



**TRANSPORT  
SCOTLAND**  
CÒMHDHAIL ALBA

# **Scotland's Road Safety Framework 2030**

## **Analysis of consultation responses**

28 December 2020

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## Executive Summary

### Background

Building on the Road Safety Framework to 2020 and, as outlined in the Programme for Government, the Scottish Government recently published its draft Road Safety Framework to 2030, which sets out a vision for Scotland to have the best road safety performance in the world by 2030. This adopts a Safe System approach to road safety.

The consultation on Scotland’s Road Safety Framework to 2030 was launched on 8 September 2020 and finished on 1 December 2020.

### Respondent Profile

In total, there were 203 responses to the consultation, of which 67 were from organisations and 136 from individuals.

Respondent Group	Number of responses
Academia / education	3
Community group	4
Cycling organisation	6
Emergency services	2
Legal organisation	2
Local authority	21
Public sector	6
Representative organisation	7
Road safety organisation	8
Third sector	4
Other	4
<b>Total organisations</b>	<b>67</b>
Total Individuals	136
<b>Overall Total</b>	<b>203</b>

Table 1: Respondent profile

### Key Themes

A number of key themes were evident across consultation questions as well as across respondent groups. Many of these are perceived to be interlinked and most effective when considered in a holistic manner. These key themes are summarised below.

- A need for **greater levels of funding and resources** was cited across all questions. There was a general perception that without funding and

resources, it will not be possible to achieve the vision or the outcomes that are outlined in the document. It was primarily organisations – often local authorities and public sector organisations – which referred to a need for greater levels of funding and resources.

- **Infrastructure and road design** was referred to across all questions, with many respondents across all sub-groups citing a need for infrastructure that allows for safe road use for all road users. Various aspects of infrastructure were cited as needing improvements, including segregation for road users, and better design for road junctions, kerbsides and pavements. Allied to this, there was another theme that the vision as it stands, is too driver-centric.
- A **reduction in speed limits** was cited across all questions. Many respondents referred generally to the need for speed limits in urban areas to be reduced to 20mph, although some referred specifically to a need for more 20mph zones, particularly in urban settings and / or where there are vulnerable road users, such as close to schools. There were also some requests for reductions in other speed limits.
- **Increased levels of enforcement** was seen to be important and there is a perception that a current lack of enforcement is sending out a message that non-compliance is tolerated without the need to worry about penalties. There was felt to be a relationship between higher levels of enforcement and higher levels of obeying traffic regulations. Indeed, without more enforcement, many respondents felt other actions taken towards road safety will not be as effective as is desired.
- **Monitoring and review** is perceived to be an essential element in delivery of a road safety framework, alongside effective governance. It was felt there is a need to understand what initiatives work well (and which do not) and to ensure that key stakeholders are undertaking their responsibilities effectively. This allies closely to a need for partnership working and collaboration, which is also needed for effective implementation of the road safety framework.
- **Improved and additional data sources** were referred to primarily by organisations. While STATS19 data is perceived to be useful, it was felt this data could be enhanced by correlating it to NHS data. There were also requests for data to be compiled on all collisions and not just those that lead to death or serious injury. In addition, respondents also requested assessment of initiatives to feed into further development of the strategy.
- **Alignment with other Government policies** was a focus for a number of respondents, primarily organisations. Respondents commented on the need to ensure that a holistic approach is adopted which emphasises clear links with other policies and strategies across a range of different sectors. Examples given included the National Transport Strategy, the National Walking Strategy and Climate Change to name a few.
- The final key theme related to a **lack of detail across all sections of the draft Strategy**, although some respondents specifically referred to the need for a more definitive commitment to each of the actions, outcomes and KPIs.

## Consultation Questions

The following paragraphs summarise the main findings from each of the consultation questions.

### Main Findings: The Vision, Outcomes and Safe System Approach

There was **widespread support for the vision** across all respondent sub-groups, and a number of specific actions were outlined as needing to be undertaken in order to implement this vision. These actions included improvements to the existing public transport system; greater emphasis on the segregation of road space to provide a greater level of safety for vulnerable road users; a focus on road design; more speed management on Scotland's roads, and education for road users. There was a perception from some respondents that the draft Framework is driver-centric and there were some calls for a greater emphasis on cyclists, pedestrians and other vulnerable road users. Another key theme was requests for higher levels of enforcement than at present.

There was a **widespread view that the outcomes are the right ones to deliver the vision**. It was felt that these outcomes would encourage road safety, that they are based on best practice, that they provide an integrated approach and that they address all key issues. Key themes included references to a need for reduced car usage, a greater emphasis on vulnerable road users, a need for greater levels of funding and resources, a need to focus on driver education and behaviour, safe road design and the development of a modern road infrastructure. There were also a number of references to safe speeds, with some requests for 20mph speed limits on what are currently 30mph speed limited roads, and the implementation of more 20mph zones, as well as calls for general reductions in speeds.

Support for the **Safe System Approach** was at a high level, and **almost all respondents agreed that this is fundamental to the success of the Framework**, with some references to the layers of protection this offers to road users. There were some comments on the need to ensure this is inclusive and takes account of all road users. A key theme was a need to place greater emphasis on education and training, which in turn would help to lead to a cultural change in attitudes and behaviour. There were also some references of a need for a modal shift to more sustainable modes of travel. The issue of funding and resources was raised across each of the outcomes. Other issues raised by respondents included a need for more data to support this approach and the need to ensure this approach links into other areas of policy.

### Main Findings: Current and Emerging Challenges

There was **widespread agreement that the 12 key challenges are the correct ones** with organisations being more supportive than individuals. Respondents cited a number of cross-cutting themes across these challenges, including a need for:

- Higher levels of enforcement for all traffic offences, with a perception from some that a current lack of enforcement is sending a message that non-compliance is tolerated. There were some suggestions that dash-cam and helmet-cam should be used in the enforcement of regulations.

- Road infrastructure and maintenance was seen to be a key area; with a focus on a safe infrastructure for all road users, and a specific focus on vulnerable road users.
- The provision of funding is seen to be essential to dealing with all the key challenges.
- The provision of education / training / behaviour was a key focus for respondents, to ensure there is an understanding of the responsibilities of different road users and to help bring about behaviour change.
- Inclusiveness so that the needs of all road users are catered for in terms of road design, the road infrastructure and road maintenance. These road users include drivers of vehicles, cyclists, pedestrians and other vulnerable road users. It was suggested that inclusiveness could be an additional challenge.
- Partnership working / collaboration was a focus for some organisations for the sharing of data and information and to help bring about consistency across Scotland.
- Alignment with other policy areas and strategies was seen to be important to enable a holistic approach. These included other travel strategies, health, climate change, justice and education.
- The need for high quality data was cited primarily by organisations who perceived gaps in the data that is currently available.
- Reduction in speed limits across all areas, with emphasis on introducing more 20mph speed limits in urban and residential areas. There was also some specific reference to the introduction of more 20mph zones in urban and residential areas.

### **Main Findings: Strategic Actions**

Overall, **more than half the respondents felt the strategic actions would not deliver the outcomes and address the identified challenges**, although there was a higher level of support from organisations. A key theme was of a need for more detail and a stronger commitment to the strategic actions, with regular monitoring and review, so that success can be measured and the contribution of each action in achieving casualty reduction rates can be ascertained. A significant number of respondents requested an additional strategic action, based on engineering, in order to meet the outcome of Safe Roads and Roadsides, as there was a perception that this is not covered adequately.

There was **widespread agreement that some of the actions are more important than others**, although a significant number of respondents recognised that these actions are all interlinked and equally important. The key actions focused on by the highest numbers of respondents were enforcement, education, funding and resourcing, active and sustainable travel, speed management and engineering. Fewer respondents focused on attitude and behaviour change, knowledge and data analysis, climate, health and technology.

## Main findings: Road Safety Performance Management

There was **widespread support for the proposed 2030 Interim Targets**, although there were some queries as to how these would be achieved, with respondents referring to a need for funding, investment and resources. Once again, there were some requests for more detail on what measures will be taken to achieve these interim targets. A number of additional interim targets were also outlined by respondents.

**Less than half the respondents felt that the Intermediate Outcome Targets and Key Performance Indicators (KPIs) were appropriate to monitor the progress towards the 2030 Interim Targets**, although there were higher levels of support from organisations than individuals. Again, there were requests for further detail, for example, on how KPIs will be measured, what would happen if a KPI is not achieved and which organisations would be responsible for the collection and dissemination of the data. A significant number of respondents requested rate-based indicators are utilised. There were also suggestions for these to fit with the Active Travel Framework. A significant number of respondents also requested that the KPIs linked to the percentage of riders of powered two wheelers, and bicycles wearing a protective helmet are removed. A number of respondents also made suggestions for additional KPIs that could be applied.

## Main Findings: Governance Structure

**A significant number of respondents agreed that the proposed Governance Structure is appropriate.** There were higher levels of agreement from organisations than individuals. This is seen to be positive in helping to improve communication at national and local levels; and Local Partnership Forums (LPFs) are perceived to have a good understanding of local issues, experiences and initiatives, which is needed. There were a few queries on how this would operate and references to the need for funding to be provided at a local level. It was felt there is a need for an effective regulatory framework to ensure policy issues are considered and to ensure maximum efficiency; alongside calls for accountability and scrutiny, with requests for reviews to assess effectiveness, identify necessary improvements and measure progress against specific actions. Respondents made a wide range of suggestions for other types of organisations or individuals which should be included in the governance structure.

There were **high levels of agreement that road safety performance would be improved across Scotland as a result of systematically sharing information and best practice between local authorities and / or local / regional partnerships through LPFs.** Key themes emerging were the importance of joined up partnership working and collaboration; and the need for consistency and co-ordination across all areas. There were also some references to the need for accountability to be built in; and for LPFs to take on the responsibility that this will entail. The challenge of funding and resources was also raised.

## Main Findings: Road Safety

When asked what **aspects of road safety work well at present**, respondents focused on segregated infrastructure, particularly in relation to cycle lanes; the role played by road safety campaigns and education; and local action and partnership



working among local road safety panels. The implementation of lower or reduced speed limits was also a focus but with the proviso that speed limits need to be enforced to be fully effective. A significant minority also highlighted the positive aspects of speed cameras.

When asked what **practical actions they would like to see taken** to encourage and promote road safety, respondents focused on more or better road safety education; higher levels of enforcement measures; higher levels of investment and resourcing of safety aspects; better road design; improved cycling and pedestrian infrastructures; incentives to encourage higher levels of active travel and usage of public transport; and a more integrated and harmonised approach across Scotland. A number of organisations asked for more analysis and data so as to prioritise practical actions that will have the greatest positive impacts.

When respondents were asked to say what **aspects of road safety do not work well in general and as a result of Covid-19**, respondents tended to focus on a lack of enforcement across various aspects of road law; a lack of encouragement to participate in active travel; a need to reduce larger vehicles from some roads; and a lack of joined up partnership working, co-ordination and evaluation between stakeholder organisations.

In reference to **Covid specifically**, respondents focused on higher levels of speeding problems and a lack of enforcement; higher levels of car usage because of a need to socially distance; and an increase in selfish or aggressive driver behaviour. Organisations tended to focus on delays to improvements in road safety initiatives and reduced interaction or contact between road safety stakeholders. Significant numbers of respondents also reiterated road safety initiatives they would like to see prioritised; key were measures to segregate cyclists from other traffic and tougher deterrents for offenders.

The final question asked respondents what **practical actions they would like to see taken to overcome aspects that are not perceived to be working well at present**. The highest numbers felt that better enforcement measures or tougher deterrents were key areas. Other actions cited by respondents reiterated those seen at earlier questions.

## Introduction

### Background

Scotland's National Transport Strategy (NTS2) was published in February 2020, with a 20 year vision for a sustainable, inclusive, safe and accessible transport system helping to deliver a healthier, fairer and more prosperous Scotland for communities, businesses and visitors.

Building on the Road Safety Framework to 2020 and, as outlined in the Programme for Government, the Scottish Government recently published its draft Road Safety Framework to 2030, which sets out a vision for Scotland to have the best road safety performance in the world by 2030. This utilises a Safe System approach – based on international best practice – to road safety.

It identifies five strategic outcomes to be achieved as well as demonstrating how road safety can contribute to cross-cutting national priorities. It also introduces a performance management system which will help to identify the different issues which influence overall safety performance, as well as monitoring effective delivery of the Framework. It builds upon partnership work previously undertaken by introducing a third tier – Local Partnership Forums – in its governance structure.

