

ANGUS COUNCIL

COMMUNITIES COMMITTEE – 24 NOVEMBER 2020

ROAD SAFETY FRAMEWORK TO 2030

REPORT BY THE DIRECTOR OF INFRASTRUCTURE

ABSTRACT

This report seeks approval of the council's response to Scotland's Road Safety Framework to 2030 consultation, provides an update on the work of the Road Safety Member/Officer Working Group, response to The Highway Code consultation, and seeks confirmation of the revised remit of the Road Safety Member/Officer Working Group.

1. RECOMMENDATIONS

It is recommended that the Committee:

- (i) approves the response to Scotland's Road Safety Framework to 2030 consultation and agrees to the response being submitted by the Service Leader – Roads & Transportation;
- (ii) notes the submitted response to The Highway Code consultation as reviewed by the Road Safety Member/Officer Working Group and submitted by the Service Leader – Roads & Transportation; and
- (iii) agrees that the Road Safety Member/Officer Working Group in reviewing associated policies, plans and strategies shall include Active and Sustainable Travel, which forms a key element of Scotland's Road Safety Framework to 2030.

2. ALIGNMENT TO THE ANGUS LOCAL OUTCOMES IMPROVEMENT PLAN/CORPORATE PLAN

This report contributes to the following local outcomes contained within the Angus Local Outcomes Improvement Plan and Locality Plans:

ECONOMY

- An inclusive and sustainable economy

PLACE

- An enhanced, protected and enjoyed natural and built environment
- A reduced carbon footprint
- Safe, secure, vibrant and sustainable communities

3. BACKGROUND

- 3.1 Reference is made to Article 5 of the minute of the Communities Committee on 28 May 2019, which approved the formation of a Member/Officer Working Group (MOWG) to inform the development of the new Road Safety Plan (Report No. 167/19). Further reference is made to Article 9 of the minute of the Communities Committee on 24 September 2019, which approved the revised remit of the Road Safety Member/Officer Working Group to review associated policies, plans and strategies (Report No.321/19).
- 3.2 The MOWG's primary role is 'to develop a new Road Safety Plan for Angus, which would take cognisance of the new national road casualty reduction targets and identify and prioritise action points to be taken forward to assist with achieving the reduction targets to 2030'.

- 3.3 Scotland's Road Safety Framework to 2030 was published on 8 September 2020 by the Scottish Government. The response deadline for the consultation is 1 December 2020.
- 3.4 A consultation for revisions to The Highway Code was published in 28 July 2020 by the Department of Transport. The response deadline for the consultation was 27 October 2020.

4. CURRENT POSITION

- 4.1 Scotland's Road Safety Framework to 2030 is based on 12 Current and Emerging Challenges and 10 Strategic Actions. These Challenges and Actions overlap and are listed below.
- 4.2 The 12 Current and Emerging Challenges are: Climate Emergency; Active & Sustainable Travel; Health; Safe System; Speed Management; Road Safety Delivery; Driving/Riding for Work & Workplace Culture; Emerging Technologies; Enforcement/Deterrence; Road Infrastructure & Maintenance; Post-Crash Response; and Road Users.
- 4.3 The 10 Strategic Actions are: Speed; Climate; Funding; Change in attitudes; Technology; Active & Sustainable Travel; Knowledge & Data Analysis; Environment; Health; and Education.
- 4.4 The Framework has the Long-term Goal of moving close to zero fatalities and serious injuries in road transport by 2050.
- 4.5 The Framework proposes the following Interim Targets to 2030:
- 50% reduction in people killed
 - 50% reduction in people seriously injured
 - 60% reduction in children (aged <16) killed
 - 60% reduction in children (aged <16) seriously injured
- 4.6 The Framework proposes the following Intermediate Outcome Targets:
- Percentage reduction in pedestrians killed or seriously injured
 - Percentage reduction in cyclists killed or seriously injured
 - Percentage reduction in motorcyclists killed or seriously injured
 - Percentage reduction in road users aged 70 and over killed or seriously injured
 - Percentage reduction in road users aged between 17 to 25 killed or seriously injured
 - Percentage of motorists driving/riding within the posted speed limit
- 4.7 The Framework proposes the following Key Performance Indicators, to enable the monitoring of road safety behaviours, vehicle safety and road infrastructure.
- Percentage of motorists driving within the speed limit
 - Percentage of drivers not distracted by a handheld mobile phone/Sat Nav or in-car entertainment system
 - Percentage of vehicle occupants wearing a seatbelt or child restraint system correctly
 - Percentage of riders of powered two wheelers and bicycles wearing a protective helmet
 - Percentage of drivers/riders driving within the legal limit for alcohol or specified drugs
 - Percentage of distance driven over roads with a casualty rate below an appropriate threshold
 - Percentage of new passenger cars with a EuroNCAP97 safety rating equal or above a predefined threshold
 - Time elapsed in minutes and seconds between the emergency call following a collision resulting in personal injury and the arrival at the of the emergency services
- 4.8 The following are key observations on the Framework.
1. The Framework sets a clear context for road safety at the centre of a range of national priorities, including Active & Sustainable Travel, Climate Emergency and Place Principles.
 2. The Framework includes provision for the development of both national and local delivery plans.

