

Appendix 2

West Yorkshire Safer Roads Partnership

This submission is made by the West Yorkshire Safer Roads Partnership, which includes road safety professionals from the 5 West Yorkshire Highway Authorities along with professionals from NHS Primary Care, Police, Fire and Rescue, the safety camera partnership, and the Highways Agency.

A safer way - consultation on making Britain's roads the safest in the world.

In general the overall impression is of a top down approach from a government department with insufficient understanding of local authority areas where the strategy will be delivered, including the workings of local authorities and the needs of their communities. This appears to be at odds with DCLG and the Audit Commission - and the neighbourhoods' agenda driving local government.

It is heavily transport based in context, concept and delivery to the exclusion of other interests, partially or completely, and in parts it is divisive. The system is defined as road users, road environment and vehicles excluding communities and the neighbourhoods' agenda.

The context should be one of "Transport in a Sustainable Community" to tie in with local authority priorities and the direction set through DCLG. This brings an immediate link to other government departments, local authorities, local NHS, community support groups and representatives, voluntary sector.

Equity, community and empowerment are all missing from the narrow context outlined in the consultation document - the document concentrates on reducing road injuries and setting targets, without considering road safety in a wider context - to deal with anti-social behaviour, to regenerate communities, to deal with criminal activity related to traffic use and offences, to reduce fear and intimidation. It does not give identity to individuals and communities to be part of - making our roads the safest in the world.

The definition of safest roads in the world seems to be related to road injuries per capita, but makes no mention of equity that people should not be disadvantaged by the place that they live or the circumstances within which they live. Measures of performance are arbitrary around set baseline/ starting points that in themselves do not quantify safety and perversely the more unsafe the area at the baseline the more likely that target reductions will be achieved. Rate per capita should be used more widely to set benchmarks in similar local authority areas and establish a real measure of safety that could be meaningfully compared. We have already made the point that there are real differences between areas of the country that have significant problems of disadvantage and those that do not.

It is essential that DfT support the target setting with more detailed and robust estimates of the effects of the strategy measures in the way that it was done for Tomorrow's Roads - Safer for Everyone with clear levels of responsibility and effect for government, local authorities and other agencies.

- and to assist local authorities an explanation of "the standard of the best" used in paragraph 19 should be provided.

Much of what is suggested in the strategy is already being done - in many local authority areas.

1. Introduction

This developing strategy is seemingly less holistic than the previous strategy where everyone, whoever they were and whatever standing they had in society, could see how they could contribute to its delivery. This is far less engaging.

One point we would make in relation to building partnerships is that DfT need to learn too and local authorities are working to regenerate local communities independent of this strategy, with significant partnership arrangements and with significant achievements contributing to improved safety. Local authorities have local knowledge and skills, and considerable expertise appropriate to local conditions that DfT does not have and does not acknowledge in this consultation.

2. Background and context

Road casualties are measured against population until performance in local authority areas is discussed and the measure is then against kilometres travelled. Local authority areas need to be shown in relation to road casualties against population - to give a more accurate and relevant measure of safety and take pedestrian and cycling activity, population density, and deprivation more fully into account.

In terms of road user behaviour the strategy continues to refer to a small numbers of people who break the law. In West Yorkshire we have very significant problems of the non-wearing of seatbelts - acknowledged in DfT studies and the road safety partnership grant - and some 70,000 people each year receiving penalties or driver training opportunities for speeding. The policing pledge has again reinforced the local communities concerns about speeding vehicles previously demonstrated in the British Crime Survey.

In relation to deprivation it would have been proper to have acknowledged that DfT together with their partner agencies and communities had been successful in meeting the 2005 target of reducing road casualties in the most deprived English Districts faster than for England as a whole. Local authorities were responsible for setting up partnerships, putting forward effective bids and substantially for delivery. It would also have been right and proper to continue government funding to deal with the recognised problems related to deprivation. The road injuries to children in deprived areas are still 4 times greater as you have acknowledged and it is a national scandal that government is allowing this to continue through the cessation of funding. In the case of deprivation a rate against population is used not a rate against road use.

The key challenges are largely as those which we are currently dealing with, our questions are what is the measure of government performance in geographical locations, have government policies been effective in dealing with local conditions, has government investment been directed appropriately and maintained in the most needy areas? We also disagree that there is poor user behaviour amongst a few. The DfT seminar in York on research, highlighted facts that driver behaviour was deteriorating. This would seem significant in locations where poor user behaviour may be linked to unlawful and criminal behaviour.