Additionally, the Framework emphasises this is for all users and that its vision, outcomes, challenges, strategic actions and targets are relevant to all people who should demonstrate shared responsibility to help to ensure the safety of all road users. It is intended that this Framework will operate in a broader UN / EU / UK context and acknowledges initiatives such as the Stockholm Declaration and the EU Road Safety Policy Framework 2021-2030.

### The consultation

On 8 September 2020 Transport Scotland published 'Scotland's Road Safety Framework to 2030' in order to gather stakeholder and public views on the vision, outcomes framework, strategic actions and targets.

The consultation contained 14 questions, all of which offered respondents the opportunity to provide comments on specific issues relating to the Framework as outlined, and road safety issues.

### Respondent profile

In total, there were 203 responses to the consultation, of which 67 were from organisations and 136 from individuals.

Respondents were assigned to respondent groupings in order to enable analysis of any differences or commonalities across or within the various different types of organisations and individuals that responded.

A list of all those organisations that submitted a response to the consultation is included in Appendix 1.

As table 2 shows, the highest number of organisation responses was from local authorities, followed by road safety organisations, representative organisations and cycling organisations.

Respondent Group	Number of responses
Academia / education	3
Community group	4
Cycling organisation	6
Emergency services	2
Legal organisation	2
Local authority	21
Public sector	6
Representative organisation	7
Road safety organisation	8
Third sector	4
Other	4
<b>Total organisations</b>	<b>67</b>
Individuals	136
<b>Overall Total</b>	<b>203</b>

Table 2: Respondent profile

## Methodology

Responses to the consultation were submitted using the Scottish Government consultation platform Citizen Space, or by email or hard copy. Three respondents submitted a response which did not answer the specific questions. These responses have been analysed and incorporated into the report at the relevant sections. One third sector organisation also submitted a survey which they had undertaken among their supporters.

It should be borne in mind that the number responding at each question is not always the same as the number presented in the respondent profile table 2. This is because not all respondents addressed all questions. This report indicates the number of respondents who commented at each question.

Some of the consultation questions were composed of closed tick-boxes with specific options to choose from. Where respondents did not follow the questions but mentioned clearly within their text that they supported one of the options, these have been included in the relevant counts.

The researchers examined all comments made by respondents and noted the range of issues mentioned in responses, including reasons for opinions, specific examples or explanations, alternative suggestions or other comments. Grouping these issues

together into similar themes allowed the researchers to identify whether any particular theme was specific to any particular respondent group or groups. Where any specific sub-group(s) held a particular viewpoint, this is commented on at each relevant question.

When considering group differences however, it must also be recognised that where a specific opinion has been identified in relation to a particular group or groups, this does not indicate that other groups did not share this opinion, but rather that they simply did not comment on that particular point.

While the consultation gave all who wished to comment an opportunity to do so, given the self-selecting nature of this type of exercise, any figures quoted here cannot be extrapolated to a wider population outwith the respondent sample.

It must be borne in mind that this consultation was conducted during the Covid-19 pandemic. As such, it is possible that individual experiences at this time may have impacted upon the answers given to consultation questions.

## Views on the vision, outcomes and Safe System Approach

The consultation paper set out a vision for Scotland to have the best road safety performance in the world by 2030. To achieve this vision, the Framework identified five outcomes (Safe Road Use, Safe Roads and Roadsides, Safe Speeds, Safe Vehicles and Post-Crash Response) which described the road safety environment this aims to deliver. These outcomes align with the five pillars of the Safe System.

Respondents were asked three questions on whether the vision set out for the next 10 years is the right one, whether the outcomes outlined to deliver the vision are the right ones, and whether the Safe System Approach is fundamental to the success of the Framework. The first of these questions asked,

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

Table 3 profiles the responses to this question and shows that there was widespread support for the vision, across all sub-groups.

Respondent Group	Yes	No	No response
Academia / education (3)	3	-	-
Community group (4)	3	1	-
Cycling organisation (6)	5	1	-
Emergency services (2)	2	-	-
Legal organisation (2)	2	-	-
Local authority (21)	18	3	-
Public sector (6)	6	-	-
Representative organisation (7)	6	-	1
Road safety organisation (8)	6	2	-
Third sector (4)	4	-	-
Other (4)	4	-	-
<b>Total organisations (67)</b>	<b>59</b>	<b>7</b>	<b>1</b>
Individuals (136)	89	41	6
<b>Overall Total (203)</b>	<b>148</b>	<b>48</b>	<b>7</b>

Table 3: Agreement on whether the vision set out for the next 10 years is the right one

A total of 184 respondents opted to provide additional commentary in support of their answer. To a large extent, whether respondents agreed or disagreed that the vision set out for the next 10 years is the right one, the same issues were raised.

There were **high levels of support for the vision**, with some respondents noting their support for specific elements of this vision including the long term aspiration for Vision Zero, for the Safe System approach to road safety delivery, for a partnership and collaborative approach or for a strategy which puts people at its centre.

A small number of respondents felt this is an aspirational vision but that it may be difficult to achieve without a concerted and focused effort. A number of those who disagreed with this vision felt it was unrealistic and queried whether this could be achieved. Conversely, a small number of respondents also felt that this vision is not ambitious enough.

Some respondents highlighted the need for specific actions to be taken in order to help implement the vision, often pre-empting later consultation questions. These included a need for an improved public transport system, with some reference to a need for this to be affordable. Some respondents noted the need for a greater emphasis on the allocation of road space in order to segregate different road users and provide a greater level of safety for vulnerable road users; most of these respondents referred to cyclists and pedestrians, although there were a small number of mentions of horse riders and disabled people.

Some respondents also commented on the need for a greater focus on road design and quality, so that roads are safer for pedestrians and cyclists; again, often citing the need for segregation of different road users. A small number of respondents also suggested the need to open up more railways to extend the public transport network and or to enable higher levels of goods to be transported via a rail network.

A small number of respondents noted the need for a greater focus on safety for pedestrians and cyclists, with some suggesting that there is a need to increase the number of roads with 20 mph speed limits, particularly in built up areas.

Another key element outlined by a few respondents was the need for education on road safety and road usage across all ages and road users. This was also allied by some for a need to change attitudes and thus road use behaviour.

A small number of respondents also focused on the need to engage with all road users. One local authority commented that the educational function previously carried out by Road Safety Officers has been lost in many local authorities and is thus piecemeal across Scotland.

Another key theme noted by respondents was of a need for the vision to have a greater focus on pedestrians or cyclists specifically, with a few respondents commenting that it focuses too heavily on drivers. Allied to this point, there were some calls for higher levels of enforcement of traffic regulations, particularly in regard to speed limits, and for tougher sanctions to be imposed on those who do not adhere to traffic regulations. While many respondents focused on car drivers, cyclists and pedestrians as key road users, a small number of organisations referred to the need to ensure that reference is also made to the freight sector as a road user within the Framework.

A focus for many local authorities was the need to ensure the vision is properly funded and resourced, with most of these referring specifically to a need for appropriate levels of investment.

A comment from a Road Safety organisation highlighted many of the issues raised by respondents:

*“As a vision it is good. A “vision for Scotland to have the best road safety in the world by 2030” is excellent. In 2019 deaths per million population was 30. This is admirable and compared to 29 for the whole UK. Other countries such as Sweden (22), Ireland (29), Norway (20) and Iceland (17) did far better in 2019. If Scotland is going to exceed the performance of other countries then the vision and its execution will need to “set best practice” beyond that which is being deployed elsewhere. Unless there is a firm commitment to going beyond the measures set by the best performing countries then such a vision is merely wishful thinking. This will inevitably also require at least a match in funding. We applaud the vision, but realism tells us that a vision that is not accompanied by a radical rethink and additional funding will only disappoint and lose credibility. A strategy that merely “aims” to put people at its centre and takes human vulnerability into account will not be sufficient. From day one the strategy “must” put people at its centre.”* (Road Safety organisation)

A small number of respondents referred to the need for the Framework to be aligned to other policy areas such as planning; as well as to other initiatives such as the Active Travel Framework.

A few respondents made suggestions for changes to the vision and these included:

- For Scotland to be ‘one of the top 3 countries’.
- For ‘Scotland’s roads to be the safest in the world for all road users’.
- ‘to be recognised as one of the leading nations in attaining Vision Zero’.
- ‘To have zero fatalities in urban areas by 2030’.
- ‘To have a commitment to meet the very best standards and from learning from, and contributing to, the breadth of global experience’ (instead of best in the world).
- A change of wording to ‘A steady reduction in the numbers of those killed and those seriously injured, with the ultimate vision of a future where no-one is killed on Scotland’s roads, and the injury rate is much reduced’. This relates to the Intermediate Outcome Targets which is covered in greater detail in a later section of this report.

**Are the outcomes to deliver the vision the right ones?**

As shown in table 4, there was widespread support for the outcomes to deliver the vision; levels of support were higher among organisations than individuals.

<b>Respondent Group</b>	<b>Yes</b>	<b>No</b>	<b>No response</b>
Academia / education (3)	3	-	-
Community group (4)	4	-	-
Cycling organisation (6)	5	1	-
Emergency services (2)	2	-	-
Legal organisation (2)	2	-	-
Local authority (21)	20	-	1
Public sector (6)	5	1	-
Representative organisation (7)	7	-	-
Road safety organisation (8)	6	2	-
Third sector (4)	3	-	1
Other (4)	2	1	1
<b>Total organisations (67)</b>	<b>59</b>	<b>5</b>	<b>3</b>
Individuals (136)	87	43	6
<b>Overall Total (203)</b>	<b>146</b>	<b>48</b>	<b>9</b>

Table 4: Agreement that the outcomes are the right ones to deliver the vision

Some of the respondents who commented provided general comments across the five outcomes; others provided specific comments on each. The following paragraphs outline the general comments. To a large extent, the comments made by respondents tended to echo issues outlined in the consultation paper.

Many of those respondents who agreed the outcomes are the right ones to deliver the vision provided little by way of comment other than noting that the outcomes are based on best practice / evidence; that they will encourage road safety; they provide an integrated approach; or that they address all key issues. However, a small number of respondents felt that more detail should be provided or that as presented in the consultation paper, these are too vague or use language that is too soft. A small number also noted concerns as to how the vision and outcomes will be achieved.

A small number of individuals felt the paper was too driver-centric and wanted to see more emphasis on reduced car usage and / or more priority given to cyclists and pedestrians, with one road safety organisation commenting that there should be an aim to reduce traffic on Scottish roads. A small number of individuals also commented on the need to focus on implementing actions that would help to reduce deaths and cited average speed cameras, GPS speed limiters, pedestrian only areas



and a 20mph default speed limit. A small number of respondents also noted that the outcomes need to be more inclusive and referred to the need to consider disabled people, horse riders and local communities as examples.

The need for funding and resources was raised in relation to all of these outcomes, primarily by local authorities.

There were also a small number of references to the current review of the Highway Code and the need for this to be taken into account in development of this Framework.

The following paragraphs outline key themes emerging in relation to each of the five outcomes.

## Safe road use

A key theme highlighted by respondents in relation to this outcome was of the need to focus on driver education and behaviour. Examples given included education interventions and advertising awareness campaigns so as to bring about changes in driver behaviour and to embed cultural change. One organisation in the academic / research sector noted the need for behavioural guidance that could be co-ordinated across all five pillars.

There were also a small number of suggestions to make education mandatory in all schools and provide pre-driver education so that there can be a positive attitude towards all road users from an early age. There were also one or two suggestions for re-testing or re-certification of mature drivers. Two respondents also referred to the need to include employers in driver education, with one referring to the Fleet Operator Recognition Scheme as an opportunity to engage with employers and their staff.

Once again, the issues of funding and resources were raised by some respondents, primarily local authorities, who felt there should be more reference to additional funding in the framework: for example, to enable local authorities to allow for the maintenance or upgrading of existing roads, or for the delivery of specific initiatives.

There were some other comments cited by very small numbers of respondents and these included:

- Requests for less of a focus on drivers and a greater focus on vulnerable road users such as cyclists or pedestrians. Allied to this, there were a few comments on the need for the Framework to include reference to all road users. One representative organisation referred to the Scandinavian model and suggested this should be considered in Scotland.
- Agreement of a need for joined up working, and for organisations to be clear on their responsibilities and actions they should be taking, to assist in the delivery of these outcomes.
- Requests for higher levels of enforcement and higher levels of funding for Scotland's police force.

