RESPONSE TO

THE DEPARTMENT FOR TRANSPORT CONSULTATION PAPER

A SAFER WAY
Making Britain's Roads the Safest in the World

JUNE 2009

Introduction
This is the response of The Stilwell Partnership to the Department for Transport's consultation paper, "A Safer Way: Making Britain's Roads the Safest in the World".

The consultation paper seeks views on the vision, targets and strategy to improve road safety for the period beyond 2010, when the current road safety strategy and casualty reduction target period ends. The Department proposes to set new casualty reduction targets for the ten year period 2010 to 2020, but also a longer term vision of "making Britain's roads the safest in the world" for the period 2010 to 2030.

The proposed strategy will aim to support responsible road use and tackle irresponsible behaviour, and focus on the roads, people and behaviours that are most associated with road deaths. It will focus on:

- Reducing the number of road deaths
- Reducing pedestrian and cyclist casualties
- Protecting children
- Protecting motorcyclists
- Improving safety on rural roads
- Tackling weak links in Britain's road safety system to bring all areas up to the standard of the best
- Improving poor road user behavior
- Tackling illegal and inappropriate speed.

The aim of the Strategy will be to develop a road safety system in which errors on the road do not lead to death or serious injury. This means:

- roads that take account of the level of safety vehicles can deliver and what drivers need to help them drive safely at all times

- vehicles that deliver greater safety, taking account of how drivers will respond to new technologies and what protection vehicles will offer in the event of a collision

- education and promotion that enable and encourage all types of road users to improve their safety skills and attitudes

The Department believes that Britain's legal and regulatory framework is "broadly fit for purpose" for delivering improved road safety. Therefore, the proposed strategy will focus on improving the delivery of road safety and on targeting key dangerous road user behaviours.

TSP General Comments

The Stilwell Partnership warmly welcomes the consultation paper.

We have seen tremendous progress over the last 20 years or so in reducing death and injury on Britain's roads, despite massive increases in traffic. In the mid 1980's over 5,500 people were being killed on the road every year; this has now (in 2007) fallen to fewer than 3,000. Of course, this still means that the number of people being killed and injured is at unacceptable and horrendous levels: 8 deaths a day on average.

There are many reasons for the reductions in road death and injury (safer cars being one of them) but one of the most important is that Britain has had national road safety strategies and casualty reduction targets over the last twenty years or so. Beginning in the mid 1980's with the national target of reducing road casualties by one third by 2000, and followed by the "Tomorrow's Roads: Safer for Everyone" road safety strategy and its casualty reduction targets of reducing deaths and serious injuries by 40% by 2010 (50% for child deaths and serious injuries).

Setting a new road safety strategy and targets for the next 10 or 20 years is a pre-requisite to continuing the avoidable loss of life on Britain's roads.

A key feature of the proposed strategy, vision and targets is that they are based on a thorough review of road casualty data and research, as have the previous strategies. This evidence-based approach is vital for the success of the strategy and targets.

TSP supports the twin-track approach of the consultation paper: encourage voluntary and willing compliance with road traffic law and increase the likelihood of getting caught, and the consequences, for those who choose not to follow the law.

We agree that Britain's regulatory framework for road use is "broadly fit for purpose". However, this does not mean that the strategy should rule out further legal changes; some will no doubt prove necessary. Laws are only as effective as their enforcement; laws that exist on paper, but are not adequately enforced – and seen to be enforced – are not effective.

This consultation paper needs to be read alongside the proposals contained in two recent, major road safety consultations, "Learning to Drive" and "Road Safety Compliance". The final road safety strategy should clearly encompass the decisions taken following those consultations, as well as the decisions taken following this consultation.

The proposed "Safer Ways" road safety strategy covers Great Britain as a whole. The Scottish Government is producing "Scotland's Road Safety Framework to 2020" and the Welsh Assembly Government may produce its own strategy. Clearly, all these strategies must support and complement each other. Northern Ireland's current road safety strategy runs until 2012, and again co-ordination with this, and any future Northern Ireland road safety strategy, is crucial.

Responses to the Specific Questions in the Consultation Paper

VISION AND TARGETS

Question
Do you agree that our vision for road safety should be to have the safest roads in the world?

TSP Response
TSP supports setting a 'Vision' for road safety.

A vision can be longer term than the period set for casualty reduction targets and can help to shape the overall philosophy of the road safety strategy. It is more challenging than the targets, and as it is longer term (20 rather than 10 years) it can provide a continuity link at the end of the proposed target period of 2020 into the following period (2020 to 2030) which will require a totally new strategy and targets.

However, it is important to be clear that the vision and the targets are separate; there has been some confusion over Sweden's Vision Zero, which is sometimes mistakenly regarded as a target. Given that zero road deaths can never be achieved in reality, such confusion could impair the credibility of such a vision.

As a vision statement, "Making Britain's roads the safest in the world" does include a competitive element and since some countries are very successful in road safety (for example, Sweden, the Netherlands) it would present a challenge for Britain to achieve it and maintain it thereafter.

However, it could be a 'hostage to fortune', in that the vision could be achieved because other countries do comparatively badly. There is also the question of whether it would matter that Britain's roads are the safest in the world, if thousands of people are still killed, and tens of thousands seriously injured on our roads every year. Simply saying in the face of such figures that Britain's roads are safer than other countries might seem complacent. This MUST be guarded against.

