



Alliance of British Drivers

**Submission to Transport Safety
Commission Inquiry into UK
Transport Safety: Who is
Responsible?**

April 2014

Summary

The Alliance of British Drivers (ABD) was formed in 2012 by the merger of the Association of British Drivers (founded 1992) and the Drivers' Alliance. It campaigns for a better deal for Britain's motorists. It is a voluntary organisation funded by subscriptions and donations from members and supporters. The ABD receives no funds from public bodies or private-sector businesses, so is truly independent. It is a member of the Parliamentary Advisory Council for Transport Safety and the National Council of Voluntary Organisations.

As the ABD is concerned primarily with road transport, its responses focus on road safety. They are summarised below.

Leadership and responsibility:

- The factors affecting road safety are vehicles, roads, and road users themselves. The EU is largely responsible for vehicle safety standards, with the Department for Transport responsible for roads and legislation affecting drivers.
- The unscheduled nature of most road trips means they are not capable of the degree of external control that applies to other modes. Greater attention needs to be given, therefore, to the education of all road users.

Objectives and targets:

- Road casualty rates (per distance travelled) have been decreasing in the UK and other developed countries for decades. The rate of decrease varies with the economic cycle. There is little evidence that road safety policies have a significant effect on this trend.
- The area where government can have the greatest impact on road safety is in improving and maintaining the road network. Targets should be set for improving overloaded single-carriageway strategic routes to dual carriageway or motorway standard. Further targets should be set for dealing with the backlog of potholes and other carriageway defects, as well as properly maintaining signs and road markings.
- Road safety policies since the 1990s have been based largely on a 'control and punish' approach that has failed to make a positive impact on the casualty trend, while often having a negative impact on the efficient use of the road network. A more positive 'educate and prevent' philosophy should be substituted, with enforcement targeted at the irresponsible minority.
- Targets should not be set where those tasked with achieving them do not have the direct power to do so. Targets may be appropriate for running education campaigns, provided these are factually based. Road safety policies must never be used to achieve other social objectives or to affect an individual's choice in mode of transport.

Perceptions and culture:

- No form of transport can ever be totally safe. Management of risk on the road network is more difficult because of the ad-hoc nature of road travel by different motorised and non-motorised modes.
- Measures aimed at reducing casualties will often have negative impacts on the efficient use of the road network and these must always be weighed against the expected benefits.

- Perceptions of safety are often false, sometimes including those responsible for introducing road safety measures.
- If people believe safety has been improved, they may take less care and become more likely to be involved in an accident. Exaggerated claims for casualty reduction should not be made in an attempt to increase acceptability by the public.

Funding:

- Government funding is inadequate to enable the road network to keep pace with rising traffic and to maintain it in a safe condition. The road network receives far less funding than rail, taking into account their respective levels of usage.
- Expenditure on road safety schemes needs to be targeted to reduce accident frequency without adversely affecting efficient movement. Policies should be evidence-led – evidence should not be commissioned to justify policies that have already been decided politically.

Monitoring and evaluation:

- Casualty figures derived from police STATS19 forms show evidence of increasing under-reporting of non-fatal accidents, giving a misleading impression of casualty reductions.
- The ABD strongly supports the establishment of a Road Accident Investigation Board. Police accident investigations are aimed at establishing whether a criminal offence has been committed, so drivers are wary of incriminating themselves. An independent board would be able to investigate a sample of accidents to establish the full facts, thus improving the knowledge base of accident causation.

Research:

- Road safety research should be completely objective and not designed to support a preconceived view of the value of particular road safety interventions. More research needs to be carried out into the effects of road user education in areas such as risk management.
- The emphasis in road safety needs to move away from external control of driver behaviour towards internal control through education (not brainwashing).

1. Leadership and responsibility

- 1.1 There are three main factors affecting road safety – vehicles, roads, and the people who use them. Much of the legislation concerning the design of vehicles originates from the European Union and is outside the control of the UK Government. The Department for Transport (DfT) has clear responsibility for setting highway design standards and for providing the Highways Agency and local highway authorities with the funding required to ensure road surfaces, signs and carriageway markings are maintained in a safe condition.
- 1.2 The DfT is also responsible for much of the legislation affecting drivers and riders of motor vehicles, as well as their training and testing. Enforcement of road safety legislation is mainly the responsibility of the police, although local authorities are increasingly taking over enforcement of parking regulations and some moving traffic offences.
- 1.3 Road transport is different from the other modes in that most journeys are not scheduled, do not follow fixed routes, and are not notified to any external system of control (e.g. air traffic control). Furthermore, most non-motorised road users (cyclists, pedestrians and horse riders) have no formal training or testing in safe road use.
- 1.4 The flexibility of road transport is its main advantage, allowing people to travel when, where and how they want. It means, however, that a large part of the responsibility for road safety must rest with individual road users, as it is not possible for external authorities to control every trip. A greater emphasis needs to be placed, therefore, on effective education of all road users.