3. The Framework states that consideration could be given to the development of a national Road Safety Improvement Fund to help road authorities meet the challenging 2030 road casualty reduction targets. Adequate funding is essential to the success of local delivery plans.
 4. The Framework is reliant on data collection and analysis based on fatalities and serious injury. This is considered to neglect slight and no injury incidents, which will in the future become a valuable means to measure and report on performance in moving close to zero fatalities and serious injuries in road transport by 2050 – the Framework’s Long-term Goal.
 5. The inclusion of a proposal National Speed Management Review.
 6. The establishment of Local Partnership Forums to share local road safety issues, plans and evaluations, and would serve as a national knowledge hub.
- 4.8 The publication of The Highway Code consultation followed the Department of Transport’s review of The Highway Code to improve road safety for vulnerable road users. The consultation was seeking views on proposed changes to The Highway Code to improve safety for pedestrians, particularly children, older adults and disabled people, cyclists and horse riders. It is important that these groups feel safe in their interactions with other road users.
- 4.9 There are 3 main changes that are being proposed through The Highway Code consultation:
- introducing a hierarchy of road users which ensures that those road users who can do the greatest harm have the greatest responsibility to reduce the danger or threat they may pose to others;
 - clarifying existing rules on pedestrian priority on pavements and that drivers and riders should give way to pedestrians crossing or waiting to cross the road; and
 - establishing guidance on safe passing distances and speeds when overtaking cyclists or horse riders, and ensuring that they have priority at junctions when travelling straight ahead.
- 4.10 The key observations on the proposed provisions in The Highway Code are:
1. The introduction of the hierarchy of road users represents a fundamental shift in road user responsibility and liability.
 2. There would need to be a substantial publicity campaign to communicate the changes in the hierarchy of road users to all road users, but especially to drivers.
 3. There may be calls for further improvements to roads infrastructure to support the changes to priority on pavements, on roads and at junctions.

5. PROPOSALS

- 5.1 The MOWG has reviewed the draft response to the consultation on Scotland’s Road Safety Framework to 2030, which is shown in **Appendix 1**.
- 5.2 The MOWG has reviewed the draft response to the consultation on The Highway Code, which is shown in **Appendix 2**. The response was issued by the Service Leader – Roads & Transportation on 26 October 2020.
- 5.3 In specific light of the inclusion of Active & Sustainable Travel in Scotland’s Road Safety Framework to 2030, it is proposed that plans, policies and strategies as associated with these are explicitly added to the remit of the Road Safety MOWG.

6. FINANCIAL IMPLICATIONS

There are no financial implications arising from this report. There may be financial implications for the development of the delivery plans and actions from Scotland’s Road Safety Framework to 2030, which will be reported to committee as required.

NOTE: The background papers, as defined by Section 50D of the Local Government (Scotland) Act 1973 (other than any containing confidential or exempt information) which were relied on to any material extent in preparing the above report are:

Report No. 321/19 - Roads Safety Plan to 2020 – Update, Communities Committee 24 September 2019.

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Appendices:

Appendix 1 – Proposed Consultation Response on Scotland's Road Safety Framework to 2030

Appendix 2 – Submitted Consultation Response on The Highway Code

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

RESPONSE 1 - YES

The Vision is ambitious but achievable with prioritisation of funding for Scotland to have the best road safety performance in the world.

The long-term goal where no-one dies or is seriously injured by 2050, which comes from the EU’s “Vision Zero”, is very ambitious. The draft Framework adopts the Stockholm Declaration calling for a reduction in road traffic deaths and serious injuries by at least 50% from 2020 to 2030, a commitment to collect data on serious injuries [which must then be shared freely with all partners], and providing targets to reduce fatalities and serious injuries among pedestrians, cyclists, motorcyclists and other vehicle users. This approach sets out a clear aspiration for the Framework to 2030.

Such an aspiration will need significant investment of resources by the Scottish Government for national, regional and local delivery. However, such investment cannot guarantee success given the role human behaviour has in road safety. The Framework recognises that all road users have a part to play. This is an area that can be tackled with support and education, which must be provided. Meeting absolute targets may therefore not be practicable.

The introduction of a comprehensive performance management system to monitor delivery of the Framework more effectively is a positive step. Such a system does though need to share data freely with partners. In this instance, it is considered that the Framework creating a third tier in its governance structure by forming Local Partnership Forums will allow for improved sharing and review of road safety data, achievement of targets and all us to build on the strong partnership approach going forward to 2030 and beyond.