We would suggest that the vision statement is amended to "Making Britain's roads the safest in the world for all road users" to encourage a focus on ensuring our roads are the safest for pedestrians and riders, not just people inside motor vehicles. It would not be acceptable to have the lowest number or rate of in-vehicle death and injury, if similar improvements are not achieved for pedestrians and riders.

Question
Do you agree that we should define a strategy running over twenty years to 2030, but with review points after five and ten years?

TSP Response
TSP agrees that the strategy should cover a twenty year period, with review points after five and ten and fifteen years. The current road safety strategy has had two review points, after three and six years, which were useful in identifying changing trends, and improved knowledge of the causes and contributory factors in the most common types of accidents, and re-directing focus, interventions, research and resources to new priority areas.

We also agree that the casualty reduction targets should be set for ten, rather than twenty, years. If the targets themselves were set for twenty years time, this would be too distant, raising the possibility that focus and resources would be lost in the interim period.
The experience of the current strategy and target period of 2000 to 2010 shows that ten years provides a good focus for targets.

Question
Do you agree that our targets should be to reduce:

- *road deaths by at least 33 per cent by 2020 compared to the baseline of the 2004–08 average number of road deaths*
- *the annual total of serious injuries on our roads by 2020 by at least 33 per cent*
- *the annual total of road deaths and serious injuries to children and young people (aged 0–17) by at least 50 per cent against a baseline of the 2004-08 average by 2020*
- *by at least 50 per cent by 2020 the rate of KSI per km travelled by pedestrians and cyclists, compared with the 2004–08 average?*

TSP Response

Reduce road deaths by at least 33% by 2020 compared to the baseline of the 2004–08 average number of road deaths
TSP agree that a specific target for reducing deaths should be set separately from the target for serious injuries. We have seen over the last few years that deaths have reduced more slowly than serious injury, and a specific target would help to ensure that such trends, if they continue, are highlighted and tackled.

Reduce the annual total of serious injuries by 2020 by at least 33%
TSP agree that a target for reducing serious injuries should also be set. These types of injuries are life changing, often resulting in life-long disabilities, and so are as devastating as fatal injuries for the victim and their family.
(In purely financial terms, they are often more expensive)

The larger numbers, especially when combined with the numbers of deaths, mean that statistical analysis of changes in numbers, trends and patterns are more valid.

We agree that the target should be the same for both deaths and serious injuries. However, TSP thinks that a target reduction of 33% is too low. TRL's report, "Post-2010 Casualty Forecasting" states that , "*even if no new road safety measures are taken, it should be possible to reduce the number of people killed in road accidents in 2020 by about one-third relative to the 2005–07 average, and to reduce the number seriously injured by almost a half. The corresponding reductions for 2030 are almost a half and almost two-thirds.*"

TSP believes that the new targets should not be lower than the current ones. If TRL forecast that a one third reduction could be achieved through the continuation of current road safety measures, but without new measures, the strategy should set more ambitious targets and seek to ensure that new measures are indeed identified and introduced.

We also suggest that indicative targets could be set for 2030, although subject to revision towards the end of the 2020 target period.

Reduce the annual total of road deaths and serious injuries to children and young people (aged 0–17) by at least 50% against a baseline of the 2004-08 average by 2020
TSP supports a separate, specific target for children. Again, the experience of the current road safety strategy and targets shows that it is possible to make better progress on child death and injury, and given their vulnerability, children merit extra consideration and protection.
We understand the reasons for including young people (16 and 17 year olds) in this

target group, as the data shows that they are a high risk group who suffer disproportionally in collisions. However, changing the age band will make comparison with the current target more difficult when analysing changes in casualty trends involving these age groups. Expanding the age range for this target group also means that it encompasses a very wide range of road users, with very different needs and casualty patterns.

Consideration should be given to retaining the definition of children as 0 – 15 years and setting a separate target for 16 and 19 year olds, or perhaps for young drivers.

Reduce by at least 50% by 2020 the rate of KSI per km travelled by pedestrians and cyclists, compared with the 2004–08 average?
TSP believe considerable focus and resources are being devoted to encouraging more people to walk and cycle more often. However, this may result in an increase in pedestrian and cyclist casualties, which could deter people from walking and cycling (a vicious circle). Therefore, it will be important to be able to measure casualty rates per distance travelled and not just overall casualty numbers. The availability of accurate and reliable data on the distances cycled and walked will be essential to measure progress towards this target and for its credibility.

DELIVERY

Questions
We have identified a number of factors that may affect our ability to deliver road safety improvements in the future world we are planning for. Do you think we have taken account of the key risks and opportunities? Are there others you would add?

We think that the key challenge for road safety from 2010 is better and more systematic delivery, rather than major policy changes. Do you agree?

TSP Response
TSP agrees that improved delivery should be a major focus of the new road safety strategy. This will require better collection and use of data, improved evaluation, greater dissemination and sharing of good practice and the development of skills amongst those who deliver road safety (not just road safety professionals and practitioners).

