

Scotland's Road Safety Framework to 2030

Consultation document: [425982_sct1219677072-001_sg-consultation-on-road-safety_final_web--1-.pdf](#)

PACTS response to the consultation

December 2020

Background

We recognise and applaud Transport Scotland's ambition and coordinated efforts on road safety over the past decade. Targets were set and at least two of three are currently on track largely. There was clearly a coordinated sense of purpose and activity, which was very welcome. There were also important legislative changes, such as the reduction in the drink drive limit, where the Scottish Government exercised its powers and has set a new standard for the United Kingdom.

During this period, **PACTS has collaborated** with Transport Scotland and others in Scotland on a number of activities. Our remit covers the whole of the UK and we hope to do so more in the future.

Proposed Framework

We welcome this consultation document *Scotland's Road Safety Framework to 2030* with its ambitious vision, strategy and the detailed Annex that supports it.

We are pleased to see road safety placed in an **overarching policy context**, relating to other important policy areas such as the climate crisis, active travel and health. PACTS also sees road safety in this wider context. It is not possible or desirable to pursue it as a single isolated issue and we believe that safety is fundamental to the delivery of other policy objectives, particularly active travel and health.

The **ambition** for Scotland to have the best road safety record in the world is one that we endorse. It is ambitious but by no means unrealistic. Norway currently has the lowest number of deaths per million population but Scotland and UK are not far behind. Norway has achieved this position relatively recently, with significant improvements over the past few years. Some other European countries, such as Ireland and Switzerland have also made rapid progress. With the right ambition, policies and resources, there is no reason why Scotland should not make even greater strides and overtake them. Norway and Scotland have much in common.

Vehicle safety engineering is a key part of safe system and the pillar which has delivered the most casualty reduction over the few past decades. The EU **General Safety Regulation** should deliver a paradigm shift in vehicle safety standards. It has been described as the biggest safety measure since the introduction of seat belts. It will be essential for the achievement of Scotland's road safety targets and for progress with safety throughout the UK. For example, Intelligent Speed Assistance, due to be implemented in 2022 under the General Safety Regulation, is vital in relation to speed management and compliance with 20MPH limits. It is essential that the UK government incorporates the provisions in full into UK legislation, now the UK has left the EU. PACTS would welcome working with Transport Scotland to ensure that it happens.

We are pleased to see that the **safe system** is endorsed as part of the strategy. The framework correctly states that a challenge for all road safety bodies is to translate safe system into meaningful, practical policies at national, regional and local levels. Safe system has much in common with a road

danger reduction approach, which places emphasis on reducing the risk of death and serious injury for vulnerable road users by restricting vehicle access, limiting vehicle speeds, and safer vehicle design – such as direct vision standards for HGVs. This can be reinforced by the type of analysis used in the recent [PACTS Report: What kills most on the roads? | PACTS](#) . We commend this analysis to Transport Scotland.

A key part of safe system is to have the correct **performance indicators** – KPIs (or safe system indicators / lead indicators). We set out those which we felt were most relevant for the UK in [our report of October 2018](#). Each country and agency with a road safety remit will need to adapt these to its own particular circumstances. They should be used to assist safety management, but not rigidly. While they should be monitored carefully, targets should be applied only where helpful.

We **support the separate targets for 50% reductions** and deaths and serious injuries, as proposed in the framework. It is good to see the targets in the 2020 UN Resolution on road safety applied to a nation of the UK.

We would not recommend, however, the indicators or targets for the road user subgroups that you have identified as Intermediate Outcome Targets, such as percentage reduction in motorcyclists killed or seriously injured. We would recommend instead that you **monitor casualty rates** by distance travelled for these groups. There is a risk that overzealous safety policies applied to these minority groups could work against other objectives such as active travel. So long as Scotland is reducing casualty rates for these road user groups and making progress towards the ambitious overall 50% reduction targets, this should be sufficient.

We support the inclusion of improving Post-Crash Response in the strategy. This can improve the outcomes of crashes for victims. The strategy does not appear to say anything about **support for the families of those killed in road crashes**. They are often deeply traumatised by the loss and their lives disrupted for many years. Providing good support for victims' families should be an essential part of road safety and included in the Framework. Victims' families can also contribute a huge amount to the improvement of crash investigation procedures and danger reduction policies, galvanising support for road safety among politicians, media and the public in ways that professional and statistics are unable to do. They should be a clear part of the strategy.

I hope these observations are of use. I apologise that circumstances prevent us providing a more detailed response. We have, however, throughout the consultation period, promoted awareness of the consultation and encouraged others to respond, including featuring it at our Members meeting in November.

David G Davies

Executive Director, PACTS

david.davies@pacts.org.uk

0207 222 7732 <http://www.pacts.org.uk/> Twitter: @PACTS

Parliamentary Advisory Council for Transport Safety 78 Buckingham Gate, Westminster, London SW1E 6PE