2. Objectives and targets

- 2.1 Road casualty rates (casualties per million veh-km) have been decreasing year on year since data on traffic flow has been available (1950 in the case of the UK). This trend is also seen in other developed countries, but the rate of decrease has varied. Casualty rates are seen to fall faster during economic downturns than in periods of economic growth. Since casualty rates take into account changes in traffic flow, these variations cannot be attributed to changes in the rate of traffic growth during the economic cycle. Explanations for the variations in casualty rate reduction have been explored by researcher Al Gullon¹.
- 2.2 The downward trend in casualty rates is observed in all developed countries (albeit from different base lines), despite differing road safety policies. There is little indication, therefore, that road safety policies have a significant effect on the trend. Most of the reduction in casualty rates is likely to be due to improved vehicle safety and better roads. As explained above, improvements in vehicle safety are driven by EU targets so are outside the control of the UK Government. The adequacy of the road network is the main area affecting road safety over which the Government has control, so this is where the focus of targets should be.
- 2.3 Casualty rates on motorways are less than a third of those on rural A-roads (single and dual carriageways combined)². Many rural single carriageway strategic routes are operating well above their design capacity and suffer particularly high casualty rates as a result. Targets should be set by the DfT, therefore, to reduce the proportion of the strategic road network operating above capacity, by improving those routes to dual carriageway or motorway standard. These improvements would also lead to improved journey times and reliability, thus providing economic benefits.

- 2.4 Underfunding of road maintenance over many years has led to deterioration in road surfaces, especially the proliferation of potholes and structural failures at the edges of carriageways. These defects can cause accidents directly, particularly to cyclists and motorcyclists, while damage caused to vehicle suspensions, tyres and steering can lead to later failure with potentially dangerous consequences. Worn carriageway markings and damaged, missing or obscured road signs can also lead to accidents. A further set of targets should be set by the DfT, therefore, to clear the backlog of maintenance issues within an acceptable timescale, and thereafter to maintain roads in a safe condition.
- 2.5 Since the early 1990s, when economic conditions led the Government to reduce funding for the road network, the emphasis on road safety has changed from making the roads safer to controlling road user – especially driver – behaviour. Lower speed limits, speed cameras and traffic calming schemes have proliferated. While some individual schemes may have led to casualty reductions (often due to traffic diversion), there is no evidence that overall casualty rates have reduced faster than before. Indeed, from the mid-1990s until the 2008 recession, the annual rate of casualty reduction was at its lowest since records began. While this was predominantly associated with the strong economic growth during that period, it does not suggest that the new road safety policies were effective.
- 2.6 Road safety policies since the 1990s have imposed increasingly onerous restrictions on drivers, with greater enforcement of them. These restrictions have often been introduced on the basis of flawed assumptions, e.g., that lower speed limits always lead to fewer accidents^{3,4}. Not only have these policies failed to improve safety, they have also had adverse effects on journey times, and drivers have been needlessly subjected to penalties (and sometimes loss of livelihood) for behaviour that in most cases has not been dangerous. The efficient use of the road network has thus been reduced to no purpose.
- 2.7 The ABD opposes this negative ‘control and punish’ approach to casualty reduction, preferring instead an ‘educate and prevent’ philosophy, to which people are more likely to respond positively. Enforcement should be targeted at the irresponsible minority, not the generally responsible majority. To bring about this change in approach will require a paradigm shift in attitudes within the road safety establishment.
- 2.8 There is little point setting overall targets for road casualty reduction since, as already explained, road safety is largely dependent on the actions of individual road users. Targets should only be set where those tasked with achieving them have the power to do so, such as improvements to road capacity and maintenance, described above. Additional targets may be appropriate for running education campaigns (for all road users), but these must provide factual, accurate information and not simply be commands to be obeyed.
- 2.9 Road safety policies and targets should not be used to achieve other social objectives. Individuals have the right to choose the mode of transport that best suits them for each journey. Walking and cycling in urban areas should be made as safe as reasonably practical, but driving should not be made deliberately unpleasant in an attempt to force people to use those modes.

3. Perceptions and culture

- 3.1 No form of transport can ever be totally safe. As soon as a vehicle of any type is put into motion it has the potential to cause damage or injury if it gets out of control. Risk can be managed, therefore, but never eliminated altogether. The management of risk on the roads is more difficult than with other networks, as journeys are made by individuals using

motorised or non-motorised modes as and when they need to travel. In 2012, 84 per cent of passenger-kilometres were travelled by private motor vehicle⁵ and, in 2010, 68 per cent of freight tonne-kilometres were carried by road⁶. In addition, large numbers of walking and cycling trips are made every day. The road network thus provides the dominant means of travel within the UK and, consequently, the greatest exposure to risk.