TSP believes that “smarter delivery” can be achieved by the government providing support and resources to the many different statutory and non-statutory partners involved in delivering road safety, as long as the resources chosen are suitable for a ‘safe for life’ whole life education, not just certain ‘appeasement’ key stage inputs which tick boxes rather than increase an individuals knowledge and attitude to remaining safe.

Data
TSP supports the proposal in the consultation paper to create a road safety information management strategy.

The timely availability of comprehensive, accurate and reliable data is clearly fundamental to any road safety strategy. The Department is already well aware of the differences between police road accident data and hospital data, and is working on ways of co-ordinating these data sets. This work is important.

The work currently being undertaken to make it easier for the police to record accident data through the use of computerised data collection systems should also be seen as a priority.

Co-ordinated access to other databases, for example, the ability to compare the DVLA vehicle register with the Motor Insurance Database (the subject of a recent consultation) will also enhance the delivery of road safety improvements. Data protection is crucial, of course, to ensure privacy is not unnecessarily breached and credibility is maintained with the public and the media.

Evaluation
A key component of improved delivery is the ability to identify what should be delivered. In recent years, there has been an increased emphasis on evaluating road safety measures and TSP supports the need for this to be strengthened in the new strategy.

Dissemination and Sharing Good Practice
Identifying, disseminating and sharing good practice has long been recognised in the field of road safety as valuable and important.
Perhaps one area where this does not seem to have worked as well as expected has been making widespread use of lessons learned from major demonstration projects such as Gloucester Safer City. This is an example of a scheme that was given significant funding, achieved good results, and was the subject of considerable attention in the road safety world for a period of time. However, it now seems to have been almost forgotten. If lessons from this scheme are being widely adopted in the rest of the country, this is not being clearly publicised.

Professional Development
Clearly, it is essential that all those who work in road safety, whether as the main function of their role or as a secondary (or even incidental) function of their role, are able to maintain and improve their professional skills, knowledge and abilities. An obvious example, would be enhancing the abilities of road safety practitioners to evaluate road safety measures. In addition to professional road safety officers and highway safety engineers, there are many professions and individuals who play a role in delivering road safety who need support to improve their capacity in this respect. Some examples are:

Driving Instructors
The DSA's consultation, Learning to Drive" recognised that it is vital to enhance the quality and delivery of driver training by providing continued professional development for driving instructors.

Teachers
Teachers are the main deliverers of road safety education in schools, but many do not feel trained, or confident, in providing road safety education. The Child Safety Action Plan, launched by the DCSF in February 2008, considers the possibility of Continuing Professional Development for teachers and other practitioners in safety education. This could be a good opportunity to develop teachers' skills and confidence with respect to road safety education.

Managers
Given the importance of improving at-work road safety (between 25% and 30% of road incidents involve someone who was at work at the time) employers and line managers need to be trained to tackle this issue. After all, they have direct and strong influence over how millions of drivers use the road.

Parents
Parents, often unknowingly, deliver road safety education to their children over many years. Encouraging them to set the right example as pedestrians, riders and drivers, and to provide effective help when their children are learning to drive, would pay dividends.

Road Safety Delivery Board

Question
Do you agree that the Road Safety Delivery Board should be tasked with holding Government and other stakeholders to account on the implementation of a new national road safety plan?

TSP Response
TSP in principle supports the work of the Road Safety Delivery Board, and commends the proposal to produce a national road safety delivery plan and an annual assessment of progress. We would question if a body including civil servants could effectively hold Ministers to account.

Independent Expert Panel

Question
Do you agree that an independent annual report on road safety performance, created on an annual basis, would be a worthwhile innovation?

TSP Response
TSP supports the creation of a new Independent Expert Panel, whose role would be to produce an annual report on road safety, and would offer one of their professionals to join the panel. To ensure credibility, it must be clear that the panel is genuinely independent.

Transport Select Committee, National Audit Office investigations and reports and other annual reports, such as "Road Casualties Great Britain" are already produced, so there may be a risk of too many annual road safety reports, each competing for attention with headline-grabbing announcements, creating an impression of confused priorities.

Proposed key performance indicators (KPIs)

Question
We are proposing a set of indicators in order to help us to monitor performance. Do you believe these cover the right areas?

- *Rate of road deaths per 100 million vehicle kilometre*
- *Rate of killed or seriously injured pedestrians per 100 million kilometres walked*
- *Rate of killed or seriously injured pedal cyclists per 100 million kilometres cycled*
- *Rate of killed or seriously injured motorcyclists per 100 million vehicle kilometres*
- *Rate of killed or seriously injured car users per 100 million vehicle kilometres*
- *Number of killed or seriously injured casualties resulting from collisions*

involving drivers under the age of 25

- *Number of people aged over 70 killed or seriously injured in road collisions per 100,000 population aged over 70*
- *Number of people killed in road collisions on rural roads*
- *Number of pedestrians killed or seriously injured per capita in 10 per cent most deprived Super Output Areas compared with 10 per cent least deprived*
- *Number of people killed where at least one of the drivers or riders involved was over the legal blood alcohol limit*
- *Number of car occupants killed who were not wearing a seatbelt*
- *Proportion of vehicles exceeding speed limits*
- *Cost of road traffic* casualties

TSP Response
TSP supports the performance indicators listed, but offer the following comments.

