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Road Safety Consultation  
2/13 Great Minster House  
76 Marsham Street  
London  
SW1P 4DR

Dear Sirs

**A SAFER WAY: CONSULTATION ON MAKING BRITAIN'S ROADS THE SAFEST IN THE WORLD**

Thank you for allowing the AA to comment on this consultation. A question by question response is on the following pages.

Generally the AA supports the course of action in the consultation document, and the response on the following pages shows that it has the general agreement of AA members as sampled through the AA Populus panel. We also feel that the vision suggested is one that is easy to communicate and which is achievable. It also has the advantage that Britain has to stay ahead of the achievements of other countries – even if their vision is zero. The targets meanwhile are the right ones for focussing all who have a role in road safety.

It is unfortunate that although the strategy can be set for twenty years into the future, we cannot do the same with funding. Similarly it does not seem possible at present for money to be set aside specifically for road safety – even road safety grants can be spent on other priorities. More certain road safety funding would certainly help the cause.

We are glad to see the consultation favours targeted speed limits, both on rural and urban roads, rather than blanket restrictions. We would hope that this remains so in

the final strategy. We do have concerns about the whole notion of “default” limits, advocated by some groups, with a suspicion that the “default” would soon become the norm, not least because authorities would be concerned at issues that could arise from authorising a speed limit higher than the default.

Drivers will always make mistakes. Protecting road users from the consequences of these mistakes is crucial, be it by more crashworthy car design, more forgiving roadside objects or the use of technology. But drivers can need to be “chivvied” back onto the right paths, and the AA is very keen to see those that draw themselves to the attention of the authorities, particularly through minor offences, are offered training in the first instance. Penalties should be for those who repeatedly offend, or who commit the more wilful offences. Training those who show they have deficiencies is a much more effective way of maintaining standards among experienced drivers than any blanket retesting or retraining requirement. Training in environmental and economic driving can help many drivers and will have considerable effect in encouraging driving techniques that are inherently safer than those used by many drivers.

The population is getting older, and it is important that the strategy takes account of the needs of older people. On balance we chose not to press for a casualty reduction target for the elderly, because there are enough targets. While we can see an argument for a young driver target we see the need to keep targets to a minimum and would think that such a target should only be introduced if it can be done without increasing the overall number of targets.

Probably the key statement in the strategy is that the government considers its main purpose is to improve delivery, as the legislative framework is fit-for-purpose. Broadly we agree with this, but there are areas – the legal limit for drink driving, and the whole way drug-driving is handled, that may benefit from change.

We feel that the first two road safety strategies and targets have been key to the reduction in road death and injury of recent years. We are very keen to see another iteration of a successful approach.

Yours sincerely

Andrew Howard

## **ANSWERS TO SPECIFIC QUESTIONS RAISED BY THE CONSULTATION**

**This consultation document sets out the current evidence on the key road safety challenges. Do you agree with our analysis? Would you highlight any others?**

Broadly speaking we agree with your analysis.

The document tends to assume that all road users are there for balanced reasons, using the road network to get from point A to point B safely and efficiently. This is not always the case and there are people who are driving (or riding) as an end in itself, or who are seeking thrills and excitement, or trying to show off (“extreme” users). This group, which includes car drivers and motorcyclists, most probably cyclists and possibly others, may not respond in the same way to road safety measures as the road users who are using the road as a way of getting around the country. The role of this “extreme” group cannot be quantified, but could be considerable. Looking at issues differently may help –are the best classifications motorcyclists and drivers, or road users for transport and road users for excitement?

There are now groups who seek to undermine some road safety messages, and the possibility of these groups having an effect on wider public views of road safety and road safety measures needs to be considered in the strategy. If people doubt basic tenets of road safety thinking (ie the relationship of speed to accidents) road safety messages do not work for those people. The apparent position where drivers do not consider points on licences to equate with being a bad driver (highlighted later) may be a result of this.