Issues

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?

Answer

We do not agree with your analysis in relation to performance in that there are no meaningful measures of relative danger, or safety, to allow any robust comparison between local authority areas. The measures of performance remove government performance from local authority areas despite the significant effect that government policy, practice and funding has on society in general and, in this case, road safety performance.

Injuries against population should be used in Local Authority areas as a measure of safety.

3. A Vision for the Future

The vision for the future should be linked to providing a better future for everyone and show strong links with other areas of government, and local, policy making and aspirations - the measure of safer roads cannot just be reductions in road injuries. The vision needs to link with health, education, safety and security, reduction of anti-social behaviour, regeneration of local communities and be seen as a holistic vision for achieving that - contributing to the "best" country in the world - healthiest, best educated, most secure etc.

Questions

- (1) Do you agree that our vision for road safety should be to have the safest roads in the world?
- (2) Do you agree that we should define a strategy running over twenty years to 2030, but with review points after five and ten years?
- (5) 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?

Answer

The 20-year period for the vision would seem appropriate given that future events cannot be reliably forecast and determined. Interim targets need to be much more robustly calculated and more sophisticated when applied locally and regionally, taking into account geographical and changing social conditions. The application of targets locally and regionally is unclear.

The vision of the safest roads in the world would seem to rely heavily on reducing the risk to children and to do that we need to reduce the levels of disadvantage in the country - dealing with inequality. The consultation and this chapter do not make the links to other areas of government policy that will be so vital in bringing about the vision.

4. Delivering our goal - the overall approach

The first question raised by this chapter is "What can local communities expect from us?" and what is in this chapter to promote personal and social responsibility for safer roads issues - other than "we all have a responsibility as road users to adjust our behaviour to reduce the chance of collisions happening". We have a much wider

responsibility to provide a better, healthier and safer future - and non-users are an extremely important consideration in the delivering the goal but seemingly excluded.

The legal and regulatory framework is not fit for purpose as it puts pedestrians and other vulnerable road users at considerable disadvantage - residential areas and areas within village, town and city centres should be places where pedestrians and vulnerable road users have priority and not be intimidated or put at risk. Conversely, consideration should be given to making laws that discourage reckless pedestrian behaviour on routes where motor vehicles need to have priority.

We have moved away from a "silo-based" approach based on the 3 or 4 E's. Our LTP has demonstrated this and our safer roads forward strategy rated "excellent" by DfT in assessing our LTP progress reports. Our model is based on community engagement and empowerment, which does not feature strongly in this DfT consultation.

Questions

- (6) 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?
- (8) 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?
- (9) Do you agree that an independent annual report on road safety performance, created on an annual basis, would be a worthwhile innovation?

Answers

The delivery of the goal should be a combination of better, more systematic delivery engaging with and empowering people to be part of the delivery, together with major policy changes around priorities for vulnerable road users in areas where they should be free from intimidation, risk and injury.

DfT need to engage more fully with local authorities to understand their structures, the conditions that each local authority area is dealing with and the requirements that are put upon local authorities by other government departments and particularly to become engaged with the neighbourhoods agenda. DfT also needs to be seen to promote the new road safety strategy with full support of other government departments, particularly the Home Office.

An annual report on performance would be innovative if it were robust, in terms of measurement and assessment of safety, and if it were to include the performance of government.

5. Strengthening the weak links in our road network

Context

The analysis of safe roads and unsafe roads is determined in this consultation by the absence or presence of road crashes and injuries, which does not sufficiently consider danger reduction, to reduce the potential for crashes and injury and to encourage correct driver behaviour on all roads, whether or not there is a crash history. Factors that lead to impatience and poor behaviour on single carriageway

rural roads include differential speeds and the frustrations of following slower moving vehicles, and the non-application of appropriate speed limits. Severe braking on bends and over-running of the centre lines are clear indications of wrongly applied speed limits and evidence of drivers lacking the visual signals - of the correct speed. Audit of routes should be used more widely to identify problem locations and to promote wider remedial action. Advisory speeds on bends have proved successful and encourage correct understanding of road layout and appropriate speeds, as have variable message signs that warn of bends and junctions.

The protection of local communities should be made a priority where they occur on rural routes and there should be greater emphasis on slow speeds where roads run through unfenced areas, or where there are no footways.