The proposed indicator for over 70 years old is based on a rate per 100,000 population, rather than the more useful rate per 100 million kilometres travelled, which would give a measure of their exposure to risk on the road. However, we accept that gather reliable exposure data for a particular age group may be difficult.

We applaud the inclusion of a performance indicator for deaths on rural roads, as this is where most deaths occur and where the rate of road deaths has not reduced as much, or as fast, as in urban areas. However, one of the difficulties encountered when considering the differences between rural and urban road safety data is that different definitions of these types of roads are used (in Road Casualties Great Britain, for example). The definition of built-up and non built-up is used sometimes and the definition of urban and rural road is used at other times.

In addition to the indicator for the number of people killed in drink drive crashes, we suggest that an indicator for the number of breath tests be included.

At some point a performance indicator for the number of deaths involving someone impaired by drugs will be needed.

A performance indicator for deaths and injuries in crashes in which at least one person was driving or riding for work should be set.

Key Road Safety Challenges

The Department has identified the following key challenges for the new strategy:

- *reducing the number of road deaths, which have fallen at a slower rate than serious injuries;*
- *pedestrian and cyclist casualties in our towns and cities – particularly in deprived communities;*
- *protecting children, particularly in deprived areas, and young people, who are greatly over-represented in the casualty statistics;*
- *protecting motorcyclists, who represent 20 per cent of road fatalities but just 1 per cent of traffic;*
- *safety on rural roads: 62 per cent of all road fatalities in 2007 occurred on rural roads, which carry only 42 per cent of traffic;*
- *variations in safety from area to area and road to road;*
- *poor road user behaviour amongst a minority, where drink driving and failure to wear a seatbelt remain a problem;*
    - *illegal and inappropriate speed: excessive speed was recorded as a contributory factor in 26 per cent of road fatalities in 2007.*

Question
This consultation document sets out the current evidence on the key road safety challenges. Do you agree with our analysis? Would you highlight any others?

TSP Response
Reducing Road Deaths
TSP agrees that reducing road deaths must be one of the key challenges for the new strategy. The latest road casualty data shows that the number of deaths is falling after several years of remaining stubbornly over 3,000 p.a., despite reductions in serious injuries. However, over the full period of the current road safety strategy the number of deaths has not fallen at the same rate as serious injuries. Therefore, this should be treated as a specific challenge and target in the strategy.

Pedestrian and Cyclist Casualties
TSP agrees that this is also one of the challenges, not just because of the extra vulnerability of these road user groups, but also because overall transport, environment and health policies are seeking to increase the level of walking and cycling very significantly. This will inevitably mean more pedestrians and cyclists, which will probably mean more pedestrian and cyclist casualties. The challenge will be to enable more people to walk and cycle more often, but also more safely.

The Department is currently conducting a thorough review of the causes and circumstances of cycling accidents, and what further measures might be effective in preventing them. This should produce some valuable proposals.

A particular issue that deserves more focus is the interaction between cyclists and large vehicles, especially when large vehicles are turning left at junctions.

Considerable funding has been made available to create Cycling Demonstration Towns and Cities, and to expand the provision and quality of practical cyclist training. These schemes should be evaluated so that their effectiveness can be assessed, and measures or approaches that prove effective can be shared.

Protecting Children
It goes without saying that children deserve greater levels of safety on our roads. However, care needs to be taken that road safety measures do not deter or prevent children from active, enjoyable and social lifestyles.

TSP thinks that it would be better to separate this very wide age group. In particular, young drivers should be regarded as a specific key challenge for the Strategy. Many of the proposed measures to improve the safety of young and novice drivers are contained in an earlier consultation, "Learning to Drive" issued by the Driving Standards Agency. TSP's response to that consultation applies to this part of the strategy consultation. We hope that the new strategy will not just make a passing reference to the DSA work on reforming the learning to drive process, but will clearly and explicitly draw the links between the areas.

Protecting Motorcyclists
It is well recognised that reducing motorcyclist casualties is a key area in road safety, especially as increases in the amount of motorcycling in recent years has led to an increase in motorcyclist deaths and injuries, although there has been a decrease in the casualty rate per 100 million kilometres motorcycled. In some ways, the approach is similar to that needed for pedestrian and cyclists in that the aim is to improve motorcycling safety in ways that do not deter motorcycling.

Our knowledge about the most prevalent types of motorcyclist crashes, their circumstances and contributory factors is now fairly extensive, and the key areas that need to be addressed are:

Training/Education for Motorcyclists
The training available to motorcyclists and the take up of that training by motorcyclists, needs to be improved. TSP would like to see a statutory register of motorcyclist instructors (similar to the one for car driving instructors) to ensure instructors are trained, tested and monitored to minimum, national standards.

We also believe that national standards for post-test training are needed for all motorcyclists, particularly newly qualified riders, riders returning to motorcycling after a long break and riders who are changing to larger, more powerful machines.

Protective Clothing
The consultation paper states that 50 lives a year could be saved by better motorcycle helmets, and notes the government's support for SHARP (Safety Helmet Assessment and Rating Programme) which provides motorcyclists with information about the safety performance of different motorcycle helmets. This scheme should be supported and widely promoted.

Motorcycles
Much can be achieved through the development of motorcycle technology, in the way that is beginning to happen with cars. Of course, technology needs to be developed specifically for motorcycles, not just transferred from cars.

