



accidents don't have to happen

Proposed content of the new Road Safety Strategy for Northern Ireland to 2030

RoSPA's response to Department for
Infrastructure's consultation

January 2022



Response to Department for Infrastructure's consultation: Proposed content of the new Road Safety Strategy for Northern Ireland to 2030

Introduction

This is the response of The Royal Society for the Prevention of Accidents (RoSPA) to the Department for Infrastructure's consultation on proposed content of the new road safety strategy for Northern Ireland to 2030. It has been produced following consultation with RoSPA's National Road Safety Committee. We have no objection to our response being reproduced or attributed.

The consultation seeks views on the proposed content of the new Road Safety Strategy for Northern Ireland to 2030. Specifically, it seeks views on the proposed approach to road safety and the issues that the Department need to address including:

- The strategic approach that will underpin the new Road Safety Strategy;
- The proposed targets which the new Strategy will seek to achieve;
- The key challenges impacting on Road Safety;
- The priority areas of focus for the new Strategy;
- The governance process that should be established for the new Strategy; and
- The equality impacts that should be considered as part of the new Strategy.



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Your details

Are you responding as an individual or representing the views of an organisation?

As an organisation.

If you have responded as an 'Organisation' please specify who the organisation represents.

RoSPA is an accident prevention charity with the vision, life, free from serious accidental injury. Our mission is exchanging life-enhancing skills and knowledge to reduce serious accidental injuries. Our response represents the views of RoSPA and members of the National Road Safety Committee.

If you have responded as an 'Organisation' please specify how the views of members were assembled.

A range of RoSPA staff have contributed to this response, including executives, road safety policy and training colleagues. RoSPA has consulted the National Road Safety Committee in preparing this response. The committee includes representatives from key organisations with an interest in road safety.



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Our approach to road safety: strategic approach

It is intended that the new strategy will provide a focus and direction for road safety policy and action until 2030, recognising that policy, decisions and actions in many other areas can and do impact on the achievement of road safety outcomes and outcomes in other areas of society. For example, infrastructure, planning, environment and transport.

In terms of transport, the Department is also committed to a long-term vision for active travel across Northern Ireland with an emphasis on shaping communities around people. In this scenario, the objective is to significantly increase the proportion of journeys made by walking, wheeling and cycling, so that this becomes the most popular choice for the many shorter, everyday journeys that we all make. What deters many people from active travel is their concern about 'road safety'. Accordingly, road safety policies need to be focused on measures that address this significant concern.

It is recognised that improvements in road safety can make a significant contribution across a number of governmental strategic priorities and support a range of key cross-cutting themes.

It is intended that the Road Safety Strategy for Northern Ireland to 2030 will be directly linked to the outcomes framework which was developed and consulted on to support the Programme for Government (PfG). This outcomes framework adopts the OBA approach which provides a blueprint for cross-cutting and collaborative working.

The new strategy proposes 4 ambitious targets to 2030 and, following analyses of consultation responses, Key Performance Indicators will be established along with detailed action plans being developed with stakeholders and delivery partners to help frame a shared vision for the future to improve road safety delivery.

Safe System Approach

It is proposed that the key outcomes from the strategy should embrace the Safe System approach to road safety improvement.

The Safe System's ethical goal of serious casualty elimination requires a long-term timeframe for actions to be developed and implemented in successive timeframes, to deliver incremental serious casualty reductions and support progress towards the long-term goal.

Adoption of a long-term Safe System approach is identified good practice and is supported by other key international road safety stakeholder organisations such as The Organisation for Economic Co-operation and Development (OECD) and International Transport Forum (ITF) (OECD/ITF Towards Zero Ambitious Road Safety Targets and the Safe System Approach 2008).

The recently adopted (September 2020) United Nations (UN) Decade of Action for Road Safety 2021 - 2030 and the WHO and UN Global Plan for the Decade of Action, released in October 2021, emphasise the need for a holistic approach to road safety and calls on government and partners to implement an integrated safe system approach.



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Do you agree that the Safe System approach should underpin the new Road Safety Strategy?

RoSPA response

Yes.

Have you any further comments about this approach or alternative suggestions?

RoSPA response

RoSPA agrees that the Safe System approach should underpin the new road safety strategy, as the aims of the strategy and safe system approach are well aligned.

One way in which the number of road users killed or seriously injured can be reduced is by adopting a Safe System approach, focussing on safe road use; safe roads and roadsides; safe vehicles; safe speeds; and better post-crash response so that when crashes do occur, it is less likely that the road users involved will be killed or seriously injured.

