



## Scotland's Road Safety Framework to 2030 Draft Public Consultation

<https://consult.gov.scot/transport-scotland/road-safety-framework-to-2030/>

### 1. Is the vision set out for the next 10 years the right one? Y/N YES

**Please explain your answer**

This is a good strategy in terms of its ambitions and overall strategy and well ahead of the other national regions of the UK. As we set out in more detail in subsequent responses, we believe that the vision should also embrace road danger reduction, including the aim of Less Traffic especially in urban areas. We would argue that as there is such a difference between a) the structure of rural and urban casualties in Scotland and b) the levels of success that Scotland has had in reducing casualties both by transport mode and by the location of the casualty (urban/rural) that the interim target should take this into account and set sub-targets for urban settings (where the numbers of casualties have fallen more slowly) and for those walking, cycling and riding motorcycles where fatalities in particular have been slower to decline.

### 2. Are the outcomes of Safe Road Use, Safe Speeds, Safe Vehicles, Safe Roads & Roadsides and Post-Crash Response to deliver the vision the right ones? Y/N YES

**Please explain your answer**

We would argue that missing from the strategy and an important additional element is road danger reduction and the aim of Less Traffic. We understand the need for rural communities to travel by personal vehicular transport but as we will go on to see, significant work is needed to reduce danger in urban areas in Scotland and opportunities must be taken to replace driven urban journeys with those that are walked, cycled and taken by public transport. We believe that there is good evidence of the impact of reducing traffic volumes on road casualties (<https://actionvisionzero.org/what-to-campaign-for/less-traffic/>) and this should be included as a core part of the strategy especially if it is to be successful in reducing danger and casualties in built-up areas. We believe that there are very significant problems in relation to a Vision Zero approach of the strategies that are incorporated in the Development of Scotland's 2030 Road Safety Casualty Targets and Key Performance Indicators<sup>1</sup> and where the Primary Scenario envisages a 37% increase in vehicle miles up (between 2014 and 2037). This appears incompatible with both the vision Zero approach and at the very least the Climate Emergency.

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<sup>1</sup> [https://consult.gov.scot/transport-scotland/road-safety-framework-to-2030/supporting\\_documents/A27919978.pdf](https://consult.gov.scot/transport-scotland/road-safety-framework-to-2030/supporting_documents/A27919978.pdf)

**3. Do you agree that the Safe System Approach is fundamental to the success of the Framework? Y/N YES**

Please explain your answer

**4. Are the 12 key challenges for road safety, from Climate Emergency, Health to Emerging technologies and Post-crash response, the correct ones? Y/N NO**

Please explain your answer

While many of the areas identified are correct (eg Climate Change and Speed Management), much of the analysis focuses heavily on target groups of road users (eg foreign drivers) and fails to underscore some of the other important problems that exist in Scotland in relation to road danger and the nation's performance in relation to reducing casualties in recent years. There is a marked absence of appreciation of the road environment in particular in built-up areas as sources of road danger.

There are some significant omissions in the analysis of performance in relation to road safety and especially the performance across the country by mode of travel and between built-up and non-built-up areas.

In relation to people killed, the table below (taken from the DfT<sup>2</sup> and marrying reasonably well to the Key Reported Road Casualties Scotland 2019 - Web Tables) shows that:

- The overall reduction in fatalities from the 2004-08 average (-43%) has been led by motor vehicle occupants. In built-up areas, pedestrians now make up 64% of all fatalities compared to the 2004-08 average of 56%.
- Casualties in built-up areas have fallen at a lower rate than in non-built-up areas. If clear strategies are not put in place for built-up areas that protect pedestrians in particular, casualty numbers will struggle to decline at the required rate.

**1. Fatalities**

Fatalities	Built-up-roads			Non-Built-up roads		
	Average 2004-08	2019	CHANGE 04-08 to 19	Average 2004-08	2019	CHANGE 04-08 to 19
Bus or coach	1	3	200%	2	-	-100%
Car (Includes taxis and minibus)	21	6	-72%	141	69	-51%
HGV	2	-	-100%	3	2	-29%
Motorcycle	6	6	0%	35	19	-46%
Other vehicle	1	2	60%	1	-	-100%
Pedal cycle	5	2	-62%	5	6	20%
Pedestrian	46	34	-27%	18	12	-35%
Van / Goods 3.5 tonnes mgw/under	2	-	-100%	7	4	-41%
<b>Total</b>	<b>83</b>	<b>53</b>	<b>-36%</b>	<b>209</b>	<b>112</b>	<b>-47%</b>