Few would disagree that men are more likely to be in the “extreme” driving group than women. It may be for this reason that we see from an AA Populus study\* that 30 per cent of males consider the target of a 30 per cent reduction in road deaths to be over ambitious, while only 18 per cent of women do. Similarly, while 58 per cent of drivers would be happy to see more restrictions to achieve the target, this hides that fact that this represents 70 per cent of women but only 49 per cent of men. There seems to be a considerable gender difference in whether or not further measures are supported.

**Do you agree that our vision for road safety should be to have the safest roads in the world?**

Yes. We envisage this as a simple vision, simply put, a statement that is almost a strapline. Any advantages in making it more specific are more than offset by keeping it clear and simple.

Detail is for strategies and targets, not for visions.

During the currency of this consultation, the provisional road casualty figures for Britain have been published and this country has returned to the top of the safety league. While it can be argued that this reduces the challenge of the target, the AA would not agree. Staying ahead of the world is a challenge in its own right.

**Do you agree that we should define a strategy running over twenty years to 2030, but with review points after five and ten years?**

Yes. Presumably there would be a review after 15 years as well.

**We have identified a number of factors that may affect our ability to deliver road safety improvements in the future world we are planning for. Do you think we have taken account of the key risks and opportunities? Are there others you would add?**

Pressure on the enforcement regime is a major factor. Over the last ten or so years, rising concern about crime and terrorism seems to have removed large numbers of traffic police, a shortcoming which to some extent has been offset by the use of technology, particularly cameras. But there is no guarantee that the economic downturn will not lead to more crime and for more pressure to be placed on the police.

Busier lives and leisure purposes are mentioned, but the recent trends of busier working lives leading to desire for more intense recreation has not been mentioned. Is “extreme” motorcycling, or car driving on the road a manifestation of this?

Whether higher levels of young people attending university will lead to large numbers of youngsters who pass their driving tests and then don’t drive for several years is also a key question, but one that must be tempered by a need to show that this makes them dangerous, not merely out of practice. If people have to wait to get into university, or have trouble getting a “proper” job on leaving, there may be more very inexperienced drivers moving into the home delivery industry which may affect van driver safety.

**We think that the key challenge for road safety from 2010 is better and more systematic delivery, rather than major policy changes. Do you agree?**

Yes. But systematic delivery can very easily become a “one size fits all” approach and care is needed to make sure that this is not the case. The controversy surrounding the notion of reducing the speed limit to 50 mph on all rural single carriageway roads shows that blanket restrictions do not sit well with the public and measures or suggested measures that are not popular could have an effect on public perception and compliance with existing measures.

That said, there is evidence that the majority of the public would accept a lower drink drive limit, as shown in an AA Populus poll.\*

*The drink drive limit should be lowered*

<i>In favour</i>	66%
<i>Opposed</i>	20%

**We are proposing a number of measures to support the effectiveness of the road safety profession. Do you think they will be effective? What else might need to be done?**

The road safety profession is nebulous. It could be considered a polyglot collection of refugees from other professions, joined by people who may be in the profession now but who will have to look to make their name in other areas.

The most effective way of improving the road safety profession would be to find a way of giving it a structure, but given the roles of central and local government, companies and the self employed it is hard to see how this can ever be done.

**Do you agree that an independent annual report on road safety performance, created on an annual basis, would be a worthwhile innovation?**

Yes. The problem is ensuring that it is considered independent by those who criticise the road safety effort. Who carries out the review, and who they report to are important considerations.

**Do you agree that highway authorities reviewing and, where appropriate, reducing speed limits on single carriageway roads will be an effective way of addressing the casualty problem on rural roads? Are there other ways in which the safety of rural roads can be improved?**

Yes. There is much that can be done through engineering to make rural roads safer. Attention needs to be paid to these easy fixes, which should not only concentrate on preventing accidents but also on protecting road users who make mistakes or who are victims of the shortcomings of others.

There is a need to ensure that there is national consistency in the application of the review. The motoring public is far from convinced that speed limits are always necessary for safety.

