

Summary:

1. Blaming RTAs on "speed" is as useful as an analytical tool as blaming aviation accidents on gravity.
2. Speed Compliance Statistics over multiple years show illegal speed is a contributory factor in <5% of RTAs
3. In the very small proportion of fatal & serious injury RTAs that involve illegal & excessive speed, gross impairment & criminal behaviour are invariably also involved. **None of these gross perceptual impairment behaviours are materially affected by either automated enforcement or ISA.**
4. The vast majority of legal speed RTAs (& hence the vast majority of RTAs) have: i. observation, ii. hazard perception & iii. hazard response (iii. because of i. and ii.) failures as their primary contributory factors. See RAS50---- series contributory factors tables in successive years' Road Collisions Great Britain reports. Nobody else but ABD appears to bother reading them; certainly not DfT officials or Government Ministers.
5. The failings above (under 4.) are all road user education and training-, NOT enforcement issues. **This is why road safety improvements have been flatlining for over three decades.**
6. RAIPB: Need an objective & independent Road Accident Investigation & Prevention Board (personnel drawn exclusively from ex-aviation & marine accident investigation backgrounds) to: (1) forensically analyse accident causation, (2) objectively set & regulate road safety policy, including speed limits & enforcement operations, for (3) maximised road safety, not maximised revenue generation.

Supplementary Background: Speed Compliance Statistics Reports

"In 2016, for all accidents, 2.8% (5,517) of vehicles had an exceeding the speed limit contributory factor allocated to them. This has remained stable over the past five years, with the value being 2.6% (5,645) in 2011."

Quote Source: Speed Compliance Statistics Great Britain 2017 - Page 15.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/743878/vehicle-speed-compliance-statistics-2017.pdf

"In 2017, for all accidents, 2.8% (4,879) of vehicles had an exceeding the speed limit contributory factor allocated to them. This percentage has remained stable since 2014, although raw numbers have decreased, with the value being 2.5% (5,381) in 2014."

Quote Source: Speed Compliance Statistics Great Britain 2018 - Page 18.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/812500/vehicle-speed-compliance-statistics-2018.pdf

These causation statistics do not vary dramatically year-on-year. Subsequent reports corroborate the above conclusions. Perhaps the UK road safety establishment needs to actually **read** them? An added complication is that UK speed limit setting procedures no longer adhere to sound road safety science; i.e., use of 85th Percentile Principle. **So much of the observed non-compliance arises from poorly set, underposted speed limits.**

Manifest Disadvantages of ISA:

- ISA assumes that road safety revolves entirely around speed limit compliance. The above observations on official accident causation data entirely refute this misapprehension.
- In the case of sober, responsible road users, the safest overtaking manoeuvres occur when carried out expeditiously, with shortest TED (Time Exposed to Danger). ISA radically interferes with this approach.
- ISA encourages a "foot-to-the-floor everywhere" mentality; with the subconscious, complacent presumptions that: (i) if the speed limit isn't being exceeded, then driving behaviour must be "safe"; and (ii) that is it up to the technology, not driver input, to sort out any problems that arise.
- This will breed further degradation in road user observation, hazard perception & hazard response skills; and - since existing deficiencies in these are **ALREADY** the primary road accident causation factors, the situation will only be worsened by the mandatory application of ISA.
- Two Questions:
 1. Could you drive safely with an obscured speedometer?
 2. Could you drive safely with an obscured windscreen?

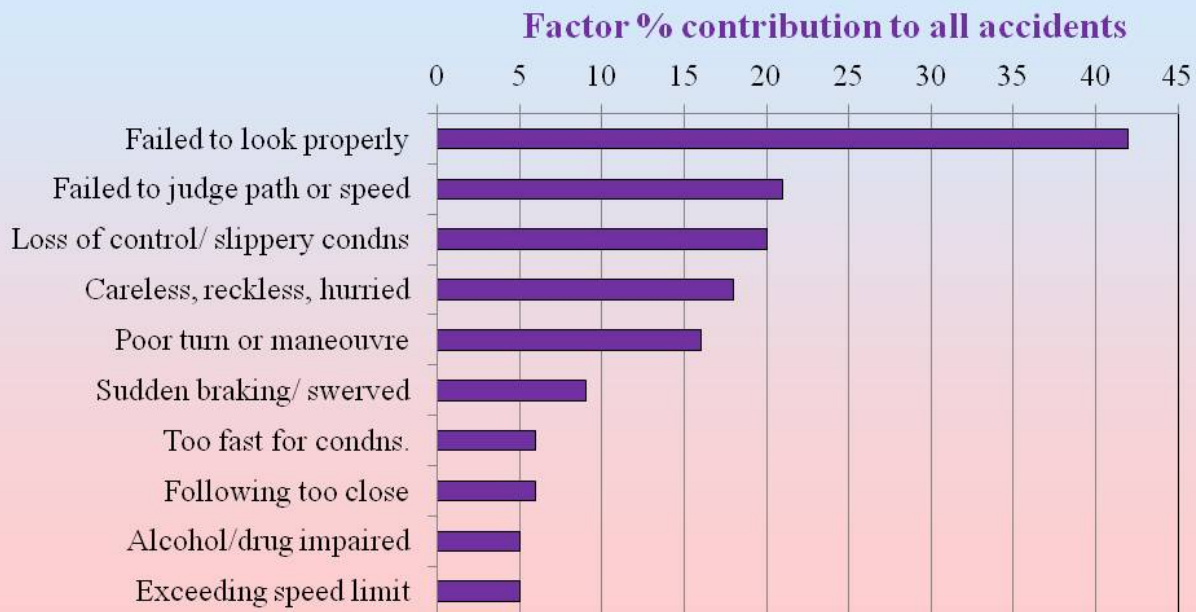
Speed as a Causation Factor:

Understanding the complex relationship between "Illegal", "Inappropriate" and "Excessive" Speed

Vehicle Speed	Above limit?	Safe/Unsafe	Comments	Solution
1. Illegal & Inappropriate/ Excessive	Yes	Extremely Unsafe	Above speed limit fatal and serious injury road accidents are predominantly perpetrated by criminal and/ or grossly perceptually-impaired road users, who are utterly unaffected by automated speed enforcement or ISA.	Road user education/ training issue, coupled with enhanced visible police presence; focussed on identifying & addressing erratic road user behaviours indicative of impairment and/ or criminal behaviour.
2. Excessive/ Inappropriate	No	Unsafe	Observation and hazard perception failures are the predominant causal factors of at-, and below speed limit RTAs per RAS 50001 Contributory Factor Tables ¹ . Often exacerbated by inadequately highlighted, unsafe road configurations: e.g., transitional (spiral) bend curvature.	Education & training issue; enforcement-unaffected & enforcement-immune. ISA only a positive influence if speed limits are set using sound road safety science, i.e., 85th Percentile Principle.
3. Illegal only	Yes	Frequently Safe	Speed limit on relevant road stretch set substantially below 85th Percentile Speed. Consequently it - & corresponding enforcement operations (likely lucrative with particular road stretch selected for that very reason) - are also inappropriate & risk bringing other, appropriately-set limits into disrepute.	Road safety establishment Best Practice failure urgently requiring remedial attention.

¹ <https://www.gov.uk/government/statistical-data-sets/ras50-contributory-factors>.

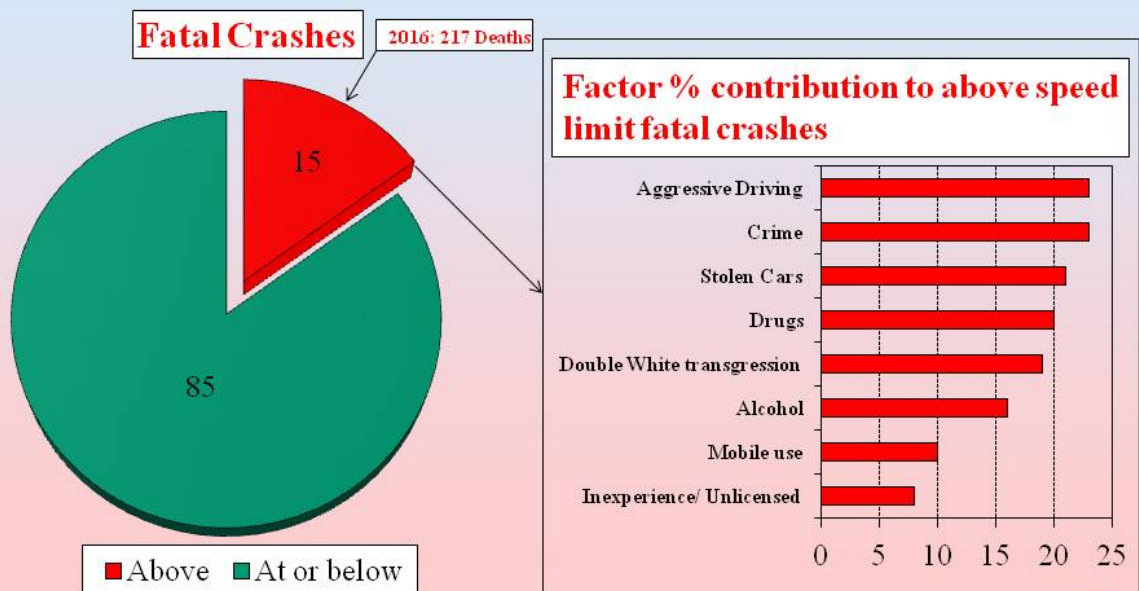
Contributory Factors to all Road Traffic Accidents 2016



2016 data; source: RAS 50001 <https://www.gov.uk/government/statistical-data-sets/ras50-contributory-factors>



Contributory factors to the 217 above Speed Limit Fatal Casualties in 2016



2016 data; source: RAS 50010 <https://www.gov.uk/government/statistical-data-sets/ras50-contributory-factors>