More important in the Vision is in delivering on the motto of “Together, we make Scotland’s roads safer” by embedding the Safe System approach most fully. This will require collective and collaborative effort and directing of resources.

Putting people at the centre of the Framework and aiming for a more-forgiving road system that takes human vulnerability and fallibility into account is very positive as is the place of Active Travel recognised in the Road Safety Framework. The importance of the contribution by and to road safety from cross-cutting priorities, such as health and wellbeing, climate change and green economic growth, is recognised in the Framework. The protection of those who choose or through poverty have to walk, wheel and cycle, who are our most vulnerable, must form part of the Framework’s interventions and improvements made to our infrastructure and behaviours.

The Strategic Priorities set out in the Framework are positive and provide a clear context on the place road safety plays in delivering these and in benefitting from other reciprocal actions for similar frameworks in these areas.

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?

Response 2 – Yes.

The outcomes are generally right, however, they can be improved.

It is positive to see the acknowledgement in the Framework that those who design and maintain, and those who use our roads are each responsible. Too often the asset owner, in Angus Council's case as road authority, is held solely responsible for collisions. This is very rarely the case.

Road users are expected to use the roads safely and to comply with the rules as is clearly stated. The need for 'safe road users to respect other road users at all times and to assume responsibility for others' safety as well as their own' is increasingly vital. This must be part of the key communications from this Framework, with follow on education interventions. This is also emphasised in the current consultation on The Highway Code. It is also particularly prevalent in promoting active travel and use of shared spaces, where segregation is not possible, practicable or desirable, and in seeking to implement the new travel hierarchy where reducing travel and particularly car-based traffic.

It is acknowledged and accepted that the risk of collisions on our roads and roadsides needs to be managed through good design and maintenance. The aim of making our roads and roadsides 'as safe as possible' is a complex range of issues, involving thousands of kilometres of historic road and roadsides. We therefore need to identify, prioritise and target out infrastructure investment. The safety of our roads and roadsides is as reliant on road users acting safely and obeying the rules as it is in design and maintenance, and in many instances more so.

In this instance, the desire and demand for segregated traffic is questionable.

Segregating traffic and separating road users is not possible in many or most cases, is costly to implement or to adapt existing infrastructure, and may have significant adverse impacts on the environment when this means additional or adapting infrastructure. This can also be contrary to applying the Place Standard. Promoting positive behaviours and safer sharing of spaces, and appropriate use of speed limits and signage, is much more applicable, affordable and sustainable in most cases.

The description of the use of speed limits in a Safe System is traditional and in truth outdated. Lowering of speed limits, other than on high speed road, should not always have to be constrained by features of the road. There is a real place for speed limits to be set in combination with behaviours of road users. There is also a place within the Safe Vehicles pillar for vehicle speeds being set by the vehicle in line with the local speed limits. Such technology should be available and implemented. This may require investment in local infrastructure to ensure communication and link to and from signs and vehicle, or support systems is provided and effective.

However, it is recognised that design and regulation of vehicles is at a national and international scale. More local interventions may assist in the use of 'safer' vehicles. However, this is not considered to be the case in many mixed urban/rural local authority areas like Angus.

The Post-crash response is of course a vital pillar to the Safe System. For investigations into the causes to be meaningful and potential solutions for the future to be identified and assessed, free sharing of data and investigation findings with partners must be ensured.

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

Response 3 – Yes.

The Safe System approach is fundamental to the success of the Framework however, the approach can be improved.

As detailed in our response to Q2:

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

RESPONSE 4 - YES

The 12 key challenges are the correct ones and largely provide for the Safe System approach to be applied appropriately in the Scottish context.

The role of the Road Safety Framework in delivering solutions and contributing positively to the climate emergency is clear in the consultation, particularly as green, cleaner choices by reinforcing the Sustainable Travel Hierarchy to promote and design our transport system so that walking, cycling and public and shared transport are promoted. The two strategic actions in relation to the Hierarchy are ensuring road safety is a key focus of active & sustainable travel in Scotland and improving understanding of all road users on their responsibilities with a view to improving attitudes and behaviours. These are supported.

The need for road users to adapt and gain the knowledge, skills and experience required to become safer and responsible users under weather and road conditions affected by climate change.

Any intervention to improve or renew fleets with low emission vehicles may be exacerbating the current high usage of our roads, however, the technological improvements in the safety of these vehicles should be adopted to lesson this potential negative impact on road safety.

Local authorities, including Angus Council, have been beneficiaries of the investment in Active & Sustainable Travel. Working in partnership with active travel stakeholders has been key to this, which has included full consideration of the road safety benefits.

The perception of rural roads being unsafe in particular needs to be addressed within the Framework with clear policy setting to encourage mobility choices by communicating the safe options that are available.