- Requests for the segregation of different road users. Suggestions included segregated cycle lanes on all roads, raised kerbs and junction redesign.

## Safe roads and roadsides

Two key themes emerged in relation to safe roads and roadsides. Firstly – and cited primarily by individuals – a reiteration of the need to address dangerous roads and junctions, dangerous driving, dangerous speeds and dangerous vehicles. Secondly - and again mentioned primarily by individuals - was the need to address road quality and develop a modern road infrastructure and incorporate better road design.

Other issues cited by very small numbers of respondents included:

- The need to consider rural roads where it might be difficult to accommodate drivers and other road users such as cyclists or pedestrians.
- Queries as to how road design and infrastructure would be funded and resourced.
- A need for research and data to ascertain the costs and benefits of different approaches, with evidence to back up any changes, so that infrastructure investment can be effectively targeted and prioritised.
- Specific reference to networks of segregated infrastructure. That said, one local authority commented,

*“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.”* (Local Authority)

## Safe speeds

A small number of respondents perceived this outcome to be the most important of the five outlined in the consultation paper.

A number of respondents commented on speed limits, with many requesting a speed limit of 20mph in all residential, urban pedestrian areas or on all town and city roads. One local authority suggested there should be a national change from 30mph to 20mph. Smaller numbers of respondents wanted to see other changes to speed limits; for example, from 40 to 30mph or for more 50mph roads. There were also a small number of suggestions that local authorities should be able to review speed limits in their areas, and have the power to change these if appropriate.

Allied to this, there were a small number of comments on the need to have policy and legislation streamlined in order to achieve changes to speed limits, for education to help bring about behavioural change in regard to speeding, and for compliance and enforcement and tougher sanctions on those caught breaking the law.

A small number of respondents noted that there should be speed limiters in cars in the same way as there are for scooters and e-bikes.

## Safe vehicles

Only a small number of respondents made specific comments about safe vehicles, thus suggesting this outcome is perceived to be of lesser importance than the others outlined in the consultation paper. Comments, each made by single respondents, included:

- The need for a greater emphasis on Intelligent Speed Adaptation.
- A need to ban all vehicles that do not have modern safety measures.
- A need to consider how Scotland can be more proactive, for example, in setting minimum standards for fleet vehicles.
- A need for the Framework to include reference to UK New Car Regulations planned for 2022 and to the work of EuroNCAP.
- The need to fast track driverless cars.

## Post-crash response

The key comment made primarily by local authorities, cycling organisations and individuals was that this is a good addition to the other four outcomes.

A key issue raised by individuals was of a need to focus on enforcement. Small numbers of respondents made some form of reference to the need for good quality data to be available and shared across all organisations. One organisation noted the need for meaningful investigations into the causes of collisions and consideration of potential solutions for the future.

The next question asked,

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

As table 5 overleaf shows, support for the Safe System Approach was at a high level, and almost all organisations and many individuals agreed that this approach is fundamental to the success of the Framework.

Respondent Group	Yes	No	No response
Academia / education (3)	3	-	-
Community group (4)	4	-	-
Cycling organisation (6)	5	1	-
Emergency services (2)	2	-	-
Legal organisation (2)	2	-	-
Local authority (21)	20	-	1
Public sector (6)	6	-	-
Representative organisation (7)	6	-	1
Road safety organisation (8)	8	-	-
Third sector (4)	3	-	1
Other (4)	4	-	-
<b>Total organisations (67)</b>	<b>63</b>	<b>1</b>	<b>3</b>
Individuals (136)	94	28	14
<b>Overall Total (203)</b>	<b>157</b>	<b>29</b>	<b>17</b>

Table 5: Agreement that the Safe System Approach is fundamental to the success of the Framework

There was widespread support for the Safe System Approach across all respondent sub-groups. Positive comments made by respondents included references to the use of a collaborative approach and that this encompasses all aspects of road safety to achieve a reduction in casualty rates. A few respondents – mainly individuals – referred specifically to the layers of protection that this approach offers.

*“A safe system approach recognises that for a system to improve, all parts of the system need to be scrutinised and treated equally. It also recognises that there can be many contributory factors involved in an accident and it is rarely possible to apportion blame to any single factor. It is reassuring, for those that advocate an evidence led, scientific based casualty reduction approach, that the Safe System approach closely aligns with the RoSPA road accident definition; ‘an accident is a rare random multi-factor event always preceded by a situation in which one or more road users have failed to cope with the road environment’. (Local authority)*

*“Safe systems’ derives from the Swedish Government’s ‘Vision Zero’ initiative, which seeks to tackle all possible sources of danger. Like the Framework’s vision, the aspiration is to eliminate road casualties altogether. I agree that the Safe System approach provides layers of protection. I would like to note that these layers are important because they provide an important safety net in that should one layer fail then the safety measures in the other layers can reduce the risk of death or serious injury.” (Individual)*

A small number of organisations noted that other countries have had success with this approach which is perceived to be internationally recognised. A few respondents – mainly individuals – also noted that Sweden has had success with its Vision Zero programme and that Scotland could learn from this.

A relatively small number of respondents, across all sub-groups, while welcoming the Safe System Approach, noted concerns about its implementation and / or its approach. However, each concern was only cited by one or two respondents.

A very small number of respondents felt this approach is not ambitious enough or that the targets set are too low. Two of these referred to a need for a 95% reduction in child deaths by 2030 and a decrease in speed limits.

A number of comments made by respondents echoed themes seen at earlier questions. These included,

- The need for a significant emphasis on education and training from an early age so as to raise awareness of the expected conduct and responsibilities of all road users. This, in turn, would help to lead to a cultural change in attitudes, beliefs and behaviour.
- The need for funding and resources across a range of areas including education, road design and road maintenance.
- The need to include all road users, with some respondents noting that all road users have to be involved or that this approach must be inclusive for everyone. Other respondents cited specific users which should be considered including residents, local communities, freight and logistics vehicles and agricultural transport.

A small number of respondents felt that the dominant culture at present is that the 'car is king' and noted a need to have a modal shift to more sustainable modes of travel. A local authority noted that there is a need to change from a reactive to a proactive approach in order to deliver the Safe System Approach effectively; and an individual commented that there will need to be significant buy in from leadership across all organisations involved in delivery of the approach.

Some respondents, while endorsing the Safe System Approach, made a small number of references to specific actions that need a greater focus. These included the lowering of speed limits, having speed limiters in vehicles, increased use of average speed cameras, the physical segregation of road users and robust enforcement.

A few organisations felt that more data is needed to support the Safe System Approach, with suggestions for data to compare rural and urban settings or the provision of better crash data via crash investigation reports. Two respondents commented that there should be a fatal accident investigation for every road death. As a cycling organisation noted,

*“Traditional approaches to road safety have taken simple casualty reduction numbers as a measure of achievement. However, as the Road Danger Reduction Forum and the PACTS report show, a more sophisticated approach*

*recommends casualty reduction using rate-based indicators as this provides more accurate reflection of the problem, and of progress in addressing it.”*

Again, there were a small number of comments on the need for a link with other Government initiatives, including the National Transport Strategy (NTS2), the Scottish Planning Policy and Designing Streets, with a suggestion from a third sector organisation that the Sustainable Transport Hierarchy should inform the Framework. Another third sector organisation noted that the requirements of the Road Traffic Act 1988 have to be delivered in order to underpin the Safe System Approach. An individual commented that this approach needs to be aligned with objectives in other sectors including public health, the environment and social justice.

## Current and emerging challenges

The consultation paper identified a number of challenges, either within or outwith the road safety system, which would make an impact now, or in the near future, on road safety generally and, more particularly, on the new Framework. They have been encapsulated in 12 themes which map easily onto the Safe System and also align with the Scottish Government’s policies, plans and strategy.

Respondents were asked,

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

As demonstrated in table 6, there was widespread agreement that the 12 key challenges are the correct ones. The highest level of support was from organisations, although views from individuals were more split. Among organisations specifically, disagreement was strongest among cycling organisations (4 disagreed) and road safety organisations (3 disagreed).

Respondent Group	Yes	No	No response
Academia / education (3)	2	-	1
Community group (4)	4	-	-
Cycling organisation (6)	1	4	1
Emergency services (2)	2	-	-
Legal organisation (2)	-	1	1
Local authority (21)	18	1	2
Public sector (6)	6	-	-
Representative organisation (7)	5	1	1
Road safety organisation (8)	5	3	-
Third sector (4)	3	-	1
Other (4)	3	1	-
<b>Total organisations (67)</b>	<b>49</b>	<b>11</b>	<b>7</b>
Individuals (136)	69	53	14
<b>Overall Total (203)</b>	<b>118</b>	<b>64</b>	<b>21</b>

Table 6: Agreement that the 12 key challenges are the correct ones

A total of 148 respondents provided further commentary to explain their initial response to this question. Some of these respondents made general comments covering all 12 of the key challenges, while others opted to provide more specific commentary related to one, some or all of the key challenges. Some of these respondents simply reiterated these challenges are the correct ones, although there were comments from some of the local authorities that some of the challenges might

be more important than others, depending on the nature of the area. For example, it was suggested Route Risk Mapping might not be relevant in rural areas; or that motorcycle casualties are more likely in rural areas and will need a greater focus than in urban or city areas.

However, a number of cross-cutting themes have emerged across all of these challenges and the following paragraphs focus on these. Across each of these areas, respondents commenting represented all the sub-groups.

## Enforcement

This is clearly seen to be a key challenge and a significant minority of respondents referred to enforcement in some way. Respondents commented on the need for enforcement of existing road regulations, including: exceeding speed limits; pavement parking; passing space given to cyclists; parking over dropped kerbs; and parking in cycle lanes. Some of these respondents felt that a current lack of enforcement is sending out a message that non-compliance is tolerated without the need to worry about penalties. There was felt to be a relationship between higher levels of enforcement and higher levels of obeying traffic regulations.

Overall, many of these respondents commented that a tougher stance on the enforcement of driver behaviour will mean roads become safer for other road users, with high levels of reference to cyclists and pedestrians. Other advantages of tougher enforcement levels included moving towards behavioural change and cultural acceptance of the wide range of different road users and their needs. A small number of these respondents also commented that there is a need for tougher sanctions in order to make drivers realise there are consequences for breaking the law.

There were also suggestions from some of these respondents that dash-cams and helmet-cams should be used in the enforcement of regulations, particularly given the numbers of road users with these has increased. Usage of footage provided to the police was perceived to be a relatively low cost option which would reduce police enforcement costs and allow them to focus on other types of crime. One cycling organisation felt there is a need for a centralised third party reporting system so as to ensure Scotland-wide consistent interpretation of any footage that is submitted.

Examples given of campaigns that have been seen to be effective in reducing road danger were Operation Close Pass<sup>1</sup> and Operation Snap66<sup>2</sup>.

A small number of respondents felt the Framework needs to acknowledge that vulnerable road users are more affected by road discipline, than are drivers of any motorised vehicle.

## Road Infrastructure and Maintenance

This was also seen to be a key challenge by a significant minority of respondents, with many of these respondents commenting on the need to focus on improving the design of the road infrastructure as well as maintaining the existing road structure.

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<sup>1</sup> Operation Close Pass is a police operation to educate drivers and take enforcement action wherever necessary

<sup>2</sup> <https://gosafe.org/faq/operation-snap/>



While it was felt this could benefit all road users, a number of these respondents focused primarily on cyclists and pedestrians, particularly because of the disproportionate impact that poor road design and maintenance have upon these user groups. There was a general perception from some respondents that the proposed Framework is too car-centric and consequently responses often focused on the problems caused to cyclists and pedestrians.

Suggestions for changes that could be introduced were segregated lanes for all road users, with physical barriers to prevent incorrect usage of a travel lane. There were also some requests for an expanded and improved infrastructure for cyclists and pedestrians to help reduce casualties, with a reallocation of the existing carriageway where possible. Examples of changes that need to be made included road and junction design; maintenance of pot-holes; worn road markings; and poor pavement surfaces which are all seen to compromise safety for these road user groups.

There were also a small number of suggestions that traffic should be removed from residential areas.