Road Design and Motorcycling
The Institute of Highway Incorporated Engineers (IHIE) Guidelines for Motorcycling was a significant and welcome development in ensuring that the needs of motorcyclists are considered when designing, constructing, changing and maintaining the road environment. They should be widely adopted and implemented. Features that are unnoticed by a car driver can be dangerous for a motorcycle rider. The new strategy should seek to ensure that motorcycling is considered by highway designers.

Training/Education for Drivers
Most motorcycle accidents involve a collision with another vehicle, usually with a car. Although, there is much that motorcyclists can do to avoid such collisions, the behaviour of drivers is equally crucial. There are many crashes in which the motorcyclist is using the road responsibly and safely, but is put at risk because a driver fails to do the same. Drivers need to be aware of the characteristics, needs and vulnerability of motorcyclists.

Motorcycle crashes at junctions in urban areas are usually the fault of drivers who fail to see a rider who is in clear view, and in some cases even wearing high visibility garments or using daytime running lights. Government road safety publicity campaigns rightly target drivers with key messages to raise their awareness that they need to look out for motorcyclists, especially at junctions, and should continue to do so. It is essential that drivers are aware that motorcyclists may be present on any road, at any time.

Further research into the behavioural aspects of drivers in regard to motorcyclists is underway and the lessons learn should help to identify further strategies to improve the attitudes, skills and behaviour of drivers towards motorcyclists.

Safety on Rural Roads
Almost two thirds of road deaths occur on rural roads, with rural single carriageway A roads in particular carrying some 38% of deaths. Crashes on these roads are more likely to be severe, and the numbers of fatal and serious crashes on rural roads has not reduced at the same rate as they have on urban roads. Rural roads must be one of the key challenges for the next road safety strategy. (Our comments on this topic are contained below in the “Roads” section)

Variations in Safety
TSP agrees that it is right and sensible for the strategy to focus on geographic areas, demographic groups, vehicles and behaviours that are shown to be higher risk, or that have not improved as much as other areas.

Poor Road User Behaviour
TSP strongly believes that tackling poor road user behavior, especially amongst deliberate violators and the types of behavior most often linked to casualties (for example, drink driving, uninsured driving) has to be one of the strategies key challenges. Many of the proposed measures related to poor road user behavior were outlined in the DfT’s recent consultation on “Road Safety Compliance”, to which TSP has submitted a separate response.
(TSP’s comments on these issues are discussed below in the section on “Behaviour”)

Illegal and inappropriate speed
One of the prime types of poor road user behaviour that leads to an appalling loss of life is driving at illegal and inappropriate speed. This costs the lives of over 700 people a year.
(TSP’s comments on these issues are discussed below in the section on “Behaviour”)

At Work Road Safety
We feel that the proposed strategy should recognise a further key road safety challenge: reducing at-work road incidents. Between 25% and 30% of road crashes involve someone who was at work at the time. In addition to the Department for Transport’s work on Driving for Better Business and support for other at-work road

safety initiatives, TSP believes that the HSE must be a key partner in the delivery of road safety and make work related road safety a greater priority.

Specifically, they should:

- Make at-work road safety a key part of its Strategy
- Allocate more resources to work-related road safety
- Liaise more effectively with the Police
- Include at-work road injuries in RIDDOR so they are recorded as work injuries as well as road injuries
- Link work-related road safety with its site transport safety campaign
- Raise MORR in visits by its Inspectors to employers
- Lead the MORR research agenda.

ROADS

Question
Do you agree that highway authorities reviewing and, where appropriate, reducing speed limits on single carriageway roads will be an effective way of addressing the casualty problem on rural roads?

TSP Response
Crashes and casualties are not evenly spread across the road network, but are more likely to occur in certain areas and locations than in others. As the consultation paper notes, they are more likely to occur on rural roads and they tend to lead to more severe casualties on those roads.

Rural roads vary widely, from wide, modern dual carriageways to narrow, hilly and bendy single carriageway roads with frequent blind bends, brows of hills and narrow verges bordered by trees and hedges. They travel through unpopulated areas but also through towns and villages. They often carry lower levels of traffic than urban roads and frequently have higher speed limits. Some are through routes and links between towns, others are mainly local access roads. Many carry both through traffic and local traffic. They are less likely to have been treated with safety engineering schemes than urban roads.

Drivers' choice of speed is partly dependent on the characteristics of the road on which they are driving, and their perception of what is a safe speed on a particular road will often differ to that of other road users, such as pedestrians, pedal cyclists and horse riders, and will often under-estimate the actual level of risk. Due to the lower traffic flow on rural roads many people think they are safer than they actually are. But, their twisty and hilly nature reduces the distance that drivers, riders and walkers can see ahead, and higher speeds on these roads gives people less time to react and results in more severe impacts.

It is crucial, therefore, that the road environment provides appropriate visual information to the people using it.

Speed limits on single carriageway rural roads
TSP strongly believes that a blanket reduction of the national speed limit on all single carriageway roads from 60 mph top 50 mph is unnecessary.
Many good quality single carriageway roads are suitable for a speed limit of 60 mph. As the consultation paper notes some rural roads have a risk of death or serious injury comparable to motorways, whilst others are more than ten times as risky.

