

Road Safety Framework 2030 Consultation

consult.gov.scot/transport-scotland/road-safety-framework-to-2030

Response from Spokes, the Lothian Cycle Campaign

"Our vision is for Scotland to have the best road safety performance in the world by 2030".
Q1 Is the vision set out for the next ten years the right one? yes/no

A reluctant 'no'. The Scottish public have been offered numerous "visions" and "targets" in the recent past, have become so accustomed to seeing these either gradually diluted, or failing altogether, and have rightly become sceptical. I return to the failed cycling target in (5) below.

Any vision or target has to be realistic from the outset (or risk ridicule when it fails), and backed not only by the right institutions and framework, but also by realistic mileposts and, above all, financial support.

In this case the institution responsible is Transport Scotland (TS), whose record is strong on building and maintaining trunk roads and motorways, but weak in most other aspects of road travel and transport.

Their road building program continues apace, with the A9 and A96 as major sources of expenditure, but also smaller local programs like Sheriffhall, and a new M9 junction at Winchburgh - all of these designed to put more traffic onto the roads, making these more hazardous for vulnerable road users, and diverting much-needed funding away from the human-scale transport modes.

Second, trunk roads are relatively safe, whereas most road casualties occur in towns and cities, which are the responsibility of Local Authorities (LAs). LAs are notoriously poorly-funded, and Road Safety is just one of their many priorities. How therefore are they to be expected to fund the measures needed to reduce casualty levels (to be described below)?

Third, many casualties are caused, one way or another, by inappropriate vehicle speeds. But current speed enforcement is not in the control of LAs, it's a Police matter. And the Police have shown themselves remarkably uninterested in enforcement. What can TS do about enforcement - which this document admits is currently inadequate?

Fourth, measures which some LAs have introduced to reduce speed, such as 20mph zones, have had little effect, largely because of near-zero enforcement. And although statistics show a marginal drop in average speeds in 20 zones, the effect is too small to be noticed, so active travel is still heavily discouraged by excessive vehicle numbers and excessive speeds.

Fifth, measures to control speeds are not being supported by Government, despite their being introduced by some LAs. Why is that? Does the Government operate by a mantra about not doing anything which might offend the motorist?

Putting all these factors together, the likelihood of a 2030 "vision" being realised is minimal without major changes of attitudes and priorities within the Government, and a fairer redistribution of transport spending away from trunk roads and towards local roads. How likely is that? On past record, not very, but we are just pointing out how difficult it is going to be to achieve any 'vision' of this kind.

(Q2) Are the outcomes of 'Safe Road Use', 'Safe Speeds', 'Safe Vehicles', 'Safe Roads' to deliver the vision the right ones? yes/no

No - but again, qualified

Safe Road Use:

We support much of this, e.g.: "Measures to encourage safe road use also include working together to reduce car-based traffic, inspiring people to use active modes, such as walking and cycling, or to use public transport rather than their own vehicles. "

This should be the focus of Government intervention, and would have many other benefits, such as carbon reduction and pollution reduction. But this would be remote from TS's current priorities.

Safe Roads:

"One way in which this can be achieved is to segregate different kinds of road users and to segregate traffic moving in different directions or at different speeds. If this is not possible, a speed limit to protect the most vulnerable road users can be implemented."

We support this. For trunk roads for example, cycle facilities for every trunk road should be built. This could have amazing benefits for tourism, for example in the Highlands.

But at the level of towns and cities where most of us spend most of our lives, how is Transport Scotland (TS) going to fund the changes needed? Does it even have a remit to do so? And the costs would be greater than the funding envisaged (elsewhere in the document). It would be a major but very worthwhile project.

Safe Speeds:

In towns and cities, how does TS propose to introduce and enforce safe speeds, if they have no remit? So far the Government hasn't even supported the introduction of 20mph by LAs which have chosen to do so.

Safe Vehicles:

"Increasingly, roads and vehicles will be managed within an intelligent transport system, relying on ever-more autonomous vehicles and smart infrastructure. "

This seems highly desirable, but somewhat 'pie-in-the-sky' at the moment. In the meantime, working to achieve modal shift towards active travel and public transport might be more reliable, and would achieve other desirable outcomes.