## Funding

Across all of the 12 key challenges there were references to the need for higher levels of funding. Examples included more funding and investment for:

- Public transport.
- Education / awareness campaigns / training.
- Police Scotland to enable them to increase levels of enforcement.
- Road design and maintenance.
- Road safety interventions, for example, non-crossing controlled zebra crossings, walk to school initiatives and so on.
- Road infrastructure so as to reflect the priorities as outlined in the Framework.
- Better quality data and reporting of casualty figures. For example, while STATS19 is seen to be a useful data source, there were some comments that it needs to be improved upon. As one organisation in the academia / education sector noted,

*“There is both a lack of clarity about what vehicles are involved in crashes causing injury and an inability to illustrate any concerning trends in relation to such vehicles. Also, currently Stats 19 does not record ethnic background meaning again that it is not possible to monitor accident and casualty trends for this equality group. These deficiencies need to be addressed in order to be able to monitor road safety statistics with more accuracy and to assess inequalities in transport casualties.” (Academic/Education Organisation)*

Some of these respondents felt that funding should be ring-fenced so as to ensure it can be used effectively.

## Education / training / behaviour

This was a key focus for respondents and comments made tended to be relevant to all the challenges outlined. A number of respondents noted that there needs to be a specific focus on education. While some respondents noted there are advantages to education on road behaviour from an early age, some noted that children do not have the cognitive skills necessary to protect themselves on the road.

The key advantage of education is its capacity to bring about behavioural change across all ages. This, in turn, would help to bring about a change in public perceptions around road fatalities and casualties. There were a small number of suggestions of a need to revalidate driving licences on a regular basis so as to ensure drivers maintain high standards of driving throughout their driving career and are aware of any changes to regulations.

While a number of these respondents focused on the need for driver education, there were also a few references of the need to provide education to all road users on their role and responsibilities.

It was also felt that increased education would lead to increased awareness of the issues surrounding road user behaviour and of the need to act positively towards other road users.

While the provision of education is perceived to be a key support for road users, a small number of respondents cautioned that education alone will not act as a substitute for poor driving habits and referred to an important role for enforcement to sit alongside that of education.

## Being inclusive

Across these 12 challenges, respondents commented on the need for the Framework to ensure it is inclusive for all road users, with one respondent suggesting that inequalities need to be recognised as a key challenge. Examples of the ways in which inclusiveness would be beneficial included involving the public in decisions; including disabled people; considering the freight / haulage sector; and generally ensuring the views of all road users are taken into account in any decisions that are taken. Indeed, it was felt that local communities with knowledge of local issues could provide valuable input.

## Working in partnership / collaboration

There were a number of comments, primarily from organisations, on the importance of partnership working and collaboration between different organisations involved in road safety. There were comments of a need for each to understand their roles and responsibilities locally and nationally so as to ensure a safe modal shift.

Other examples given which highlighted the benefit of partnership working included learning from other industrial sectors which already have relatively stringent health and safety requirements, and working to co-ordinate road safety measures. Partnership working could also have the benefit of effectively using limited resources.

## Alignment with policy areas and strategies

A number of respondents – primarily organisations – commented on the need to ensure that a holistic approach is adopted which emphasises clear links with other policies and strategies across a range of different sectors. Examples given included the National Transport Strategy, the National Walking Strategy and Climate Change to name a few. There was a view expressed by a small number of organisations that road safety cannot be regarded in isolation to other public health challenges.

## The need for data

A number of respondents – mostly organisations – commented on the need for good quality data and felt there are some gaps in what is currently available. For example, data provided by the police focuses solely on fatal and serious collisions, but it was felt it would be beneficial to also have data on minor injuries.

Other suggestions included the need for data on the involvement of speed in injury collisions; and data on locally led initiatives and activities that can be shared with other areas to see what works effectively (as well as what does not), particularly as interventions should be evidence-driven.

## Speed Limits

A number of respondents, across all sub-groups, were supportive of extending 20 mph speed limits into urban and residential areas, with some suggestions that this should be the national default speed limit. A small number of these referred specifically to the need for 20mph zones which have been introduced by some local authorities. Allied to this, there were also a small number of general comments of the need to reduce speed limits.

Related to this last point, there were also some comments relating to the need for enforcement; for example, in enforcing speed limits or a greater use of speed cameras, particularly as these are perceived to be a relatively cost-effective approach.

## Other issues

A number of other issues were raised by relatively small numbers of respondents, sometimes as cross-cutting themes and sometimes in relation to specific challenges. These included:

- The impact of Covid-19 on travel modes and the need to include this in future deliberations.
- A need for data on air pollution from cars (cited in relation to climate emergency).
- Climate emergency should be the overriding decision in transport policymaking (climate change).
- A commitment to discouraging the use of cars within a community environment, as per some other countries (climate change).
- The wearing of cycle helmets should not be mandatory as there is no evidence as to the effectiveness of this approach and the mandatory wearing

of cycle helmets is perceived to be off-putting to potential cyclists (active and sustainable travel).

- There needs to be a greater focus on sustainable transport (active and sustainable travel and climate change).
- Safety in numbers is regarded as a benefit to road safety by cyclists (active and sustainable travel).
- Concerns over the adoption of Connected & Autonomous Vehicles (CAVs) and a need for more evidence as to their effectiveness (emerging technologies).
- A need to refer to direct vision cabs and the adoption of these (emerging technologies).
- A need to introduce a Presumed Liability Law, which is common in many other countries.

## Strategic actions

In order to address current and emerging challenges, the consultation paper outlined ten Strategic Actions. These are meant to be overarching and the collective responsibility of all stakeholders and road safety partners. The delivery of these strategic actions will be monitored through the three-tier structure of the Framework governance.

The first question on these Strategic Actions asked,

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

As demonstrated in table 7, a greater number of respondents across almost all sub-groups felt the strategic actions will not deliver the outcomes and address the identified challenges. The organisation sub-groups in most agreement were local authorities and representative organisations.

Respondent Group	Yes	No	No response
Academia / education (3)	2	1	-
Community group (4)	2	2	-
Cycling organisation (6)	2	4	-
Emergency services (2)	2	-	-
Legal organisation (2)	1	1	-
Local authority (21)	17	3	1
Public sector (6)	2	4	-
Representative organisation (7)	6	-	1
Road safety organisation (8)	2	5	1
Third sector (4)	1	1	2
Other (4)	2	2	-
<b>Total organisations (67)</b>	<b>39</b>	<b>23</b>	<b>5</b>
Individuals (136)	39	85	12
<b>Overall Total (203)</b>	<b>78</b>	<b>108</b>	<b>17</b>

Table 7: Views on whether the strategic actions will deliver the outcomes

A total of 165 respondents provided additional commentary in support of their response to this question. To an extent, many of the responses to this question echoed those seen in previous questions. Again, some respondents provided general comments they felt were applicable to all the strategic actions, while others focused their comments on specific actions. The following paragraphs outline general comments made. This is then followed by reference to the specific actions.

## General comments

The key theme, cited by a significant minority of respondents, and coming from all sub-groups was of a need for more detail and a stronger commitment for these actions, with some respondents also noting that some of the wording is too vague or weak and that the strategic actions need to be more evidence-based. For example, one third sector organisation commenting on the section on funding and resources noted,

*“This statement is incredibly weak and lacks conviction. ‘Consideration’ needs to be replaced by ‘implement the recommendations of a review into road safety funding’ A firmer commitment is needed, e.g. the “framework will be supported by a review and reform of national funding by 2022 to better resource for local action”.* (Third Sector Organisation)

The need for regular monitoring, review and scrutiny was cited by some respondents in order that success can be measured and the contribution of each action in achieving the casualty reduction targets can be ascertained. There were also a few comments on the need for consistency in data collection and monitoring.

Sitting alongside this, the need for collaboration and partnership working was highlighted. A small number of respondents suggested that there could be collaboration across regions in a similar way to Police Scotland and its road policing and reporting structures.

## Potential additional actions

A significant minority of respondents noted the need for an additional strategic action around engineering in order to meet the outcome of Safe Roads and Roadsides. Reference was made to road design, road infrastructure and maintenance of the existing road infrastructure. It was felt that this issue was not covered in the strategic actions as they were set out in the consultation paper, despite the view that a commitment to improving the current road structure was felt to be important. Respondents' comments related to various issues about road design including the need for consistent design standards and design guidance. In terms of road design specifically, reference was made to a wide range of different road elements including segregated lanes for cyclists and pedestrians and for improved junctions and kerbsides.

The following paragraphs outline the key comments made in relation to each of the strategic actions.

## Speed

A significant minority of respondents, across all respondent sub-groups, commented on this specific strategic action. The key theme was of a need to reduce speed limits and introduce more consistency across Scotland, with some respondents noting a need to reduce speed limits in general, while others focused on a need to reduce the national speed limit or to introduce a mandatory speed limit of 20 mph in built up or urban areas.

There were some specific references to the National Speed Management Review which was largely welcomed, although a small number of respondents noted this

would need funding and that it should not simply be another review of speed limits but to feed into changes to driver behaviour in the long term.

## Climate

Only a small number of respondents commented on this specific strategic action and the key theme was of a need to have a stronger commitment to individuals changing their mode of transport. One or two respondents, while pleased to see a commitment to climate, felt that climate has little impact on road safety and that road safety should be the priority (rather than climate impacts) when it comes to constructing new roads or infrastructure.

## Funding and Resourcing

This strategic action received a great deal of attention from respondents. The key theme was that the commitment to government funding in the Framework is weak or that there is little commitment to funding. There were also requests for additional funding to be made available to meet all the strategic actions and for enhanced maintenance of the existing infrastructure. There were also a few comments that funding should be focused on vulnerable road users such as cyclists, pedestrians or disabled people.

Some organisations – mainly local authorities and public sector organisations – felt the National Road Safety Improvement Fund is essential, although there were some comments that more detail on this is needed, such as how this would be managed or who would determine the allocation of funds. A small number of local authorities also felt this should be direct funding rather than funds that have to be bid for. A small number of local authorities also suggested a separate allocation of funding on a bid basis for innovation projects and cited Spaces for People<sup>3</sup> as an example that had worked well on this approach.

A small number of respondents also commented that it should be possible to demonstrate that road safety is a good investment as it offers longer term savings in relation to, for example, a reduction in hospital admissions, reductions in police time spent on road collisions, and so on.

## Change in Attitude and Behaviour

This strategic action received relatively few comments. While there was general support of a need for cultural change, it was felt that this is challenging to achieve. This strategic action was also aligned to education for some of these respondents who felt that education can help to lead to a change in attitude and behaviour.

There were a few comments that this can be achieved over time. ‘Clunk, click, every trip’ and ‘drink driving’ campaigns were both cited as good examples of how behaviour can change, although there was some acknowledgement of the time it can take to embed messages that lead to culture and behaviour change. Again,

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<sup>3</sup> Spaces for People is a new, temporary infrastructure programme in Scotland which offers funding and support to make it safer for people who choose to walk, cycle or wheel for essential trips and exercise during Covid-19.

respondents focused on the need for enforcement to ensure changes in attitude and behaviour are realised.

A small number of respondents felt that the proposed changes to the Highway Code, with a hierarchy of road users, could influence driver behaviour, so they take responsibility for their actions, rather than blame other road users.

## Technology

There were relatively few comments in relation to this specific strategic action. The key theme was that appropriate research and evaluation needs to be conducted in order to ascertain the impacts of new technology on casualty reductions; and some reference to the need for caution in the introduction of new technologies.

## Active and Sustainable Travel

There were relatively limited comments on this specific strategic action. There were two key themes, albeit each was only mentioned by a few respondents. First, that this is too vague and there is a need for this to be specific, measurable, achievable, relevant and timely (SMART). One individual commented that it is not clear on what needs to be done in addressing the needs of vulnerable road users and for road safety.

The second key theme was that active travel should be the top of the hierarchy, in the same way as it is in NTS2, in order that the perceived current imbalance favouring cars can be redressed. In this way, there would be a greater focus on active travel and it would help to overcome the perception felt by some potential active travellers, of the dangers of active travel. Allied to this point, there were a small number of comments that there is a need to deliver a safe infrastructure for vulnerable road users in order to increase levels of active travel. A small number of respondents also queried whether this modal shift will, in reality, happen. While there was an acknowledgement of an increase in active travel during Covid-19, there was an expectation that more cars will return to the road after Covid-19 and some scepticism as to whether increased levels of active travel will continue, particularly without a safe road infrastructure for vulnerable road users.