It has been positive that the Mid-term Review of the current Framework allowed for a focus on walking and cycling road safety initiatives, the current lack of knowledge of The Highway Code, particularly with the consultation on this in 2020 from road users is a continuing risk for the safety of cyclists and pedestrians. Publicity and education of the Highway Code, with perhaps issues of refresher training for licenced road users should be considered in the new Framework. This will form part of addressing the apparent misalignment between the road safety benefits of supporting active travel and the benefits to active travel in supporting road safety.

The economic and health benefit to the Framework's focus on preventative road safety interventions is acknowledged. How these benefits are communicated and shared among stakeholders is an issue that needs to be addressed.

With the increased usage of sign-only 20mph speed limits recently through the Spaces for People funding, it is considered that there should be ample evidence on their effectiveness. Sign-only 20s may form a significant part in road safety interventions as part of this Framework, and as such are an opportunity for all safe road users to show that they are taking responsibility and behaving in a way that reduces speeds and the incidence and severity of collisions. Such interventions can play a part in an holistic Place making approach.

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s noted in previous responses, the lack of knowledge of the Safe System Approach so that this is applied in the Scottish context is key. The five pillars are generally fine, with exceptions identified previously, but these are better supported by the 12 key challenges and in itself the approach will not deliver what is required of the Framework. A more proactive/preventative approach is endorsed.

However, the content of the section on implementing the Safe System at all levels is therefore alarming in that it suggests that the failure of the road system is solely infrastructure driven rather than behavioural. It is a combination of infrastructure and behaviour, which is recognised within the wider Framework, but must be corrected in this section. Furthermore, roads infrastructure may need to be 'forgiving' and take account of human vulnerability. If only infrastructure is seen as the cause, then the Framework is likely to fail. The cost of reducing collisions and impact on climate change by physical improvement would certainly be neither affordable or sustainable, nor fair and reasonable.

It is fair and accurate to say that there continues to be a cultural speed issue in Scotland. There is an acceptance that there are still too many collisions related to non-compliance with the speed limits or not driving/riding to the conditions. This is correct and demonstrates the contrary point made on the Safer System approach focussing on the failure of the road system and it not being 'forgiving' being the main cause of road safety incidents.

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

RESPONSE 5 – YES.

The ten overarching Strategic Actions will deliver the outcomes and address the identified challenges provided the Framework ensures collective responsibility for delivery and action, which will be largely dependant on appropriate funding for the national and local delivery plans.

In relation to the ten Strategic Actions, there will need to be a range of coordinated initiatives with Education, Engineering and Enforcement playing a critical consideration, but being applied in fresh ways using advancing technology.

Undertaking a National Speed Management Review as part of the new Framework is considered positive, particularly given the attention placed on 20mph speed limits in recent years. Such a Review would need to be appropriately funded by those leading and contributing to it, and there would need to be a suitable funding mechanism to deliver actions that would come from such a Review.

Ensuring that road safety is seen and dealt with as a priority in planning and delivering responses to extreme weather conditions and events to mitigate risks is critical. This should include consideration of speed management for weather and ensure coordination with winter maintenance planning for roads authorities. Similarly, the role of the Travel Hierarchy and speed management in meeting climate change targets given the substantial part played by Transport in production of emissions is critical, with the Framework developed to link to wider climate emergency response strategies and plans.

As stated above, there will be a clear need for appropriate funding and resourcing to develop the Framework and deliver its actions and outcomes. A national Road Safety Improvement Fund to help road authorities meet the challenging 2030 road casualty targets is essential. This must be part of a wider pooling of resources across partners to aligned outcomes, with a share in the costs and benefits for improved casualty reduction for example.

Linked to the Education and Enforcement elements of the Speed Strategic Actions, changing attitudes and behaviours will be required. A national conversation may be a means to this, but would need to be followed up with substantive actions. Such a conversation should be coordinated with changes to technology, particularly in vehicle design and built-in speed and safety management, which will require life-long learning for existing road users across the Travel Hierarchy. We need to maintain and expand the free sharing of road safety information across partners as well as with the public. This will be part of the education and life-long learning process we need to better adopt. Perhaps a resitting of theory part of the driving test should be considered every 5 years to ensure drivers maintain the adequate level of knowledge on road safety issues should be considered.

The expansion of road safety considerations within the new Framework to better include Active & Sustainable Travel in making safer places, with health, wellbeing, social, environmental, and economic benefits cannot be under-emphasised. We are anticipating further step changes in the use of Active Travel in the next decade to 2030, which will require the Framework to be massively flexible as our roads and streets and how we use them changes.

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

RESPONSE 6 – NO.

It is considered that the relative success of the new Framework will depend on delivery of each of the Strategic Actions, and most critically ensuring that they are fully coordinated to provide a joined-up set of actions and interventions.