<sup>2</sup> <https://roadtraffic.dft.gov.uk/custom-downloads/road-accidents>

**2. Fatal and Serious Injuries.** Clearly care needs to be taken with this data owing to the changes in reporting but the historic data is valuable in giving a sense of the structure of casualties and their relative changes over time. These indicate that:

- The reduction in serious and fatal casualties is well below target.
- Pedal cycle casualty number in built-up areas have risen from the baseline. If active travel is to be enabled as per the Transport Strategy, actions are needed that will start to address danger in urban areas.
- Casualties have fallen less in built-up areas and pedestrian casualties in built-up areas are now almost a quarter of all fatal and serious casualties in Scotland.
- Motor vehicle casualties remain a significant issue on non-built-up roads.

Fatalities	Built-up-roads			Non-Built-up roads		
	Average 2004-08	2019	CHANGE 04-08 to 19	Average 2004-08	2019	CHANGE 04-08 to 19
Bus or coach	49	23	-53%	7	3	-56%
Car (Includes taxis and minibus)	366	296	-19%	1,056	737	-30%
HGV	9	8	-13%	25	16	-37%
Motorcycle	161	116	-28%	243	187	-23%
Other vehicle	12	9	-26%	13	7	-46%
Pedal cycle	115	154	33%	27	33	24%
Pedestrian	645	484	-25%	64	44	-31%
Van / Goods 3.5 tonnes mgw/under	12	10	-15%	48	37	-22%
<b>Total</b>	1,369	1,100	-20%	1,481	1,064	-28%

In addition, this section focuses on the medical response and does not mention the need to improve collision investigation or support services for crash victims. Both these areas are included under UN's Global Road Safety Plan.

The Safer System approach assumes that the transport system will be able to accommodate human error but not non-compliance with traffic laws. It should be possible to know how many crashes were caused by law-breaking and resulted in a criminal prosecution. It is not good enough to rely on contributory factors when these are basically the best guess of the reporting officer and reported at the start of the investigation.

**5. Do you think the strategic actions will deliver the outcomes and address the identified challenges?  
Y/N NO**

**Please explain your answer**

Although the analysis of the challenges is strong in many places, the strategic actions are insufficient to tackle them in particular in the light of the problem of the failure to reduce casualties in built-up areas especially amongst those who walk and cycle.

The following are proposed as stronger actions in relation to some of the Strategic Actions. Overall, we are sceptical about the impact of education- and behaviour-change based approaches to deliver Vision Zero targets. We would very much like to understand the evidence in favour of their use and a reliance on them. We feel that while they may have a supporting role to communicate about change, it is speed management, road layout and infrastructure, traffic volumes and enforcement/compliance that are the drivers of successful casualty reduction strategies.

Largely absent too is a description of how towns and cities will need to change if Scotland is going to be able to reduce casualties amongst those walking and cycling. It is concerning that while there is significant and detailed description of the actions targeted at driver groups (and in particular driver focused analysis in the Development of Scotland's 2030 Road Safety Casualty Targets and Key Performance Indicators document, there is very little description of how places will need to evolve to reduce road danger in built-up areas for those walking and cycling. It is important that there is an awareness that this Vision Zero strategy cannot be delivered without significant change to the status-quo. Some suggestions around this agenda and what more is needed are provided below.

Strategic Action Area	Proposal
<b>Speed</b>	<ul style="list-style-type: none"> <li>• Adopt 20mph as the default speed limit in built-up areas, with 30mph as the exception, where justified.</li> <li>• Consideration of lower speed limits (eg advisory 15mph as in the City of London) in town centres and high streets where there are large numbers of people walking and cycling.</li> <li>• Outside built-up areas, adopt maximums of: 20mph in village centres; 40mph on minor roads; and 50mph speed limits on other single carriageway roads.</li> </ul>
<b>Technology/Safe Vehicles</b>	<ul style="list-style-type: none"> <li>• Although over-rideable Intelligent Speed Assistance (ISA) is likely to be introduced on new motor vehicles from 2022, this increasingly appears to be being watered down as it moves towards implementation. Mandatory ISA (as is now used on new TfL buses<sup>3</sup>) has the potential to ensure compliance with posted speed limits. The Scottish Government should enable Local Authorities to:               <ul style="list-style-type: none"> <li>- Adopt mandatory ISA in their own fleet procurement practices as part of any renewal programme.</li> <li>- Ensure mandatory ISA is a standard requirement for any service procured by an authority with a fleet requirement.</li> <li>- Encourage the uptake of mandatory ISA in other fleets, such as hauliers, construction firms and coach operators.</li> <li>- Require mandatory ISA for car club vehicles.</li> </ul> </li> </ul>

