



By email: RPCallforEvidence@dft.gov.uk

Date: 29th September 2020

Our ref: OPCC/AC/001

Dear Sir/Madam

Thank you for the opportunity to comment on the Roads Policing Review¹. I am submitting this response as the Police and Crime Commissioner for Wiltshire and Swindon. It subsumes input from Wiltshire Police. In developing this I have engaged closely with partners from Wiltshire Council, Swindon Borough Council, Dorset and Wiltshire Fire and Rescue Service and Highways England, although this should not necessarily be considered to authoritatively reflect all of their views.

Road safety is a key concern to communities within Wiltshire and Swindon and is regularly mentioned in my engagement with the public. It is a particular priority within my Police and Crime Plan², which I updated and reissued earlier this year. I am briefed regularly on road safety issues, on killed and seriously injured (KSI) data and on specific incidents where appropriate. Last year I also invited the Chief Constable to take the lead in reinvigorating the local Strategic Road Safety Group, chaired by an Assistant Chief Constable, and the means by which we engage on a regular basis with our partners, feeding into Community Safety Partnerships.

Wiltshire is a very largely rural county, with one significant urban area in Swindon. We have strategic routes transiting the County, such as the M4 and A303, and a large network of rural roads. As such, we face a different road safety and roads policing challenge from some other areas. Over the past decade we have seen a largely unchanged rate of road casualties, including broadly static numbers of road deaths. Even with the wide mix of roads and traffic across the area there is no strong evidence of particular areas of higher risk on our roads network, with KSI events broadly distributed both geographically and by road type. Other than the detailed KSI data that we collect, there is relatively little quality data available to provide as “evidence” to this consultation. Separately the Strategic Road Safety Group is commissioning work to improve our data sources.

¹ Department for Transport Roads Policing Review Call for Evidence dated July 2020.

² <https://www.wiltshire-pcc.gov.uk/Police-and-Crime-Plan>

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Between 2014 and 2018 roads policing was delivered on a Tri-Force basis with Avon and Somerset and Gloucester. Since the termination of this collaborative arrangement, I have invested further resources to strengthen our roads policing unit, which is now better able to respond to local priorities than hitherto, and in particular to achieve a greater degree of integration with Community Policing Teams, which largely provide the policing effort on much of our rural road network. Further increases to numbers of roads policing officers would be welcome, but I recognise the priority here must be balanced against the Chief Constable's advice to me on wider Threat, Harm and Risk and where resources are most effectively employed. The layered effort also includes a vibrant community speedwatch (CSW) network across the area and I am introducing an enhanced mobile enforcement capability to support this. Over the past two years we have recorded an increase in the number of speeding motorists from around 3.5% to 5% of those passing CSW teams and increased the number of warning letters we send out from around 2,000 to 2,500 per month. Wiltshire and Swindon discontinued the local Safety Camera Partnership in 2011. We cannot identify a causal relationship between road casualties and the lack of a fixed enforcement capability. Our approach is now rather for targeted enforcement action, based on an understanding of where and when road users break the law.

In doing this, priorities for enforcement are framed at present around the "fatal four" causes of collisions; excess speed, drink/drug driving, seatbelt wearing and distraction. Our data suggests that many of our KSI are ascribed to "driver error" but that at least one of the fatal four is often a contributory factor. Technology can help in part and the recent introduction of roadside drug wipes have undoubtedly improved our ability to address drug impairment. The most significant gap here is the ability to detect and enforce mobile device use and I suggest this should be a national priority to address.

But enforcement is but one part of what must be a systems approach to improving our road safety. Whilst changes to style and level of enforcement can have some impact, this must also be balanced against the requirement to maintain the consent of those policed. We need to continue to change behaviour of our road users in order to reduce risk. There is a balance here between that which should be done nationally and that which is more appropriate locally. National campaigns on behaviour, such as mobile phone use, will be much more effective and efficient than anything that can be delivered locally. But I believe that strong local partnership working is powerful in certain cases, for example to deliver targeted road safety advice in our schools.

Detailed responses to the question set, drawing on the data held, are at Annex A.

Yours sincerely



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Police and Crime Commissioner for Wiltshire and Swindon

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Chief Executive, Association of Police and Crime Commissioners

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Department of Transport – call for evidence

Question	Answer
Why do you think road casualties have remained fairly constant since 2010?	Advances in vehicle technology have probably hit a law of diminishing returns. Less enforcement on the roads, albeit greater capability around technology is helping.
What does the evidence suggest has the most impact on reducing deaths on the road?	Enforcement of fatal 4 offences – drink drive, speed, mobile phone use, seatbelts.
What evidence led initiatives demonstrate what could be done to help reduce road traffic casualties?	Nothing locally. Plenty of reports nationally and internationally – PACTS report/ RUNE ELVIK etc.
Can you provide examples or empirical evidence demonstrating a relationship between road traffic law enforcement and compliance with road traffic law?	Nothing locally that would stand up to statistical scrutiny. CSW data suggests steady increase in speeding offences.
Can you provide any examples or empirical evidence identifying a causal relationship between enforcement and road collision casualty numbers	Nothing locally that would stand up to statistical scrutiny.
Can you provide any evidence or examples that road traffic enforcement can disrupt or detect other (non motoring) criminality?	Roads policing officers stop lots of vehicles for traffic violations and end up dealing with other matters including crime, however the data to support this isn't available at present.
What else alongside enforcement (such as education or examples of use of technology and signage) has been evidenced to increase compliance?	The term usually used is the 3"E"s. Education, engineering and enforcement. Again this seems to be nationally accepted. There is also evidence to suggest that whilst a speedcheck is in progress that it has an impact on passing traffic – this is equally true with community speedwatch as it is a Police officer at the side of the road. As with many policing issues enforcement should be seen as the last resort with engineering and education being used first.
How have improvements in design and technology of vehicles (such as collision avoidance systems) impacted on road safety?	Anecdotally it would be agreed by many that this has helped – but there is no data locally to support this.
In respect of commercial vehicles can you provide any evidence or examples that current levels of enforcement by Police and/or DVSA and the sanctions that follow are an effective	This data is not collected by the force.

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deterrent to encourage compliance?	
If not can you provide and evidence or examples of how enforcement or sanctions could be changed to achieve improved compliance?	No. The bigger question is to get the data recording right first – then we can identify gaps and respond accordingly. This will be addressed in the upcoming Wiltshire RPSTRA.
If not can you provide any evidence or examples where enforcement of road traffic law can benefit congestion management and air quality?	This is not generally an issue for Wiltshire being a largely rural force – more likely to be prevalent in the larger metropolitan forces.
Is there evidence to show how prosecutions contribute to road safety?	Nationally yes – again refer to PACTS report but nothing locally.
Can you provide evidence or examples (in particular the use of technology) of what could be done to better enable and equip those charged with enforcing traffic laws?	Op TRAMLINe is a really useful tool where a truck is provided and police use it to observe drivers and film activity. It would be really useful to have some sort of camera system that shows what a driver is doing inside their car – but vehicle cameras and body worn cameras do not show this and there is no other solution at present.