



“...Un-Acceptable Losses..”

How Roads Policing priorities need to address the poor level of road safety for vulnerable users across our city – and how this unequally disadvantages people with disabilities, women, the very old and youngsters currently.

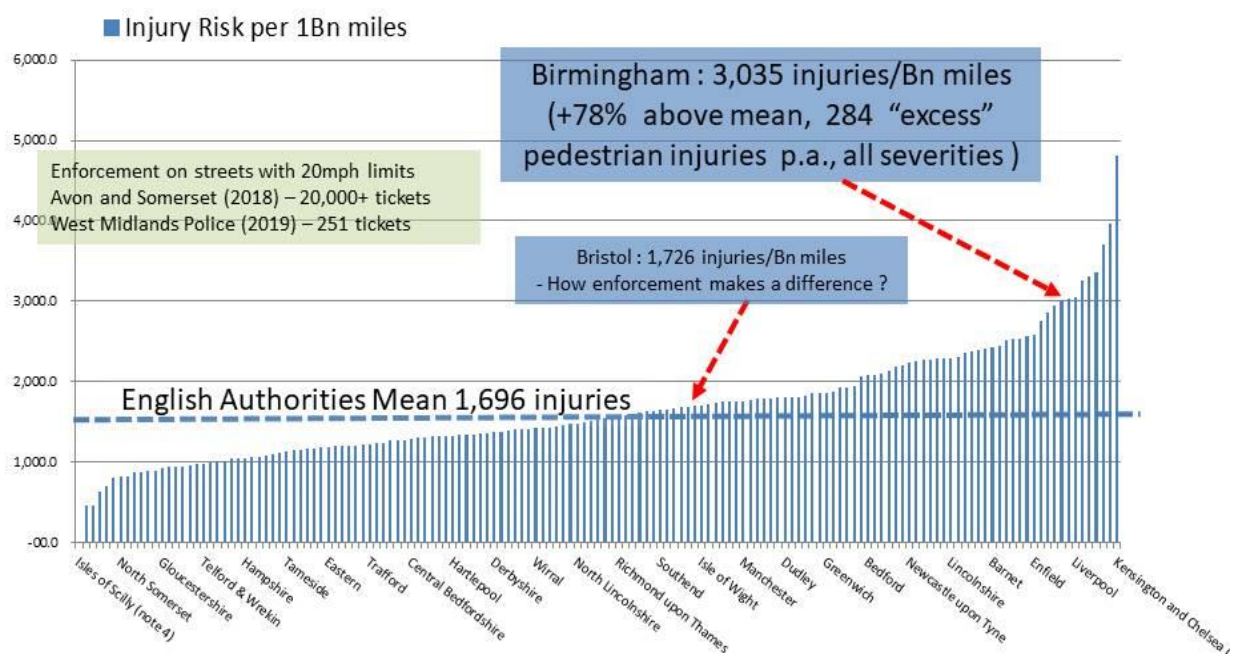
A briefing document for West Midlands Police and Crime Commissioner Candidates 2021, prepared by Birmingham Living Streets campaign group

Dear Candidate,

This briefing document has been prepared to ensure WMPCC candidates are fully informed of issues arising from the current priority-setting policies as they affect roads policing in Birmingham and vulnerable road users (VRUs) - and understand why equality regulations mean that more even-handed policies and priority-setting processes, driven by evidence, are needed.

The issues - what's gone wrong round here ...

2019 Pedestrian Injury Risk stats : B'ham ranks 143rd worst performing LA of 152 authorities



English Local Authorities – Best to Worst , high tourist LAs (City of London, Westminster) not shown

Full table and data sources : <https://t.co/VNtxqw9GTY?amp=1>

- **Pedestrians experience far higher risk of injury in Birmingham than almost all other areas of England¹** Claims of a great road safety record in the region, in reality, apply only to those using cars. For injury risk, the Birmingham area ranks as the 143rd worst performer of 152 English authorities based on DfT and NTS data. The consequent 'excess injury' rate, relative to national average, for pedestrians equates to 284 injured pedestrians of varying severities including fatalities per annum. *In any week this represents over 5 'excess' crashes into pedestrians, far above national average, where a pedestrian is injured, potentially seriously.*
- **Fatalism about pedestrian safety as Indirect discrimination.²** Within poorer demographic groups – those with less or no access to car travel - the following are over-represented³ : the very old, the very young, women, people from minorities, people with disabilities. While there is doubtless no *intended* discrimination in the priority-setting policies devised by the

PCC, Police and Crime Panel or senior officers, the consequences are that higher injury risk levels for these groups are accepted fatalistically, depriving already disadvantaged people of safe, health-promoting travel options.

