadway House, 35 Monument Hill, Weybridge, Surrey KT13 8RN
Tel: +44 (0)1932 841515 Fax: +44 (0)1932 852516 www.rha.net

Chief Executive: Roger King FIM

Secretary: James Falkner TD

Registered in England No. 391886

Registered office as above

1. The RHA shares the DfT's desire to reduce further our level of death and injury on our roads, however that is expressed. We note that this important issue generates relatively little party-political heat. We share the views, expressed in a recent debate in the House of Commons, that a balance must be struck between road safety and cost and that there is much to be done in which that is not an issue.

2. It is helpful to have a long-term aim and a view of long-term trends and in that regard 20 years is appropriate. The periodic reviews should include a resetting of strategy as required and can be used to focus attention on road safety, A more flexible, continuous assessment approach than that proposed would prove beneficial, with different aspects of strategy being reviewed in a period that reflects the relevant factors to that aspect, rather than relying a pre-determined catch-all timetable.

3. On balance, we believe that the 40% targets should be retained. That said, the science behind how the targets can be achieved is not well developed and the targets should not become rigid straightjackets in terms of policy.

4.

I. We are concerned at the lack of information on causes of accidents.

II. There should be greater sub-division of older people, eg over-70 and over-80. In respect of younger people, there should also be emphasis on the category of (say) 18-25 years old.

III. There should be division of driver/passenger KSI.

IV. We are strongly of the view that there should be more information on drivers from abroad.

V. There should be more information in respect of uninsured drivers

VI. There should be an indicator related to on ethnicity.

VII. There should be a category for drug driver. This is identified as an issue of growing concern.

VIII. Speeding is an unhelpful indicator. The issues are appropriate speed and excessive speed.

IX. It would be useful to develop indicators of driver competence and attitude. This would be challenging but, we believe, possible and worthwhile.

5.6.7. We agree generally with the proposals, but believe an important area not covered is occupational road risk, which needs to be adopted more widely by business; and government has a crucial role to play in this strategy.

We agree that data collection needs to be coordinated to a greater extent than is currently the case, perhaps there is an immediate case for a PIC (person-in-charge) in the event of road accidents who's responsibility would to investigate causation and adequate recording of relevant information.

The documented challenges highlighted in the consultation cover the areas needing to be addressed, however delivery will require input by all major players, such as Government agencies, local government, teachers, driving instructors' and importantly parents.

A major challenge will be managing the expectations of individual groups and on those where impact is made e.g. raising the speed limit for freight vehicles to 50 mph on single carriage roads where safe to do so, which we believe will assist road safety due the reduction in driver frustration when following slow moving freight vehicles.

8. Adequate funds must be made available at local government level to meet road safety education in respect of schools.

9. An independent annual report on road safety performance would be a desirable and worthwhile innovation, building on the work already undertaken as part of the 'ALARM' report.

10. We agree with the continuation of the Road Safety Delivery Board to hold government and stakeholders to account. We would question the benefit of the current membership of this body and believe it would benefit from a greater breath of opinion. Care must be taken to ensure there is not surfeit of bodies reporting road safety issues, which could conflict and confuse priorities.

11. The review of local conditions has its place but that should not be the main thrust of policy. More effective would be appropriate visual information for road users and sound maintenance: signs kept clear, junction marking and sight lines improved, a greater use of vehicle activated signs to warn drivers, alternatively the use of rumble strips on roads to warn of danger areas, and improved maintenance of surface condition. Explore best practice from other countries, such as weather related speed limits; count down markers to signed hazards etc. Improved driver perception training on rural roads when learning to drive, take the opportunity to promote this training in schools and possible at local community events.

The DfT has yet to focus a campaign on rural road safety, the risk and the causes of accidents, by way of driver education.

It is a paradox that, while vehicles designers have done much to improve road safety and the impact of this will continue to improve road safety outcomes for years to come, but government, central and local allow rural road maintenance in many cases to regress.

The personal experience of Ray Engley, a member of our Weybridge staff who formerly ran a large fleet of trucks, is particularly striking. He was involved in transport operations predominantly operating on rural roads during his 30 year operational career. During that time he dealt with many accidents, six of which resulted in seven fatalities. In all six instances the trucks involved had stopped on seeing the approaching car/van and was stationary at point of impact. Most of the accidents involved young people.

