

Scotland's Road Safety Framework to 2030

Consultation response from Cycling UK in Scotland

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 we welcome its inclusion. 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 booklet¹ 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 Cycling UK included in the report Cycle Safety – make it simple². 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

We agree that the Safe System approach is the right one. It seeks to tackle all possible sources of danger and 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.

We believe that the Framework needs to also embed the road danger reduction approach. The Road Danger Reduction Forum³ describes this approach as achieving safer roads by seeking to reduce danger at source i.e., addressing first who or what causes the greatest danger to others, rather than prioritising the safety of the most benign or vulnerable to danger. For example, a

¹ Cycling UK, Safety in Numbers,
https://www.cyclinguk.org/sites/default/files/document/migrated/campaign/ctc_safety_in_numbers_0.pdf

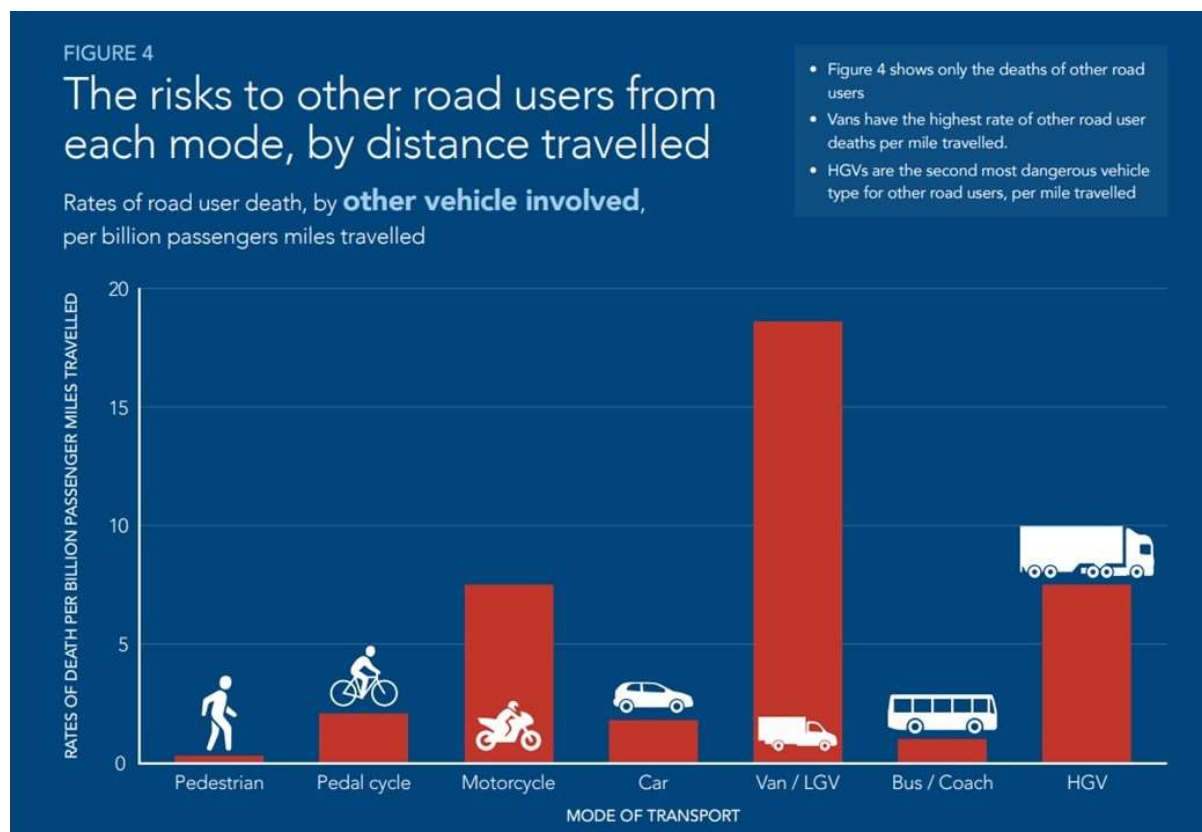
² Cycling UK, Cycle Safety – make it simple
https://www.cyclinguk.org/sites/default/files/document/2018/04/1804_cyclinguk_cycle-safety-make-it-simple.pdf

³ <https://rdrf.org.uk/road-danger-reduction/#:~:text=What%20is%20Road%20Danger%20Reduction,the%20road%20is%20motor%20vehicles>

report⁴ by the Parliamentary Advisory Council on Transport Safety (PACTS) explains, 'pedestrians and cyclists, sometimes viewed as "unsafe", pose very little risk to other road users. By contrast, some modes which may be seen as comparatively 'safe' to travel in, are disproportionately dangerous to other road users relative to passenger miles travelled'.

Addressing road danger reduction, seen through the lens of attitudes and behaviour change, encourages road users to consider the responsibility they have to reduce the danger they pose to others, rather than addressing the need for road users to protect themselves. It therefore considers HGV drivers, for example, as having a greater responsibility for road safety than pedestrians. Likewise, it also means government should, for example, close roads around schools to HGVs and LGVs rather than insist that all school children wear high visibility clothing or helmets when cycling.

This approach calls for a recognition of the fact that the principal source of danger on the road is motor vehicles and, as shown in figure 4 of the PACTS report (see graph below), particularly dangerous to others per mile travelled are HGVs and vans/LGVs.



Traditional approaches to road safety view vulnerable road users as a problem needing safety attention, rather than seeing other road users, who pose the greater danger as the problem. A road danger reduction approach enables policymakers to view pedestrians and cyclists not as a problem but rather as people contributing positively to reducing climate emissions and healthy lifestyles statistics.

⁴ PACTS, What kills most on the roads? <https://www.pacts.org.uk/wp-content/uploads/PACTS-What-kills-most-on-the-roads-Report-13.0.pdf>

Traditional approaches to road safety have taken simple casualty reduction numbers as a measure of achievement. However, as the Road Danger Reduction Forum and the PACTS report show, a more sophisticated approach recommends casualty reduction using rate-based indicators as this provides more accurate reflection of the problem, and of progress in addressing it.

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

No

The groupings cover the majority of road safety challenges; too often, however, the information provided fails to identify the root cause of the problems to be addressed or elucidate the priority challenges.

We recommend a section outlining the challenges for reducing road danger.

In all areas, we would like to see the specific challenges for increasing the safety of people cycling, walking and wheeling recognised and described clearly.

Road danger reduction: maximising the health and environmental benefits of road safety

As described above, in answer to question 3, we highlight the need for the Framework to view road safety policy and delivery in terms of road danger reduction. We would therefore like to see road danger reduction identified as an explicit challenge. Giving this challenge the subtitle of “maximising the health and environmental benefits of road safety” would highlight how road danger reduction helps address wider issues beyond road safety itself, and would relate the challenge to the ‘Sustainable Travel Hierarchy’ set out in the National Transport Strategy.