<sup>3</sup> <https://etsc.eu/case-study-intelligent-speed-assistance-isa-on-london-buses/>

Strategic Action Area	Proposal
	<ul style="list-style-type: none"> <li>- Require mandatory ISA in taxis and private hire vehicles and encourage the appropriate licensing authority to make ISA a requirement for new taxis and private hire licensing.</li> </ul>
<b>Active and sustainable Travel/Safe streets</b>	<p><b>Town Centre/High Street design.</b> There is a focus of injuries in town centres and high streets and in the longer-term changes need to focus on:</p> <ul style="list-style-type: none"> <li>• low vehicle speeds</li> <li>• the removal of general traffic (where possible) at peak times</li> <li>• safe and frequent crossing facilities (see below for detail)</li> <li>• low carriageway capacity (ideally town centres should only have single carriageway roads) coupled with the widening of pavement space.</li> </ul>
	<p><b>Safe Crossings.</b> In detail, this would be: 1) Reducing ‘wait times’ for pedestrians at signalised crossings and implementing the new, more accurate DfT assumed walking speeds to crossing timings of 1 metre/second (m/s) rather than the current 1.2 m/s. Ideally the speed would be 0.8m/s, however, in order to provide safe crossing facilities for people with limited mobility. 2) Ensuring roads are easy to cross through a) frequent/regular provision of formal crossings (signalised/zebra) throughout the length of busy roads and b) direct and single-phase (rather than staggered) crossings.</p>
	<p><b>Low Traffic Neighbourhoods/Neighbourhood Streets.</b> In Scotland (for the years 2015 to 2019), 26% of all serious and fatal casualties in built-up areas occurred on “C” and Unclassified roads. Low traffic neighbourhoods have the capacity to reduce through traffic and thus reduce danger at source owing to significant traffic evaporation. They also have significant capacity to replace short driven journeys with trips on foot and by bicycle.</p>
	<p><b>Protected cycle infrastructure on main roads.</b> The numbers of people injured while cycling has risen from being 8% of all fatal and serious casualties in built-up areas in Scotland in the 2004-08 average to 14% in 2019. To enable further growth in cycling a safe cycling network is required. At its core this needs to consist of: i) protected routes on main roads, ii) Low Traffic Neighbourhoods to reduce through traffic on neighbourhood streets and iii) safe links and junctions to connect the different parts of the cycling networks.</p>
<b>Enforcement</b>	<p>Clear and visible police enforcement with a focus on speeding and other priority offences (these should include careless driving).</p>
	<p>Average speed cameras on A roads with a higher than average risk profile.</p>
	<p>Emphasis on motorcycle speed compliance.</p>
	<p>Enhanced role for Community Speedwatch.</p>
	<p>Operation Snap, e.g. third-party reporting, promoted with feedback provided to those reporting bad driving.</p>
	<p>Enable data sharing by the police with open, transparent and timely production of statistics.</p>
	<p>Enable community engagement in setting and monitoring enforcement objectives.</p>
<b>Other Areas</b>	
<b>Less traffic</b>	<p>Lower private vehicle usage will support fewer people being killed and injured in built-up areas; this will also enable more walking, cycling and public transport usage. In built-up areas, this requires attractive active and sustainable travel alternatives to reduce the numbers of short driven journeys.</p>
	<p>The introduction of smart road user charging is needed to price private vehicle usage fairly. There are good descriptions of how this might operate in urban settings in the 2019 Centre for London report Next Generation Road User Charging<sup>4</sup>.</p>

<sup>4</sup> <https://www.centreforlondon.org/wp-content/uploads/2019/04/Next-Generation-Road-User-Charging.pdf>

Strategic Action Area	Proposal
	Sustainable Freight. Reducing danger by removing motor vehicle journeys by developing a sustainable freight framework. In a recent PACTS report <sup>5</sup> , it was identified that "...vans and light goods vehicles, have the highest rate of deaths of <i>other</i> road users of any mode of transport on our roads". Local authorities should develop frameworks to reduce freight vehicle usage using delivery consolidation, retiming and last-mile sustainable delivery, for example with (e-)cargo bikes.

