

# Submission to the Inquiry into the Road Safety Framework

## Introduction

1. This memorandum is submitted on behalf of 16 organisations, whose names are listed at the end of the submission. Taken together, these organisations represent the key deliverers of road safety at national and local level, the professional bodies representing highway engineers and planners and representatives from the transport research sector. We have chosen to make a joint submission, in addition to specific points raised in individual representations, because we believe that improvement in road safety is a collective responsibility, the achievement of which is attained most successfully through joint partnership working. The importance of the partnership approach has been acknowledged in a report from the Department entitled *Delivery of Local Road Safety*, Road Safety Research Report 124, published in September 2011.

## Is the Government right not to set road safety targets and is the outcomes framework appropriate?

2. It is important for the Committee to remember that Great Britain has a long tradition in road safety delivery dating back to the publication of *Road Safety: the Next Steps* in 1987. This publication set the first target for casualty reduction: the achievement of a reduction of one-third in all casualties by 2000 taking the years 1981-85 as the baseline years against which progress should be measured. At the time, the adoption of a target was a radical move. However, it was developed with professional support and adopted by those active in the field. In our view, road safety is a policy area that has benefited from targets which have supported rather than distorted policy initiatives.

3. In 2000, the government, having consulted widely, adopted a second round of targets although these were of a more differentiated kind. In *Tomorrow's Roads – safer for everyone*, three targets were proposed

- To cut death and serious injury (KSI) by 40% by 2010
- To cut child KSI by 50% by 2010
- To reduce slight injuries by 10% by rate by 2010

4. Progress towards the achievement of these targets was to be measured against the years 1994-98. It is also important to note here that these reductions were based on a rigorous analysis of casualty trends, policy options and potential changes in traffic mix. This underlying analysis can be found in TRL report 382, *The Numerical Context for Setting National Casualty Reduction Targets* (Broughton, Allsop, Lynam and McMahon). The 2000 targets were not figures plucked out of the air by a government but were based on achievable ambitions. As the 2010 casualty figures show, deaths fell by 48% over the decade 2000-10 and KSI by 49% although we accept that the serious injury figures should be treated with some caution as there are issues of data reliability when comparing police and hospital casualty figures.

5. Target setting has therefore been a positive policy development in Great Britain over the last two decades. In addition, international analysis published in the journal *Safety Science* in 2010 (Wong and Sze, *Safety Science*, 2010, pp 1182-88) has estimated that having in place a national target increases the annual average percentage reduction in road deaths by typically 4% during the target period compared with similar countries without targets.

6. In 2009, the previous government consulted over the option of a third round of casualty reduction in *A Safer Way* (DfT, 2009). In this document, the government also suggested that Great Britain should adopt a vision for road safety to guide policy over the next decade: to make Britain's roads the safest in the world. The proposed targets were a further reduction of at least one third in KSI by 2020 and of 50% in child KSI over the same period. This approach was again supported by professionals in road safety, demonstrating the joint commitment to improving safety. Our concerns about the approach proposed focussed on whether the targets proposed were sufficiently ambitious and whether we should aim for the *safest road users* rather than the *safest roads*.

7. It is therefore deeply disappointing to note that the new government has turned its back on the history of successful road safety in Great Britain, preferring to talk of forecasts rather than specific targets. While we recognise that in other areas of policy, targets can be interpreted as having distorted policy, this is not the case in road safety. **We would urge the Committee to recommend to the government a re-think on the issue of target-setting given the overwhelming evidence that targets work in this area.** Should the government not recognise the continuing relevance of a target-led approach and prefer to continue with its current approach, **we would urge the Committee to recommend that a more robust approach to both performance and measurement of progress needs to be adopted as we set out below.**

8. In terms of the outcomes framework, we agree that it is important to have a measurement system in place to assess whether the policy objective is being achieved. In terms of assessing progress, *Towards Zero* (OECD, 2008) rightly draws the distinction between final outcome data and performance data. The former focuses on deaths and injuries, the latter on how the network is performing and on changes in behaviours exhibited by road users. We believe that it is vital to measure a combination of these in order to be sure that safety is improving and that the risk profile for road users is not changing in any negative way.

9. In terms of the proposed Outcomes Framework, we believe that the 14 valuable indicators based on injury figures should be complemented by a wider range of indicators based on network performance than the 8 that are so far proposed. Over the last decade, it is, for example, notable that the percentage of drivers complying with the 30mph speed limit in free-flowing traffic has risen from 30% to 51%. This behavioural change suggests that the urban network is becoming a safer environment. We believe that a wider set of performance measures should be adopted, including, for example, the percentage of vehicles with 5 Star EuroNCAP ratings, the percentage of the road network assessed as adequate by EuroRAP, the amount invested in traffic calming measures and the percentage of car occupants wearing seat-belts. Much of this data is already collected but published in different places. The role of the Outcomes Framework should be to bring it all together as a comprehensive data source.