This challenge could then subsume the existing challenges relating to climate change and health. As drafted, these sections do not set out many unique challenges which cannot be included more naturally in other areas. For example, the challenge of adapting our roads to climate change is a challenge of education, awareness raising, technology and engineering.

If anything, the climate challenge is problematic, as it focuses on how the climate emergency (or action to address it) might increase road casualties, rather than looking at how road safety measures could help address the climate challenge. The health section is somewhat better, in that it does recognise the physical activity benefits of walking and cycling, yet it fails to acknowledge that they also contribute to reductions in air pollution. Focussing instead on road danger reduction would allow the Framework to set out the challenge of maximising the contribution of road safety measures to meeting these wider government objectives.

Active and Sustainable travel

One could then argue that a road danger reduction challenge could also subsume the challenge relating to active and sustainable travel. However, we would wish to retain it, but focus it more clearly on how to achieve ‘more’ as well as ‘safer’ walking and cycling. Evidence of the ‘safety in numbers’ phenomenon shows that these two objectives can, and should, go hand in hand. This challenge would set out the need, and the opportunities, to ensure that they do.

Unfortunately, the description of the ‘safety in numbers’ phenomenon as drafted is not helpful as it treats increased rates of cycling and walking as a problem, rather than as a solution. We recognise that with a higher rate of cycling there may be an increase in the number of collisions

involving cyclists, but this is not necessarily the case. There are plenty of examples where increases in cycling have gone hand in hand with absolute reductions in cyclist casualty numbers. But even if increases in cycle use are accompanied by an increase in cyclist casualty numbers, the 'safety in numbers' evidence shows that this is likely to be a lot less steep, and hence a reduction in the risk of cycling.

Alongside this, it should also be recognised that cycling and walking present very little danger to other road users (a point highlighted in the PACTS report⁵ on road danger we referenced earlier), hence a shift to increased walking and cycling represents progress towards Vision Zero even if (paradoxically) there is a short-term increase in cyclist casualties. It should also be noted that the health benefits of cycling far outweigh the risks involved⁶, hence an increase in cycling will result in an overall reduction in early deaths and ill health. Ultimately though, a next zero future is one in which there is a lot more walking and cycling, less motor vehicle traffic and hence a reduction to zero in overall road danger. In this respect, the 'safety in numbers' should be seen as a contributor to a 'Vision Zero' future, not a problem to be overcome.

It is for this reason that we also urge that the Framework measures cycle (and pedestrian) safety using 'rate-based' indicators, e.g., the risk of a cycling casualty per mile/km or per trip made by cycling.

This section fails to discuss the importance of a coherent network of cycling infrastructure despite highlighting the Scottish Government's funding promises. It needs to detail the challenges of spending active travel funding including:

- Ensuring all designers use agreed active travel design standards
- Increasing the resources and expertise for local authority staff to deliver active travel infrastructure
- Speeding and smoothing the planning system (Traffic Regulation Orders) to enable installation of a network of cycling infrastructure.

This section should also highlight the challenge of delivering cycle training for people of all ages as a means to boost the safety of cyclists (reducing the risks of cycling both for themselves and for pedestrians) as well as their confidence. That would enable more people to cycle more often in greater safety in accordance with the real 'safety in numbers' effect.

Driving/Riding for Work and Workplace culture

In addition to the points covered under this challenge, we urge that it should also address the issue of lorries. The PACTS report referred to earlier⁷ describes the dangers posed by HGVs and vans/LGVs which cause the most deaths of other road users, per mile travelled. We believe this data should be included in the Framework and considered in policymaking. EU rules mean that direct vision cabs for HGVs will become compulsory on new lorries by 2028⁸. However, many models are available now and the challenge will be to promote rapid adoption of direct vision cabs on lorries driven in Scotland before and after 2028.

⁵ <https://www.pacts.org.uk/wp-content/uploads/PACTS-What-kills-most-on-the-roads-Report-12.0.pdf>

⁶ https://www.cyclinguk.org/sites/default/files/document/2017/09/health_1c_rv_brf.pdf

⁷ <https://www.pacts.org.uk/wp-content/uploads/PACTS-What-kills-most-on-the-roads-Report-12.0.pdf>

⁸

https://www.transportenvironment.org/sites/te/files/publications/2016_07_Trucks_direct_vision_briefing_FINAL_0.pdf

Emerging technologies

Technologies such as Connected and Autonomous Vehicles (CAVs) and micro-mobility vehicles could prove either to have significant safety (and other) benefits, or disbenefits, depending on how they are regulated and managed. This section needs to highlight the risks as well as the benefits, particularly in relation to CAVs.

From the perspective of cycle (and pedestrian) safety, CAVs could prove to be more predictable, and more 'law-abiding', than human-driven vehicles. However, there are also risks that the desires of vehicle and equipment manufacturers to recoup their substantial investments in this technology may create pressures to roll it out prematurely, before CAVs are really capable both of detecting cyclists and pedestrians, and of predicting their movements. At present, cyclists negotiate for space with human drivers using hand signals and eye contact. It is far from clear how these interactions will be replicated in CAV technology.

There are also risks that it could be even harder for pedestrians and cyclists injured by CAVs to obtain justice. It may not be clear whether or not the vehicle was in autonomous mode at the time, and hence whether their injury damages claim should be brought against the driver or a manufacturer. Moreover, manufacturers who have made substantial investments in the technology may have very strong incentives to hide evidence of failings in their systems. This makes it all the more important that the Scottish Government reconsiders the issue of presumed liability that it considered a few years ago.

Yet, given the potential benefits of CAV technology, we would not wish to hold back its development. Our view is that CAVs should be used initially only on closed roads, on motorways or on trunk roads with high-quality cycle lanes, i.e., on roads where there is no need for cyclists to share the road with these vehicles. They should only be used on roads shared with pedestrians and cyclists when the technology has proved highly reliable (in controlled trials) at detecting the presence of non-motorised road users and at detecting their movements.

Similarly, e-scooters and other micro-mobility vehicles could provide significant road danger reduction benefits. However, they pose a real threat to cycling and walking (and particularly to the safety of more vulnerable pedestrians) if the speed, power, weight and acceleration limits are set too high. We urge the Scottish Government to adopt a cautious approach to the regulation of e-scooter and other micro-mobility technologies, including e-scooter trials. It is easier to relax the regulations if they prove unduly cautious (e.g. to permit an increase in the maximum weight, speed, power and acceleration) than to do the opposite (i.e. to restrict these once people have bought vehicles that were initially legal).

We recommend that this section more clearly outlines what the challenges of each technology are and the specific challenge for ensuring safety, e.g. regulation or awareness-raising amongst users. We would like to see greater discussion of the challenges these technologies have on cyclists and vulnerable road users.