## Knowledge and Data Analysis

There were relatively limited comments on this strategic action. The key theme was of a need to improve upon the data that is currently available, with references to significant gaps in what is available at present. There were requests for data on all collisions, including factors causing the collision and who was culpable. There were also suggestions that NHS data could be used to supplement STATS19 data to achieve a more complete dataset; and there were a small number of references to other analytical tools such as MAST.

There were a small number of suggestions for the provision of regional collision and casualty data.

Perhaps not surprisingly, there were also requests for increased funding to be able to gather additional data.

## Enforcement



This strategic action received the highest number of comments, from a significant minority of respondents. The key theme – and cited by many of these respondents and across all sub-groups – was of a need for higher levels of enforcement across all aspects of road safety. There were a small number of criticisms that the UK has one of the most tolerant enforcement levels in Europe and that other strategic actions are likely to be impeded if higher levels of enforcement are not introduced.

A number of respondents referred specifically to the benefit of using dash-cam and helmet-cam footage and noted this would be a cost effective approach to adopt, particularly as it would be expected to save police time and effort. Some others referred to average speed cameras, which are seen to be effective in reducing the numbers of drivers who break speed limits, as well as freeing up police time to deal with other issues.

Allied to the issue of enforcement, a few respondents commented on a need for greater sanctions for those who break the law; these included higher fines, longer sentencing and heavier fines or sentences for individuals who repeatedly break the law.

A small number of respondents referred to a need for graduated licencing and noted this has recently been introduced in Northern Ireland.

A similar number also referred to the need for a third party reporting system that is nationwide and consistent in the way it interprets data.

## Health

Relatively few respondents made specific reference to the strategic action on health, although there was some acknowledgement of benefits to the health system if there is a reduction in demand due to reduced numbers of collisions. As with the strategic action on Knowledge and Data Analysis, there were some references to the benefits of cross referencing STATS19 data with hospital admissions data to get a fuller picture of the cost of road collisions.

This strategic action also linked into benefits for active travel and environmental improvements, with a number of acknowledgements about the health benefits of active travel.

## Education

A significant number of respondents referred to this strategic action. A key theme was that education can help to deliver the longer term objectives. While some respondents focused on the need for education across all age groups, some focused on more specific groups such as older road users or children at school.

There were some references of a need for education to be an ongoing and lifelong issue, so that for example, when there is new road safety legislation or revisions to the Highway Code, there should be some means of providing this information to road users.

The issue of driver licence revalidation was raised by a few respondents who felt this should be mandatory; and also to refresher training for all drivers and mandatory training for offenders and reoffenders.

There were some references to the need for public education programmes or advertising campaigns that can address bad driving so that it becomes socially unacceptable for all road users. The drink driving campaign and 'Clunk, Clink Every Trip' were again provided as examples of public education campaigns that have been very effective in previous years. Most references related to drivers of vehicles, although there were also a small number of mentions of the need for cyclists and walkers to be aware of their roles in contributing towards road safety and ensuring they are aware of their responsibility as road users.

Other issues raised by small numbers of respondents included the need:

- To introduce a Law of Presumed Liability.
- For higher levels of investment in public transport – with comments that car drivers will not give up their cars if there is no suitable alternative mode of transport.

The consultation paper then went onto ask,

***Are some of these actions more important than others?***

As demonstrated in table 8 overleaf, there was widespread agreement that some of the actions are more important than others, and 146 respondents overall agreed this was the case, compared to only 36 who disagreed. The organisation sub-group where there was greatest disagreement was local authorities.

Respondent Group	Yes	No	No response
Academia / education (3)	3	-	-
Community group (4)	4	-	-
Cycling organisation (6)	6	-	-
Emergency services (2)	2	-	-
Legal organisation (2)	2	-	-
Local authority (21)	8	11	2
Public sector (6)	3	2	1
Representative organisation (7)	6	-	1
Road safety organisation (8)	7	1	-
Third sector (4)	1	-	3
Other (4)	4	-	-
<b>Total organisations (67)</b>	<b>46</b>	<b>14</b>	<b>7</b>
Individuals (136)	100	22	14
<b>Overall Total (203)</b>	<b>146</b>	<b>36</b>	<b>21</b>

Table 8: Agreement that some of these actions are more important than others

A total of 160 respondents provided comments in support of their views. The key theme from those who disagreed that some of these actions are more important than others was that they are all equally important and / or are interlinked; for example, as noted by one respondent, combinations of measures are generally more effective than if emphasis is placed only on one of them. However, a small number of respondents noted that priorities may change in different areas or that local authorities will need to decide what is important in their area. As at previous questions, there was a small number of comments about the wording of these strategic actions being rather vague or non-committal.

Of the many respondents who agreed that some of these actions are more important than others, there were still comments of the interlinked nature of these. For example, funding and resourcing was seen to be important to all of the strategic actions by some respondents; enforcement was seen to be a necessary action to help reinforce education, better driving habits and changes in attitude and behaviour by some others.

A number of the themes outlined at earlier questions were highlighted in response to this question. These included:

- A significant number of respondents noted the importance of **education**, with references to the need for lifelong learning, for driver behaviour training, revalidation and CPD. There were a small number of comments on the need for a co-ordinated and consistent Scotland-wide approach.

- Slightly fewer respondents focused on **attitude and behaviour change**, although they noted the interrelationships between education and attitude and behaviour. There was also some comment on the impact this can have on other strategic actions. The key benefit highlighted was this would help to protect road users and ensure they are not put at additional risk as it would educate motorists on their responsibilities and highlight the consequences of the decisions they take. A small number of organisations suggested Scotland could learn lessons from abroad where there has been a change to the culture of using vehicles to a great extent. However, a small number of respondents felt this strategic action in isolation would have limited impact and it needs to be backed up by other strategic actions including enforcement, funding and road design and infrastructure.
- A significant number of respondents, across all sub-groups, focused on the importance of **funding and resourcing** across all the strategic actions. Strong links with enforcement were identified – which in turn is seen to be interlinked with other actions – and education, design and infrastructure, and the delivery of initiatives. The issue as to whether funding should be ring-fenced was highlighted by a small number of respondents. Similarly, a small number of local authorities felt that funding should be automatically allocated, rather than something that has to be bid for.
- **Active and sustainable travel** attracted high levels of importance from respondents, across all sub-groups, albeit many identified themselves as cyclists. This action also attracted a number of comments about the extent to which it is interlinked with other actions; key were health, climate, speed management and enforcement.
- **Enforcement** was a key strategic action for a relatively high number of respondents, many of whom were individuals, with comments that enforcement is needed to target individuals who break speed limits or who do not comply with the Highway Code, and it will help to bring about changes in attitude and behaviour by instilling a sense of the necessity of complying with traffic regulations. There was a perception from a few respondents that lack of enforcement can serve to diminish the impact of other strategic actions. The interrelation of this action with others was highlighted by a third sector organisation,

*“[We] believe actions related to speed, behaviour change and enforcement are the most critical actions. Reference to funding is cross cutting and is specifically important in relation to enforcement. The lack of resources to proactively support initiatives such as 20mph limits highlights the strategic importance of more resources for enforcement. Whilst education and behaviour change actions are welcome their impact will be diminished without enforcement as a back stop.”* (Third Sector Organisation)

- A number of respondents, across all sub-groups, focused on **speed management** as being more important than other strategic actions.

- The need for an additional action in relation to **Engineering** with comments relating to active and sustainable travel and the need for segregation and physical protection for vulnerable road users.
- **Knowledge and data analysis** attracted relatively few comments, although of those that were made, all came from organisations. The key theme was of a need to include more mention of STATS19. More generally, data was perceived to be fundamental as an evidence base so that resources can be targeted to specific and effective interventions and the implementation and success of targets and outcomes can be measured. There were a small number of references to the need for collaboration and partnership working.
- Few respondents focused on the strategic action for **climate**. Those that did tended to make general comments that climate is key or that it is an overriding issue; a reduction in air pollution was highlighted by some. However, a small number noted that, in the arena of road safety, action to protect the climate is of less relevance in the wider transport context in that it has limited direct impact on reducing casualties or in helping to bring about improvements in road safety.
- Very few respondents commented on the **health** strategic action. Indeed, comments made tended to focus on health benefits as a subset of some of the other strategic actions. One public sector organisation highlighted the importance of aligning this strategic action with Health and Wellbeing in the National Transport Strategy (NTS2) and the Scottish Government Active Travel Framework.
- Only a relatively small number of respondents commented on **technology** and the key theme was of a need for safe cars. As at earlier questions, there were some references to a need for mandatory Intelligent Speed Assistance (ISA) and direct vision lorries. One representative organisation noted the need for suitable infrastructure to be put in place to allow for the use of new technologies.

## Road Safety Performance Management

The consultation paper noted that all Safe System work is based on a performance framework, with a hierarchy of targets. The new Framework has a vision for Scotland to have the best road safety performance in the world by 2030 and it outlined a number of interim targets to 2030. Progress towards meeting these Interim Targets to 2030 would be based on the use of indicators, with a key one being the number of deaths and serious injuries. A number of other indicators were also outlined – Intermediate Measures – tracking performance of casualty figures for specific user groups – or Key Performance Indicators – measuring observed road safety behaviours, vehicle safety and road infrastructure. There was an initial list of key priority areas. It is also intended that Key Performance Indicators will be developed to enable the monitoring of road safety behaviours, vehicle safety and road infrastructure.

The next question in the consultation asked,

### **What are your views on the proposed 2030 Interim Targets?**

A total of 156 respondents answered this question, and offered widespread support for the proposed interim targets. However, some respondents had provisos as to how these interim targets would be achieved and there were requests for appropriate levels of funding, investment and resources to be provided; a need for infrastructure for all road users; and for higher levels of enforcement.

Some respondents requested more detail on what measures will be taken to achieve the interim targets and on how these will be delivered at local and national level. There were also some comments on the need for monitoring and reporting on these.

While these targets were welcomed by significant numbers of respondents, some felt they are too ambitious, with some comments that any easy targets have already been met or that there could be challenges in meeting them. As one local authority commented,

*“The targets are, understandably, very ambitious. Essentially they strive for similar or greater percentage reductions over the next ten year period than those set for the previous ten year period. This is likely to be difficult for a number of reasons. Typically, continuous reductions/savings become more difficult to achieve as time passes and the “easier improvements” have already been achieved. Some areas of the 2020 target reductions have proved difficult to achieve. Previous progress in the reduction of fatal and serious injuries has started to flat-line in more recent years.”* (Local Authority)

Conversely, some other respondents, across most sub-groups, felt these targets are not ambitious enough, primarily in relation to the need for a quicker timeframe. There were a small number of comments on the need to aspire to more bold targets, particularly as these are perceived to be broadly similar to the rest of Europe. A typical comment was *“If Scotland is to have the best safety performance in the world, should the targets not be more ambitious as well?”*

Some respondents took the opportunity to outline additional targets they would like to see. These included:

- Greater reductions in deaths, serious injury and less serious injury by 2030; for example, no road deaths by 2030, a 90-95% reduction in all child deaths, a measurement of collisions with cyclists and pedestrians or measuring the severity of collisions. National child casualty targets adjusted to KSI as opposed to having a separate child fatality target
- Rate-based targets that show risk rather than hazard.
- The numbers of people undertaking various modes of travel, the rates of active travel or the level of confidence felt by those who would like to cycle or walk.
- Reduction in levels of air pollution.

The next question asked,

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

As shown in table 9, greater numbers of respondents disagreed that the Intermediate Outcome Targets and Key Performance Indicators are appropriate to monitor the progress towards the 2030 interim targets, than agreed. In terms of organisations, the highest levels of support came from representative organisations and local authorities. The lowest level of support was from cycling organisations.

Respondent Group	Yes	No	No response
Academia / education (3)	2	1	-
Community group (4)	2	1	1
Cycling organisation (6)	1	5	-
Emergency services (2)	2	-	-
Legal organisation (2)	-	1	1
Local authority (21)	14	5	2
Public sector (6)	2	2	2
Representative organisation (7)	6	-	1
Road safety organisation (8)	3	3	2
Third sector (4)	1	-	3
Other (4)	1	3	-
<b>Total organisations (67)</b>	<b>34</b>	<b>21</b>	<b>12</b>
Individuals (136)	41	76	19
<b>Overall Total (203)</b>	<b>75</b>	<b>97</b>	<b>31</b>

Table 9: Agreement that some of these actions are more important than others

A total of 137 respondents provided additional commentary in support of their response.