10. We would, however, urge two further changes to the Framework. We believe that the indicator of deaths at national level may lead to a focus on what are increasingly rare events. We would prefer the indicator to be based on deaths and serious injuries as is the case for local authorities. We also believe that the data must be published in a consolidated format. We are concerned that the decision to cease publication of *Reported Road Casualties Great Britain* in a printed format and to make it available as a series of tables on-line has led to difficulties for the profession in accessing and interpreting data. If *RRCGB* is no longer to be printed, it must at least be available in a consolidated format comparable to previous years.

*How will the decentralisation of funding to local authorities work in practice and contribute towards the fulfilling of the Government's vision?*

11. This is obviously a key question for the Committee. However, the honest answer is that it is very difficult to know at the present time. The combination of reductions in local authority funding and the end of ring-fencing has led to significant reorganisations in local authority structures and personnel. Many authorities have seen experienced staff accept voluntary severance or early retirement packages. As a result, expertise has been reduced. However, it is not possible to quantify the effect of this at present. In addition, according to data provided to the Daily Telegraph via a Freedom of Information request, the numbers of dedicated roads policing officers has fallen overall by 4% in the year between May 2010 and May 2011.

12. Finally, the decision to end the capital funding of safety cameras in June 2010 and to reduce the grant paid to local authorities for road safety partnership work has led to a reduction in partnership working. In Northamptonshire, for example, decisions about safety cameras have been returned to the police force rather than remaining within the established partnership, resulting in an end to enforcement at fixed camera sites and the reduced presence of mobile units. In Wiltshire and in Avon and Somerset, fixed cameras have been switched off altogether without a thoroughgoing analysis of the potential impact on casualties. Where police forces are now required to meet the costs of enforcement entirely through funds hypothecated from speed awareness courses, such as in Thames Valley, the deployment strategy is now less focussed on high casualty rates than was previously the case.

**We would urge the Committee to recommend that the Department undertake and publish its own analysis of the impact of the recent changes. Such an analysis ought to include a survey of local authority and police staff to assess the scale of job losses and internal reorganisation.**

13. Local authorities and police forces have always had a key role in the implementation and achievement of casualty reduction in Great Britain over the last two decades. We endorse the view that decisions about local roads are best taken at the local level. Our concern, however, is that an emphasis on decentralisation with no commitment from central government to monitor progress may lead to inconsistency around the country with some authorities continuing to focus on road safety and others concentrating on different local priorities. As the DfT itself has admitted in the Strategic Framework, performance in casualty reduction around the country is varied. Decentralisation is likely to exacerbate that position. It is vital to monitor independently performance across local authorities and the different administrations and to share good practice across the profession. The Strategic Framework fails to do this.

*Is the Government right to argue that the right legislative framework is in place and that the Road Safety Act 2006 has fulfilled its objectives?*

14. For local authorities, a key part of the legislative framework lies in the Road Traffic Act 1988. Section 39 of this Act places statutory duties on local authorities with regard to road safety. These are:

- To prepare and carry out programmes of measures designed to promote road safety;
- To carry out studies into accidents arising out of the use of vehicles on roads within their area; and

- To take such measures as appear to be appropriate to prevent such accidents.

15. This part of the Act has worked well in ensuring the continuing commitment of local authorities to casualty reduction work. It reflected the adoption of targets for casualty reduction in 1987 and ensured that local authorities had a level of accountability for achieving them.

16. We accept that both the Strategic Framework as a whole and the Outcomes Framework within it create a new structure and context for the operation of road safety. We believe that this needs to be reflected in a new legislative framework for road safety. **We would urge the committee to recommend that new duties to ensure the safe operation of the road network and the improvement of the safety of road users should be placed on both the Secretary of State for Transport and highway authorities. This should be accompanied by a duty on the Secretary of State to publish and update annually a detailed action plan covering road user, vehicle and highway safety that will show how future reductions will be achieved.** Such an approach was adopted in Sweden with the law enshrining *Vision Zero* being passed by Parliament.

17. Finally, in terms of the current legislative framework, while we acknowledge that the earlier report from the Committee on drink and drug driving did not support an immediate lowering of the Blood Alcohol Content for drivers from 80mg to 50mg, we would urge the government to revisit this issue. Both the Northern Ireland Executive and Scottish Government have indicated their intention to lower the legal limit. We believe that it is time for the government in Westminster to do the same.

18. At the same time, it is also disingenuous of the Government to suggest that the current framework is adequate when there are two further changes to it being proposed in the extension of fixed penalty notices (FPN) to include careless driving and the new offence of causing serious injury through dangerous driving. The latter was added during Committee Stage to the Legal Aid, Sentencing and Punishment of Offenders Bill. We accept that both of these will help the police service in better enforcement of road traffic law and give greater flexibility to the courts to take into account injury as well as death when considering an appropriate level of sentence. We would, however, urge the Committee to recommend a thorough evaluation of these when they are implemented. In particular, it will be important to know whether the FPN option for police officers results in additional enforcement or merely reduces police bureaucracy.