Driving/Riding for Work and Workplace culture

In addition to the points covered under this challenge, we urge that it should also address the issue of lorries. The PACTS report referred to earlier⁵ describes the dangers posed by HGVs and vans/LGVs which cause the most deaths of other road users, per mile travelled. We believe this data should be included in the Framework and considered in policymaking. EU rules mean that direct vision cabs for HGVs will become compulsory on new lorries by 2028⁶. However, many models are available now and the challenge will be to promote rapid adoption of direct vision cabs on lorries driven in Scotland before and after 2028.

Enforcement / deterrence

We welcome the recognition of the safety benefits of roads policing. Additional evidence for this is provided in Cycling UK's response to the Whitehall Government's recent review of roads policing.⁹

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. 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.

'Operation Close Pass' has been successful in police force areas in Scotland in helping drivers to understand the dangers to cyclists of not leaving sufficient space when overtaking. This is a good example of effective enforcement and, again, needs rolling out widely across Scotland.

We welcome reference to the increased use of *'dash/helmet cameras, providing digital video and photographic evidence which can be used in prosecutions.'* The section refers to Operation Snap in Wales but fails to clearly state that the challenge here is that there is no single, easy to use, third-party reporting system in Scotland. In addition, not having a central system means that any footage submitted as evidence is viewed by individual officers rather than dedicated officers experienced at interpreting it. We believe that the challenge here is how to resource a third-party reporting system for Scotland rather than the efficacy of the technology.

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. This section fails to note that the design of many of our existing roads and junctions severely deters cycling by anyone other than confident and experienced cyclists. This is a significant and serious challenge both in terms of road safety and encouraging more people to lead active lifestyles.

We recommend that this section also discusses the challenge for pedestrians and cyclists of poor road and roadside maintenance. Potholes, worn road markings and poor pavement surfaces all compromise safety for people walking, wheeling and cycling. Cyclists and pedestrians are disproportionately endangered by poor maintenance, particularly on minor roads and off-road cycle paths which are more often used by cyclists. Cycle lanes and routes, and pavements need to be integrated into highway maintenance works, and highway maintenance engineers need to understand what kinds of highway defect most endanger cyclists. Evidence on the importance of good maintenance to cyclists' safety, and what needs doing to improve it, is set out in Cycling UK's submission to a House of Commons inquiry into the subject¹⁰.

Post-crash response

This section discussed the problems of health services emergency response. We would like this section, or some other in the Framework, to discuss the challenges of road safety that relates to the police and police investigations as follows:

⁹ https://www.cyclinguk.org/sites/default/files/document/2020/10/2010_rg_dft_roads-policing-review_con.pdf

¹⁰ <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/transport-committee/local-roads-funding-and-governance/written/90786.html>

- Improving the quality of police investigations following road incidents
- Consistent charging decisions
- Victim support
- Access to information and data, either in individual cases (for victims who need to know what decisions have been taken in their case, and by whom) or about the performance of the system of traffic law enforcement generally.

Road users

This section fails to talk about the challenge of providing cycle training (either for children or for adults), and the benefits it can provide not just for cyclists' own safety but also as training in roadcraft (i.e. with the potential for people to become better drivers and more aware of cyclists).

The Safe System and Road Safety Delivery

These sections contain challenges about the capacity to deliver the Framework and for governance. We recommend challenges are placed at the end of this challenges chapter and described in this way. We also recommend that this section does more to outline the priority challenges that need to be addressed.

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

No

Cycling UK does not believe that the strategic actions, as written in the Framework, will deliver the outcomes or address the challenges. The descriptions of the strategic direction are often too brief or lack detail and do not give confidence that they will help to meet the outcomes.

As indicated below we believe that a new Strategic Action is needed because the Framework fails to describe the strategic direction needed to address the problems of dangerous road, roadside and junction design, and their maintenance.

In the answer below, we provide recommendations for improving the Framework's strategic actions or for inclusion in developing a Delivery Plan.

Engineering [proposed additional Strategic Action]

Cycling UK strongly recommends the inclusion of an additional Engineering strategic action. This is needed to focus attention on addressing the challenge of reducing the danger posed by road infrastructure – for all road users. The strategic actions section of the Framework does not contain any commitment to improve our existing roads, roadsides and junctions to make them safer. We believe this is a huge gap that must be addressed if the outcome of Safe Roads and Roadsides is to be met. We believe that government must have a specific focus on making roads safer for this to happen.

Unfortunately, the legacy of roads and junction design is that too many roads are intimidating and dangerous for cyclists. This is not an issue to be solved simply in the funding strategic action, neither is it solely within the scope of the Active & Sustainable Travel strategic action to improve safety for people walking, wheeling and cycling. Moreover, a road danger reduction approach necessitates this strategic action because it identifies that dangerous roads are a root cause of casualties. The Framework in its current form only sees engineering in terms of tackling

speeding. Although this is needed, it must go alongside action to reduce the other dangers posed by roads, roadsides and junctions.

Roads, roadsides and junctions need to be redesigned for all road users to use safely, including vulnerable road users. Cyclists also have a right to ride on the road, as well as in cycle lanes, and this right and the right to be safe on the road needs to be maintained and encouraged through safety improvements. We recognise that not all roads can have a cycle lane installed, so the safety of the road must be addressed instead.

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. This should follow the models of the Welsh Government's Active Travel Act Guidance, or the Whitehall Government's recent Local Transport Note (LTN 1/20) on Cycle Infrastructure Design. The former is perhaps a more useful model, in that it incorporates both walking and cycling infrastructure (NB. though excellent, it is already being revised). The adoption of good design guidance will secure good value for money by ensuring that opportunities to improve cycling and walking conditions are consistently identified, maximised, and designed to high standards.

20 mph streets should be designed or re-designed to feel like 20 mph streets, a place for pedestrians, children or shoppers rather than for through traffic. Sympathetic design and high-quality surfacing are good ways to achieve this, while removing central white lines and other highway markings can help reinforce the visual impression of a 'street' or a 'lane', rather than a 'road'. Engaging the local community in street design improvements can help maximise this.

Junctions

Safety at junctions is critical: around three-quarters of cyclists' collisions happen at or near them¹¹. Too often, junctions prioritise motorised traffic rather than the safety of cyclists or pedestrians. A common example is the use of wide flared openings to side streets (figure 1) rather than square corners (figure 2), which allow vehicles to enter the junction at higher speeds. These wide openings mean pedestrians have to spend longer in the road junction when crossing a side-street. The same is true if a cycle lane also crosses the side-street. A simple solution is to re-engineer the junction, reducing the wide flared opening and changing the space to pavement or greenspace.

There are many other examples of common faults with junctions which disadvantage vulnerable road users. All junctions need to be reviewed to assess the potential for improving safety.