The Covid lockdown showed clearly how a switch to active travel is possible when vehicle numbers are reduced to sensible levels.

(Q3) Do you agree that the Safe System Approach (SSA) is fundamental to success? yes/no

No - but qualified

The answers are given in (2) above. The SSA would be a great solution, offering many 'layers' of protection to vulnerable road users; but many changes in Government policies, attitudes and beliefs are needed before road safety can progress beyond the 'plateau' it has currently reached.

Progress to 2020 (pp 13ff)

Fig.3 (p.14) shows a welcome reduction in 'killed', but Fig.4, Seriously Injured (SI) is more reliable statistically, being based on larger numbers. Casualties show a decline until 2012, but a worrying increase from 2013 onwards; Fig 6 also shows a worrying increase in SI among children, from 2018 on.

These figures show that what we are currently doing is just not enough.

Q4 Are the 12 key challenges for road safety ... the correct ones? yes/no
(no)

It is good that the consultation recognises that there are connections between the climate crisis and road safety policies. However, the **most important connection** has been completely omitted - namely the fact that the climate crisis, and Scotland's legal 2030 emission reduction targets, mean that the Government's whole approach to transport must change, - and rapidly. Policies, whether explicit or implicit, to encourage motorised travel through heavy investment must be reversed, with investment transferred to sustainable and active transport.

Similarly policies and investment must seek to reverse the trend to more and longer journeys, through substantial measures to encourage lives to be lived more locally, whether for work, shopping or leisure. This is the context within which the Framework needs to consider road safety.

The material in these 'challenges' is very useful and informative, and certainly shows what the authorities are up against. Some of this is very worrying, e.g. the big increase in vans on our roads, and the 'gig' economy, where everything is done 'at the double'. These recent increases may partly explain the upswings in the graphs in Figs 4 and 6 (see above), and may be a sign that casualties are now on the increase again.

On 'Active and Sustainable Travel' (AT), p.22, we appreciate the doubling of the AT budget, but the £100m p/a proposed for the next 5 years has to be seen in the context of the £6bn budget for just the A9 and A96 schemes alone. But the budget is not the only problem; there have been issues in the past year over finding ways to spend the money (this is an institutional problem).

We believe the best approach is to first identify what needs to be achieved. The roads and streets where speed discrepancies (between motorised vehicles and, e.g., cyclists) are greatest, require segregation. Since road widening is rarely feasible, this must be done by various measures such as removing parking, re-allocation of carriageway space, and pedestrianisation. And the segregation must be done in such a way that vehicles cannot encroach, unlike current cycle lanes.

The costs, nation-wide, will greatly exceed the funds currently allocated, but if we are serious about the new "transport hierarchy", then a re-allocation of the funds is logical. The focus must be on better infrastructure; in the past, funding has only been allocated for 'soft' measures like behaviour change and education. And implementation of the "Safe System Approach" (e.g. p.25 para 1) which acknowledges that "a failure of the road system is what results in death or serious injury" will surely bring about these infrastructure changes. We welcome similarly the recognition (p.25, para 3) that "the costs of preventing casualties are usually substantially less than the actual costs of treating [them]".

The graph of "average speeds by road and vehicle type", p.26, makes very sobering reading. Looking at the tables for 'national single' and '30mph roads', which is where most cycling is done, the average speeds for the 'car/small van' and 'rigid HGV/large van' categories (which together form 93.2% of the traffic) are extremely close to the speed limit, and in some cases above it. If these are average speeds, it means that substantial numbers of vehicles are exceeding the limits.

Likewise, there is disquieting evidence of non-compliance in 20mph zones, due to "lack of enforcement" and "lack of concern about the consequences".

The conclusion drawn (by the authors) is a possible 'National Speed Management Review', but we vulnerable road users want to see much stronger outcomes than that; these figures just strengthen the case for widespread segregation, along with re-allocation of carriageway and reduction of roadside parking.

In the second para of p.23 , the wording "Scotland may FACE the so-called 'safety in numbers' effect" should be changed to "may benefit from". Safety in numbers is regarded (by cyclists) as a means of increasing safety.

