A guide to Scotland's Road Safety Framework consultation

The purpose of this document is to serve as a helpful guide to Transport Scotland's Road Safety Framework to 2030 consultation and to provide selected key priorities and short responses which you can use or adapt for your own response. Our Cycling UK consultation response will be longer and more detailed. The Framework and the consultation can be found [here]. **The deadline for responses is 1ˢᵗ December.**

The Framework sets out the government's aim to achieve a target of zero deaths on the roads by 2050 and to have a world leading road safety record by 2030. To achieve this the Framework highlights the challenges it must address, its vision and the strategic actions (or direction) it intends to take to get there. By consulting on the Framework government is asking for your opinion on this and for thoughts on anything that should be covered in the plan.

Summary of key points to make in your response

- The vision, the targets and the use of the Safe System Approach are welcome.
- Road safety challenges faced by cyclists need to be better emphasised, specifically, perception of safety, enforcement, and unsafe road design and surfaces.
- We recommend an additional Engineering strategic action to improve the safety of roads, roadsides and junctions during maintenance, redesign and construction.
- We recommend expansion of the Enforcement strategic action wording to explicitly cover enforcement of all rules of the road in order to improve the safety of cyclists.
- The Key Performance Indicator (KPI) measuring the wearing of helmets must be removed. This KPI will not provide useful data or support future decision-making.
- Scotland needs a single easy to use camera footage submission system – to support Police Scotland enforcement and influence driver behaviour change.

Consultation questions

The following sections provides answers to the majority but not all questions. More detailed Cycling UK recommendations on road safety can be found in the [Cycle Safety – make it simple] report published in 2018. It provides an excellent resource for a more detailed response to the consultation.

With many challenges, strategic actions and outcomes included in the Framework and proposed by us below, this guide colour codes these as follows:
Outcomes – blue,　　　Challenges – red,　　　Strategic actions – green

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

YES - The Scottish Government has a vision to have the best road safety performance in the world by 2030 and ultimately a 'vision zero' of no road deaths by 2050. This is a laudable target and should be welcomed. However, achieving the target will take concerted and focussed effort.

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 - Our 'Safety in Numbers' booklet identified four major safety deterrents that need to be overcome in order to maximise the health and other benefits of increased cycle use. These are: dangerous roads and junctions, dangerous driving, dangerous speeds and dangerous vehicles. Four of the five outcomes in the Framework address these and are very similar to the Safe System approach headings that CUK included in the report Cycle Safety – make it simple. We agree with the addition of Post-Crash Response as an outcome in the Framework.

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

YES - 'Safe systems' derives from the Swedish Government's 'Vision Zero' initiative, which seeks to tackle all possible sources of danger. Like the Framework's vision, the aspiration is to eliminate road casualties altogether.

We agree that the Safe System approach provides layers of protection. We would like to note that these layers are important because they provide an important safety net in that should one layer fail then the safety measures in the other layers can reduce the risk of death or serious injury.

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

No – Not fully. The groupings cover the majority of road safety challenges however the emphasis for people cycling and other vulnerable users are specific, and recognising and addressing them is urgently needed. The following are missing or need more emphasis:

Enforcement and deterrence – for people cycling, the challenge of improving enforcement is key to safety and safety perception. This is not just enforcement of speed limits but other rules of the road which if followed fully would improve safety for cyclists. For example, the following examples of inconsiderate or dangerous driving all compromise the safety of cyclists and need better enforcement: not looking when opening a door (car dooring), close passing during overtaking, aggressive driving, parking in cycle lanes, drivers not keeping advance stop lines clear, and drivers not following rules or paying attention at junctions.

Road infrastructure and maintenance - road and junction design, and road maintenance are key safety issues for cyclists. Many road junctions are a danger to those walking, cycling and wheeling and need to be redesigned to the highest standards. Pot-holes, worn road markings and poor pavement surfaces compromise safety for people walking, wheeling and cycling.

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

No – The strategic actions need a stronger commitment and more detail. A workplan of detailed actions is needed to accompany each strategic action in the Framework.

We recommend the inclusion of an additional Engineering strategic action, needed to focus attention on addressing the challenge of Road Infrastructure and Maintenance. This is not an issue to be solved simply through Funding, neither is it solely within the scope of the Active & Sustainable Travel strategic action to improve safety for people walking, wheeling and cycling.