¹¹ GCPH, Cycling in Scotland: a review of cycling casualties, near misses and under-reporting, Figure 18. https://www.gcph.co.uk/assets/0000/7810/Cycling_Casualties_in_Scotland.pdf



Figure 1 Flared junction



Figure 2 Square junction

Highway maintenance

Road maintenance must be better resourced and refocused to ensure that all parts of the highway are accessible and safe. A greater priority must be given to active travel routes including minor roads. Whilst every road user suffers from poor road surfaces, cyclists face a disproportionate risk of injury or death. Over the last five years in Scotland, 18 pedal cyclists have been injured in crashes attributed to poor road surfaces, 2 were killed and 7 seriously injured¹². It is probable, however, that these statistics - capturing only those reported to the police - greatly underestimate the total number of cyclists affected by poor road surfaces.

Maintenance of roads is good value for money – especially local roads. A Transport Scotland review¹³ of the economic value of road maintenance found that a £1 cut to road maintenance budgets would have an average economic cost of £1.50, but also that this disbenefit was significantly higher for local roads (£1.67) than for trunk roads (£1.12).

Highway maintenance regimes need to pay particular regard to cyclists' needs. Inspection frequencies and response levels should be higher on the most important parts of the cycle network, even where these routes are minor as far as motor vehicles are concerned, e.g., quiet lanes or back streets. Criteria for intervention should also deal with the specific risks to cyclists, such as location in the road (i.e., the 50cms - 1.5m from the kerb where cyclists typically ride (figure 3)), and the shape of the fault (for instance, longitudinal cracks or sunken trench reinstatements may not reach the depth criteria but can still represent a considerable risk for cyclists).

In addition to dangerous potholes and uneven surfaces, maintenance priorities need to ensure existing road markings are clear and visible to all (figure 4), especially those relating to cycling infrastructure.

¹² Reported Road Casualties Scotland 2015 to 2019

¹³ <https://www.transport.gov.scot/media/29244/j235737.pdf>



Figure 3 Potholes in the 'riding zone'



Figure 4 Worn road markings

Recommendations:

- Include an additional Engineering strategic action, needed to focus attention on addressing the challenge of improving the safety of new and existing roads, roadsides and junctions, and their maintenance.
- 20 mph streets should be redesigned to look and feel like 20 mph streets, with the local community involved in their design to maximise local support.
- Road maintenance must be better resourced and refocused to ensure that all parts of the highway are accessible and safe, with greater priority given to active travel routes.

Speed

Most people find cycling on busy roads intimidating. Cycling Scotland's 2019 survey¹⁴ 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.

This fear is particularly acute where cyclists are being overtaken by motor vehicles travelling much faster than they are. Pulling out to turn right on a cycle, for example, becomes much harder if you have to look a long way over your shoulder before you can be sure it is safe. This may explain why slower cyclists tend to find higher-speed traffic particularly intimidating. To create the conditions where cycling becomes a normal activity for young and old alike, for all genders, and people with disabilities, we either need to separate cyclists from motor vehicles or ensure that they can mix safely with light volumes of traffic travelling at low speeds.

Higher speeds are more dangerous as well as feeling dangerous. The International Transport Forum states that¹⁵: "... forces a human body can tolerate and still survive must be considered

¹⁴ <https://www.cycling.scot/mediLibrary/other/english/7268.pdf>

¹⁵ International Transport Forum/OECD. Speed and Crash Risk. 2018. <https://www.itf-oecd.org/sites/default/files/docs/speed-crash-risk.pdf>

when designing the road system and setting the speed limits. Such physical limitations are for example that most unprotected road users survive if hit by a vehicle at up to only 30 km/h [20 mph] ...". The report also reiterates the accepted fact that even small increases make a difference: "... a 1% increase in average speed results in approximately a 2% increase in injury crash frequency, a 3% increase in severe crash frequency, and a 4% increase in fatal crash frequency. Thus, reducing speed by a few km/h can greatly reduce the risks of and severity of crashes."

20 mph default speed limit

We agree with the need for a National Speed Management Review. Cycling UK believes 20mph should become the 'default' limit for all built-up streets in Scotland¹⁶. By this, we mean that, local authorities would still be able to introduce 30 mph (or higher limits) for roads that were designed for higher traffic volumes and speeds (including the provision of separate cycle tracks), however these would be as the exception, rather than the other way round as at present. Speed limit signs would then be concentrated on the vehicle-dominated main roads rather than on residential streets where they are more intrusive.

Public support for 20 mph limits in residential streets is generally high. An evaluation report for the 20 mph zone in Edinburgh showed they worked in terms of reducing speeds and were also more popular than before they were introduced, with 65% of people supporting and 24% strongly supporting¹⁷. The Framework's Health strategic action section provides evidence from a 2018 Department for Transport study that '20 mph limits are perceived to be beneficial for cyclists and pedestrians'.

A similar approach should be taken to lowering the 'default' speed limit for single-carriageway roads in non-built-up areas. This limit should be reduced to 40mph, again allowing for exceptions on wider and straighter 'main' single-carriageway roads. Again, this would concentrate the road signs for speed limits where they were least visually intrusive.

In response to the Covid pandemic and the need to provide space for people to distance safely while walking and cycling, a number of local authorities in Scotland have used Spaces for People funding to introduce 20 mph zones in many areas. Currently, 20 mph is more appropriate than 30 mph in these and many areas.

A diagram in the draft Framework shows that average speeds often exceed national speed limits, depending on vehicle and road type. We note that this is only average speed, whereas in reality actual speeds in many instances will be much higher. Speed limit enforcement should be given higher priority, along with other aspects of road policing. The combination of good design and community engagement, however, should ensure that enforcing 20 mph limits requires no additional police resources than 30 mph limits do.

Speed cameras are an effective way to ensure compliance from those who might otherwise drive dangerously even on narrow residential streets, or indeed on quiet rural lanes. Early cameras were criticised on the grounds that they prompted drivers to slow down momentarily (and

¹⁶ <https://www.cyclinguk.org/news/why-were-urging-scottish-government-adopt-20mph-limit-urban-areas>

¹⁷ <https://theedinburghreporter.co.uk/2019/10/city-council-evaluates-impact-of-20mph-zones/>

possibly unsafely), then speed up immediately afterwards. Nowadays, however, they can record how a driver behaves throughout a speed limited zone.

Recommendations:

- Make 20 mph the default speed limit for most streets in built-up areas, with 30 mph (or higher) limits being the exception that requires signing, not the other way round.

Climate

We are unconvinced by the need for this section, for reasons set out in our response to question 4. Although road safety has a huge role in helping to reduce the CO2 emissions from transport (by enabling more people to walk and cycle in greater safety), we are not convinced that climate change has major impacts on road safety.

If it is retained however, Cycling UK in Scotland would like to see this section do more to explain the relationship between road safety and both climate mitigation, and adaptation to the impacts of climate change. We caution that this strategic action is only used to focus on the actions needed to address road safety that can come from mitigation measures and adaptation responses.

