

## Response ID ANON-G69J-DD5A-X

Submitted to **Scotland's Road Safety Framework to 2030 Draft Public Consultation**

Submitted on **2020-11-30 21:51:58**

### Questions

#### 1 Is the vision set out for the next 10 years the right one?

No

**Please explain your answer:**

We support the long term aim of 'vision zero' with the elimination of KSI casualties.  
But within the planning horizon of the next 10 years no realistic aims or vision has been set out.

#### 2 Are the outcomes of Safe Road Use, Safe Speeds, Safe Vehicles, Safe Roads & Roadside and Post-Crash Response to deliver the vision the right ones?

No

**Please explain your answer:**

The anticipated outcomes under these 5 headings are not set out.

There are also major overlaps between some of the headings; notably between 'Safe Speeds and Safe Road Use.

The right headings and actions to concentrate on are those that will eliminate the higher speed collisions that result in serious casualties. Speed reduction is the critical variable, and especially so when pedestrians are involved in the collisions. . These actions are well covered under the traditional headings of Education, Engineering and Enforcement. 'Post-Crash Response' is already good in Scotland and is in any case dealing with the consequences of our failure to eliminate the casualties; i.e. the failure to make progress towards the vision as set!

#### 3 Do you agree that the Safe System Approach is fundamental to the success of the Framework?

Yes

**Please explain your answer:**

Yes a systematic approach is essential, but with the focus clearly on safe speeds, as stated above.  
New vehicle technology can make vitally important contributions, but progress in implementing much of this depends on international agreements, and political acceptability. It seems unlikely to make a major impact over the next 10 years. [Speed governors for instance have been with us for many years, but motor vehicles capable of speeds double the legal limit on motorways are still allowed to operate on public roads.]

#### 4 Are the 12 key challenges for road safety, from Climate Emergency, Health to Emerging technologies and Post-crash response, the correct ones?

No

**Please explain your answer:**

See answers to Qs 2 and 3 above, re. Emerging Technologies, and Post-Crash Response.

Other stated challenges are of little relevance.

Impacts on the Health system, as with Post-crash Response, are a consequence of failure to meet the key road safety challenges that face us, rather than a contributor to them!

In terms of Climate Change, it is very uncertain whether the impacts in Scotland will have net positive or negative effects on road safety over the next 10 years.

The key challenge is to eliminate excess speeds if progress is to be made towards vision zero and casualty reduction targets are to be met.

#### 5 Do you think the strategic actions will deliver the outcomes and address the identified challenges?

No

**Please explain your answer:**

Strategic actions likely to be effective are hard to find.

The proposed Road Safety Improvement Fund is certainly one, and is very welcome. We assume it will be used to promote more activity by hard pressed local authorities and provide them with more, targeted resources. But it will only be as effective as the amount of the resources put in.

#### 6 Are some of these actions more important than others?

Yes

**Please explain your answer:**

See answers to Qs 2,3,4, and 5 above.

**7 What are your views on the proposed 2030 Interim Targets?**

Not Answered

**Please explain your answer:**

The Interim Targets are challenging and will only be met by effective actions to achieve safer speeds. This is especially true for the casualty reduction targets for vulnerable road users such as pedestrians.

Proposed actions with direct links to the targets are simply not there.

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

No

**Please explain your answer:**

A number of IO targets are set for various modes of travel, but they are not linked to any set of actions aimed at achieving them.

For pedestrians safer speeds are critical, but no effective means are proposed to achieve reduced speeds. We need specific actions to better enforce speed limits, and renewed investment to support the redesign of older roads; lowering design speeds by means including traffic calming, and the elimination of old wide-splay junctions.

Motor-cycling is a highly dangerous form of travel, and the IO target for motor-cycling can only be achieved if there is a concerted effort to reduce travel by this means, and especially by young men!

Similarly for cycling it needs to be acknowledged that achieving any substantial increase in cycling will inevitably result in increased cycling casualties, notwithstanding any falls in the casualty rate per kilometer.

**9 Do you think that the proposed Governance Structure is appropriate?**

No

**Please explain your answer:**

Road safety problems are concentrated on local authority roads, but local authorities are currently starved of both the resources and the powers they need to support road maintenance and road safety activities.

We lack effective local enforcement systems. For there to be effective enforcement in regard to speeding and other safety offences powers need to be devolved to allow local transport authorities to levy fines for moving vehicle offences; in support of and in conjunction with the police. At present no effective system exists, with police priorities being understandably elsewhere, and with no adequate stream of funding generated from fines to support enforcement operations, or prosecutions.

**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?**

Yes

**Please explain your answer:**

Self evidently so. Sharing information and learning from best practice should be routine practice across local authorities and partnerships.

This can only happen effectively though if local authorities and the police have sufficient staff and other resources for the learning to take place. Devolved powers and funding, on the lines indicated in the answer to Q9, are seen as essential to this process.

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

**Please explain your answer:**

Safety engineering efforts have been very successful in terms of new developments and larger redevelopments with lower design speeds. And traffic calming has been very effective in reducing speeds on existing residential roads. Within the new 20mph speed limit areas there is still great potential for the speed limits to be made self-enforcing through the use of traffic calming measures targeted on places where speeding is causing problems. Much more also remains to be done in terms of the redesign of junctions etc.

Cameras have also been very effective deterrents to speeding on main roads, where they have been suitably employed (as exemplified in the consultation draft). Their use has been too restricted and underfunded, however, and there is great potential for them to be used more effectively. [Red light jumping at traffic lights for instance is seemingly not prosecuted unless it results in a collision!]

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

**Please explain your answer:**

Devolution of powers over enforcement to local authorities and partnerships, as indicated above.

Stronger support in terms of support for traffic calming and other road safety engineering schemes from central government through both advice and funding.

### 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:**

1) Speed management and speed limits enforcement! See answers above.

2) Contradictions between policies between safety and less important environmental considerations. See answer to Q4 above. Concern over trivial increases in air pollution associated with driving on traffic calmed streets is another case in point, when vehicles are being electrified and the pollutants are being progressively eliminated at source.

3) Contradictions between safety and support for the least safe forms of travel; motor-cycling in particular, but cycling to a lesser extent (see answer to Q8)

4) With regard to Covid-19 the reduced levels of traffic associated with the epidemic appear to have already enabled and occasioned increases in speeding. If this is allowed to continue unchecked there will inevitably be increases in pedestrian casualties.

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

**Please explain your answer:**

See answers above: Qs 8,9,10, and 12.

Much change is currently going on, some of it temporary, in the face of the Covid epidemic. Lasting benefit can be gleaned from analysis and policy review of this experience. Road safety needs to be restored to the heart of a wider review of national and local transport policies if this potential benefit is to be realised.

## About you

### What is your name?

**Name:**

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### Are you responding as an individual or an organisation?

Organisation

### What is your organisation?

**Organisation:**

Living Streets Edinburgh Group

### The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

**We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?**

Yes

**I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.**

I consent

## Evaluation

**Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)**

### Matrix 1 - How satisfied were you with this consultation?:

Very dissatisfied

### Please enter comments here.:

The generality of discussion and lack of specific proposals was frustrating and led inevitably to much duplications between responses to the questions asked. Specific proposals need to be made in order to make more progress and gain more useful feedback through consultations.

**Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:**

Very satisfied

**Please enter comments here.:**

The format for responses gives good space for open ended comments.