Reducing pedestrian casualties

Measures needed to reduce pedestrian casualties are determined by a number of factors - for children age, and the need to prepare for independent travel are most important. Up to 8 years old traffic calming, home zones and 20mph zones are most appropriate - preventing casualties close to home. As children become independent travellers and young people the establishment and expansion of pedestrian routes, road space reallocation, speed limit reviews, safer routes to school and to play become more important particularly in relation to major roads that are used in daily activities.

The issue of pedestrian injuries on major roads for all age groups does raise the question of whether we are doing enough to provide facilities for convenient and safe travel opportunities, particularly where there is significant severance of local communities.

Tackling the riskiest routes

Many if not all local authorities have robust statistics on roads that have casualty records. In West Yorkshire we use a comparison with "expected" casualty rates and causation factors to determine either those roads with higher than expected casualty rates or prevalent causation factors that can be treated. In our experience authorities already have extensive partnership arrangements with police and other stakeholders, and extensive local consultation networks to progress safer roads issues.

Reducing speeds

Our view is that the determination of speed limits is still heavily biased towards motor transport and often results in unsocial and unsafe speeds for communities and vulnerable road users. Guidance that requires a casualty record to reduce speed limits to sociable levels is unacceptable.

Better investment in road safety

Investment in local road safety schemes needs to be combined with wider investment to provide measures that change behaviour on all roads - not just those that have concentrations of road injuries. In urban areas these concentrations can be of slight injuries and much more needs to be done to modify behaviour outside of the urban areas to deal with isolated and random crashes that are often more serious.

Improving the riskier areas

As we have detailed before the analysis made of risk is based on arbitrary performance not comparative safety. In West Yorkshire road deaths have fallen from 144 in 2001 to 71 in 2008, more than 50%, against a current population estimate of 2.2 million.

There are many factors that contribute to "standards" of road safety - societal make-up, environment, deprivation, government policy, practice and investment, and, in fact, withdrawal of investment to most needy areas. It is an issue that within this consultation that DfT do not accord with the Neighbourhoods Agenda of the remainder of government, which denies local authorities funding support for safer roads activities. It is also an issue that Metropolitan Areas are not sufficiently represented on the national Road Safety Delivery Board. We see this as a significant gap in government knowledge and an absence of representation for a significant proportion of the population.

Government is as much responsible for meeting local targets, as are local agencies.

Questions

- (11) 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?
- (12) 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?
- (13) How can we provide better support to highway authorities in progressing economically worthwhile road safety engineering schemes?

Answers

Speed limit reviews are necessary as are audits of rural roads to identify and treat locations where speeds within the speed limit are unsafe. Speed limit guidance still fails to take into account the needs of communities and vulnerable road users.

20 mph has been promoted in West Yorkshire for many years following the former Health Development Agency report that reducing speeds to 20 mph would reduce injuries to children by 2/3rds. West Yorkshire Police have commented that 20 mph speed limits and zones need to be self-enforcing.

Other measures have been discussed earlier in this section. The comments in relation to cycling would be similar to pedestrians - slow speeds in residential areas, providing effective networks and links and, on major roads raising awareness, providing facilities and achieving suitable safe speeds for other traffic.

Highway authorities have significant experience and knowledge of casualty reduction techniques. Concentrating solely on economically worthwhile road safety engineering schemes will not contribute sufficiently to the achievement of targets to reduce killed and serious injury.

6. Supporting the choice of the safer vehicle

The continued development of safer vehicles is essential for both primary safety, to prevent crashes and injuries, and secondary safety to reduce the potential for injury when a crash occurs.

The choice of a safer vehicle is a much wider issue and there is clear evidence from government that older smaller vehicles are very much more unsafe than newer more robust vehicles and less likely to prevent injuries in a crash. The growth of SUVs, 4x4 vehicles, has brought about great differentials in vehicle size and weight against standard vehicles, again making smaller vehicles less safe in an impact. People in areas of deprivation are those most likely not to be able to take advantage of new vehicle technology and will remain to be at risk unless more is done to reduce poverty and deprivation.

There is a significant need to develop vehicle technology to prevent injuries to pedestrians.

Questions

- (14) What should Government do to secure greater road safety benefits from vehicles?
- (15) Do you agree that, in future, crash avoidance systems will grow in importance and will have the potential to greatly reduce casualties?
- (16) How can we best encourage consumers to include safety performance in their purchasing decisions?