We agree that many climate mitigation measures and policies to reduce GHG emissions can benefit road safety. However, there needs to be careful consideration to build increased safety into the roll out of measures.

In the future, it is likely that roads will need to be adapted, moved or newly constructed in order to adapt transport networks to the impacts of climate change¹⁸. This may include moving roads away from eroding coasts or altering roads across floodplains. When these decisions are made, we believe that the opportunity should be taken to ensure safe road design and safe speeds are a prime consideration.

Recommendation:

- Ensure that road safety improvement is a priority objective when roads are altered or constructed in response to the impacts of climate change.

Funding

We recognise the need for a Road Safety Improvement Fund to focus on specific road safety strategies. However, we caution against this fund being viewed as the only source of funding for road safety improvements. We want to see other funding streams, such as from the transport budget, used to pay for road safety improvements as part of normal working.

This Strategic Action is particularly weak in terms of commitment, when compared to other sections of this chapter.

¹⁸ <https://www.gov.scot/publications/climate-ready-scotland-second-scottish-climate-change-adaptation-programme-2019-2024/pages/10/>

Funding for active travel

Cycling UK wants to see a significant increase in funding for active travel not only to increase the amount of safe protected space for cycling, but also to increase people's cycling skills and help them feel safe and confident on the road.

Cycling UK and our partners have consistently called for at least 10% of the transport budget to be spent on active travel. The current £100.5m budget amounts to 3.3%. Whilst this is needed to pay for active travel projects, much more money needs to be found or reallocated to pay for maintenance and redesign of roads, to improve road safety and achieve the Framework's ambitious targets.

Local authorities vary in their current spending with councils like Edinburgh City Council already spending 10% of their transport budgets on active travel. All councils need to be encouraged to spend more than 10% of their transport budgets on active travel and should be encouraged to move human resource from focussing on roads towards an integrated focus on roads and active travel.

As well as substantially increasing the levels of funding for active travel, the Government also needs to achieve a healthy balance between capital and revenue funding. It is not sufficient to assume either that (revenue-funded) behaviour change measures can substitute for capital investment in quality cycling infrastructure. Positive behaviour change measures are particularly important if new infrastructure is to attract usage by women, older people, people with health conditions or disabilities, and people from BME communities, to overcome the perception that cycling is "not for people like me."

DfT-funded research¹⁹ considered the optimal balance of capital and revenue funding for sustainable transport projects in general, though not for cycling and/or walking specifically. It suggests a capital-revenue balance of between 70-30 to 80-20. Cycling UK recommends that the balance should start initially at around 70-30 in the early stages of a local cycling strategy, increasing to 80-20 as funding levels increase. This reflects the fact that relatively low-cost revenue-funded behaviour change projects can achieve relatively quick wins at a local level, whereas capital schemes take longer to develop.

Recommendations

- Government should commit to increase the proportion of national transport spending allocated to cycling and walking from 3.3% at present to at least 10%.
- Urban local authorities should be encouraged to set higher percentage spending figures, reflecting their different needs and starting levels.

Attitudes and Behaviour

Cyclists depend heavily on responsible driver behaviour, their understanding of cyclists' vulnerability, and how to interact with them safely. For this to be ingrained, routine and enduring, it needs to be a much stronger element of the driver training and testing process, and regularly bolstered by effective awareness campaigns and, of course, enforcement. Improving the

19

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/606513/cycling-walking-rapid-evidence-assessment.pdf

attitudes and behaviour of road users is an ongoing process of awareness-raising, with enforcement being a key means of achieving this.

While inattention, bad driving and conscious law-breaking are of concern to all road users, it is especially alarming for the most vulnerable. Perhaps most crucially for cyclists in general, their own behaviour is less likely to be at fault in collisions than that of drivers: cycles, along with buses/coaches, are the vehicle-type least likely to have 'contributory factors' (CFs) attributed to them by the police through STATS 19.

Cycling UK recommends that road safety campaigns which are focussed on cycle safety awareness are positive and based on facts and statistics. We also recommend that awareness-raising needs to be linked to enforcement. There is little evidence to suggest that awareness campaigns change behaviour on their own. To maximise their impact, therefore, they need to interact synergistically with enforcement activity.

Operation Close Pass undertaken in a number of areas of Scotland is one such awareness-raising campaign which is backed up by enforcement. The operation, which is ongoing, involves intercepting drivers who fail to give a plain clothes police officer on a bike enough room, and pulling them aside for a demonstration of safe passing distances on an illustrated ground-mat. While awareness campaigns help make people understand why they need to behave in a certain way, vigorous enforcement seals public acceptance, and ensures that those who still ignore the messaging will be suitably penalised.

Whilst campaigns need to target behaviours dangerous to vulnerable road users, care must be taken at all stages to avoid making cycling look like a dangerous activity with the result that fewer people cycle.

We recommend the following awareness-raising and enforcement campaigns which would benefit the safety of cyclists:

- Car dooring and the Dutch Reach - see awareness raising video²⁰.
- Use of phones whilst driving
- Not parking in cycle lanes
- Speed limits
- Leaving space when overtaking cyclists
- New Highway Code rules when they come into force

Recommendations:

- Cycle safety awareness campaigns must be positive, based on fact and linked to enforcement.
- Roll out awareness and enforcement campaigns on more road safety issues which commonly affect vulnerable road users.

²⁰ <https://www.cyclinguk.org/dutchreach>

Technology

Lorries and other large vehicles

Between 1995-2018 in Scotland, cars represented the majority (84%) of motor vehicles involved in a cyclist casualty, whereas vans or goods vehicles were involved in just 7% ²¹. Unfortunately, data for how many of these collisions in Scotland resulted in people being killed is not readily available. However, a review of media shows anecdotally that collisions with HGVs is much more likely to prove fatal. HGVs account for only around 3.4% of non-motorway motor-vehicle mileage on Britain's roads, yet they are involved in around 15.5% of cyclist fatalities and 13% of pedestrian fatalities²². The problem is particularly acute in urban areas where lorries are involved in about a quarter of cyclist deaths.

Many urban cycling fatalities or serious injuries involve left-turning lorries, partly because most lorry cabs place the driver high off the ground with a lot of metal (rather than window) surrounding them. Compared with buses, it is far harder for lorry drivers to see cyclists or pedestrians alongside or in front of them.

Fortunately, new cab designs are now available (and becoming common on refuse vehicles). These give the driver a much better view of their surroundings without having to resort to mirrors, cameras and sensors. Modelling suggests these 'direct vision' cabs are likely to prove far safer. The vehicles, from Mercedes-Benz, Dennis Eagle, Volvo, Scania, DAF and MAN, are on sale now. They were designed under the industry-backed Construction Logistics and Cyclist Safety agreement (Clocs)²³.