- ***A" vicious circle" has emerged whereby people walk and cycle little compared to safer regions and cities where enforcement is applied more equally.*** Weak performance on pedestrian safety for some years indicates priority-setting policies that disfavour people choosing this mode of travel. It is unsurprising that actual walking levels and cycling levels, have dropped to the lowest within English regions⁴.
- ***Government and Mayoral Candidates are committing to 50% Walk & Cycle trip rates.*** The Secretary of State for transport has committed to massively increase levels of walking and cycling in urban areas to 50% of trips by 2030. Most WM mayoral candidates have committed to support this (from the mere 35%, approx., of 'active travel' trips in the WMCA currently). To avoid carnage amongst this increased active transport user population the PCCs responsible for urban areas will have to provide a far more equitable level of resourcing, used far more effectively, to create safer streets.
- ***Roads policing currently is too focused on drivers' personal safety.*** Actual traffic law enforcement in ordinary neighbourhoods, where pedestrians are at significant risk of injury even in so-called 'low speed collisions' has little resource assigned. Conversely the far better resourced focus on driver safety (Cf - CMPG funding and the focus of 'speed van' operations on trunk roads). This focus is on the kind of high-speed roads where serious injury to car drivers and occupants is more likely, has led to a huge differential in resourcing and disparate safety outcomes. But the "driver-first" logic and consequences has become 'normalised' and seemingly goes unquestioned, despite more than 35% of households in the West Midlands not even owning cars. Speeding tickets reflect this highly skewed priority; of 60,000-70,000 tickets issued by WMP annually⁵, only 251 tickets were issued in 2019 for 'the entire WM police area for dangerous speeding in 20mph zones. These 20mph roads are the very network of roads that elected councils prioritised for safer pedestrian and cyclist usage. Council initiatives are clearly undermined by this lack of support.
- ***Cost-effectiveness - prevention costs less than clearing up consequences.*** Putting aside the effects of crashes in terms of human misery and sometimes tragedy, the acceptance of 'excess crashes' squanders police time and effort. The cost benefits of preventative effort rather than clearing up the aftermath cannot be overstated. Increasingly constabularies like Avon and Somerset, the Metropolitan and Dorset ('No Excuses') Constabulary are proving that tougher policing and 'driver education courses' creates a climate of compliance on the roads that means less officer time being required overall. Being indulgent on dangerous behaviour, uninsured driving, tints, etc. leads to a dangerous - and expensively out-of-control - car culture on city streets that becomes a huge drain on forces. Additionally, broader societal impacts of crashes are costed by government at between £18k (Slight) to £2m (fatal)⁶ - these need to be factored into the 'whose safety matters' prioritisation process and policies.



Your Commitment to Change

We are asking Police and Crime Commission candidates to commit to:

- **Equality:** There need to be clear targets regarding Roads Policing ***that are equitable*** and in the short term – 2021-2014 - aim at ‘levelling up’ performance on risk to active travel users by achieving English average risk levels in Birmingham. Annual reviews and progress reports should be instituted and published on progress.
- **A “Vision Zero” plan:** The elected PCC should have a longer-term plan clearly and coherently phased at delivering a “Vision Zero” target. This is in line with TfL/Met’s 2017 phase-targeted delivery of no KSI’s aims to reach by 2041, with similar emerging pledges across other metropolitan mayor regions. (See Vision Zero report – ‘further reading’ and recommendations on prioritisation, transparency, post-crash responses)
- **Vigorous road policing enforcement** In line with Peel’s 9th principle, it is the clearly perceivable absence of criminal and anti-social behaviour on roads that truly re-assures the public, not post-tragedy activity. Pro-active deterrence needs to focus on the “high harm” offences; increased speed enforcement in particular and promoting – *and acting on* - widespread third-party reporting of driving offences.
- **“What works” focus** – There should be a clear focus on “what works” in terms of deterring dangerous driving, avoiding non-evidential tactics. Comparison internationally have left the UK a weak performer on active travel safety⁷. We should be prepared to learn from high performers both across national forces and internationally. If the lives of pedestrians are as important as those of motorway travellers, then the same robust, tactics need to be adopted, rather than ill-resourced measures that could, potentially, be seen to trivialise dangerous drivers and their behaviour in neighbourhood settings. This should include action within forces, *plus PCCs collaborating on recommendations to government for refining regulations and the legal frameworks as necessary.*

...And some food for thought

From ‘Vicious Circle’ to ‘Virtuous Circle’ - What works to reduce danger on our roads also makes our air cleaner, reduces CO2 emissions and enables more people to be active by walking and cycling. These are key outcome that all major elected bodies, local and national, and most Mayoral candidates have endorsed, albeit at varying speeds of delivery, which need the support of the PCC and WMP.

Strategic Ambition? The West Midlands is currently guided by the 2019 Transport for West Midlands (TfWM) and WMP Regional Road Safety Strategy. At a time when other UK cities are setting targets to reduce fatal and serious road casualties to zero by as early as 2040, this strategy only commits to “reduce casualties by 40% by 2028” from a 2015-17 average. If applied unselectively *this would barely achieve the 2019 national average for pedestrian safety*. This represents a failure of ambition given the vastly better performance evinced by our near European neighbours for active travel. We cannot allow fatalism about the high levels of pedestrian deaths and injury on its roads, especially amongst the poorest demographic groups – to run on into the foreseeable future.