The 60 mph national speed limit should be retained. Reducing the limit to, say, 50 mph will do little to reduce accidents without additional training and warnings such as vehicle activated signs, greater use of rumble strips etc.

12. We support the of 20 mph zones in residential areas. However, we have concerns of over-zealous introduction and that they will be introduced for reasons other than road safety. Where that happens, the justification should be clearly identified. We are concerned; too, that traffic calming requirements and cost may delay the introduction 20 mph zones that are justifiable on grounds of road safety. Greater emphasis should be given to what is acceptable driving and to enforcement, as many traffic calming measures are not only costly to install but raise the cost of running vehicles and increase emissions.

A simple gateway principle would indicate the entering of a restricted zone. Segregated cycle ways should be introduced where practical.

We are seeking a greater understanding of the total expenditure on traffic calming and we would question whether at least some of the money might be better spent on road surface maintenance. Meanwhile, we understand that several relevant factors are not considered in the costing of calming measures, including increased fuel consumption and pollution and increased wear and tear to vehicles.

13. We would recommend DfT becomes the conduit to adequate guidance and standards in an effort to achieve consistency across the road network. A greater flexibility is required in certain areas to meet local authority needs.

14. Vehicle design has made a great contribution to our road safety improvements and we commend the government for fully recognising this fact. The impact will continue to be positive as older vehicles are replaced. Technology continues to advance with vehicles being equipped with greater levels of technical assistance for drivers. Controlling/driving vehicles in the reasonably near future will be a considerably different experience than driving today's vehicles. Because the vehicle will be changing around the driver differing skills will need to be obtain by individuals probably making regular booster training a reasonable option in future, however drivers will need to retain basic knowledge and perception skills in the event technology fails. The greatest danger is that only the top range vehicle will gain the benefits of technology so government must ensure that essential safety technology becomes part of the basic specification of vehicles. However the simple fact of regularly maintaining vehicles and tyres will have a considerable beneficial effect on vehicle safety.

15. Crash avoidance systems will grow in importance over the coming years, government's role in this will be to ensure that consumer information and choice is highlighted to the general public. Additionally government should take the lead role in the identification via research and adequate evaluation of the most appropriate technology, promote full adoption and perhaps more importantly provide the necessary advice on its use.

16. Cost will be the biggest obstacle to change initially as pointed out earlier but as technology impacts cost generally drops. Assistance from insurance companies may well reflect an earlier take-up of technology; we suggest it would probably be in the best interest of their profits and shareholders to assist. Continued education and information in both eco-driving and technological advances in vehicles would also contribute in a cost effective manner we would argue

17. We agree that recent consultation papers adequately cover the dangerous driving behaviours – speeding, drink driving, drug driving, non-seat belt wearing and careless driving we also believe mobile phone use and distraction should also taken into consideration specifically.

18. Local Authorities should review their strategy in an attempt to get motorist on side, in some areas speed limits are over cautious, and clear, consistent signage must be adopted, the use of road surface marked speed limit may be appropriate. Adequate funds must be made available for LA's to undertake required infrastructure changes. Expansion of the THINK! campaign could prove beneficial.

19. The introduction of Pass plus and the proposed school training will assist going forward, the continuation of speed awareness education training. Continue publicity of the THINK! campaign. An increased availability of traffic policing would also reinforce the safety message. Consideration should be given to the adoption of Intelligent Speed Adaptation as a means of controlling speeds of 30 MPH and lower

20. Rewarding good drivers further seems inappropriate. They already have a government reward, in being able legally to use the road in the absence of penalties. The issue is fraught with practical difficulty, for example in assessing those drivers. Rewards are currently delivered also in terms of reduced insurance premiums. Following this issue up from an alternative standpoint, we suggest consideration be given to mandatory retraining and re-examination of drivers if they are involved in 3 notifiable accidents in 5 year period...