Therefore, TSP believes that should a Local Authority post a 50mph speed limit on a rural road, that limit can become the 'acceptable' speed for some drivers/riders to drive at. Whereas if it had been left as a National Speed Limit applies, (60mph) the driver/rider would perceive this as too fast and most probably use it at around the 40mph 'mark'.

Question
Are there other ways in which the safety of rural roads can be improved?

TSP Response
TSP believes that improvements can also be achieved by following existing best practice guidelines published by the Institute of Highways and Transportation (IHT). For example, IHT Guidelines note that T-junctions have lower accident rates than cross roads and roundabouts, and recommend that multi-arm junctions be avoided.

Junctions can be hidden by bends and undulations in the road or by overgrown vegetation, resulting in drivers approaching too fast because they are not aware a junction is ahead, and not expecting traffic to emerge onto their road, or to slow down to turn off into the junction. Good sightlines are also essential to help drivers assess when it is safe to emerge into the junction. Therefore, it is essential to make junctions as conspicuous as possible with advance warning signs and road markings, and to ensure that there are good sightlines for all road users.

Road Safety Education
Many road safety education resources and initiatives focus on the urban environment. The DfT should assess whether there is a gap in the provision of appropriate resources and guidance that are specifically tailored to the rural environment. This should include the Department's own Think! Road Safety campaign materials.

Horse Riders
There are around three million horse riders in Great Britain, many of whom ride on the road. Although they prefer not to do so, riders often have no choice because they need to reach bridleways and other off road facilities. Horse riders have a right to use the road, and both riders and motorists are responsible for each other's safety.

Horses are powerful animals that are easily frightened and can panic, especially near fast-moving traffic or at sudden loud noises. Accurate statistics for road incidents involving horses are not available, but the British Horse Society estimates that there are 3,000 such accidents each year, about half of which occur on minor roads.

Question
How can we most effectively promote the implementation of 20 mph zone schemes in residential areas?

TSP Response
The consultation paper correctly notes that "*too many pedestrians are hit in residential streets at speeds that the human body cannot bear*".

Traffic calming schemes and 20 mph zones are well proven to significantly reduce casualties, especially amongst the most vulnerable road users; children, pedestrians and cyclists.

TSP generally supports the use of 20 mph zones as they are an effective means of reducing road casualties. They can, and should, be supported by other measures to help drivers drive at safe speeds, and to enforce the limits for drivers who choose to ignore them.

Traditionally 20 mph zones required physical measures, such as speed humps, to achieve compliance with the 20 mph limit. However, there are recent schemes, such as that in Portsmouth, where only speed limit signs are used. The effectiveness of such schemes should be established, and if they prove successful in reducing speeds and casualties, DfT guidance should be amended to reflect this. Schemes that do not require physical measures would be quicker and less expensive to install, however, we need to be sure of their effectiveness.

Additional Comments
The strategy should not forget the role that technology in the road infrastructure will play in how roads are used in the future. We are at the beginning of a period of technological advances in the road infrastructure, the most obvious example of which is Active Traffic Management Systems, such as that operating on part of the M42 and being rapidly expanded to other parts of the motorway network.

These types of more highly managed roads do, and will, influence the way drivers use such roads, and the experience, so far, suggests that the benefits include more appropriate speeds, compliance with limits, less congestion, lower emissions and fewer crashes and casualties.

As the next two decades progress this type of technology will increase, and the way in which it interacts with vehicle technology will become very important, as will a thorough understanding of how it affects driver behavior.

VEHICLES

Questions

What should Government do to secure greater road safety benefits from vehicles?

Do you agree that, in future, crash avoidance systems will grow in importance and will have the potential to greatly reduce casualties?

How can we best encourage consumers to include safety performance in their purchasing decisions?

TSP Response

Vehicles are changing.

Technology is becoming available that allows a much greater level of vehicle automation. Technology will support the driver in different ways and at different times depending on the vehicle or circumstances, and assist drivers to avoid hazards and collisions, even by taking control of the vehicle in some circumstances. The driver of the future will play a very different role to the driver of today when using a car.

Of course, as the vehicle changes around the driver, there is a need to ensure that drivers understand and can use the new technology safely. This means that as technology develops, and becomes more prevalent in the car fleet, driver education and training will need to keep pace to ensure that not only are basic driving skills kept up to date, but also that the new skills, which drivers will need to monitor and control varying levels of automation, are developed.

There are a vast number of new technologies available on new vehicles or top of the range models that will become more common in future; and ever more technologies being developed. It is important that the most beneficial of these are identified at an early stage and emphasis is put on introducing them as early as possible.

The Government should take a lead role in identifying, through research and evaluation, the most appropriate types of technology, promoting their adoption by manufacturers and ensuring that advice is provided on their use.

Other stakeholders also need to take a proactive approach to the inclusion of vehicle technology in road safety, and indeed health and safety, policies. For example, pro-active fleet managers seeking to reduce the risk to their employees as part of their strategy to manage occupational road risk are well placed to advocate emerging technology.

Up until recently, vehicle safety technology has required no great level of interaction from the driver. For example, passive safety only requires the driver to buckle the seat belt, and adjust the head restraint. Braking and stability systems assist driver's actions and limit the consequences of driver error by magnifying the effectiveness of the driver's manoeuvre, but a driver in a vehicle with ESC should drive in the same way whether or not ESC is fitted.