Key to this will be a clear allocation of roles and responsibilities for delivery partners, which must include clarity on funding and resources. Principal to this will be the respective roles and expectations of and on roads authorities and Police Scotland. Without this shared clarity and adequate provision of funding, we and the Framework are in danger of not meeting our, its or the public's expectations.

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

The proposed 2030 Interim Targets are appropriate and show a progression towards close to zero fatalities and serious injuries in road transport by 2050. It is considered more realistic and achievable for this to be 'close to zero' rather than net zero, as stated elsewhere in the consultation document.

It is important that the proposed 2030 Interim Targets are seen in relation to the Intermediate Outcome Targets and Key Performance Indicators, as the performance in reaching the proposed 2030 Interim Targets, and the actions to be included in local and national delivery plans, will provide a vital and broader substance and narrative on road safety than just four headline targets. Further details on the content and the development of the local and national delivery plans is requested.

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

RESPONSE 8 – NO.

The Intermediate Outcome Targets and Key Performance Indicators as detailed are not considered to be completely appropriate to monitor the progress towards the 2030 interim targets. It is acknowledged as detailed in 'Development of Scotland's 2030 Road Safety Casualty Targets and Key Performance Indicators' that "slight casualties [are proposed to be] removed [from the new Framework] as they do not align with a safe system approach which only the most serious injuries are prioritised." However, the 2020 targets and those previously have included 'slight injury' incidents, and it is considered that these should be retained in the 2030 targets. Furthermore, as reported in 'Development of Scotland's 2030 Road Safety Casualty Targets and Key Performance Indicators', Scotland has adopted the CRASH system in

2019 which means that future severity reporting is likely to be higher. This is likely to see a greater disparity in looking solely at serious injuries over slight injuries.

This is based on the need for consistency of performance monitoring from Framework to Framework, i.e. 2020 to 2030, and as importantly for the period 2030 to 2050. As the frequency and severity of road traffic collisions and impacts become fewer and less, there needs to be a means of maintaining comparable and consistent performance management data. If we are approaching zero fatalities and serious injuries in road transport by 2050, we will need to maintain a subjective means to monitor our performance, which will become more about slight and no injury incidents that might have been or are indicative of a road safety risk that merits intervention. Without such figures to 2030 and beyond, road authorities with low or zero numbers of fatal and serious injury collisions will appear to have no road safety issues or improvements to make.

The KPI of "Percentage of riders of powered two wheelers and bicycles wearing a protective helmet" must be changed with bicycles being removed. Bicycles riders are not mandated to wear protective helmets. As recommended in the 'Development of Scotland's 2030 Road Safety Casualty Targets and Key Performance Indicators', which quotes, "There is significant debate as to whether the use of cycle helmets should be made mandatory, although the evidence for effectiveness is less controversial." A KPI for protective equipment is therefore not required for cyclists and would be impossible to measure as there can be no offence levied on riders to wear a protective helmet.

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

RESPONSE 9 – NO.

It is considered that the new Local Partnership Forum (LPF) – singular – is a positive proposal so that local and regional group coordination is provided. However, rather than this being seen as a third tier beneath the Strategic Partnership Board (SPB) and Operational Partnership Group (OPG), it is considered that the LPF should be positioned and used as a means of working between and with the SPB and OPG, in more of a triumvirate approach. It is considered that the Chair of the LPF attend both the SPB and OPG to ensure communication/coordination/collaboration.

It is also considered that the Society of Chief Officers of Transportation in Scotland (SCOTS) be added to the SPB to ensure that their expertise at a strategic level for road safety, in addition to their representation at the Operational Partnership Group, is shared.

10. Would road safety performance be improved across Scotland as a result of systematically sharing information and best practice between local authorities and/or local/regional partnerships through Local Partnership Forums?

RESPONSE 9 – YES.

As detailed in response 8 above, the governance of the Road Safety Framework to 2030 must be established to allow systematic sharing of information and best practice. Fundamental to this is the existing role that SCOTS plays for this, including the specific work of their Traffic and Road Safety Working Group, as well as joint working with Transport Scotland , Regional Transport Partnerships and other transport bodies with a road safety role. This sharing would be strengthened by the establishment of the Local Partnership Forum, and the coordination of efforts envisaged with the Strategic Partnership Board and Operational Partnership Group, as detailed in response 8 above.

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

The Angus Area Traffic Co-ordination Group, which consists of representatives from Roads Maintenance, Roads Traffic, Transport, Schools & Learning, Planning, Community Enforcement and Police Scotland, meets on a monthly basis to discuss local road safety and traffic management issues, including reports of concerns from residents and elected members. This collaboration works successfully and results in a variety of actions and improvements to road safety including speed surveys and investigations, and recommendations to the appropriate council committee on traffic calming, speed limits, pedestrian crossings and parking restrictions. Although road safety improvements are historically based on evidence such as collision records, causation factors and speed data the Traffic Co-ordination Group are introducing a more pro-active approach to implementing preventative measures to ensure that travel in Angus is safe.