Some respondents noted their support for the Intermediate Outcomes and Key Performance Indicators, although some others provided qualified support. A number of respondents, across all sub-groups, requested more detail on a number of factors, including how KPIs will be measured, who will be responsible for measuring the KPIs, the lack of actions proposed to support the targets and information on how the five outcomes will be measured as the KPIs do not cover all the outcomes.

Some respondents noted that the KPIs will need regular monitoring and review so that areas requiring improvement can be highlighted and acted upon. The need for guidance so that the KPIs can be applied consistently across all areas was requested by a small number of respondents.

A few respondents – mostly individuals – noted that indicators and targets should be used to inform policy change, not simply just to show success or otherwise.

Many respondents commented on specific targets and KPIs. The key target that respondents – primarily cycling organisations and individuals – focused on was *'percentage reduction in cyclists killed or seriously injured'*, with requests that this should be changed to a rate-based indicator of *'percentage per mile or hour cycled'*. The perception was that this change would align with Indicator number 8 in the Scottish Government's Active Travel Framework and would be more likely to promote cycling as a safe, healthy and enjoyable activity even if the numbers of cyclists killed or injured in the short-term increases due to an increase in the numbers of individuals cycling. One cycling organisation commented that this would bring Scotland more into line with other European countries.

While respondents were supportive of the Intermediate Outcome Targets, there were some requests for percentage reductions in pedestrians, cyclists and motorcyclists to be extended to include other slight injury incidents as this would provide a fuller picture and align with other policies.

There were requests for the KPI relating to *'percentage of riders of powered two wheelers and bicycles wearing a protective helmet'* to be removed. Again, it was primarily cycling organisations and individuals who commented on this KPI. As a cycling organisation noted,

*"The KPI of 'percentage of riders ... wearing a helmet' makes the mistake of conflating cyclists (who are not legally obliged to wear a helmet) with motorcyclists (who are), and is therefore meaningless. The evidence that helmets increase safety for cycling does not exist (and was originally based on a very flawed piece of research); in countries where helmets have become mandatory, the outcome has invariably been a reduction in cycling numbers. Please delete this KPI."* (Cycling Organisation)

A few respondents also felt that cyclists should not be blamed for poor driver behaviour and that this KPI places responsibility on cyclists when it should sit with drivers.

There were a few requests to delete the KPI for *'time elapsed in minutes and seconds between the emergency call following a collision resulting in personal injury'*



*and the arrival at the scene of the emergency services*'. It was felt there is already too much pressure on the emergency services.

A number of respondents suggested additional KPIs that should be applied and these included KPIs that would measure:

- People's perceptions of safety as this would help to encourage people to participate more in active travel and go some way to helping with a modal shift. This would also align with the Active Travel Framework Indicator number 9. This was suggested by a significant number of respondents.
- The extent of safe travel infrastructure, again to align with the Active Travel Framework. This was suggested by a significant number of respondents. Allied, to this, there were also some requests for a KPI that would measure the distance travelled from home to reach a safe cycling infrastructure.
- The number of cars on the road.
- Reduction in motor speeds.
- The number of drivers committing a traffic offence.
- The number of 20mph speed limits.
- Measure the level of enforcement being applied.

Across all of the Intermediate Outcome Targets and KPIs there were requests for data that takes into account all road users as well as providing demographic information.

There were some queries as to how KPIs relating to the percentage of vehicle occupants wearing a seatbelt or child restraint system correctly and the percentage of drivers not distracted by a handheld mobile phone/Satnav or in-car entertainment system could be measured. A road safety organisation commented that drink or drug driving should be an intermediate outcome target rather than a KPI.

As at earlier questions, there were also some comments on the need for appropriate levels of funding and resources and the need for enforcement and / or tougher sanctions.

## Governance Structure

The 2020 Framework saw the establishment of a Strategic Partnership Board (SPB) to govern the Framework and a supporting Operational Partnership Group (OPG). It is proposed that the SPB and OPG continue until 2030. The consultation paper also proposed that the new Framework has a third tier – Local Partnership Forums (LPFs) – which would be comprised of the Chairs of local road safety forums, groups, or partnerships. Its key purpose would be to share local road safety issues, plans and evaluations and would serve as a national knowledge hub.

The next question asked,

### ***Do you think that the proposed Governance Structure is appropriate?***

As table 10 demonstrates, a higher number of respondents, across all sub-groups, agreed that the proposed Governance Structure is appropriate, than disagreed (90 agreed and 66 disagreed). Across respondents overall, agreement was higher among organisations than individuals. Views were split among individuals, with just under half in agreement and just over half disagreeing.

Respondent Group	Yes	No	No response
Academia / education (3)	2	1	-
Community group (4)	3	1	-
Cycling organisation (6)	2	1	3
Emergency services (2)	2	-	-
Legal organisation (2)	1	-	1
Local authority (21)	15	4	2
Public sector (6)	4	2	-
Representative organisation (7)	5	1	1
Road safety organisation (8)	4	3	1
Third sector (4)	2	-	2
Other (4)	2	1	1
<b>Total organisations (67)</b>	<b>42</b>	<b>14</b>	<b>11</b>
Individuals (136)	48	52	36
<b>Overall Total (203)</b>	<b>90</b>	<b>66</b>	<b>47</b>

Table 10: Agreement on whether the proposed Governance Structure is appropriate

A total of 112 respondents, across all sub-groups, answered this question. There was broad support for this proposal with a number of respondents noting support for the overall structure or for elements of this, with some comments that this would improve communication at national and local levels or that it is a positive move to include LPFs given that they will have an understanding of local issues, experiences

and initiatives. Only a very small number of respondents felt this lacked ambition or would have insufficient power.

While there was broad support for this governance structure, some respondents noted concerns or requested further detail on how it would operate. A key issue, raised primarily by organisations, was the need for funding to be provided at a local level. Another issue noted – again, primarily by organisations – was of a need to ensure that the LPFs have influence, are managed effectively at a local level, and communication is a two way process to allow for good practice to be shared and adopted and to provide feedback on local issues. A small number of respondents felt the structure as outlined was ‘top down’ rather than ‘grass roots up’ and queried whether the LPFs would have much real input. One representative organisation noted concerns that there could be a fragmented approach across regions and there is a need for an effective regulatory framework to ensure policy issues are considered so as to ensure maximum efficiency. As noted by an emergency services organisation,

*“It is important that this new structure develops effective processes that support individual and collective accountability, as well as a renewed approach to sharing information, data and good practice.”* (Emergency Services Organisation)

Allied to this last point, there were a few calls for accountability, with requests for scrutiny, reviews to assess effectiveness and identify necessary improvements, and a capacity to measure progress against specific project-based actions. An emergency services organisation suggested a need to develop effective processes that support accountability and allow for information sharing, good practice and the collection and sharing of data.

Other suggestions made by small numbers of respondents included a need for:

- Greater commitment from the NHS on the SPB.
- The OPG to have at least one expert member to ensure there is a detailed understanding of issues and actions.
- The devolution of current police powers in relation to the enforcement of speeding and other moving vehicle offences to local authorities. This would have two key benefits; first, by reducing pressure on the police and freeing them up to focus on more serious issues; and, second, allowing for higher levels of enforcement within each local area.
- A strong management team to ensure that action and feedback is taken.
- A need to ensure that all areas of Scotland have representation within the structure to allow the LPFs to work effectively.
- A need to consider the structure and interrelationships between different elements and suggestions that the structure used by alcohol and drug partnerships would be a good model to adopt.

The potential for an alternative structure was highlighted by a relatively small number of organisations, many of which were local authorities. These included suggestions

to make use of existing regional groups so as to benefit from their expertise and knowledge, with one local authority commenting that Regional Partnership Forums should be based on existing Police Road Safety Unit regions. Another two local authorities endorsed this approach but felt this structure should be adopted within local authority areas rather than the existing police units.

A small number of individuals felt the proposed structure would create too many layers which in turn would have a knock on impact in that any action would take longer to implement.

Other alternatives suggested by one or two respondents included:

- There should be a triumvirate approach where LPFs work directly with the SPB and OPG, rather than as a third tier.
- An overarching organisation to operate as a centralised data source, including crash data; an alternative would be to have a separate data analysis team providing support to the SPB, OPG and LPFs.
- One streamlined governance group combining the roles of the SPB, OPG and LPFs and with representation from all local authorities.
- LPFs to replace the OPG and report directly to some form of SPB.

Respondents answering this question also outlined a number of other types of individual or organisation that should be involved in the governance structure. Those mentioned most frequently included community groups / community councils / members of the community / local residents, cycling organisations / cyclists and representatives of walking groups / pedestrians.

The next question asked,

***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?***

As shown in table 11, there were high levels of agreement from organisations and individuals that road safety performance would 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 (148 agreed compared to only 24 who disagreed).

Respondent Group	Yes	No	No response
Academia / education (3)	3	-	-
Community group (4)	3	1	-
Cycling organisation (6)	4	1	1
Emergency services (2)	2	-	-
Legal organisation (2)	1	-	1
Local authority (21)	20	-	1
Public sector (6)	5	-	1
Representative organisation (7)	7	-	-
Road safety organisation (8)	7	-	1
Third sector (4)	1	1	2
Other (4)	4	-	-
<b>Total organisations (67)</b>	<b>57</b>	<b>3</b>	<b>7</b>
Individuals (136)	91	21	24
<b>Overall Total (203)</b>	<b>148</b>	<b>24</b>	<b>31</b>

Table 11: Agreement as to whether road safety performance would 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

A total of 130 respondents across all sub-groups provided additional commentary in support of their initial response to this question. Many of these expressed positive views on the importance of joined up partnership and collaborative working, the need for consistency across all areas and on sharing data. As noted by one representative organisation,

*“Information sharing is central to facilitating a collaborative approach to addressing road safety. To improve transparency, national and local data should be readily available via an online, central database to track progress.”*  
(Representative Organisation)

However, a number of respondents expressed a qualification. Key to this was the sharing of information and best practice needs to be co-ordinated; accountability needs to be built in; and LPFs have to take on the responsibility that this will entail.

A few respondents commented that there needs to be action and the LPFs need to be more than simply a ‘talking shop’. A very small number of respondents were cynical as to whether the systematic sharing of information and best practice would actually happen.

A few respondents – mainly individuals – noted concerns about the involvement of local authorities and felt that some do not have the necessary skills or expertise to be able to take a lead, or some local authorities have been unwilling to share best practice in the past.

As has been noted at earlier questions, the issue of funding and resources was raised, with comments that funding on infrastructure is underfunded in many areas, or funding will be needed for engineering improvements or enforcement. One third sector respondent commented there is insufficient capacity at a local authority and Police Scotland level to support the proposed Partnership Forums.

## Road Safety

Through the consultation, Transport Scotland were keen to understand what aspects of road safety work well at present and what could be done to encourage and promote these aspects. Equally, they were also keen to understand what aspects of road safety do not work well in general and as a result of Covid-19, and what practical actions could be taken to overcome these aspects.

The next question in the consultation asked,

### ***In your opinion what aspects of road safety work well at the moment?***

A total of 167 respondents, consisting of 55 organisations and 112 individuals, chose to make comments at this question.

The aspect of road safety most frequently mentioned by respondents – a significant minority – as working well was segregated infrastructure, especially in relation to cycle lanes. Specific mentions were made relating to keeping cyclists separated from drivers, off road cycle tracks, cycle spaces at the front of traffic lights and Glasgow's City Ways<sup>4</sup> project.

A significant minority of respondents, particularly organisations, highlighted the role of road safety campaigns and education. Useful facets of these included the dissemination and sharing of information; raising awareness (e.g. about vulnerable road users); and promotion of the benefits of active travel. A number of different examples and sources perceived as being successful were given including:

- Biker Down Programme<sup>5</sup>, providing emergency first aid courses for motorcyclists.
- Royal Society for the Prevention of Accidents (RoSPA) road safety courses<sup>6</sup>, providing road safety engineering courses based on best practice.
- Give Cycle Space<sup>7</sup>, a campaign to highlight the legal consequences for drivers who pass too close to cyclists.
- Road Safety GB website<sup>8</sup>.
- Other aids such as Real Time Crash Scenarios, CPR training and Virtual Reality visualisations.