However, as more active systems are introduced, it will become more important that drivers receive appropriate training in the use of in-vehicle equipment, and how it affects their driving. Some of the new equipment will require fundamentally different skills to the ones currently learnt by drivers, and at some point learner driver training, and post test training, will need to include the use of different types of technology.

Intelligent Speed Adaptation

Perhaps the most well known technology is Intelligent Speed Adaptation (ISA), which can discourage, and ultimately prevent, drivers from exceeding the speed limit on any particular road.

Research suggest that over the 60 year period from 2010 to 2070, it may be possible to reduce fatal crashes by between 10% (approximately 15,400 fatal crashes) and 26% (approximately 43,300 fatal crashes) and serious injury crashes between 6% (96,000 crashes and 21% (330,000 crashes). In other words, it has potential to save lives and prevent injuries on the road.

Transport for London and Lancashire County Council are currently conducting trials of different types of ISA systems.

One of the requirements for the widespread implementation of this technology is a digital map showing the speed limit on every road in the country, which can easily and regularly be updated, including speed limit changes at road works. The Department should ensure that such a map is produced as quickly as possible.

The use of such a map by satellite navigation providers, so that the SatNav informs the driver of the speed limit of each road they are using, should be investigated.

Motor manufacturers could do more to help the driver by, for example, improving the design of speedometers to help drivers maintain their awareness of their speed and to stay within speed limits. On many speedometers, 30 mph is indicated only by an almost imperceptible mark. Research into the effectiveness of speedometers in helping drivers understand what speed they are doing, and in helping drivers stay within speed limits, would be helpful.

Consumer Information

The importance of consumer information should be not be underestimated, and in particular the role of schemes such as EuroNCAP. Further education of vehicle sales staff would help to improve the safety information provided to people when buying new vehicles.

If the current vehicle scrapage scheme proves successful, consideration should be given to using such a scheme to encourage consumers to swap older cars, with a poorer safety performance, for new ones with better safety performance.

BEHAVIOURS

Question

We have highlighted what we believe to be the most dangerous driving behaviours. Do you agree with our assessment?

What more can be done to persuade the motoring public that illegal and inappropriate speeds are not acceptable behaviours?

What more can be done to encourage safe and responsible driving?

Should more be done to reward good driving? If so, what?

TSP Response
Much of this section of the consultation paper relates to the measures and proposals discussed in the DfT's recent consultation on "Road Safety Compliance", to which TSP has submitted a separate response, and our responses here reflect what we said in that response.

TSP believes that both consultation papers have highlighted the most dangerous driving behaviours:

Speeding
In 2007, 727 people died in crashes in which speeding was a contributory factor.

Drink Driving
Driving while impaired by alcohol accounted for at least 460 deaths in 2007.

Non-Seat Belt Wearing
Nearly 400 lives each year could be saved if everyone always wore their seat belt.

Drug Driving
Over 20% of drivers and riders in fatal crashes have at least one impairing prescription or illegal drug in their body, and this proportion is increasing.

Careless Driving
In 2007, 408 deaths had 'careless, reckless or in a hurry' recorded as a contributory factor by the Police. This is likely to be a significant under-estimate.

Almost all road crashes involve human error, ranging from simple, 'honest' mistakes to deliberate dangerous and illegal behaviour. Road traffic law and its enforcement is a fundamental part of Britain's road safety strategy. TSP supports the twin-track approach of encouraging voluntary and willing compliance with road traffic law and increasing the likelihood of being detected, with the consequences of this, for those who choose not to follow the law.

However, as many road users who break road traffic law do so inadvertently, TSP believes that it needs to be much, much easier for road users, especially drivers and riders, to drive and ride in a safe and responsible manner. This can be achieved through education and training, better and more consistent roadside information, improved vehicle design and more high profile, intelligence led roads policing.

All of the proposals depend upon consistent and visible enforcement. Roads policing plays a key role in saving lives and minimising injury on the road, and must be given its rightful priority and be adequately resourced by the government and the Police Service.

Inappropriate Speed
In our response to the Road Safety Compliance consultation, TSP supported measures to lower the threshold at which higher penalties for speeding are incurred, especially on 20 mph and 30 mph roads where the most vulnerable road users are very likely to be present: pedestrians, pedal cyclists, children, and elderly people.

We also support the many other strands of speed management policy that play a vital role in making our roads safer for everyone to use, most notably

- Continued mass publicity through the Think! Campaign, which focuses on 30 mph roads
- Safety cameras
- Speed awareness training
- Intelligent Speed Adaptation, which warns drivers if they are exceeding the limit, or even, prevents them from doing so.

The over-riding principle of speed limit signing should be to ensure that the limit is always as clear and obvious as possible. Drivers should not be expected to work out the speed limit; it should always be clearly and consistently marked. This requires greater use of speed limit repeater signs and speed limit road markings. Local publicity campaigns explaining the reasons why certain roads have lower speed limits than drivers may believe are justified, would also be useful.