RoSPA encourages people to choose active travel modes, such as walking and cycling, where possible. We believe that cycling and walking should become the first choice for shorter journeys, and can play a role as part of longer journeys. As the paper states, a key barrier to active travel is people's concerns about the safety of the roads. The DfT's active travel survey showed that two thirds of UK adults feel it is not safe to cycle¹. Improving the safety of our roads, by adopting a strategy based on the principles of the safe system approach, could in turn lead to an increase the number of people walking and cycling, with all of the health and environmental benefits that active travel brings.

¹ Department for Transport (2020) 'National Travel Attitudes Study' <https://www.gov.uk/government/statistical-data-sets/national-travel-attitudes-study-ntas>



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Proposed targets for the new strategy to 2030

This strategy takes cognizance of targets which have been set in a wider UN/EU/UK context. More information on Road Safety targets in an international context is available below.

Review of our road safety targets up to 2020, as detailed in the Road Safety Context section, show that 3 of the 4 targets have been achieved. While Target 1 was not met, it is important to consider the change from the 2004-2008 baseline position. Importantly the trend assessment comparing the baseline with the most recent 5 year rolling average, provides for a more robust assessment of progress against targets and has identified a decrease in trend.

It is within this wider and local context, including consideration of the performance against the 2020 targets, that the proposed targets for the draft strategy to 2030 have been identified. It is recognised that it will not be possible to eliminate deaths and serious injuries on our roads by 2030; however it is not accepted that any death or serious injury is inevitable and this strategy will strive to achieve the maximum reduction in casualties by 2030.

The proposed targets for the Road Safety Strategy for Northern Ireland to 2030, based on 2014-2018 baseline are:

- **To reduce the number of people killed in road collisions by 50% by 2030 (a target of 34 fatalities against the 2014-2018 baseline)**
- **To reduce the number of people seriously injured in road collisions by 50% by 2030 (a target of 375 Serious Injuries against the 2014-2018 baseline)**
- **To reduce the number of children (aged 0-15) killed or seriously injured in road collisions by 60% by 2030 (a target of 28 Children Killed or Seriously Injured against the 2014-2018 baseline)**
- **To reduce the number of young people (aged 16-24) killed or seriously injured in road collisions by 60% by 2030 (a target of 78 Young People Killed or Seriously Injured against the 2014-2018 baseline)**

Do you agree with these proposed targets?

RoSPA response

Yes.

Have you any comments or concerns about the targets being proposed or alternative views?

RoSPA response

Yes. RoSPA believes that in some part, the lack of reduction in the number of road casualties over the last decade could be addressed by the introduction of dedicated road safety targets. RoSPA expects that these targets will be of benefit, as they help to focus and unite efforts to make our roads safer alongside targeted interventions.



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RoSPA is supportive of the proposed targets as they adhere to the EU Road Safety Policy Framework, which sets out the EU Safe System results hierarchy. The interim targets of 50% fewer deaths between 2020 and 2030, with a view to zero deaths and serious injuries in 2050 follow the framework. The targets specifically focussing on children and young people also adhere to this framework. The UN Decade of Action for Road Safety 2021-2030 and the UN and WHO Global Plan for the Decade of Road Safety also include ambitious targets of preventing at least 50% of road traffic deaths and injuries by 2030.



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Strategic outcomes

Pre-consultation engagement with key stakeholders and with the Committee for Infrastructure has taken place which provided an opportunity for the Department to build on our knowledge and experience and to help inform the draft Road Safety Strategy.

Consideration of this early engagement and review of best practice has informed the proposed way forward for the new strategy. Three outcomes for the Road Safety Strategy have been identified:

1. **SAFE PEOPLE: OUR PEOPLE WILL BE SAFER ON OUR ROADS**
2. **SAFE ROADS: OUR ROADS WILL BE SAFER FOR ALL**
3. **SAFE VEHICLES : OUR VEHICLES WILL BE SAFE**

Do you agree that these are the best outcomes for the strategy?

RoSPA response

Yes.

Have you any further comments or alternatives as to what the outcomes should focus on?

RoSPA response

Yes. RoSPA believes that these strategic outcomes seem sensible, stemming from the Safe System approach of which three of the pillars are safe road use, safe roads and roadsides and safe vehicles.



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Safe people: our people will be safer on our roads

Safer people relates to the need for increased support for responsible road use, ensuring all road users use the roads safely and comply with the rules, taking responsibility for the safety of themselves and not putting others at risk or making them feel more vulnerable, especially road users such as people walking, wheeling or cycling and those with a disability.

Road users should pay full attention to the road, understand and travel at appropriate speeds to the conditions and within the speed limits, not drive after taking drink or drugs and give sufficient room to all other road users no matter what their mode of travel. It is recognised that education and awareness campaigns can encourage safe behaviour by targeting such high-risk behaviours and influence responsible behaviour to achieve positive road safety outcomes. It is also recognised that enforcement of the law can also help to create, promote and maintain a safe road environment by encouraging road users to adhere to traffic laws.

