

# Response ID ANON-G69J-DDZV-R

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

Submitted on **2020-11-26 10:19:02**

## Questions

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

Yes

**Please explain your answer:**

We agree it's the right vision, but would welcome less focus on road safety performance and more on Scotland being a safe place / one of the safest places / the safest place to be a pedestrian, cyclist, motor vehicle user. 'Road safety performance' may not be a phrase that resonates with citizens and this could affect the vision of shared responsibility / ownership of the framework.

We welcome the inclusion of the Safe System Vision Zero in the framework.

### 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?

Yes

**Please explain your answer:**

International evidence indicates the Safe System approach is the current best practice safety culture.

It would be valuable to understand if there are a set of key conditions that need to be in place for it to be successful and if there are any cultural differences or other issues (e.g. infrastructure or neighbourhood 'construction') that might impact its implementation and success in Scotland.

The Safe System Approach values these all equally; it would be interesting to know if these factors all have an equal influence on injuries and fatalities and therefore if effort / resource / funding etc needs to be differentially directed to each of these areas.

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

Yes

**Please explain your answer:**

The success seen in other countries using the Safe System Approach would indicate that this approach is key to making Scotland's roads safer for everyone.

The approach needs to be supported by key actions however, which aren't all referenced in the RSF to 2030 or are not within Scotland's gift to lever, and the absence of these key activities could jeopardise the success of the Safe System Approach in Scotland. Some of these are outlined in <https://www.pacts.org.uk/safe-system/>.

The shift to preventing injuries and fatalities is understandable, but we have a small concern that not focusing on preventing collisions may skirt over the negative impact of being involved in a collision but not being injured.

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

Yes

**Please explain your answer:**

We agree that these are key challenges for road safety.

There seems to be some repetition between the Safe System pillars, the Safe System approach and within the 12 challenges. We would encourage the team to reflect whether the repetition of these and inclusion of 12 challenges detracts from some of the key over-arching and longer-term challenges for example Climate emergency, Active travel, Emerging technologies, Safe system implementation, Funding and capacity, Changing patterns of driving for work and Driver behaviour.

Within the public health challenge the framework could explicitly mention the incorporation of the UNCRC - specifically Article 19 – the right to be protected from being hurt and Article 24 – the right to the best health possible and the right healthcare and information to remain safe and well (specifically Article 24 Section 2, e re prevention of injuries “States Parties shall pursue full implementation of this right and, in particular, shall take appropriate measures...to ensure that all segments of society, in particular parents and children, are informed, have access to education and are supported in the use of...and the prevention of accidents”).

The Covid19 pandemic may be an additional one to consider given the change in vehicle use during this time and into the future and some of the 'spaces for people' work, spaces to play for children, the 20 minutes neighbourhood etc. What is the role of road safety partners nationally and locally to encourage and support a safer modal shift?

We look forward to seeing the proposed strategic response(s) to the 12 challenges in more detail.

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

Yes

### Please explain your answer:

Yes, but we look forward to seeing more detail on what these strategic actions will be over the course of the framework.

There are some key strategies / drivers noted as effective in the safe system that are absent or less prominent as they could be in the strategic actions. These have an important role to play in the outcomes of safe roads for everyone and the challenges. For example:

The road user hierarchy - encouraging safer modes - and the emphasis on safer routes could be more explicit within the actions.

The role of the road engineering in creating safe roads for all.

The important role that things like GDL, 20mph standard could play.

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

Yes

### Please explain your answer:

We believe that because there are some key strategic drivers in the safe system that have a disproportionately high impact on casualty rates, taking early action and focusing efforts on these will be important. Mechanisms such as the Operational Partnership Group will be valuable for having some of these conversations and for planning the activity over the 10 years of the framework.

Equally there are some bigger gaps in some areas than others e.g. where work in previous frameworks hasn't previously focused, but are important to meeting the outcomes. For example, the RSF proposes a shared model of ownership and responsibility but there is some way to go with citizens and communities to share some of this responsibility. There is a gap in previous work, particularly locally, in and in 'what works' in relation to education. This is not an exhaustive list.

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

Yes

### Please explain your answer:

This is a difficult question to answer yes / no to.

We think the 2030 interim targets are appropriate. An interim target by mode to emphasise the importance of vulnerable road users by mode would be worthy of consideration.

We would urge caution on a narrow focus on targets - it is important that these aspirational targets do not narrowly focus the work of the road safety sector on solely achieving these targets.