Figure 5 Examples of 'direct vision' cabs

Cycling UK urges Scottish Government and local authorities to change procurement rules to require lorries with direct vision lorries in their own fleets, for their contractors, and as a condition of planning permission for new developments.

²¹ GCPH, Cycling in Scotland: a review of cycling casualties, near misses and under-reporting, p60.

https://www.gcph.co.uk/assets/0000/7810/Cycling_Casualties_in_Scotland.pdf

²² The traffic statistics from: DfT. *Road Traffic Estimates in Great Britain*. Table TRA0104; and the road casualty statistics from: DfT. *Reported Road Casualties Great Britain*. Table RAS40004. (All 2015-2019).

²³ <http://www.standard.co.uk/news/transport/cyclist-friendly-trucks-unveiled-to-cut-deaths-on-capitals-roads-10071724.html>

Measures should also be taken to reduce urban lorry traffic, for example by making greater use of rail and water-borne transport. Another solution is edge of town 'trans-shipment depots', created outside large cities so that large lorries can essentially stick to motorways and trunk roads (in future using CAV technology). They would then transfer their loads into safer and more sustainable urban delivery vehicles (including cargo bikes) for 'last mile' deliveries. Cargo bikes, delivering smaller consignments in urban areas, could significantly reduce the number of delivery vans on busy streets. This model would also support cities with ultra-low or zero emission zones in the future.

A further way to reduce the risk of danger from lorries and HGVs is to restrict them from certain streets in cities – especially streets surrounding schools and playgrounds. Prompted by Cycling UK's campaigning, Transport for London (TfL) developed a 'road-map' to progressively restrict unsuitable lorries from using the city's streets.

E-scooters

Cycling UK urges Transport Scotland to adopt a cautious approach to e-scooter trials and we urge the Scottish Government to adopt a cautious approach to the regulation of e-scooter and other micro-mobility technologies, including e-scooter trials. Regulators must ensure trials are properly monitored, with the criteria for 'success' being clearly defined beforehand. It is easier to relax the regulations if they prove unduly cautious (e.g. to permit an increase in the maximum weight, speed, power and acceleration) than to do the opposite (i.e. to restrict these once people have bought vehicles that were initially legal).

Autonomous vehicles

We welcome the inclusion of a reference to autonomous vehicles in the Framework. Cycling UK recognises the potential benefits of autonomous technology; huge care, however, must be taken to ensure it is safe for cyclists and other vulnerable road users. Autonomous vehicles have the potential to cause great damage and therefore must be regulated with a precautionary approach. For example, it is crucial not to allow automated vehicles onto roads with cyclists until they can predict cyclist movements, not just see and recognise cyclists.

Practical adaptations will also be needed before automated vehicles and cyclists can share the roads even when a cycle lane is in place. For example, before lane keeping assistance technology is introduced all substandard painted cycle lanes must be removed and ideally replaced with physically protected space. This is to avoid CAV trucks and buses following painted cycle lane lines and passing too close to a cyclist using the lane.

Recommendations

- The Scottish Government and local authorities should change their procurement rules to require lorries with direct vision lorries in their own fleets, for their contractors, and as a condition of planning permission for new developments.
- Ensure that the development of autonomous vehicles, and the legislation governing them, prioritises cyclist and pedestrian safety.

Active Travel

We strongly disagree that the Framework will have to tackle the 'safety in numbers' effect – as defined in the Framework. Instead, we understand safety in numbers to mean the increased safety that comes from more cyclists using the road together and riders feeling safer as a result. The reasons for this include drivers becoming more aware of cyclists and altering their driving behaviours accordingly.

True safety in numbers will only come when there is more safe space for cyclists to use on the roads. This can either be achieved by providing more segregated cycle infrastructure or slowing and calming traffic to make people who want to cycle feel safer and more confident. We believe that focus of policy and delivery must be put on increasing the amount of quality, safe cycling infrastructure to boost rates of cycling and create safety in numbers.

The Framework must do more to outline the steps needed to provide safe segregated cycle space. We believe that consistent design standards, comprehensive and coherent networks of segregated cycle lanes and good maintenance are needed to boost cycling and increase cycling safety.

Design

Cycle and active travel infrastructure has been designed over the years using differing guidance and standards. It has led to, and still leads to, too many examples of very poor and inconsistent design, which is confusing to drivers and cyclists alike, and often downright dangerous.

Instead, we need a single consistent source of cycle-friendly design guidance covering specific provision for cycling, plus how to integrate cycling into other transport schemes, a process known as 'cycle proofing'. The guidance should apply to all road and junction types, all highway and traffic schemes, all new developments and indeed to planned highway maintenance works. Cycling UK understands that the Scottish Government is currently developing its Cycling By Design guidance and that it will be regularly reviewed. We recommend that this guidance is fully integrated with other active travel needs.

Given the Government's 'Public Sector Equality Duty', the guidance also needs to address the fact that children, older people, women and people with disabilities are particularly deterred from cycling under current conditions.

Road design principles must be re-aligned to focus on movement of people rather than vehicles.

Comprehensive and coherent cycle route networks

Government needs to create a comprehensive and coherent network of safe cycling infrastructure in Scotland – or a series of interconnected cycling infrastructure networks in towns and cities. This blueprint is needed to drive forward work at pace to install the routes locally and join up existing routes.

Local authorities need to deliver these comprehensive and coherent cycle route networks, both within and between built-up areas, so that people of all ages and abilities can cycle and walk safely and comfortably for any local journey. Connecting homes, schools and workplaces, shops, stations and other key destinations, cycle route networks should be:

- Safe: avoiding conflict with high-volume or high-speed traffic, particularly at junctions
- Direct: avoiding significant detours

- Coherent: offering good connections between the links in a network and avoiding stop-start cycle lanes
- Comfortable: with good surfaces and no unnecessary stops-and-starts, and
- Attractive: with the street-scene or landscape enhancing the quality of the cycling experience.

Generally, the links in a high-quality cycle network will take one of three forms:

- Physically protected cycle tracks alongside faster and/or busier main roads. (The faster and/or busier the traffic, the greater the separation needed),
- Lightly-trafficked low-speed streets or lanes, where through traffic is removed as far as possible, and which are designed to feel like community streets, with low-speed limits,
- Routes entirely free of motor vehicles – often a joy to ride, although they must be integrated with a wider cycle network to meet people’s day-to-day journey needs.

Neighbourhoods

Spatial planning policies must be improved to place higher priorities on walking and cycling, with provision for these modes prioritised in future layouts, and tests imposed on developments to ensure easy, safe access to local services. 20-minute neighbourhoods and community-led planning should be encouraged and have road safety and promotion of active travel as a core objective.

Major infrastructure projects must be cycle-proofed to build cycling in from the start.