Statistical Analysis

Gender: 71% of fatalities that occurred on the roads in 2020 were male.

Age: those aged 35 to 49 accounted for 25% of fatalities; those aged 50-64 accounted for 21% of KSIs.

Road user type: pedestrians, cyclists and motorcyclists are identified as the most vulnerable road user group with the rate of KSI per 100 million kilometers (KMs) by road user type in 2020 showing: car user 2, pedestrian 24, pedal cyclist 47 and motorcyclist 251.

More information is provided at the link below.

Stakeholder Analysis

The most recent stakeholder analysis has identified challenges which may impact, now or in the coming years, on our ability to ensure our people will be safer. These include:

- Human error is still recognised as a key source of road traffic collisions with attributing behaviours including speeding, driver distraction, use of mobile phones, drink/drug driving and higher risk of collisions involving both young drivers and older drivers.
- The need to change the habits, behaviours and attitudes of all road users and gain their acceptance that the road is a shared space.
- Concerns surrounding the risk to vulnerable road users (identified as pedestrians, cyclists and motorcyclists) and the need to ensure they are safer on the roads.
- The need for promotion of sustainable modes of transport as well as walking, wheeling and cycling and to address the barriers to active travel.
- The need for policy to be proactive as opposed to retrospective, that is, the need to identify and apply local intelligence as opposed to historical data to target problem areas and prevent collisions instead of responding to them.



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- The need for more enforcement of existing regulations relating to our roads was identified as a key challenge with suggestions that more PSNI/DVA presence is required on our roads.

Do you agree that the challenges identified represent the key challenges that may impact on our ability to ensure that everyone will be safer on our roads?

RoSPA response

Yes.



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Safe people: key priority areas for the new strategy

Current context

Since the introduction of the 2020 Strategy there have been ongoing developments and actions which contribute to addressing some of the challenges that have been identified. These include:

Legislative change, for example:

The Road Traffic (Amendment) Act (NI) 2016 which introduced a range of measures aimed at improving road safety.

The Road Traffic Offenders (Amendment) Order (NI) 2020 and the Road Traffic (Fixed Penalty) (Amendment) Order (NI) 2020 which came into effect on 3 February 2021 and provided for 6 penalty points and a fixed penalty fine of £200 for mobile phone use while driving.

Promotion and Outreach:

Ongoing programme of measures to promote road safety and provide advice and guidance. For example the Cycle Proficiency Scheme, Practical Child Pedestrian Safety Training scheme, Active School Travel Programme and the annual Teaching Aid Calendar.

Ongoing road safety public information programmes which aim to encourage behavioural change by targeting the main causes of road traffic casualties as identified by PSNI data. These have included, for example, excessive speeding, drink/drug driving, and careless/inattentive driving; emphasis on more vulnerable road users such as people walking, wheeling or cycling and those riding motorcycles; awareness of the lifesaving benefits of seatbelt wearing; and the dangers of rural roads.

New public information campaigns developed to make the public aware of changes in legislation, for example, the increase in penalty points and fines associated with the use of handheld mobile devices.

Key priority areas for the new strategy

Whilst the ongoing actions identified above will continue to be monitored in terms of their impact on road safety, the following priority areas have been identified for consideration under the new strategy to enable us to achieve the outcome of 'Our People Will Be Safer on Our Roads', the implementation of which will be subject to available budgets:

Education/training: taking forward measures relating to education and training to ensure that all road users have the appropriate attitudes, skills and knowledge to ensure safe road behaviour and to reduce the chances of human errors being made. This will include, for example:

- proactive and remedial education to communicate future legislative changes and in response to road safety concerns that may arise over the lifetime of the strategy; and



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- the introduction of *Graduated Driver Licensing (GDL)* legislation to establish a revised training, testing and post-test regime for new drivers (and riders) to reduce the over representation of new (mainly young) drivers in fatal and serious road collisions.

Communication/awareness: taking forward measures relating to targeted communication and public information advertising campaigns to raise awareness on road safety matters, delivered in an age-appropriate manner. These will seek to engage the public at an individual level, and the Department to work at partnership level, to influence all road users to change their attitude and make better choices, taking personal responsibility for their own safety and to ensure they do not put other road users at risk.

Active and Sustainable Travel: taking forward measures aimed at encouraging active and sustainable travel; and identifying and addressing barriers to encourage and enable safe, active and sustainable travel choices.

Policy/legislation/regulation: ongoing consideration of policies/laws/regulations aimed at improving road user behaviour and the enforcement of these. This may also include the impact of other policy or legislative change on road safety, including energy policy, climate change and health. Examples include:

- enhancing the anti- drink driving regime in Northern Ireland;
- consideration and introduction of appropriate changes to the Highway Code to enhance local road safety; and
- reviewing the approach to the offence of careless driving.