In the following para, the wording on cycle helmet-wearing is very unfortunate (and not entirely clear in meaning). Cycle campaign groups have been "slaying the helmet dragon" for years, but the message has clearly not got through to some. In short, the benefits of helmets (for casualty reduction) have not been confirmed by research, and there is considerable counter-evidence that helmet-wearing can increase the dangers for cyclists, since it makes them look less vulnerable than they really are.

The para also makes the mistake of conflating cycles with motor cycles (we agree that the latter should wear helmets). The simplest change to the document is to remove the reference to cycles altogether. CyclingUK has an excellent briefing paper on this topic.

Q5 Will the strategic actions deliver the outcomes and address the challenges? yes/no (no)

I have already mentioned the failed cycling target set by Scottish Government. In 2006 it set a target of 10% as the modal share of cycling by 2020, from the then-current basis of a 1% share. However, the cycling budget of around £30m per annum was not increased, and virtually none of the spending was devoted to better infrastructure, despite the campaign groups' repeated view that an infrastructure component was essential.

'Cycling Scotland' was set up, but was concerned only with 'soft' measures - education and encouragement. Unsurprisingly in view of the lack of better infrastructure, modal share remained stubbornly at 1% for over a decade, and by 2016 the "target" had been downgraded to an 'aspiration', as the Government (and everyone else) realised the target could not be achieved.

By 2019 the modal share remained at just over 1%, and the 'aspiration' was quietly abandoned. The obvious conclusion is that the proposed 'strategic actions' now need a strong commitment, more detail, and proper funding.

One good thing did come out of Cycling Scotland, which was the annual Pedal for Scotland. The Glasgow-Edinburgh ride attracted thousands of riders, because roads were closed for the event (and it was partly off-road). The event was so popular that "spin-off" events were organised in other parts of the country to meet the increasing demand.

The lesson is, that Scottish people are willing and happy to cycle when conditions are right, and that many people are capable of riding 50+ miles in a day. Similarly, cycle events with road closure, such as Etape Caledonia, attract hundreds of participants and the demand cannot be satisfied.

This year Scotland witnessed the resurgence of general cycling, under lockdown. With the roads free of traffic, cyclists came out in their thousands.

When is the Government going to accept that cycling could take up a significant modal share, if conditions are right?

However, the Government has to deliver safe infrastructure first. We have indicated that this can be done by a variety of means - traffic reduction, reallocation of road space, better road surface conditions. And it has to be introduced where cyclists want to be - in towns and cities, not on trunk roads. SSA, above, happily seems to have the same objectives.

The question then is, can the "strategic actions" deliver this? The requirement is a change of culture, no less, in Transport Scotland, who are tasked with our infrastructure delivery. Can they be weaned off trunk roads and motorways, and onto people-focussed travel and transport modes?

Q5.2 Are some of these actions more important than others?(yes/no)

Yes

The most important actions are:

1 RE-ALLOCATION of road space where required, to give cyclists a space where they can feel safe. Think of pedestrians - they feel safe, because (almost) every road in a town or city has a pavement ('footway'). Cyclists need their 'footway' too - not everywhere, but certainly on roads where speed differences between them and vehicles are significant - i.e., wherever cyclists feel threatened;

2 traffic REDUCTION in towns and cities. Currently, the sheer volume of motor vehicles is a threat and a deterrent. More than one third of car/van journeys are currently less than 2 miles; these can be replaced by cycles/electric bikes. On-street parking means that most suburban streets have nearly half their width removed, through vehicles parked along both sides. Cyclists are then forced to ride in the middle of the road, dodging to the side as an oncoming vehicle approaches. One very effective means to reduce traffic is by identifying, and then removing, "rat runs";

3 MAINTENANCE: bring the quality of road surfaces in our towns and cities up to the standards enjoyed on our trunk roads and motorways. Potholed roads are not just uncomfortable, they are unsafe! Cyclists again find themselves very frequently riding in the middle of the road, because the edges are so full of potholes that riding there is impossible.;

4 FUNDING: change of priorities in favour of local roads, and people rather than vehicles.

Q6 What are your views on the proposed 2030 Interim Targets?