19. In response to whether the Road Safety Act 2006 has fulfilled its objectives, while we welcome the publication of the *Post Legislative Assessment* of the Act ((TSO, 2011), we would also note that some of the Sections of the Act have yet to be implemented. The Sections governing the driving instruction industry are still being put in place and further changes to the driving test are likely to occur following the completion of a research project currently under way.

20. In addition, Section 35 of the Act which aims to put in place a course intended for drivers who might otherwise lose their licences is listed as an action to be completed in 2013. Such a course could be particularly important given the recent media focus on the number of drivers who have retained their licences through pleas of personal hardship when faced with loss of licence through “totting up” of penalty points. Earlier remedial interventions might help to prevent further offending or to ensure that drivers lose their licences as the law intends rather than being allowed to abuse the system.

21. Finally, we would urge a note of caution with regard to the new offence of causing death by careless driving. While the Assessment reports that since August 2008 there have been 155 convictions for this new offence, it is important to note that the number of prosecutions for causing death by dangerous driving has fallen from 312 in 2009 to 221 in 2010. We do not wish to suggest that there has been a move to lower the level of the charges brought against drivers. **What we would urge is an in-depth research report into the overall impact of the new charge of causing death by careless driving to ensure that it is achieving its objective of increasing enforcement of road traffic law.**

*Are the measures set out in the Action Plan workable and sufficient?*

22. In principle, the measures set out in the Action Plan are workable but are hardly sufficient. There are two significant qualifications that need to be placed upon them. First, they are primarily short-term actions with nothing considered beyond the period of the current Parliament.

23. Secondly, they are unambitious and do not fully reflect the challenges facing road safety. There is nothing in them about continuing investment in road engineering measures or about engagement with Europe. While the emphasis on educational alternatives for offenders is laudable, there has been little research into the effectiveness of such courses. It will be vital to ensure that any interventions are based on a robust research base and are evaluated rigorously to ensure that they achieve long-term behavioural change. Equally, while the emphasis on remedial education is appropriate, it overlooks the need to educate road users at an earlier age, thereby helping to prevent offences in the first place.

24. We are also disappointed that there is no reference in the Action Plan to maintaining the country's research base to inform policy development. As the number of deaths on the roads falls, it becomes increasingly important to know a number of key pieces of information about the contributory factors underlying the crash, the environmental factors and the contribution that vehicle design could make to occupant protection or impact mitigation. Consideration should also be given to the effectiveness of accident damage repairs to maintain the integrity and safety efficiency of the original vehicle design. Reliance on data provided by STATS19 will not give as full a picture as is required to inform future policy.

25. Over the last decade, the DfT has contributed financially to two in-depth crash studies (the Co-operative Crash Injury Study and the On the Spot Study or OTS) which have helped to further the understanding of why crashes occur and what improvements to vehicle design could be implemented. Funding for a renewed OTS study was ended in May 2010. As a result there is likely to be a drastically weakened understanding of accident and injury causation on a significant statistical basis. **We would urge the Committee to recommend the resumption of this important analytical resource. We would also urge the continuance of research to understand the nature of fatalities among different road user groups as was undertaken in the monitoring of the progress towards the 2010 targets.**

26. Another missing action is any reference to the ISO standard for road safety management. This is currently being developed at international level and has strong support from a number of our European partners. We would urge its adoption throughout the road safety community to improve the overall management and understanding of road safety.

## *The Relationship between the Government's strategy and EU road safety initiatives*

27. The main EU road safety initiatives are set out in the Policy Orientations proposed by the European Commission in July 2010. A key point to note here is that the Commission has proposed a further reduction of 50% in deaths on European roads to be achieved by 2020. Given the reluctance of the British government to adopt a target-led approach, this places an immediate gap between Great Britain and the European Commission and Parliament. In both the Commission proposals and the report on road safety adopted by the European Parliament, there has been strong support for both a target and a long-term commitment to *Vision Zero*. These are both absent from the DfT publication.

**28. We would therefore urge the Committee to recommend to the government that the framework is revised to reflect the approach adopted by the EU which corresponds more closely with international best practice. We also believe that Great Britain needs to take an active role in policy development at a European level, especially in the areas of the design of vehicles and vehicle-based systems and of pan-European research projects.**

29. In a joint letter to the Times in July 2011, our organisations committed themselves to halving deaths on Britain's roads by 2020. We believe that this is an achievable goal given political leadership and continuing government commitment. We would urge the committee to set out a similar vision for road safety for the coming decade.

### Conclusion

30. Reductions in deaths and injuries on our roads bring both economic and public health benefits, reducing demands on the health service and creating an environment in which more people are likely to walk and cycle. The recent substantial reductions in deaths are clearly welcome but may well be related to the overall economic situation. There is therefore no guarantee that the downward trend will continue. We believe that far more can and should be done to prevent the cumulative, individual tragedies on our roads, thereby ending the "Scandal of Complacency" identified by the committee in an earlier report.

### **Memorandum submitted by**

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