‘Rat-run’ neighbourhoods are increasingly dangerous – Nationally, the proportion of pedestrian injuries occurring on unclassified roads has risen from an average of 49% of all pedestrian fatal and serious injuries in 2000 to 2004 to 56% between 2015 and 2019⁸. These are the very types of roads that current policies ignore or provide only token effort toward.

Evidence-based policy making/processes - Some current detailed policies and processes appear to have little supporting evidence, or even contradict evidence available elsewhere. One example would be current helmet/dashcam processes. The Metropolitan police (see sidebar) have instituted a ‘dash cam’ / helmet camera reporting system that yields a high level of enforcement and follow up action⁹; they believe this is critical to their progress on ‘Vision Zero’ objectives. The Met process maintains a link between the complainant and the force whereas, locally, WMP have opted into a scheme that disconnects the complainant from the process, and perhaps predictably a far higher level of ‘No further Actions’/Cancellations (68%, 2019)¹⁰ seems to result.

Further Reading and Sources

“Action Vision Zero” Call to action for PCCs –A useful source of general information for PCC candidates and more detailed examination of priority changes needed to achieve Vision Zero KSI levels

<https://actionvisionzero.org/wp-content/uploads/2021/01/JointRoadDangerPCCManifesto2021-SM.pdf>

West Midlands and ‘Vision Zero’ – A very comprehensive analysis of data and issues is available in the “West Midlands Mayoral Elections 2021- Vision Zero Manifesto”, <https://actionvisionzero.org/wp-content/uploads/2021/03/VisionZeroManifesto-WestMidlandsMayoralElections2021.pdf>

International comparisons – The Parliamentary Advisory Committee on Transport Safety have published a *risk*-based analysis testing the UK claims to have “the safest roads in the world” *overall*. This exposed the huge divide between the actual low level of injury risk that drivers and car passengers are exposed to, contrasting with the far higher level of risk that vulnerable road users , especially those on foot or bicycle experience in the UK relative to comparator nations. The parliamentary advisory committee discusses this shortfall and the implications of ‘whose safety matters most’ at length here: <https://www.pacts.org.uk/news-and-publications/safest-roads-in-the-world/?hilite=%27safest%27%2C%27roads%27>.

¹ Full table of rankings by risk, and NTS, DfT and Defra data sources available at: <https://t.co/VNtxqw9GTY?amp=1>

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1/3 We deploy Traffic Officers across #London 24/7 however Police can't be everywhere all of the time. Therefore the public support safer roads by reporting offences via our online portal. For example yesterday we received 120 referrals. We consistently enforce 60-70% of these.



11:04 AM · Jun 30, 2020-Twitter for iPhone

² “Indirect discrimination is the legal term that describes situations which occur when an organisation, [...] or member of staff [...] makes a decision, or puts in place a particular policy, practice or procedure, which appears to treat everyone equally, but which in practice leads to people from a particular protected group being treated less favourably than others ”
<https://www.equality.admin.cam.ac.uk/training/equalities-law/key-principles/indirect-discrimination#:~:text=Indirect%20discrimination%20is%20the%20legal%20term%20that%20describes,protected%20group%20being%20treated%20less%20favourably%20than%20others.>

³ Poorer people have less access to cars/vans and, health permitting, must travel further by active travel. This reflects within the imbalances socio-economically by gender, age, ethnic group and disability - overall socio-economic car/van access :
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906029/nts0708.ods

Access to cars/van by gender:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906035/nts0702.ods

Access to car/van by ethnic group:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906040/nts0707.ods

Those with health conditions only walk a little less than the general population, but have a significant smaller amount of car miles

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906032/nts0711.ods

Young people (<17) obviously only have active travel modes available for independent travel, however even generation X increasingly cannot afford car usage

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/673176/young-peoples-travel-whats-changed.pdf

⁴ See NTS9903 report in

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906543/national-travel-survey-2019.zip

⁵ Speeding tickets WMP area Sept19-Sep20 – 71,828 Notices

https://www.whatdotheyknow.com/request/mobile_fixed_speed_camera_fines#incoming-1692282

WMP Speeding tickets in 20mph zones, 2019 – FoI requests

⁶

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/922014/ras60001.ods

⁷ See PACTS report “The safest roads in the World? But not for pedestrians”, under ‘Further Reading’

⁸ [9 \(https://roadtraffic.dft.gov.uk/custom-downloads\)](https://roadtraffic.dft.gov.uk/custom-downloads)

⁹ Approximately half the submissions result in the Metropolitan Police taking action, on a monthly basis.

<https://www.standard.co.uk/news/crime/thousands-of-motorists-use-dashcam-footage-to-stop-dangerous-drivers-a4168896.html>

¹⁰ <https://foi.west-midlands.police.uk/dashcam-footage-722a-20/>