*An AA Populus study\* has shown that drivers consider the most appropriate national speed limit for a single carriageway 'A' road in a rural area to be: (accepting that in particular places on this road, such as villages, a different (lower) limit may be set).*

40mph	17%
50 mph	30%
60 mph	45%
70 mph	6%

*(47% believe it should be lower, 51% the same or higher)*

**How can we most effectively promote the implementation of 20 mph zone schemes in residential areas? What other measures should we be encouraging to reduce pedestrian and cyclist casualties in towns?**

There is considerable logic in looking to increase the number of 20mph limits in residential areas. Much of the key to doing this effectively is to introduce the system in a way that is seen as acceptable by drivers, especially on those roads which are both "residential" and major traffic routes.

The AA has argued for a phased approach. The first phase would be to create a “fast track” for the introduction of 20mph limits in those residential streets where it is fundamentally difficult to exceed that limit. This could include almost all post 1980, cul-de-sac based housing developments, and many purely residential roads in urban areas. This would create the situation where a significant proportion of the population lived in 20 mph limits and would therefore be more likely to respect these limits. This would not have a great impact on road casualties – but it would however create the atmosphere in which 20 limits would be accepted by most drivers.

Later, these limits could be extended to take in other residential streets that were relatively low on the road hierarchy. A good guide would be those roads which were not bus routes. Further extensions would be possible in the future.

*An AA Populus study\* has shown that increasing the number of 20mph zones is a good way to reduce pedestrian casualties?*

<i>Agree</i>	<i>44%</i>
<i>Disagree</i>	<i>32%</i>

There are many still to be convinced.

The next twenty years are going to see massive increases in the number of older pedestrians. More attention needs to be paid to older pedestrian safety, and particularly in residential and shopping areas. The road safety effort should not be taken by surprise by an increase in older people, and therefore their casualties, that has been inevitable for 60 or 70 years.

### **How can we provide better support to highway authorities in progressing economically worthwhile road safety engineering schemes?**

If it is possible to have a ten or twenty year strategy, can it not be possible to have a ten or twenty year funding regime, which ensures that road safety money pays for road safety measures?

An AA Populus study\* has shown that AA members see engineering as a key way of improving road safety:

*Which of the changes listed below is most likely to make our road safer?*

<i>More cameras</i>	<i>2%</i>
<i>More traffic police</i>	<i>27%</i>
<i>Road and junction improvements to remove accident black spots</i>	<i>70%</i>

Ensuring stable funding, and making sure that funding cannot be removed and diverted to other areas of an authority, remains key to delivering safer roads.

### **What should Government do to secure greater road safety benefits from vehicles?**

**Do you agree that, in future, crash avoidance systems will grow in importance and will have the potential to greatly reduce casualties?**

The time may be coming when it is necessary to “cross cut” some consumer data to take account of the people who will be using the vehicle. While EuroNCAP and other innovations have doubtless improved vehicle safety by raising the public’s perception of the difference in safety offered by various vehicle models, it may need to move forward. There is a danger that we are developing a “one size fits all” philosophy – for example older people may not be interested in how well a car protects children, but could be far more interested in the way it will affect occupants, like them, who are frailer than average. Cars may have smart systems that mean that the characteristics of the person they are trying to protect are taken into account, but are road users aware of this and can they can they find out about effectiveness. It has to be applauded that we now know how vehicles protect the 50<sup>th</sup> percentile occupant. In the future this information can be improved so that people who are not “average” can understand how a vehicle will protect them.

Crash avoidance systems will have a growing importance, but important decisions need to be made on the legal considerations around their operation. Eliminating the risk that a system might cause an accident seems to also reduce the capacity of the system to avoid accidents. Government, almost certainly European Government, has a key role to play in creating a balance here while maintaining the integrity of motoring law.

**How can we best encourage consumers to include safety performance in their purchasing decisions?**

Help them by tailoring information to their own individual needs.

**We have highlighted what we believe to be the most dangerous driving behaviours. Do you agree with our assessment?**

Yes. We are concerned however that the list does not take into account some of the behaviours that drivers are told not to do and which make them feel uncomfortable when they are carried out by others. Examples would be following too closely, overtaking on the inside or hogging the middle lane. Many drivers would argue that these activities need to be discouraged and would like to see more action taken against drivers who carry them out.