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

Yes

### Please explain your answer:

We broadly agree that the IOT and KPIs are appropriate to monitor the progress. We would offer the following reflections and suggestions:

- We would strongly encourage inclusion of a measure on perceptions of safety. Casualty rates are only part of the picture of how safe Scotland's roads are. How safe people feel as road users is crucial, and evidence shows it has an important role to play in encouraging a modal shift too. Helpfully there is a measure in the Active travel framework that could be used. This would bring the RSF in line with other areas of community safety where occurrence and perceptions are both measured and used to inform policy decisions and track progress.

- Not all the pillars of the Safe System are reflected in the IOT/KPI e.g. safety of the road infrastructure (not just the distance driven over "safe routes") - there is a measure in the Active travel framework that could be used, there is no measure on education. A measure on awareness / responsibility / perceptions or attitudes of other road users could be worth exploring.

- We would support an alternative presentation of the IOTs to be injury rate per X distance travelled. For cyclists this measure already exists in the Active travel framework so would be useful to mirror in the RSF as alignment with active travel work was identified as one of the 12 key challenges.

- We would not support the inclusion of the protective helmet wearing - in motorcyclists this is almost 100% so the measure would add little value. The evidence is mixed in cycling and focus on this measure, we believe, is an unhelpful focus and distracts from other more important levers and actions. (There is also no legal requirement for helmet wearing in cyclists unlike all the other IOTs/KPIs in the proposed framework).

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

Yes

**Please explain your answer:**

We believe the current SPB and OPG structure works well.

We have outlined some of our thoughts on the proposed LPFs:

The idea of supporting practitioner forums / communities of practice in road safety is a good one and creating a mechanism for doing this is welcome. The local partnership forum model is one option but there are possibly some others that are less 'top down' and 'one size fits all'.

We would query whether the LPFs need to be another rung of governance that sits within the existing governance structures. The LPFs could continue to be a practitioner support and place of learning but it is unclear from the consultation document why they need to then feed into the larger national governance model and what purpose this would serve to support local road safety. We believe existing OPG members could provide this knowledge exchange function.

We hope that the forums will be given some support from national organisations if they are being created by a central body.

Mechanisms for involving citizens in these conversations locally and nationally perhaps needs more thought.

**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:**

Broadly yes, we welcome the concept of supporting practitioner forums / communities of practice in road safety and creating a mechanism for doing this is welcome. The local partnership forum model is one option but there are possibly some others that are less 'top down' and 'one size fits all'.

Again as in our response to Q9 consideration of where citizens and communities fit into this picture would be welcomed.

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

**Please explain your answer:**

Segregated cycle lanes

Average speed cameras

Reduced speed limits (though there are enforcement issues, we believe it is a good position to take to encourage some social norms around speeding).

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

**Please explain your answer:**

More of the above: more segregated cycle lanes (and joining up of these lanes to form useful networks), more average speed cameras.

Roll-out of 20mph limits as standard on particular types of road to encourage social norms around speeding.

**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:**

Covid-19 has helpfully focused minds on what reduced car use could offer, and social distancing requirements has offered an opportunity to explore spaces for people. The modal shift to private car use due to public health concerns about using public transport is less helpful, however.

Funding for dedicated road safety provision locally and crowded space for education on road safety issues within the curriculum is a challenge. Effective strategies for education of pre-driver cohort and shifting some driver attitudes and behaviour is also a challenge.

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

**Please explain your answer:**

More funding and more enforcement and more educational initiatives are the obvious things to highlight here, but we believe that some of the 12 strategic challenges offer an opportunity to connect road safety to other policy areas and offer a more realistic approach to address these issues.

A conversation with communities on road safety could be a different way of talking about these issues and offer some practical solutions.

**About you**

**What is your name?**

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

Organisation

**What is your organisation?**

**Organisation:**

Scottish Community Safety Network

**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?:**

Neither satisfied nor dissatisfied

**Please enter comments here.:**

Some of the questions were very open-ended and difficult to answer as an organisation involved in road safety, so I imagine this would have been very challenging to respond to as a member of the public.

Some of the questions didn't lend themselves to the format of the response e.g. Yes / No. There was limited room for a nuanced response with no 'somewhat' or 'partially' option given.

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

Slightly satisfied

**Please enter comments here.:**

In future, some conversations on road safety would be a great way to approach the consultation - the approach of the National Planning Framework 4 consultation was really refreshing. (Appreciate this wouldn't have been possible for this one due to Covid).