Roads, roadsides and junctions need to be redesigned for all road users to use safely. The safety of cyclists on the road goes beyond but includes the development and creation of a joined-up cycling infrastructure network. We recommend the establishment of consistent design standards to ensure cycle and pedestrian-friendliness is designed in from the outset into all highway and traffic schemes, new developments and highway maintenance work. Agreed design guidance will ensure that public money pays for safe roads.

The commitments under the Enforcement strategic action need to be expanded to cover all aspects of road safety but particularly to ensure that road users follow all the rules of the road, especially those which increase the risk for vulnerable road user (see issues listed in answer to question 4).

The commitment to government Funding is particularly weak in the Framework. To achieve the Framework's stretching targets government must re-balance transport spending to provide more funding for road safety measures.

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

Yes – Increased cycling during the Covid-19 lockdown proved surveys right in that when the streets were safer and quieter people did cycle more. A Cycling Scotland survey from 2019 found that the main barrier to cycling in Scotland is 'not feeling safe on the roads' (68% of respondents), and 81% said that more cycle lanes, traffic free routes & cycle paths would motivate them to cycle.

Scotland has declared a climate emergency and needs to reduce emissions and promote active and sustainable travel. This needs urgent attention if we are to meet our international obligations. In addition, we need to promote active travel to reduce the inactivity related health crisis.

For all these reasons the most important strategic actions are those that will directly and quickly help people feel safer whilst walking, wheeling or cycling, i.e. actions on Speed, Active & Sustainable Travel, Enforcement, and the Engineering strategic action we have proposed. Funding is also important to resource all of these.

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

The Framework proposes Interim Targets to 2030, based on a 2014-18 baseline. These are 50% reductions in people killed and people seriously injured, and 60% reductions in children (aged <16) killed and children seriously injured. These interim targets represent a good commitment towards a Vision Zero target in 2050.

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 – Instead of '*Percentage reduction in cyclists killed or seriously injured*' we recommend a rate-based indicator which measures the percentage reduction in cyclists killed or injured per mile or hour cycled. This rate-based indicator would align with the Indicator No. 8 in government's Active Travel Framework, and would be more likely to promote cycling as a safe, healthy and enjoyable activity even if the actual numbers of cyclists killed or injured increases in the short-term as cycling rates increase.

Perception of safety is important in order to encourage people to cycle more. We, therefore, recommend a perception of safety indictor to align with Indicator No.9 in the Active Travel Framework. This will help to show if the Framework is increasing the perception of road safety, especially for cyclists and other vulnerable road users. Indicators and targets must be used to inform policy change where necessary not just show success.

The KPI of '*Percentage of riders of powered two wheelers and bicycles wearing a protective helmet'* should not be included as it will not help to show progress towards the vision or inform decision-making. Riders of powered two wheelers (motorbikes) are legally required to wear a helmet, whilst riders of cycles and e-bikes are not. Lumping these two groups of riders together in one indicator therefore provides meaningless statistics.

In addition, even though many people do wear a helmet when cycling, evidence shows that laws requiring helmet use can reduce cycling rates. Furthermore, with public hire bike schemes increasing in number and popularity in Scotland it would be detrimental to their success to require hirers to wear a helmet. In future we expect this mode of travel to become much more popular as people combine this with public transport, and feel safe to use the hire bikes in cities with more and better cycle routes.

We recommend the inclusion of KPIs which would measure the extent of safe active travel infrastructure, akin to the indicators in the Active Travel Framework, i.e. 5. *Km of traffic-free walking and cycling facilities*, and 6. *Distance to traffic-free cycling infrastructure.*

Questions 9 and 10 cover governance issues – we have no recommendations for this guide

Questions 11-14 allow you to provide ideas based on your own experiences. We recommend you include the following:

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

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

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

Excessive speeding was a problem that increased whilst roads were less busy during the Covid-19 lockdown. Enforcement of speeding, close passing, and other dangerous driving is insufficient in Scotland and because of this does not discourage poor driving.

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

Achieving Attitudes and Behaviour change and Enforcement, would benefit from the introduction of **a single easy to use camera footage submission system by Police Scotland** which all road users can have confidence in. Cycling UK has called for this following the case of CUK member David Brennan who was assaulted by a driver. The Framework's Speed strategic action includes the wording '*...new technology and opportunities, such as processing dashcam footage will also be key to achieving success'*. Now is the time to introduce a single video footage submission system as a practical action to achieving the Safe Speeds and Safe Road Use outcomes.

We recommend that 20mph is made the default speed limit in built-up areas.

For more information please contact:
Jim Densham, Campaigns and Policy Manager – Scotland, campaigns@cyclinguk.org