We feel that steps need to be taken to deal with inconsiderate, wilful and aggressive driving. Human beings will always make mistakes and be careless – extensive enforcement is unlikely to stop that. But they need not inconvenience and endanger people wilfully. There is a need for this sort of behaviour to be discouraged. The safety benefit may not be immediate, but it will help drivers have some respect for the law if something is done to bring deliberate bad drivers to book.

Ever changing traffic conditions mean that new hazards arise. An example of this is the disproportionate number of cyclists that are being killed in collisions with trucks. Six female cyclists have been killed in this way already this year in London. We believe that this matter should be looked at urgently. But it is also an example of how

changes in how we use the roads can create new dangers, and new dangerous behaviours.

### **What more can be done to persuade the motoring public that illegal and inappropriate speeds are not acceptable behaviours?**

It may be that the furore over speed cameras is at last in decline and that the public may again be beginning to understand that the speed issue is one of road safety and not one of money. If that is the case we are at last leaving an era where public discussion of speed issues has been almost impossible because of the camera debate. This may lead to an era where decline in speed becomes a reflection of increased concern about its dangers, rather than of being caught.

The overriding principle in handling speed issues has to be to accept that it is a controversial area. Activity, especially enforcement activity must be transparent and must appear above-board to all who look at it. A goal must be not to upset the sceptics. Too often initiatives serve less to deter speeding than to reopen old wounds and resuscitate rumours and misinformation.

During the period of the last strategy technology has come on a long way, and there are approaches which were basically impossible in 2000 that are possible and relatively cheap now. Interactive signs are a good example. They can give targeted messages, and almost “talk” to individual drivers. There are many ways that these signs could be developed – perhaps even to the extent that they can measure pedestrian or cycling activity on town centre streets.

When described as an optional aid to driving there is support for intelligent speed adaptation. This ceases to be the case if it is looked upon as a compulsory restriction. How messages are given at all levels of the road safety world can have a key effect on how the public sees innovations and measures.

### **What more can be done to encourage safe and responsible driving? Should more be done to reward good driving? If so, what?**

Perhaps the time has come to stop thinking of “drivers” as a group.

Normal drivers do their best. They are human, they make mistakes, and learn by experience. Sometimes, from a road safety point of view, they learn the wrong things. Sometimes their mistakes have to be treated as inevitable and are best protected against – by forgiving road design or by crashworthy cars or cars that help them avoid mistakes. Most drivers only need chivvyng back into line. There are good ways of doing this (see Top up training, below).

Some drivers are inexperienced, foolish or under pressure. They can do absurd things. They have to be the prime target for education.

Other drivers are more extreme. They may deliberately drive in a way that they feel is right, yet which endangers, or just annoys others. They may not do this all the time. These drivers have to be the prime target for enforcement.

It is hard to see how good driving can be rewarded by government, among other things because there would be a logical school of thought that not being a recognised good driver meant you were a bad driver. Care would have to be taken to ensure that any scheme did not serve to reward driving “anoraks” rather than normal people who use cars.

People need to be given an incentive to improve their skills though training and reduced insurance premiums will be the best way of doing that. But insurers are unlikely to adjust premiums to incentivise training until it has been shown to cut their claims. Could the government “prime” the system? It is almost certain that courses would cut emissions as well as improving safety.

Of course a no claims discount is a way of recognising good drivers. Those that have a full discount (which could be up to 60 per cent of all drivers) can consider themselves good drivers as can those holding an advanced driving award or a vocational licence – in fact these groups can claim they have it in writing. The growing number of company driving schemes may be producing another group who consider themselves good drivers. Some may consider they are good drivers because they have no penalty points.

The AA is concerned that the link between having points and not being a good driver is ceasing to exist in public perception. A recent AA Populus study among nearly 14000 AA members showed that 48 per cent thought that a driver with points on his or her licence was as safe as someone without points, 8 per cent thought them safer, while 32 per cent thought them less safe.