- 3.2 While it is clearly right to wish to minimise road casualties, the negative impacts of measures adopted towards this end must be weighed against the benefits. These impacts could include longer journey times, reduced mobility or higher costs. The law of diminishing returns must also be considered. Emotive phrases such as “If it saves just one life...” can have no place in a rational assessment of road safety interventions.
- 3.3 Perceptions of safety are often false and not restricted to the general public. Many in central and local government, both politicians and officials, have excessively optimistic views on the value of some road safety measures, especially those that impose restrictions on drivers. An example is the current debate about the value of 20 mph speed limits in urban areas. The evidence from existing schemes is mixed, with instances recorded of both increases and decreases in some classes of casualty.
- 3.4 If people believe that safety has been improved, they may take less care and, paradoxically, be more likely to be involved in an accident. This may explain the increased casualties seen in some 20 mph schemes, where actual speeds have hardly changed but there is a perception that traffic is slower. It is very important, therefore, that exaggerated claims about the alleged benefits of proposed road safety measures should not be made in an attempt to make them more acceptable to the public.

4. Funding

- 4.1 As explained in paragraphs 2.3 and 2.4 above, Government funding is inadequate to enable the road network to keep pace with rising traffic and to maintain it in a safe condition. In 2012/13, capital expenditure on roads in Britain (excluding Northern Ireland) was £4.568bn and revenue expenditure was £2.949bn. Public capital expenditure on the railways was £4.072bn and revenue expenditure was £1.430bn⁷. These figures show that the road network receives much less investment than the rail network once their respective levels of usage are taken into account.
- 4.2 That part of roads expenditure used to implement road safety schemes needs to be used in ways that will reduce accident frequency without adversely affecting efficient movement. Road safety policies should be evidence-led – evidence should not be commissioned to justify policies that have already been decided politically. The ABD suspects this may have been the case with some of the policies introduced since the 1990s, especially those that have led to widespread reductions in speed limits (paragraph 2.6 above).

5. Monitoring and evaluation

- 5.1 Road casualty trends are already monitored by the DfT, based on police STATS19 returns. There is concern, however, that progressively greater underreporting of non-fatal casualties in the STATS19 data, compared with that from hospital admissions, is giving an over-optimistic view of casualty reductions. This issue was raised by the Transport Select Committee in its 2008 report⁸ and is an area requiring improvement.

- 5.2 Establishment of an independent Road Accident Investigation Board (RAIB) has long been promoted by the ABD. Current investigations by the police are aimed primarily at establishing whether an offence has been committed by one or more of the road users involved. This focus on criminal proceedings makes drivers reluctant to be completely honest with police investigators for fear of prosecution, so the true causes of accidents may not become known. This in turn means that the table of contributory factors published each year by the DfT may not be entirely reliable.
- 5.3 It would clearly not be possible for all road accidents to be investigated by the RAIB, so it would be necessary to select a sample of accidents of different severity in order to obtain a representative assessment of accident causes overall. Exactly how the RAIB would work would require careful planning, but it might expect police forces to submit returns of accidents investigated on, say, a monthly basis, from which the RAIB would select those it wishes to study. The police would then provide the evidence they have already gathered on those accidents, plus contact details for the individuals involved and any witnesses. It would be imperative for any interviews by the RAIB with those involved in accidents to be strictly confidential, to ensure complete frankness.

6. Research

- 6.1 The ABD's main concern about road safety research is that it should be completely objective and not designed to support a preconceived view of the value of particular road safety interventions. As explained in paragraph 2.7 above, the ABD does not support the 'control and punish' approach favoured by much of the road safety establishment. More research needs to be carried out into the effects of road user education in areas such as risk management while driving, as promoted in Stephen Haley's book *Mind Driving*⁹.
- 6.2 The emphasis in road safety needs to move away from external control of driver behaviour towards internal control through education (not brainwashing). The Chancellor of the Exchequer's recent Budget announcement on changes to the way individuals' pension funds may be used implied trusting people to make their own financial decisions. It is time a similar approach was adopted towards road users.

References

1. (E.g.) Gullon A.C. **Traffic Safety: Russia MUST NOT Follow the West ... Russian Science Can Lead the World to Lower Crash Risk.** November 2010.
2. Department for Transport. **Road Casualties GB 2012**, Table RAS10002.
3. <http://www.abd.org.uk/onemph.htm>
4. <http://www.abd.org.uk/tr1511.htm>
5. Department for Transport. **Transport Statistics Great Britain 2013**, Table TSGB0101.
6. Department for Transport. **Transport Statistics Great Britain 2013**, Table TSGB0401.
7. Department for Transport. **Transport Statistics Great Britain 2013**, Table TSGB1302.
8. Transport Committee Inquiry. **Ending the Scandal of Complacency: Road Safety beyond 2010.** October 2008.
9. Haley, Stephen. **Mind Driving.** Safety House. 2006.