The recently re-formed Tayside Road Safety Forum, which consists of representatives from Angus Council, Dundee City Council, Perth & Kinross Council, Police Scotland, NHS Tayside, Scottish Fire and Rescue Service, Scottish Safety Camera Programme (North), Scottish Ambulance Service, TACTRAN, and others, aims to use a co-ordinated collaborative partnership approach to promote road safety and reduce casualties on our roads.

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

The provision of existing road safety measures, such as cyclic road maintenance, winter maintenance, road safety education programmes, traffic calming and active & sustainable travel measures would greatly benefit from the continuation of funding and resources from both local and central government.

The proposed Local Partnership Forum would provide a new conduit for the Angus Area Traffic Co-ordination Group and recently re-formed Tayside Road Safety Forum to collaborate with, which is considered a positive.

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

Covid-19 has shown over the pandemic and response since March 2020 what variations to the use of our roads and transportation infrastructure might look like. This includes the increase in the use of Active Travel and the decrease in the use of public passenger transport. These changes have provided an indication on how the Transport Hierarchy may change with

changing priorities and strategies to 2030 and beyond. This includes road safety impacts, where the number of concerns raised by both local residents and elected members has increased leading to a greater strain on already stretched resources and budgets.

The change of transport hierarchy priorities has led to a change in local residents' priorities and to increased expectations and aspirations. The increased demand for active travel infrastructure means all requests must be evaluated and prioritised increasing the demand on already stretched resources.

The introduction of temporary 20mph speed limits throughout the towns and a selected number of villages of Angus, as part of Angus Council's Spaces for People initiative, could lead to an additional burden on police enforcement resources and could affect the Scottish Safety Camera Programme's ability to maximise its casualty reduction potential. The change to an existing speed limit acts to rebase the stretch of road where a safety camera is located, resulting in enforcement action ceasing at that location until such times as speed and collision data has been collected and assessed for the amended speed limit. Similarly, the introduction of the temporary 20mph speed limits could also have an impact on the site selection processes for newly identified potential camera sites, resulting in some of these sites not being delivered until such times as speed and collision data has been collected and assessed for the amended speed limits.

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

The provision of Covid-19 related safety measures and increased active travel infrastructure would greatly benefit from the continuation of funding and resources from both local and central government.

The national Road Safety Improvement Fund to help road authorities meet the challenging 2030 road casualty targets stated in the consultation is co

Changes to The Highway Code: improving safety for cyclists, pedestrians and horse riders

Your details

Q1. Your (used for contact details only):

name? Walter Scott

email? scottw@angus.gov.uk

Q2. Are you responding:
on behalf of an organisation?

Organisation details

Q3. What is the name of your organisation?

Angus Council

Hierarchy of road users

Q5. Do you agree with the introduction of new Rule H1?

Yes

Hierarchy of users wording

Q7. Is the proposed wording easy to understand?

Yes

Clarification of right of way and stronger priorities for pedestrians

Q9. Do you agree with the introduction of new Rule H2?

Yes

Stronger priorities for pedestrians wording

Q11. Is the proposed wording easy to understand?

No

Disagrees with stronger priorities for pedestrians wording

Q12. Why not?

"Cyclists should give way to pedestrians on shared use cycle tracks". Give way when? This is neither clear nor achievable in most situations.

Cyclists priorities and right of way

Q13. Do you agree with the introduction of new Rule H3?

Yes

Cyclists priorities and right of way wording

Q15. Is the proposed wording easy to understand?

No

Cyclists priorities and right of way

Q16. Why not?

Needs to include equitable responsibility for pedestrians to also respect cyclist safety and pedestrians should take care not to obstruct or endanger cyclists unnecessarily, which is the reciprocal wording. There is reference to it being necessary to endanger another road user – it is not clear when this would be acceptable.

Rules for pedestrians

Q17. Do you agree with the proposed change to give way to pedestrians waiting at a:

Yes No Don't know?

junction? X

zebra crossing? X

Q18. Is the proposed wording easy to understand?

Yes

Rules for pedestrians

Q20. Do you have any further comments about other changes to the rules for pedestrians?
Needs to include equitable responsibility for pedestrians to also respect cyclist safety and pedestrians should take care not to obstruct or endanger cyclists unnecessarily, which is the reciprocal wording. There is reference to it being necessary to endanger another road user – it is not clear when this would be acceptable.

Rules about animals

Q21. Do you agree to the proposed change to Rule 52?
Don't know?