Similar numbers of respondents, again mainly organisations, focused on local action, especially partnership working amongst local road safety panels. Examples of such groups given were the Angus Area Traffic Coordination Group; the Tayside Road Safety Forum; and the A9 Safety Group<sup>9</sup>. These were regarded as vital in helping coordinate stakeholders including local authorities, the police, fire brigade,

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<sup>4</sup> A project designed to deliver safer, more comfortable, faster and more coherent cycle routes to expand Glasgow's cycle network.

<sup>5</sup> <https://www.facebook.com/bikerdownscotland/>

<sup>6</sup> <https://www.rospa.com/safety-training/on-road/rse>

<sup>7</sup> <https://www.cycling.scot/what-we-do/campaigns/give-cycle-space>

<sup>8</sup> <https://roadsafetygb.org.uk/>

<sup>9</sup> <http://a9road.info/>

ambulance, NHS and road operators. A very small number of respondents referred to the importance of community engagement and support in making these partnerships work. One local authority commented,

*“Partnership working in local road safety panels is vital for the sharing/discussion of knowledge, concerns and solutions. This is especially reflected in road safety education with all partners participating in events.”*  
(Local Authority)

A significant minority of respondents pointed to the implementation of lower or reduced speed limits as being a success; most of these commented specifically about 20mph limits in places like Edinburgh, while smaller numbers highlighted 20 mph zones. A third sector organisation noted,

*“In Scotland, 20mph outside school gates has been a critical part of safe routes to school. Further roll out of 20mph could benefit other vulnerable populations e.g. older people.”* (Third Sector Organisation)

Other respondents commented about lower speed limits more generally, with a few respondents noting they were only useful if enforced properly. Very small numbers of respondents pinpointed flashing lights at speed limit changes as being effective.

Respondents (again, a significant minority) also chose to highlight the positive aspects of speed cameras, with most of these involving favourable mentions of average speed cameras. Particular areas of Scotland were specified in this respect including the A90, A9 and roads north of Glasgow.

Various elements of road design which were perceived to work well were pinpointed by a few respondents. The following specific measures were discussed favourably:

- Traffic calming measures (e.g. speed bumps in new estates, raised roads at crossroads).
- Junction redesign (e.g. more roundabouts, voice overs).
- Improvements in road conditions (e.g. signage, potholes and rural roads).
- New technology impacts, particularly in relation to signage (e.g. variable message signage, warnings a vehicle is exceeding the speed limit).
- Low traffic neighbourhoods or traffic management systems giving priority to active travel.
- Other improvements in road safety design (e.g. one way systems, prioritisation of public transport).

A few respondents focused on safety for pedestrians. These aspects included pedestrian crossings, ‘Spaces for People’ adaptations such as pavement extensions and in particular the implementation of no car zones; and active travel routes such as Safe Routes to School. A small number of respondents mentioned improvements for cyclists regarding road functionality aspects such as specific traffic lights or lighting, while others highlighted the use of cycle training such as Bikeability<sup>10</sup> for

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<sup>10</sup> <https://www.cycling.scot/bikeability-scotland>



schoolchildren. Vehicle and driver safety improvements were discussed by a few respondents, including better driver education, automated safety systems in cars, high rates of seatbelt wearing, the Euro NCAP rating system (which rates vehicle makes for safety) and direct vision HGVs. Small numbers of respondents cited parking safety improvements such as the increase in permit-only areas.

A few respondents highlighted the value of deterrence and enforcement on road users, particularly in respect of drink drive and drug drive measures. These included aspects such as higher police visibility and enforcement campaigns such as Operation Close Pass<sup>11</sup>. However, larger numbers of respondents thought that higher levels of enforcement, deterrent measures and monitoring were needed.

A few respondents (mainly organisations) commented that road safety was working well in a historical context, with deaths, injuries and road accidents continuing to fall. Small numbers of respondents pinpointed more in-depth analysis of safety data helping to correctly inform decision-making and target-setting. Positive comments were made about the roles of Road Safety Scotland and Accident Investigation and Prevention in this respect.

However, a few respondents felt that no aspects of road safety were working well at the moment, mainly citing perceived negative effects of anti-car measures such as the reduction of speed limits encouraging non-compliance.

Finally, small numbers of respondents chose to discuss specific areas in which more action was perceived as being needed (e.g. educating road users, road design improvements, more traffic calming, more speed cameras, more measures for disabled or vulnerable road users, etc.). A few organisations stated the need for more resources in order to undertake road safety work.

The next question asked,

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

155 respondents, consisting of 52 organisations and 103 individuals, chose to make comments at this question.

The most frequently mentioned practical action was more or better road safety education, discussed by a significant minority of respondents. Various types of training and awareness courses and schemes were put forward and included education via schools (e.g. Green Cross Code, Highway Code, cycling proficiency), training or courses for drivers (e.g. on how to handle cyclists, how to change behaviour, introduction of a Graduated Drivers Licence Scheme), training or awareness schemes rolled out via employers and bringing back Accident Investigation and Prevention courses or instigating other road safety / auditing courses to Scotland.

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<sup>11</sup> Operation Close Pass is a police operation to educate drivers and take enforcement action wherever necessary

In relation to these, more and / or better targeted road safety awareness and advertising campaigns were suggested by smaller numbers of respondents, via social and / or national media.

A significant minority of respondents (almost all of them individuals) called for more deterrent measures. A wide variety of broad and specific measures were desired including: stricter laws; harsher punishments or sentencing for violations; a more visible police presence; presumed liability in accidents being with the motorist; and making it easier to make video submissions.

Similar proportions of respondents, but this time mostly comprising organisations (and local authorities in particular), saw the need for greater investment or resourcing of safety aspects. Suggested areas for which this was seen as being required included having dedicated safety officers and instigating a forensic capability. Small numbers of respondents pointed out that funding had diminished in recent years, with others calling for a larger proportion of the transport budget to be given to active travel.

An improved cycling infrastructure was prioritised by a significant minority of respondents. Perceived areas for improvement included: joined up cycle networks; more cycle lanes; more safe routes; better signposting; better maintenance; and more cycle rack availability for parking bicycles. Similar numbers called for more segregation for cyclists in the forms of dedicated cycle paths, segregated cycle lanes or wider cycle lanes. A very small number desired action to be taken on Close Pass to protect people on bikes.

More or better pedestrian infrastructure was also called for by a significant number of respondents. Particular facets which were suggested included: more pedestrian priority; pavement widening; having non-obstructed pavements; and more zebra and / or pelican crossings with more pedestrian-friendly traffic lights (e.g. longer crossing time for the green man).

Similar numbers of respondents saw the need for more incentives to encourage active travel or public transport as opposed to car travel. Practical actions were specified including less road building; a reduction in through routes for vehicles in towns; road closures for vehicles in city or town centres; reduced road priority for vehicles; car-free streets near schools; and more car parking restrictions.

A slightly smaller number of respondents (but still a significant minority) called for better road design. Priorities cited included prioritising safety (e.g. having more road safety engineering schemes for junctions and side roads); making road navigation easier for vulnerable users; better or more frequent signage; and removing bottlenecks. Further road safety measures reflected those mentioned at the previous question and included more 20mph zones, more average speed areas or cameras, better road maintenance and more traffic calming measures.

Better or more enforcement of these practical actions was mooted by a significant minority of respondents, in particular regarding speed limits.

A more integrated and harmonised approach to create national consistency was deemed desirable by a significant minority of respondents, in particular local authorities. Promotion of closer working between various bodies or groups was

suggested to help achieve this, including: agencies or partners working with communities; Transport Scotland with local authorities; and between local and national levels more generally. Very small numbers of respondents desired the encouragement of the proposed Local Partnership Forum or the linkage of road safety panels to a national strategy. A Road Safety Scotland online platform was also mooted to help enable harmonisation.

*“Support and collaborative work between the Scottish Government and local authorities will improve local efforts. Local authority roads make up 93% of all public roads in Scotland, therefore require significant investment in maintenance and ongoing works to provide a safe road network for all users which can contribute to achieving the national vision as outlined within the Framework.”* (Local authority)

In order to successfully prioritise practical actions for the greatest positive impacts, a significant minority of respondents (particularly organisations) desired more analysis and feedback from real life experiences and data. Examples were given including risk assessments, road safety audits and wider collection of data (not just STATS data). Similar numbers invoked learning from the sharing of good practice, including from overseas, with Holland in particular being mentioned.

A variety of other actions were suggested, each by small or very small numbers of respondents, as follows:

- Car / vehicle technology measures (e.g. limiting new vehicle maximum speeds or better safety features).
- NTS Roles and Responsibilities review to consider how road safety is delivered within local / regional government.
- More encouragement for road safety partnerships to expand or reach their capabilities.
- Having decision-makers travel by means other than car to get first-hand experience.

Finally, a small number of respondents regarded current actions as fine and the framework should continue the downward trend in casualties.

The next question asked,

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

174 respondents, consisting of 58 organisations and 116 individuals, chose to make comments at this question.

Respondents' answers tended to categorise themselves into the following three types: general aspects of road safety perceived to be not working well; aspects not working well as a specific result of Covid; and reiterations of previous responses giving opinions as to what actions were required in order to make road safety work well. Frequently, responses incorporated facets of all these types of answer.

The most frequently mentioned aspect of road safety perceived not to work well in general was a lack of speed limit enforcement, cited by a significant minority of respondents. Speeding generally was seen to be an issue in a variety of contexts, including built up areas, rural roads and motorways. A few respondents commented on poorly or inconsistently-set speed limits causing confusion, with varying opinions focusing particularly on 20mph zones; very small numbers stated that 20mph should be the default speed limit in residential areas while others either called for a further reduction or expressed frustration that this limit was not adhered to.

A significant minority of respondents bemoaned a lack of enforcement in other areas of road law, specifically mentioning driver behaviour, mobile phone use and lack of a police presence. Poor driver behaviour was a focus of similar numbers of respondents, described variously as selfish, aggressive, unsafe or distracted, with driver skills (e.g. in bad weather) also criticised.

Vehicle parking issues were raised by a significant minority of respondents: safety-related complaints were raised about illegal parking, double parking, parking on residential street corners, on pavements, on cycle lanes and near schools.

Respondents – again, a significant minority – saw problems relating to the encouragement of active travel with a perceived lack of practical support measures. Problems which were pointed out included inequities of road space, roads, regulations and traffic lights prioritising motor vehicle traffic, and Spaces for People schemes failing to work well.

Slightly smaller numbers of respondents (though still a significant minority) pinpointed particular safety issues relating to larger and more powerful vehicles, specifying 4x4's, HGVs, vans, LGVs and agricultural vehicles in this regard. Problems highlighted included vehicles being too large for existing vehicle restraint systems such as barriers; lorries being in city centres during peak travel times; and a lack of rest areas in Scotland for HGV drivers.

A significant minority of organisations argued the need for a more joined-up approach to road safety including more partnership working, coordination and evaluation between stakeholder organisations. Examples of problem areas were given including:

- A lack of updates re. data distribution and data reporting.
- Perceived under-reporting of cycling road casualties.
- A lack of connection between engineering and road education policy.
- Differing approaches taken by local authorities.

*“Roads Authorities are adopting different approaches to aspects of road safety. This can be witnessed by driving around different council areas and is perhaps most recently demonstrated by the implementation of 20 mph speed limits on road networks. Similar examples can also be seen on different parts of the trunk road network such as the implementation of flag style chevrons on bends in some areas but not others.”* (Representative organisation)

A variety of other aspects of road safety perceived as not working well in general were each stated by small numbers of respondents as follows:

- Issues relating to children and school safety including lack of lollipop people, car congestion, and problems relating to the provision of road safety education.
- The poor condition of roads (e.g. lack of maintenance, signage and road marking problems).
- Speed bump issues, including the perception that these fail to slow down larger vehicles such as 4x4s, vans and lorries.
- Contradictions between safety and environmental considerations (e.g. increased air pollution on traffic calmed streets).
- Contradictions between safety, and support for some less safe forms of travel (e.g. motorbikes, e-scooters, e-bikes).
- Problems with cyclists' interactions with horses / horse riders (horses being left between cyclists and vehicles, etc.).
- Speed camera issues (only effective at checking speed in a zone, Satnav warns drivers, etc.).
- Drivers finding routes or rat runs through residential areas (e.g. through Satnav).
- The needs of vehicle users being ignored (e.g. too many unused cycle lanes).
- Poor cycling skills or untrained cyclist issues (e.g. cycling without lights, unpredictable movements, lane wandering).