It is even more questionable how many people see points on their own licence as a sign of being a bad driver – they may well feel themselves victims of circumstances, or that the only difference between them and “good” drivers is that the good drivers have not been caught. Perhaps a more sensible challenge would be to make people who have committed offences think they are bad drivers.

#### “Top up” training

There will always be an argument that drivers should be periodically retrained or retested. The AA would not call for this to be applied to all. But there are sound arguments that training should be the first measure considered for people who commit minor offences and who have no record of committing these offences. This has become the case through the introduction of driver improvement and speed awareness courses, and new courses are being developed to cover other offence areas.

The AA supports this approach. An AA Populus panel study shows that this has public support

*To what extent do you feel that drivers who commit certain minor offences (such as speeding) should be offered a driver improvement course, at their own expense, as an alternative to prosecution*

<i>Agree</i>	80%
<i>Neither agree or disagree</i>	8%

*Disagree*

12%

Effectively, this approach would be saying “people whose bad driving brings them to the attention of authority will be retrained”. Punishment then comes to those who are either unable or unwilling to benefit from the training. And the role of training as an adjunct to punishment must be considered.

The government should check that these courses give the right training, and that such training reduces accidents and further offences among participants.

Courses in environmental and economic driving can help here too, as safer driving is invariably a spin off from these courses.

**Do you agree that our targets should be:**

- **to reduce road deaths by at least 33 per cent by 2020 compared to the baseline of the 2004–08 average number of road deaths;**

Yes. We believe that this should be a national target and that its use on a more local basis should be discouraged as the numbers become too small for them to be statistically meaningful. It can be argued that the 14 per cent reduction in deaths in 2008 makes this less challenging, but at the time of setting the target there is no assurance that 2008 has not been for some reason a “blip” and that the reduction will be sustained.

*An AA Populus study\* among AA members has shown that setting a target to reduce Britain’s 3000 road deaths per year to 2000 by 2020 is:*

<i>About right</i>	38%
<i>Over ambitious</i>	25%
<i>Under ambitious</i>	21%
<i>Don’t know</i>	16%

- **to reduce the annual total of serious injuries by 2020 by at least 33 per cent;**

Yes. This is a better headline target for local authorities.

- **to reduce the annual total of road deaths and serious injuries to children and young people (aged 0–17) by at least 50 per cent against a baseline of the 2004/08 average by 2020**

Yes

- **to reduce by at least 50 per cent by 2020 the rate of KSI per km travelled by pedestrians and cyclists, compared with the 2004–08 average?**

Yes. We are aware that there are concerns about what can be used as the exposure measure but believe that the value of the target, particularly in that it cannot be achieved by stopping people walking and cycling, overcomes any concerns about data reliability.

**Targets in general**

There are good arguments for keeping the number of targets to a minimum. There are arguments for other targets but we feel that too many targets can be counter productive. We are glad to see the key performance indicators are being used, and would hope that annual reviews will be able to deal with any issues which arise because of problems with specific indicators. An example of this would be older people, where increasing numbers could well mean that casualties do not reduce as fast as they would with a static or declining population.

It is likely that there will be continued discussion about recording differences between the road accident system and the health service system. It is important that this is explored fully and that a situation is not reached whether success or failure can depend on the recording system chosen. The baseline years for the fourth road safety strategy will start only four years after the start of the new strategy, so decisions on recording made in the next few years could still be having an effect in 2030.

**We are proposing a set of indicators in order to help us to monitor performance. Do you believe these cover the right areas?**

Yes

**Do you agree that the Road Safety Delivery Board should be tasked with holding Government and other stakeholders to account on the implementation of a new national road safety plan?**

We agree with the concept. We have concerns about the structure, as it appears to be a board appointed by the government accounting to the government for the performance of the government. There may be better ways of organising the work of the board, and that of the production of the annual reports

\* The answers above feature responses to AA Populus panel surveys. There are now some 75,000 AA members signed up to the AA Populus Panel. These drivers are approached monthly for their views on a wide range of motoring issues, and in the region of 10,000 to 20,000 respond each month. Populus is a member of the British Polling Council and abides by its rules.