Safer roads, and healthier modes of travel, can only be achieved through suitable infrastructure in our towns and cities, on local roads (as opposed to trunk roads and motorways). If TS is prepared to shift the focus of its transport funding, there should be no problem in meeting any "interim" targets, since we have shown that Scottish people are willing and able to shift travel modes (towards more people-friendly and environment-friendly modes), so long as the conditions are right.

Q7 Are the Intermediate Outcome Targets and Key Performance Indicators (KPIs) appropriate? yes/no

No.

The problem in general is that "targets" and "KPIs" become a distraction to the main goals; manpower is devoted to measuring and monitoring, but only ACTION in the form of creating safer roads and streets can produce the outcomes we need and deserve.

What happens when a target' or KPI isn't reached? There are no sanctions. The public has come to mistrust such forms of measurement, and regard them as a waste of time and effort. Too many targets are not reached, too much manpower wasted in measuring them. However, some measurement is obviously necessary.

Specifically, 'percentage reduction in cyclists killed or seriously injured' is a totally misleading measure because it is not based on frequency of cycle trips, ie per miles (or hours) cycled. As noted above in the comment on 'safety in numbers', as frequency increases, cycling becomes relatively safer. Any measurement must therefore be based on cycling rates, not on an 'absolute' figure.

The KPI of 'percentage of riders ... wearing a helmet' makes the mistake of conflating cyclists (who are not legally obliged to wear a helmet) with motor-cyclists (who are), and is therefore meaningless. As noted earlier, the evidence that helmets increase safety for cycling does not exist (and was originally based on a very flawed piece of research); in countries where helmets have been made mandatory, the outcome has generally been a reduction in cycling numbers. Delete this KPI.

Q8 Is the proposed Governance Structure appropriate? yes/no

No.

The real governance issue, in our view, is the allocation of transport funding, which at present is heavily skewed towards trunk roads/motorways, and away from transport in our towns and cities, which needs to be much more focussed on walking and cycling, cleaner air, well-surfaced local roads, limitations on parking, etc, as described earlier. Means must be found for devolving transport monies 'downwards' - or alternatively, by TS 'adopting' all classified roads - to give local travel its fair share.

Q9 and Q10 What aspects of road safety work well/do not work well?

Based on the writer's current daily cycle commute of 2.5km, many VERY GOOD, GOOD, BAD, and VERY BAD aspects of current road safety can be observed; pointers to what needs to change:

VERY GOOD:

Roads/streets closed to through traffic by a barrier partway along; cyclists are permitted through, and a 'shared-use' sign legitimises use of short piece of footway

GOOD:

Quiet streets, ideally tree-lined;

Streets with limited parking;

Streets with speed-controlled features, like humps;

Streets with good surfaces, free of potholes;

Streets with cycle protection (eg a cycle lane) on the uphill side

Main roads with cycle protection (eg 'green lanes', bus lanes)

BAD:

Streets parked-up on both sides, meaning a) cyclists forced to ride in middle of street, outside their comfort zone, and b) visibility of side junctions is restricted;

Congested streets - poor/bad air quality; remember "the back end kills more than the front end";

Streets with bad surfaces, especially at the edges; cyclists forced to ride in middle of street;

Streets used as rat-runs

VERY BAD:

Combinations of the BAD, eg streets parked-up both sides AND bad surfaces

Q9.2/10.2 What practical actions could be taken to overcome these aspects?

Already described in 5,6 etc above - instal cycleways, to put cyclists on the same footing as pedestrians; reallocation of road space; reduce traffic; reduce on-road parking; bring road surfaces up to the same standards as trunk roads/motorways now enjoy; focus on people rather than on vehicles.

Q10.1

Trunk roads and motorways are relatively very safe; casualties occur mainly on local roads in towns and cities. Casualty reduction, if it's to take the quantum leap we now need, has to focus on making significant changes on those roads - as described earlier.

Big increases in 'white van man' numbers, and the gig economy, do not bode well for road safety; if we do not act now, we can expect increases in casualties.

Q10.2

As described above. Government policies have hitherto been directed towards the increasing of traffic, towards making conditions as favourable as possible for vehicles and vehicle use. It's time to change our priorities.