A few respondents pointed out that reductions in numbers of accidents and casualties have been getting smaller.

Many respondents also made comments about aspects of road safety not working well as a result of Covid. A significant minority stated that, at least initially during lockdown, the overall effect was positive, in terms of: less vehicles being on the road; less speeding; increases in active travel; interventions supporting the setting of 20 mph limits; and vulnerable road user support. Small numbers maintained that there was no direct effect from Covid on road safety.

However, the largest number of respondents who made Covid-related comments suggested that speeding problems had increased since lockdown, with emptier roads playing a part. Smaller numbers pointed to a lack of enforcement on speeding due to Covid.

A significant minority of respondents commented that there was now more traffic on the roads as people were using private vehicles more due to social distancing requirements. Similar numbers saw problems arising from reduced public transport availability and the use of public transport being discouraged. In the longer term, small numbers of respondents predicted that public transport use may be undermined by the increase in active travel, cycling in particular.

Driver behaviour has got worse since lockdown, according to a significant minority of respondents, with less concern for other users being specified by the examples of perceived hostility to cyclists, close passing and aggressive undertaking.

Responses from organisations focused on two areas: delays to improvements to road safety or implementation of road safety initiatives, and reduced interaction or contact between road safety stakeholders. Organisations complained about the following issues in particular:

- The absence of data reporting.
- The extra demands on resources, or resources diverted to deal with Covid.
- Failure to bank the benefits of Covid-induced modal shifts in travel.
- Poor / wrong prioritisation of actions.
- Delayed education or training (e.g. in schools, and increased numbers of untrained cyclists on roads).
- A lack of road safety officers.
- The cessation of partnership working.
- The negative impact on statutory consultations.
- Delays to road maintenance work.

Other Covid-related safety issues were cited, each by small numbers of respondents, as follows:

- Pedestrian issues, in particular a lack of space on pavements to socially distance, and hygiene regarding the touching of traffic light buttons.
- Increased conflict between road users, caused by the increase in cyclists and walkers.
- Pressure on car parking, particularly at beauty spots.
- Lack of engagement with disabled or vulnerable road users re. Covid interventions.

Finally, significant numbers of respondents chose to reiterate road safety initiatives which they would like to see prioritised. The highest number of respondents focused on safer measures for cyclists; for example the segregation of cycle lanes or reinforced protective legislation. In addition, significant minorities of respondents suggested the following:

- Tougher deterrents for offenders.
- Better road design or road infrastructure (e.g. engineering improvements, traffic calming, vehicle restraint systems, improvements at junctions).
- Safer measures for pedestrians (more crossing opportunities, etc.).

- More measures prioritising active travel (e.g. keeping vehicles out of city / town centres, less road building, less priority given to cars).
- More or improved road safety education, training and campaign work (e.g. including reassessment of drivers' abilities throughout their driving career or having the objective of changing peoples' mindsets).

The final question of the consultation asked,

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

A total of 163 respondents, consisting of 56 organisations and 107 individuals, chose to make comments at this question.

The highest numbers of respondents, including widespread support amongst individuals, thought better enforcement measures or tougher deterrents were the key to overcoming aspects of road safety that were not perceived to be working well.

Predominant among desired enforcement measures were those acting on speed limits. To this end, more speed management infrastructure such as speed bumps or cushions and speed reminders like those seen on entry roads to villages, were suggested. As highlighted in previous questions, better enforcement action was also suggested regarding mobile phone use by drivers, car parking in cycle lanes or on pavements, and obedience at traffic lights.

Among potentially tougher deterrents suggested for wrongdoers (mainly by individuals), the following were mooted:

- On the spot fines (for driver penalties).
- Licence removal.
- A zero tolerance attitude.
- A tougher legal attitude to drivers (e.g. introduction of strict or presumed liability, removal of exceptional hardship loophole for those about to be banned).

A more visible police presence was desired by a significant minority of individuals. Respondents also wished for easier acceptance of, and submission methods for, video or camera evidence, such as that from body cams or helmet cams. More use of technology for enforcement purposes was mooted by a small number of respondents; suggestions included increased use of telematics devices or digital equipment, technology use in vehicles to control speeds, and the use of technology to identify mobile phone users. Respondents also advocated the use of more speed cameras or cameras in general (e.g. at traffic lights).

A significant minority of respondents (especially organisations) cited the need for more appropriate road safety education. A large number of these respondents said a major focus of education and training should be to try to induce a cultural change in drivers' mind-sets, behaviour and attitudes, particularly towards cyclists. Other respondents suggested: improvements to the learner driver process; ongoing periodic assessment for qualified drivers: different training depending on vehicles

being driven: and the introduction of i-learning courses (particularly if Covid was going to be a long term factor). Further support for schools' road safety education was also expressed, in particular to catch up after Covid-induced delays.

A slightly smaller minority of respondents saw value in producing better or more awareness and publicity campaigns, with suggested topics including driver behaviour, close pass safety issues, road sharing, and agricultural vehicle safety.

A significant minority of respondents commented about actions related to active travel; many of these stated that cars should no longer be prioritised: vehicles should be kept out of city and town centres as much as possible; and road building should be curtailed.

Similar numbers focused on cycling, with many of these respondents commenting on a need for segregation from other traffic. Improvements were suggested for improving cycling infrastructure including: more lanes with barriers: joined up cycle networks: long distance cycle ways: and specific traffic lights for cyclists.

Slightly smaller numbers of respondents suggested safety measures for pedestrians. These actions included: prioritisation at traffic lights: the expansion of pedestrian only streets: the redesigning or widening of pavements: segregated pedestrian lanes: and an increase in zebra crossings or other road-crossing infrastructure.

Small numbers of respondents suggested other actions to assist active travel which included the following:

- Restricting vehicle parking (e.g. banning from pavements or city centres).
- Cutting out 'rat runs' (e.g. by blocking relevant streets from satnav, installing bollards or implementing Low Traffic Neighbourhoods).
- Promotion or subsidisation of e-bikes (e.g. government loans made available for purchase, removal of VAT).
- Horse prioritisation over cycles.

A variety of suggested measures were made concerning speed limits: the majority commented favourably about 20mph zones, saying these should be made standard for certain types of area (e.g. near schools, hospitals or urban areas). Smaller numbers of respondents were in favour of lower speed limits, particularly in rural areas (e.g. HGVs reduced to 50 mph).

A significant minority of respondents advocated for improved road infrastructure. Specific suggestions included: engineering improvements; better junction design; introducing signage on rural roads relevant to vehicles passing bikes; better maintenance; and ensuring Equality Impact Assessments were taken into account. Small numbers of respondents advocated improved safety measures for large vehicles such as HGVs and agricultural vehicles: these included reinforced vehicle restraint systems and more rest areas for HGV drivers.

Increased funding or resourcing of road safety measures was a priority for slightly smaller numbers of respondents. The majority desired this to be targeted at road infrastructure.



A significant minority of organisations (particularly local authorities) stated a desire to improve communication, coordination and information and resource sharing between road safety stakeholders, such as Transport Scotland, road operators, cycle groups and local authorities. In relation to this, respondents thought there should be more joined up thinking about how the different elements of road safety come together, and also about how road safety intersects with other policy areas such as air pollution and health. According to a representative organisation:

*“...an inconsistent approach to road safety between Roads Authorities may be attributable to a combination of limited knowledge sharing and numbers of specialist road safety practitioners in some Roads Authorities. This inconsistency ultimately may be contributing to road user confusion or mistakes resulting in more serious collision outcomes. To address this the proposed Governance structures should be reviewed to include the road safety practitioners and key decision makers within all Roads Authorities. Where Roads Authorities have limited road safety practitioners, consideration should be given to how this knowledge gap can be bridged. A nationally understood person specification for a road safety practitioner may help road authorities understand their own limitations.”* (Representative Organisation)

Slightly smaller numbers of respondents were in favour of increasing the use of data or KPIs to implement safety targets (such as zero urban fatalities by 2030) using an evidence-based approach. These respondents noted that accurate and up to date data would be needed (e.g. in the form of casualty updates or vehicle speed data).

Smaller numbers of respondents saw the need for more consultation with disabled or vulnerable road users about specific road safety actions before introducing any changes (e.g. only allowing higher speed limits if safe for vulnerable users).

Other actions and comments were made by small numbers of respondents as stated below:

- More promotion of, and investment in, public transport (particularly post Covid).
- Using Covid as an opportunity to reset rules, objectives and interventions (e.g. by maintaining the Covid road safety infrastructure).
- Learning from good practice elsewhere (e.g. Safe System approach; practices in the Netherlands).

Small numbers of respondents were in favour of no further practical actions, citing that these were a waste of money, or expressed a dislike of some road safety initiatives (e.g. speed cameras).

## Concluding comments

A number of respondents welcomed the opportunity to respond to this consultation; and some organisations provided background information in order to set their response in context.

Views on the Road Safety Framework to 2030 were generally positive and there was widespread support for the proposed 2030 Interim Targets. However, there were some requests for further detail throughout and less than half of respondents felt the Intermediate Outcome Targets and Key Performance Indicators were appropriate to monitor progress towards the 2030 Interim Targets.

In many instances, respondents outlined key issues they felt needed to be addressed more fully by the Framework. Moreover, these issues were highlighted throughout consultation responses, across consultation questions and cited by all respondent sub-groups. Many noted the interlinked nature of these issues and perceived they would be most effective if considered in a holistic manner.

Key issues raised by respondents included the need for higher levels of funding and resources, and increased levels of enforcement, along with more stringent sanctions. There were comments on the need for speed management, and respondents wanted to see reductions in speed limits across many areas of Scotland. Monitoring, review, scrutiny and accountability of initiatives and the governance structure were perceived to be essential elements in delivery of the Road Safety Framework. Furthermore, there were requests for improved and additional data sources in order to be able to implement the most appropriate initiatives and measure the success of these.

Alignment with other Scottish Government policies was a key focus with comments on the need to ensure that a holistic approach is adopted and that it emphasises clear links with other policies, strategies and initiatives across a range of sectors.

## Appendix I

### *Respondent Organisations*

20's Plenty for Us  
Aberdeen Cycle Forum  
Aberdeenshire Council  
Active Vision Zero  
Angus Council  
APIL  
ByCycle Perth and Kinross Cycle Campaign  
Chartered Institution of Highways and Transportation (Scottish Branch and Society of Road Safety Auditors)  
City of Edinburgh Council  
CLOCS (Construction Logistics and Community Safety)  
Cockenzie & Port Seton Community Council  
Cycling Scotland  
Cycling UK in Scotland  
D.tec International Ltd  
Dumfries and Galloway Council  
Dundee City Council  
Dundee Cycling Forum  
East Dunbartonshire Council  
EVA Scotland  
Falkirk Council  
Fife Council  
Glasgow Centre for Population Health  
Glasgow City Council  
Heart of Argyll Wildlife Organisation  
Highland Council  
IAM RoadSmart  
Living Streets (Edinburgh Group)  
Living Streets  
Logistics UK (formerly Freight Transport Association)  
MACS  
Mark Ruskell MSP Office  
Moray Council  
Nestrans

NFUS

North Ayrshire Council

Orkney Islands Council

Pacts

Paths for all

Perth & Kinross Council Traffic & Network Service

Police Scotland

RAC Foundation

RAC Motoring Services

Road Haulage Association

Road Safety North East Scotland

Road Traffic Accident Law (Scotland) LLP

Roads Service, Shetland Islands Council

Royal Town Planning Institute Scotland (RTPI)

Scone and District Community Council

Scottish Borders Council

Scottish Community Safety Network

Scottish Fire & Rescue Service

Scottish Women's Convention

Shetland Council

Society of Chief Officers of Transportation in Scotland - Traffic and Road Safety Working Group

South East of Scotland Transport Partnership (SEStran)

South Lanarkshire Council

Spokes, the Lothians Cycle campaign

Stirling Council

Sustainable Cupar

Sustrans Scotland

Tactran (Tayside and Central Scotland Transport Partnership)

The British Horse Society Scotland

The Royal Society for the Prevention of Accidents

TRL

West Dunbartonshire Council

West Lothian Council

WSP



**TRANSPORT  
SCOTLAND**

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