Recommendations

- Redefine ‘safety in numbers’ in the Framework and set as a positive goal to achieve.
- Establish 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.
- Government must develop a coherent and comprehensive safe cycle network (or series of networks) for Scotland, and remove planning and resourcing barriers to its rapid implementation.
- Government must ensure that all local authorities have the incentives and resources to implement and deliver the network of cycling and walking infrastructure.

Knowledge and Data

The safe system approach may be a new concept for many of the bodies involved in delivering road safety measures. We believe there is a need to put in place specific actions to help organisations fully understand the Safe System Approach and embed it in their operations. Transport Scotland must not fall into the trap of presuming that it will be understood but set specific actions to develop and embed the Safe System Approach and to apply and enhance it in Scotland. As a new concept each body needs to understand and apply the concept to its work.

As already stated in answer to question 3, we recommend that the Framework must embed the road danger reduction approach in order to achieve the outcomes and targets in the most appropriate way. Therefore, in a similar way to our comment above on the Safe System Approach, the road danger reduction approach must be embedded in the Framework and be used by government and all delivery bodies to address the greatest road safety dangers.

The concept of road danger reduction is consistent with the Safe System Approach, as the PACTS report explains. Road danger reduction aims to address the causes of the greatest dangers to others, rather than prioritising the safety of the most vulnerable (or least safe).

Government must collect more data on cycling use. This is needed to support policymaking but also for calculating rate-based indicators, including at the local level.

Lack of cyclist KSI figures on some fast, busy and dangerous roads is hampering the decision-making process. This lack of data may lead to the mistake of considering a stretch of road as not requiring any safety action. We urge government to collect more data in areas which are reported as dangerous for cyclists and vulnerable road users in order to support decision making.

Recommendation

- Scottish Government must put in place specific actions to help organisations fully understand the Safe System Approach and embed it in their operations
- Embed the road danger reduction approach within the Framework and ensure all delivery bodies understand it and are able to use it in decision-making and delivery.

Enforcement

As already stated above, effective enforcement is key to ensuring roads are safe and feel safe, especially for cyclists and vulnerable road users.

Roads policing

Visible roads policing is known to be a highly effective road safety measure²⁴. This is because the fear of being caught influences people's driving standards far more than the severity of the ensuing punishments.

Roads policing should be prioritised in policing strategies and Police Scotland should be given the backing to allocate the resources that roads policing needs and deserves. Roads policing is an important deterrent, but it also ensures crashes are investigated effectively. Well-resourced and well-trained roads police officers are also important for improving the standard of support for road crash victims.

As already stated in response to the Attitudes and Behaviours section, road safety awareness raising campaigns must be backed up with enforcement. We want to see visible enforcement of rules which affect the safety of cyclists, including:

- Speed limits
- Close passing - the need to leave space when overtaking cyclists
- Use of phones whilst driving
- Parking in cycle lanes rules
- Cars waiting in cycle boxes at advanced stop signs
- New Highway Code rules when they come into force
- Car dooring. [link to video]

²⁴ See section 2.3 of Cycling UK's evidence to the DfT: Cycle Safety - make it simple, safety https://www.cyclinguk.org/sites/default/files/document/2018/06/1806_cuk_response-to-dft-call-for-evidence_finalv2.pdf

Cycling UK recommends the introduction of a third-party reporting system in Scotland for dashcam/helmetcam footage. The success of this type of system and 'Operation Snap' in Wales shows that police forces can be helped by the public being able to submit evidence of irresponsible behaviour.

Cycling UK advocates a much greater use of long driving bans for offending drivers: not only are they an effective deterrent, but they also take dangerous drivers off the roads and give the authorities the chance to correct the behaviour in question and subject the individual to re-training and re-testing.

Recommendations

- Roads policing should be strengthened, both to deter irresponsible road behaviour and to improve the quality of road crash investigations.
- Police Scotland should introduce a third-party reporting system for dashcam/helmetcam footage.

Health

This strategic action is particularly weak and does not provide clear direction as to what government and agencies will do to address road safety through health and the post-crash response.

The focus of this strategic action is on the post-crash response rather than how a focus on providing safer roads can lead to more people cycling and walking and therefore improving the health of the population. We therefore recommend that this strategic action is re-written to explicitly focus on the post-crash response.

However, post-crash response is wider than just the health sector, it also involves the police and other emergency services. We would like to see a post-crash strategic action which includes actions to improve the:

- quality of police investigations,
- consistency of charging decisions
- effectiveness of victim support
- access to information and data, either in individual cases (for victims who need to know what decisions have been taken in their case, and by whom) or about the performance of the system of traffic law enforcement generally.

Recommendation

- Widen the scope of this strategic action to cover all aspects of post-crash response.

Education

Cycling UK strongly believes that all road users should respect the rules of the road and the safety of others. To achieve this, education and enforcement measures must be pursued hand-in-hand, as shown by half a century's experience of tackling drink driving.

Education at all stages of life is needed to raise awareness of the rules and why they matter. This improves compliance as well as building public support for enforcement activity. But the enforcement activity is also necessary to ensure that educational messages are not undermined

by those who ignore them. Those who continue to behave irresponsibly must be seen to face appropriate sanctions.

In Cycling UK's view, all schools should teach children about responsible road use in PSHE lessons, supported by resource packs that include positive material about taking particular care of cyclists and pedestrians. This would benefit children from their earliest stages of development right up to their teenage years, when group-based peer discussions about road safety help offset the otherwise 'solo' nature of learning to drive.

Cycle training

Bikeability cycle training helps people cycle more often and further, boosts confidence and reassures parents about allowing children to cycle. Evidence also shows that it promotes safer and more responsible cycling, and prepares people better for learning to drive.

Cycling UK is keen to see all primary school children assisted to achieve Bikeability Level 2, and more people of all ages, including older students, to be given the opportunity to take Bikeability Level 3.

Driver training

We encourage all driver training providers to include cycle awareness in their education courses. This should be included in commercial training courses, Continuous Professional Development (CPD) and in retraining of those convicted of driving offences. Cycling UK believes that cycle awareness modules should be developed for all trainee drivers, with a set amount of time devoted to them. In particular, learners should be told how cyclists are intimidated and are at risk of injury when drivers:

- fail to look properly at junctions;
- overtake too closely;
- speed;
- use mobile phones at the wheel; and
- open car doors without checking first for cyclists.

Re-tests

Cycling UK also believes that it should be mandatory for disqualified drivers (and for drivers who have accumulated 12 points) to undergo a special extended re-test linked to remedial training; and it should certainly be compulsory after any serious road traffic offence.

Recommendations

- Schools and colleges should teach children about responsible road use and promote positive messages about cycling and cycle safety.
- Government should strengthen funding for Bikeability so that every child has the chance to qualify at least to Level 2, and Level 3 is available, free of charge to older pupils before they leave school/college, and to adults.