TSP recommends that a trial of using 30mph repeater signs should be conducted. If this was effective, the prohibition on using repeater sign on 30 mph roads with street lamps should be rescinded to enable Highway Authorities to put repeater signs or roundels on roads which have a speeding, or speed-related crash, problem. Repeater signs are not the only way of informing drivers of the prevailing speed limit. Other methods should also be developed.

Speed awareness courses provide a good opportunity to educate drivers who have committed speeding offences. Many drivers seem to believe that their car will not do less than 35 mph. Education, training and publicity should seek to help drivers understand that they can control their vehicle sufficiently to drive within the 30 mph speed limit.
RoSPA's "Top Ten Tips for Staying Within the Limit", which can be downloaded from www.rospa.com/roadsafety/toptentips/index.htm, is an example of the advice that can be given.

Drink Driving
TSP believes that the next road safety strategy should include:

- a lower drink drive limit
- wider powers for the police to breath test drivers, including random tests and targeted checkpoints
- tighten the measures to ensure that High Risk Offenders cannot drive after their disqualification until they have been passed fit by a medical examiner
- further research into the use of alcohol breath interlocks
- courts' having the power to impose a driving ban as part of bail conditions where a defendant might commit a further drink-drive offence whilst on bail.
- the immediate suspension of the driving licence of drivers who have failed an evidential breath test
- drink drive rehabilitation courses

Drug Driving
TSP supports the introduction of a new offence of driving with an illegal drug in the body as this would make it easier and more practical for the police, prosecutors and the courts to catch and convict drug drivers, which in turn would act as a greater deterrent. One of the reasons for the success of drink driving enforcement is that the only evidence required is for a driver to fail a breath test.

Another key tool is the development of a roadside drug test. However, there have been attempts to develop such devices for at least 20 years, and it has still not been possible yet to produce a device that can be type-approved and be used as evidence in court.

Non Seat belt Use
TSP believes that failure to wear a seat belt should be an endorseable offence.

Additional Comments

Driver and Rider Training
TSP believes that the new strategy should include a strong focus on remedial training and retesting. It is absolutely right that sanctions should seek to change offender's behaviour and help them to improve their driving or riding so they are less likely to re-offend. Many drivers who are sent on Driver Improvement, Speed Awareness or Drink Drive Rehabilitation courses say that they wish such help had been available before they offended.

Very few drivers take any further driver training after gaining a full driving licence. Once the driving test has been passed, the driver is licensed, virtually for life, with no requirement and very little incentive, to develop his/her driving skills any further.
Awareness of refresher driver training needs to be raised considerably.

Driving for Work
Millions of drivers use the road because their jobs require them to do so, and research has shown that these drivers face a higher accident risk.

TSP strongly welcomes the inclusion of driving for work in the consultation paper. However, we do not feel it has been given sufficient emphasis – only four paragraphs that mainly refer to the Driving for Better Business Programme. While this Programme should certainly form part of the strategy, much more should also be included.
This issue is particularly relevant to new and young drivers at work, because they face the multiple risks of being novice drivers and being at-work drivers.
The Management of Occupational Road Risk, and in particular the needs of young staff who drive for work, should be an important part of the strategy.

As stated earlier in this response, TSP believes that the HSE must be a key partner in the delivery of road safety and make work related road safety a greater priority.
Specifically, they should:

- Make at-work road safety a key part of its Strategy
- Allocate more resources to work-related road safety
- Liaise more effectively with the Police
- Include at-work road injuries in RIDDOR so they are recorded as work injuries as well as road injuries
- Link work-related road safety with its site transport safety campaign
- Raise MORR in visits by its Inspectors to employers
- Lead the MORR research agenda.

Lighter Evenings
TSP believes that changing Britain's timekeeping to Single/Double British Summertime (SDST) so that during Winter, time would be GMT+ 1 hour and during summer, time would be GMT+ 2 hours would create lighter evenings all year round and result in fewer people being killed and injured in road accidents. It would also

bring significant environmental, economic and health benefits, the latter being particularly relevant to the concerns about obesity and public health.

We are pleased to see that Single Double British Summertime is included in the consultation paper, with an acknowledgement that it would save around 80 lives a year, and prevent over 200 serious injuries. However, we are disappointed that the Department does not intend to pursue it as part of its road safety strategy because the issue goes beyond the scope of the strategy.

Right at the start of the consultation paper (paragraphs 1.6 and 1.7); the Department states that the road safety strategy must contribute to the key goals of overall transport policy, which include health, safety, economic growth, quality of life and tackling climate change. A move to lighter evenings would help to achieve all of those things in one go, at the same time as contributing to the achievement of the new casualty reduction targets and the long term vision of making Britain's roads the safest in the world.

The recent report by the National Audit Office, "Improving Road Safety for Pedestrians and Cyclists in Great Britain", noted that "*child pedestrians are most at risk from 3pm to 7pm, especially during the weeks after the end of British Summer Time. It also states that there are clear seasonal patterns to pedestrian casualties and "The end of British Summer Time appears to be a significant factor*".

Lighter evenings should be introduced on a trial basis for 2 – 3 years, and a decision about continuing permanently could then be based on the consequent effects on road casualties, and the other policy areas of health, environment and economy.

TSP thanks the Department for Transport for the opportunity to comment on the proposals. We have no objection to our response being reproduced or attributed.

The Stilwell Partnership
Road Safety Division

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