Rules for animals wording

Q23. Is the proposed wording easy to understand?
Yes

Rules for cyclists

Q25. Do you agree with the proposed change to rule 63?
No

Disagrees with Rule 63 for cyclists: shared spaces

Q26. Why not?
Wording states that cyclists should "not pass pedestrians, horse riders or horse drawn vehicles closely or at high speed, particularly from behind." It may not be possible to pass other than closely at which time it should be slowly and passed with warning, and be ready to stop when necessary.

Rule 63 for cyclists wording: shared spaces

Q27. Is the proposed wording easy to understand?
No

Disagrees with Rule 63 for cyclists wording: shared spaces

Q28. Why not?
Wording states that cyclists should "not pass pedestrians, horse riders or horse drawn vehicles closely or at high speed, particularly from behind." It may not be possible to pass other than closely at which time it should be slowly and passed with warning, and be ready to stop when necessary.

Rules for cyclists

Q29. Do you agree with the proposed change to Rule 72 to ride:
Yes No Don't know?

in the centre of your lane on quiet roads? X
in the centre of your lane in slower moving traffic? X
in the centre of your lane when approaching junctions? X
at least 0.5 metres away from the kerb on busy roads? X
If no, why not?

At least 0.5 metres will be taken as 0.5 metres. The safety of the cyclist and the judgement of the cyclist on the safe distance from the kerb should be the rule. Better wording would be "keeping between 1.5 metres and 0.5 metres away from the kerb edge or edge of carriageway".

Q30. Is the proposed wording easy to understand?
No

Disagrees with Rule 72 for cyclists: road positioning

Q31. Why not?
Other road users must respect the judgement of cyclists on the safe position that they take. "If you can do so safely" needs to be reciprocated by the overtaking vehicle or indeed cycle. It must be for the faster vehicles to overtake safely, which is the case more generally. It should not necessarily be dependent on the cyclist moving to the left. What is the definition of a "faster moving vehicle" and how would you know? For example, does it relate to the rural national speed limits?
The 1.5m distance from kerbs is fine, however, on narrower roads, the 1.5m distance from car doors could take you over into the opposite lane, which may lead to needing to pay attention to doors opening on both sides. The speed and busy-ness of the road is irrelevant. the responsibility to overtake safely lies with the faster vehicle (or cyclist). Although, the responsibility for the Dutch reach should provide

additional safety for passing cyclists and other road users.

Rules for cyclists

Q32. Do you agree with the proposed change to Rule 73 at junctions with:

Yes No Don't know?

special cyclist facilities? X

no separate cyclist facilities? X

Q33. Is the proposed wording easy to understand?

Yes

Rules for cyclists

Q35. Do you agree with the proposed change to Rule 76?

Yes

Rule 76 for cyclists wording: going straight ahead

Q37. Is the proposed wording easy to understand?

Yes

Rules for cyclists

Q39. Do you have any further comments about other changes to the rules for cyclists?

Rule 13 - On shared paths, cyclist..."should also take care not to obstruct or endanger them [pedestrians] unnecessarily". This should at the least be reciprocated by pedestrians, but I cannot see when endangering a cyclist (or other road user) is necessary.

Rule 59 changes are reasonable.

Rule 61 - "where they make your journey safer and easier" is critical and a positive change.

Rule 62 - I don't think the need to take cognisance of pedestrians should be limited to shared cycle tracks, even in segregated cycle tracks where the onus is on pedestrians to keep out, cyclists need to be travelling at appropriate speeds, just like cars on roads should travel at appropriate speeds and not always to the speed limit.

Rule 63 - wording must be changed for clarity. "Do not pass pedestrians, horse riders or horse drawn vehicles closely or at high speed, particularly from behind." It may be necessary to pass closely at which time it should be at a slower and safe speed. The proposed wording does not make this clear and suggests you cannot pass from behind at all!

Rule 64 - suggest the following addition for clarity in applying the Highway Code and this rule: "You MUST NOT cycle on a pavement...even if you do not feel safe in using a cycle route or the carriageway. If this is the case then the cyclist should dismount and wheel the cycle until they do feel safe to continue on the cycle route or carriageway."

Rule 66 - second bullet point must be reworded correctly! "When riding in larger groups on narrow lanes, it is sometimes safer to ride two abreast. Ride in single file to allow overtaking only when it is safe to do so. Drivers wishing to overtake must only do so when it is safe for them to do so, whether cyclists are riding one or two abreast."

Rule 67 second bullet point must be amended to allow for a "move to the left or right, whichever is safer to avoid them." Current wording lessens the validity of moving right when this may be the safer option.

Rule 71 change is reasonable.

NEW Rule 72 is generally positive but distance from the kerb edge must be revised to be "1.5 metres to at least 0.5 metres from the kerb edge" otherwise the presumption by drivers will be 0.5 metres and in fact less in my experience. Please give the default of safe space for the cyclist to use.