Answers

Advances in vehicle technology should not be seen as an alternative to correct behaviour whilst driving vehicles. Government should stress this whilst promoting safe technology - and emphasise the requirement to make cars less damaging when in an impact with pedestrians and cyclists.

Crash avoidance systems may well be seen as intrusive and taking away personal liberty and choice. It remains to be seen if this will be acceptable to the community at large in the future.

Consumers cover all age groups from late teens to senior citizens, private and business/fleet operations. Safety should be a prerequisite in vehicle design and manufacture - so that consumers cannot purchase unsafe vehicles. The issue is how can we reduce poverty and deprivation so that people have a real choice of purchasing a newer, safer vehicle.

7. Responsible and irresponsible road use

It is clear that the reduction in roads policing has had a harmful effect on driving behaviour and the statements on seat belt wearing are not substantiated by practice in West Yorkshire. This consultation has already highlighted Calderdale and the low levels of seatbelt wearing. It would be interesting to compare other metropolitan areas in the country to see how prevalent the non-wearing of seatbelts is.

Mobile phone use whilst driving, as dangerous as drink driving, appears endemic, as

is speeding. Some 70,000 speeding tickets are issued in West Yorkshire annually.

The Home Office should set meaningful roads policing targets based on the current APACS indicators.

Questions

- (17) We have highlighted what we believe to be the most dangerous driving behaviours. Do you agree with our assessment?
- (18) What more can be done to persuade the motoring public that illegal and inappropriate speeds are not acceptable behaviours?
- (19) What more can be done to encourage safe and responsible driving?
- (20) Should more be done to reward good driving? If so, what?

Answers

The use of mobile phones whilst driving has been proven to be as dangerous as drink driving and should be included.

The work to discourage speeding has gained some considerable impetus and many more people in society support adherence to speed limits - it may be that sustaining present activity will continue to have an increasing effect in reducing offences and casualties. Increasing enforcement practices will create additional deterrents as has been shown in Essex - greater use of mobile enforcement through safety camera partnerships and local roads and neighbourhood policing will reinforce the message of social irresponsibility particularly in response to the Policing Pledge to deal with anti-social and unlawful activity of most concern within local communities.

Road safety strategies and delivery plans should promote personal and social responsibility and empower people to promote safer roads activities and behaviour. A solely top down approach to safer roads is counter productive and takes away personal and social responsibility.

There should be meaningful roads policing targets.

A safe and healthy future is sufficient reward for good driving. Advanced driving, as promoted by RoSPA and the IAM, in general promotes anticipation, consideration and care for the vehicle and passengers - and some satisfaction in providing safe and comfortable travel without causing intimidation and danger. There are additional benefits in the reduction in wear and tear on the vehicle, reduced maintenance and reduced fuel costs.

8. Measuring and ensuring success

Clear and unambiguous target reductions for road casualties have been feature of previous road safety strategies. It is not clear within this consultation what the target reductions will be for local authority areas or for regional government, other than killed and serious injury will be the benchmark.

We broadly support the national targets but would be better informed if a more detailed analysis were made available, as it was for Tomorrows Roads - Safer for Everyone.

Questions

- (3) 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;
 - the annual total of serious injuries on our roads by 2020 by at least 33 per cent;
 - 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
 - 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?
- (4) We are proposing a set of indicators in order to help us to monitor performance (Appendix A). Do you believe these cover the right areas?
- (10) 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?

Answers

We broadly agree with the headline target reductions - presumably the baseline for serious injuries is also the average of 2004 to 2008. The target reductions for local authority and regional government areas need clarification.

Proposed key performance indicators

An analysis should be made of drivers at fault in road crashes where that can be determined by age groups. It is not sufficient to use numerical data without qualifying fault or innocence. Similarly exposure should be identified for drivers by age groups - rate of injury per 100 million vehicle kilometres.

Deprivation is an issue that cannot be confined to pedestrian injuries. If deprivation and super output areas are to be used, it should include all road user groups, all ages and cover at least 20 per cent most deprived.

The cost of road traffic casualties appears to be in contrast to the accepted "value to society of preventing road traffic casualties" - the new method should be fully explained with the rationale for change.

National Road Safety Delivery Board

From our information to date the National Road Safety Delivery Board is not representative of the nation as a whole, particularly metropolitan areas, and that would make it an unsuitable body to hold anyone to account.