In addition, to responses to the consultation questions, we would stress the following points:

21. The issue of spending on roads is highly significant to the road safety debate. Road users are paying increasingly high taxes but road condition in many areas is deteriorating alarmingly. We fear a downward spiral of increasingly hazardous roads caused by inadequate maintenance, with the only response being the imposition of speed limit reductions and further controls and capacity reductions on the road network. Central government must play its role in setting and enforcing national road standards. Discipline must be imposed upon local authorities to spend money allocated for road maintenance on that task. To allow local authorities to use the money elsewhere would only be democratic if the local authorities were themselves raising the tax. We suggest that local authorities should be assessed and ranked according to road condition; and that their roads should be rated for suitability for cycles and motorcycles.

22. We believe there is a core culture of safety in the professional road haulage industry. In a survey of members, 93% of respondents agreed with this. Members are not complacent and a large proportion said they continue to work to improve the safety culture in their businesses. This core culture of road safety can, we believe, be both further strengthened and act as a role model for other road users, including van and company car drivers.

The numbers of accidents goods vehicle are involved in continues to reduce year on year a record to be proud of the - numbers of people killed and seriously injured dropped 40% and 17% respectively from 2007 – 2008 (road casualties main results 2008). Trucks are 40% less likely to be involved in KSIs per unit of distance travelled than cars, despite trucks' greater size and weight. There is little UK evidence on accidents involving trucks, but such studies as we have from abroad suggest that around 75% are caused by the other road user and not by the truck driver. Our members have expressed a strong desire for other road users (including cyclists) to be better informed as to issues concerning trucks and we would repeat our call for a section on this issue to be included in the Highway Code. The suggestion was left aside in the latest revision of the Code.

23. More should be done in respect of foreign trucks, although we recognise and welcome the strides made by the increased enforcement efforts of the past year. The DfT's Impact assessment for the graduated fixed penalty etc schemes, autumn 2008, stated that foreign trucks are eight time more likely to be involved in KSIs than UK trucks. This has an adverse impact on the industry's accident statistics and outcomes. We would like to see this highlighted more strongly to visiting drivers, with advice on how to minimise risk. The obvious increased risk of left-hand-drive is not a criticism of foreign drivers.

24. We would like to see a greater emphasis on the development of a good driving culture, on driver skills and on driver responsibility. We fear that a growing degree of intervention and control may be mitigating against culture, skills and responsibility.

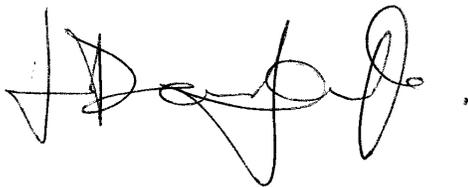
25. The apparent absence of influence of government on the marketing of many cars and motorcycles is of concern. An interesting comparison is with the responsible promotion of trucks. If we are to be serious about road safety, then the major influences on road user culture have to come under closer scrutiny. We cannot go on promoting high speed, particularly on rural roads, the way we are at present.

26. We believe the Highways Agency should restrict use of its message boards to information. The current practice of urging the fundamentals and the obvious upon motorists is considered a counter-productive irritant. We would welcome knowledge of evidence to the contrary.

27. We are greatly concerned about the impact that closure of secure truckstops may have on road safety. Drivers have a statutory duty to take breaks at regular intervals but the parking infrastructure is inadequate in many areas of the country. There is a degree of legal uncertainty among drivers, who have long been allowed to continue to drive beyond their hours if they feel that the security of their truck, their load or their own personal security is at threat, provided that road safety is not impaired. (This is currently allowed under Article 12 of EU Regulation 561/2006 on drivers' hours.) We have examples of the police moving trucks on from crime hot-spots after the driver has finished – or thought he had finished – his day's driving. We are encouraged by the Department for Transport's growing recognition that more needs to be done to protect and promote a strategic truckstop parks. However, we sense a need for greater urgency of action; local authorities must accept the need for truck parks in their transport plans; additionally, there is concern that investment in security at truckstops attracts substantial increases in business rates, which acts as a disincentive to invest.

28. The RHA has been actively involved with the HSE 'Road Distribution Action Groups' working on policies relating to load safety and the effects of fatigue drivers of all types. This work has now virtually come to an end with recommendations to DfT particularly on fatigue related issues. This type of involvement is indicative of the associations drive for greater road safety for all road users.

Yours sincerely,



Jack Semple
Director of Policy