Rule 73 is positive particularly the inclusion of "Use these facilities where they make your journey safer and easier." This must be at the discretion of the cyclist and their must not be presumed as compulsory by other road users.

Rule 74 - generally positive change. Suggest addition after "Do not ride on the inside of vehicles signalling or slowing down to turn left." with "Cyclists turning left at junctions may filter on the left of vehicles slowed or stopped and not turning left if it is safe to do so."

NEW Rule 75 is reasonable and positive.

NEW Rule 76 is reasonable and positive.

NEW Rule 77 is reasonable and positive.

Rule 78 is reasonable and positive.

Rule 79 – cyclists can use the left or right lane when turning right at roundabouts.

This contradicts Rule 186 (using the road). Should 186 be edited to advise drivers that cyclists may be in the left lane when turning right?

Rule 82 is reasonable and positive.

Rule 140 addition of "Bear in mind that cyclists are not obliged to use cycle lanes or cycle tracks" is a significant positive.

Rules for drivers and motorcyclists

Q40. Do you have any comments about the proposed change to Rule 97?

No comment.

General rules, techniques and advice for all drivers and riders

Q41. Is the proposed wording in Rule:

Yes No Don't know?

123 easy to understand? X

124 easy to understand? X

General rules, techniques and advice for all drivers and riders

Q42. Do you agree with the proposed changes to Rule 140 on giving way to cyclists using a cycle:

Yes No Don't know?

lane? X

track? X

Q43. Is the proposed wording easy to understand?

Yes

General rules, techniques and advice for all drivers and riders

Q45. Do you have any further comments about the changes to the general rules, techniques and advice for all drivers and riders?

Very positive rule changes and advice included.

Using the road

Q46. Do you agree that cyclists may pass slower moving traffic on their right or left as detailed in Rule 163?

Yes

Using the road

Q48. Do you agree with the proposed speed limits detailed at Rule 163 for overtaking:

Yes No Don't know?

motorcyclists? X

cyclists? X

horse riders? X

horse drawn vehicles? X

Q49. Do you agree with the proposed passing distances detailed at Rule 163 for overtaking:

Yes No Don't know?

motorcyclists? X

cyclists? X

horse riders? X

horse drawn vehicles? X

Q50. Is the proposed wording easy to understand?

Yes

Using the road

Q52. Do you agree with the proposed changes to Rule 186 that:

Yes No Don't know?

you do not overtake cyclists within their lane? X

you allow cyclists to move across your path? X

cyclists may stay in the left lane when continuing across or around the roundabout? X

horse riders may stay in the left lane when continuing across or around the roundabout? X

horse drawn vehicles may stay in the left lane when continuing across or around the roundabout? X

Q53. Is the proposed wording easy to understand?

Yes

Using the road

Q55. Do you agree with the proposed change to Rule 195 to give way to pedestrians and cyclists waiting to cross at a parallel crossing?

Yes

Using the road Rule 195 wording: zebra and parallel crossings

Q57. Is the proposed wording easy to understand?

Yes

Using the road

Q59. Do you have any further comments about the changes to the rules on using the road?

Positive changes for sharing road space fairly and safely.

The wording of Rule 8 may not make it clear that a pedestrian only has right way over vehicles turning into a side road. There could be confusion as to when the pedestrian has right of way - is it when vehicles are turning into the side road or coming out of the side road turning into the main road or indeed going straight ahead. Requires pedestrian to consider whether they are on a side road or a main road i.e. pedestrian has right of way on side road, but not at main road at a junction – mixed messages. Also applies to rules 170 and 206.

Road users requiring extra care

Q60. Do you agree with the proposed changes to Rule 213?

Yes

Rule 213 road users requiring extra care: cycling on narrow roads

Q62. Is the proposed wording easy to understand?

No

Disagrees with Rule 213 road users requiring extra care: cycling on narrow roads

Q63. Why not?

We would suggest that distance is "1.5 metres or at least 0.5 metres".

Road users requiring extra care

Q64. Do you have any further comments about other changes proposed in the chapter on road users requiring extra care?

Positive changes for sharing road space fairly and safely

Waiting and parking

Q65. Do you agree with the proposed change to Rule 239?

Yes

Rule 239 waiting and parking: Dutch reach

Q67. Is the proposed wording easy to understand?

Yes

Waiting and parking

Q69. Do you have any further comments about the other change proposed to Rule 239 on waiting and parking?

Very positive change.

Annexes

Q70. Do you have any comments about the changes proposed to:

annex 1? Recommendation for cycling training is excellent.

annex 6? It is doubtful that such a recommendation will have much of an affect.

Other comments on The Highway Code

Q71. Do you have any further comments regarding the proposed amendments to The Highway Code which focus on safety improvements for cyclists, pedestrians and horse riders?

Thank you for consulting on such vital changes to make our roads fairer, safer and more equitable.

Final comments

Q72. Any other comments?

No.