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

Yes

Increased cycling during the Covid-19 lockdown proved surveys right²⁵ in that when the streets were safer and quieter people did cycle more. A Cycling Scotland survey²⁶ 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 and 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 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.

However, we recommend that rate-based targets are used in the Framework to show risk rather than hazard.

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

Intermediate Outcome Targets

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 the Government's Active Travel Framework²⁷, 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.

²⁵ <https://www.cyclinguk.org/blog/increased-cycling-during-scotlands-lockdown-proves-surveys-right>

²⁶ Cycling Scotland, Attitudes and Behaviours Towards Cycling in Scotland
<https://www.cycling.scot/mediaLibrary/other/english/7268.pdf>

²⁷ Transport Scotland, Active Travel Framework,
<https://www.transport.gov.scot/media/47158/sct09190900361.pdf>

Perception of safety is important in order to encourage people to cycle more. We therefore recommend a 'perception of safety' indicator 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 to show success.

Key Performance Indicators

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.

The question then arises of whether there should be a KPI for the wearing of protective helmets by riders of bicycles. We do not think this is an appropriate or helpful indicator as it would not provide useful information for positive policymaking.

Cycling UK's opposition to both helmet promotion campaigns and helmet compulsion is based on the detriment to public health that accompanies both²⁸. This is because they lead to a reduction in cycling, an activity that offers enormous health benefits as set out in the introduction to this response. The overwhelmingly important issue is the need to weigh up whether any possible injury savings due to helmet wearing justify the likely reductions in cycle use which accompany either compulsion or promotion, and the consequent loss of its health, environmental and other benefits.

Addressing this question, Australian statistician Piet de Jong concluded that: "Even with very optimistic assumptions as to the efficacy of helmets, relatively minor reductions in cycling on account of a helmet law are sufficient to cancel out, in population average terms, all head injury health benefits."²⁹

Based on de Jong's evidence, Cycling UK has estimated that telling people to wear helmets (let alone requiring them to do so by law) would shorten more lives than helmets themselves could possibly save (even if helmets had miraculous safety properties) if this led to reductions in cycle use of more than a fraction of a percent.³⁰

Evidence shows that helmets only provide protection to the rider at relatively slow speeds and can therefore provide a false sense of security³¹.

If Scotland, continues to build networks of segregated and safe cycle lanes in Scotland's towns and cities, which people feel are safe to use, it is likely to lead to a feeling of safety in numbers and less helmet use. This is the case in cities in the Netherlands which, as described in the Framework, have better cycling safety records than Scotland. 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

²⁸ <https://www.cyclinguk.org/campaigning/views-and-briefings/cycle-helmets>

²⁹ <https://onlinelibrary.wiley.com/doi/abs/10.1111/j.1539-6924.2011.01785.x>

³⁰ See Cycling UK's evidence briefing on cycle helmets, downloadable from <https://www.cyclinguk.org/campaigning/views-and-briefings/cycle-helmets>

³¹ <https://www.cyclinguk.org/campaigning/views-and-briefings/cycle-helmets>

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.

Instead, 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

Cycling UK has no recommendations to make to these questions.

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

- Awareness and enforcement campaigns, such as Operation Close Pass, have been successful.
- Construction of safe segregated cycling infrastructure, such as the South City Way in Glasgow.
- The introduction of 20 mph zones in residential areas, including through Spaces for People funding.
- Bikeability training is being provided for large numbers of primary school children.
- Use of average speed cameras

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

We have outlined the practical actions that we believe are needed in answer to question 5. However, priorities include:

- Increasing funding for active travel to at least 10% of the transport budget.
- The above is needed to pay for the creation of more segregated and quiet cycling routes. provision on faster/busier main roads, and redesigning dangerous junctions.
- We recommend that 20 mph is made the default speed limit in built-up areas, as already explained in answer to the Speeding section of question 5.
- Greater use and publicity of awareness raising and enforcement actions by Police Scotland to cover: speed limits, mobile phone use, close passing, parking in cycle lanes, and the new Highway Code rules when approved, particularly in relation to junction priority.
- Action to widen the availability of cycle training for people of all ages, and to strengthen the role of cycle awareness in retraining for offending drivers.
- Greater use of speed cameras, and average speed cameras, especially for communities who request these to slow traffic in their areas.

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 lockdown³².
- More people have returned to driving rather than using public transport.
- Enforcement of speeding, close passing, and other dangerous driving behaviours is insufficient in Scotland and, because of this, does not discourage poor driving.
- Parking is a problem in many areas, either pavement parking or parking in cycle lanes³³.
- Safety near schools is a problem due to people parking and waiting during school drop-off and pick-up times.
- The safety record of HGVs, vans and LGVs needs to be improved as they pose the greatest danger to vulnerable roads users.
- Focus of cycle safety campaigns is too often focused on asking cyclists to be visible, rather than asking drivers to take care and look for cyclists. Too often these campaigns can be construed as 'victim blaming' and gives credence to poor attitudes amongst drivers. A campaign focus on reminding drivers to look out for cyclist is an example of using the Road Danger Reduction approach, as described in answer to question 5.
- Sat-navs may aid drivers' route-finding, but they do guide drivers through neighbourhoods along quiet routes and 'rat runs', thereby putting other peoples' safety at risk.

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

We have outlined the practical actions that we believe are needed in answer to question 5. However, additional priorities include:

- A high priority for Cycling UK is 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 Cycling UK member David Brennan who was assaulted by a driver³⁴. 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 third-party reporting through a single video footage submission system and an initiative, similar to Operation Snap in Wales, to raise awareness.
- The law on parking in a cycle lane must be updated as it no longer matches rules in the Highway Code³⁵. This prevents the ability of those with enforcement powers to do their job effectively.
- We want to see the creation of Low Traffic Neighbourhoods (LTNs) to reduce 'rat runs' and through traffic, rather keeping volumes of traffic to trunk roads and main routes. The design of LTNs should be done with communities and can be easily implemented with bollards and planters to close through roads.

³² <https://www.bbc.co.uk/news/uk-52370352>

³³ <https://www.otsnews.co.uk/police-highlight-risks-posed-drivers-park-cars-pavements/>

³⁴ <https://www.cyclinguk.org/news/cycling-uk-demands-reform-after-assaulted-cyclist-warned-swearing>

³⁵ <https://www.cyclinguk.org/blog/its-time-fix-law-stop-parking-cycle-lanes#:~:text=Rule%20140%20of%20the%20Highway,during%20its%20times%20of%20operation%22.>



Transport Scotland consultation document https://consult.gov.scot/transport-scotland/road-safety-framework-to-2030/user_uploads/425982_sct1219677072-001_sg-consultation-on-road-safety_final_web--1-.pdf

Submission date – 27 November 2020

For more information contact:

Jim Densham, Campaigns and Policy Manager for Cycling UK in Scotland.

jim.densham@cyclenguk.org