**6. Are some of these actions more important than others? Y/N YES**

**Please explain your answer**

Care should be taken in relying heavily on education and behavioural change programmes alone. The experience of New York is extremely valuable in how it has driven down casualties in an urban environment. The focus was on speed management, the design of urban streets and in particular taking into account the needs of those walking and cycling and a beefing up of enforcement by officers and using cameras. It is vital that the core aspects of the safe system approach are given primacy and that requires a focus on speed management (including setting lower speed limits), safe road design and in particular a network of protected cycle routes on main roads, safe vehicles and maximising the potential of new technology (mandatory ISA on working vehicles), Direct Vision Lorries and Autonomous Emergency Braking as well as less traffic.

**7. What are your views on the proposed 2030 Interim Targets? Y/N YES**

**Please explain your answer**

These are very important but as we have outlined earlier, we believe that they need to be able to identify in good time a) modes where reductions are not occurring at the rate required and b) that they are not too distant. A real concern is that targets may be well off track by 2030 and there needs to be other checkpoints along the way to ensure that no unbridgeable gap appears between the target and what is being achieved. It should be noted that London has a target that by 2041 no one will be killed or seriously injured on London’s roads<sup>6</sup> and there are quantified interim targets in 2022 and 2030. It is suggested that an initial interim target that is closer that 2030 should be adopted.

With enforcement, Action Vision Zero is campaigning with RoadPeace and 20s Plenty for Us and calling for a rethink on roads policing. This includes greater priority given to reducing road danger and traffic harm, with closer collaboration with the community, who are key to delivering Community Speed Watch and Operation Snap. We are also developing good practice guidelines for these enforcement activities which we believe should be used to monitor enforcement efforts.

<sup>5</sup> <https://www.pacts.org.uk/wp-content/uploads/PACTS-What-kills-most-on-the-roads-Report-12.0.pdf>

<sup>6</sup> <content.tfl.gov.uk/vision-zero-action-plan.pdf>

**8. Do you think that the Intermediate Outcome Targets and Key Performance Indicators are appropriate to monitor the progress towards the 2030 interim targets? Y/N**

**Please explain your answer**

See above

**9. Do you think that the proposed Governance Structure is appropriate? Y/N**

**Please explain your answer**

No Response

**10. Would road safety performance be improved across Scotland as a result of systematically sharing information and best practice between local authorities and/or local/regional partnerships through Local Partnership Forums? Y/N**

**Please explain your answer**

No Response

**11. In your opinion what aspects of road safety work well at the moment?**

**Please explain your answer**

Scotland has done better than the England in recent years and that is in no small part owing to its openness to set targets and to be held accountable to them. It is no surprise that the removal of targets in England in 2010 has led to poor performance in the intervening years. Scotland is to be admired for taking this step to adopt a Vision Zero approach with both an end date target and interim targets.

Scotland has led the way in reducing the drink drive limit in Britain. And whilst this alone has not led to reduced drink drive casualties, the lower limit should be kept and better enforced. This is the same approach that should be taken with reducing the default 30mph speed limit to 20mph. There is no justification for the higher limit in either case.

**12. What practical actions would you like to see taken to encourage and promote these aspects?**

**Please explain your answer**

No Response

**13. In your opinion what aspects of road safety do not work well in general and as a result of Covid-19?**

**Please explain your answer**

As we have noted, the key concerns in Scotland are a) the smaller reductions in fatal and serious casualties in built-up areas over time and b) the smaller reductions in serious casualties amongst those walking and cycling. There are especial concerns about casualties in built-up areas if Scotland is to achieve its parallel target of enabling a dramatic increase in active travel.

**14. What practical actions would you like taken to overcome these aspects?**

**Please explain your answer**

We would very much like to see far more detail on the steps that Scotland proposes to be realistically capable of reducing casualties in urban areas. This feels an issue that is unexplored in the data analysis and the strategies proposed. Given the potential of ISA to increase compliance with (lower) speed limits, we would like to see the government in Scotland following the lead in Wales and adopting a 20mph default speed limit.

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