Do you agree that these are the key priority areas which will help to deliver on the outcome of our people will be safer on our roads?

RoSPA response

Yes.

Do you have any views on the high-level actions that have been identified?

RoSPA response

RoSPA is supportive of the measures outlined.



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Safe roads: our roads will be safer for all

Safe roads relates to those who manage, maintain and develop our road infrastructure well as those who use them; all must contribute to eradicating fatal and serious injuries. Responsible behaviour on the part of every individual road user is the basis for safety on the roads. However, since road users are human and make mistakes, it is important that the management of the network reflects this and promotes the need to ensure that roads are designed, maintained and operated in a manner that not only promotes safe driving and appropriate speed choice, but also mitigates the consequences of collision.

Statistical analysis

In 2020, 73% of fatalities, 56% of those killed or seriously Injured (KSIs) and 37% of collisions occurred on rural roads.

Fermanagh and Omagh LGD had the highest rate of KSI casualties per population in 2020 highlighting the increased casualty risk on less densely populated often rural roads. Although rural roads are a priority, the focus should include safety of all roads.

Approximately three-fifths (62%) of pedal cyclists were killed or seriously injured on urban roads. [Pedal Cyclist KSI Casualties in Northern Ireland, 2014-2018 | Department for Infrastructure \(infrastructure-ni.gov.uk\)](#) and 85% of pedestrians were killed or seriously injured on urban roads [Pedestrian Killed and Seriously Injured \(KSI\) Casualties in Northern Ireland, 2013-2017 \(infrastructure-ni.gov.uk\)](#).

Stakeholder analysis

The recent stakeholder engagement analysis has identified challenges which may impact on our ability to deliver a safer road system. These include:

- The ability to deliver on the statutory requirement for ongoing road maintenance and the funding challenge this presents. Examples include minimising the impact of overgrown hedges/trees/verges and unfilled potholes on road safety;
- The need to consider planning policy, road design and infrastructure provision in an integrated way to improve the safety of all road users. Specifically major roads projects and the involvement of planners in the design of new developments would be required in order to improve road safety figures;
- The need for improved infrastructure to encourage and ensure safe, active and sustainable travel and which also contributes positively towards addressing the climate emergency and health impacts for our people. Examples include the development of walking and cycling infrastructure outside schools and the need for segregated cycle lanes;
- The impact of new technologies and forms of mobility and their impact on road capacity particularly when operating in mixed conditions alongside 'traditional' vehicles. Examples include the risks associated with the lack of noise from electric vehicles, particularly on rural country roads; concerns over the safety of e-bikes and e-scooters, both to riders and pedestrians; and the impact of in-vehicle driver distractions enabled by technology, such as allowing drivers to send text messages;



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- The risks associated with rural (identified as any single carriageway with a speed limit greater than 40 mph) and rural country roads presented due to a lack of driver awareness of these roads, slow moving large agricultural vehicles, poor maintenance, including no footpaths, and less visible enforcement; and
- The need for the wider adoption of 20mph speed limits outside schools along with the desire for wider adoption of Speed Indicator Devices (SIDs), particularly in rural areas.

Do you agree that the challenges identified represent the key challenges that may impact on our ability to deliver a safer road system for all?

RoSPA response

Yes.



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Current context

Since the introduction of the 2020 Strategy there have been continual developments aimed at maintaining and improving our roads and which, going forward, may contribute to addressing the challenges that have been identified. These include:

Roads:

- Upgrade of TrafficWatch NI website and an increase in the number of CCTV camera feeds available online including CCTV on the A6 to allow the public to update themselves on weather and traffic conditions when planning a journey;
- Street lighting: ongoing replacement of street lights with use of LED road lighting units and use of energy from sustainable sources, which in the next two years, will result in a reduction of approximately 38% in energy consumption since 2016;
- Identification and development of a Strategic Road Improvement Board with one objective being to improve standards for traffic volumes and reduce collision rates;
- Variable Message Signs (VMS): use of VMS to warn road users of incidents and for road safety messages with messages consistent with DfI and PSNI campaign calendars;
- Close liaison with PSNI to manage serious incidents on the strategic road network;
- Ongoing monitoring of progress on Cooperative – Intelligent Systems and Services (C-ITS) and Connected and Autonomous Vehicles (CAVS) in the UK and Ireland including their impact on road safety;
- Camera enforcement: work with NIRSP to operate speed cameras and red light running cameras;
- A continuous programme of planned road maintenance to prevent deterioration of the roads network, depending on funding available. This includes a system of regular safety inspections to ensure safe passage for road users, routine roads maintenance activities to public safety including street lighting maintenance, grass cutting to prevent obstruction of sightlines and traffic signs; and
- An annual programme of Local Transport and Safety Measures (LTSM) (more details on this available at the link provided below).

Planning:

- Regional planning policy recognises road safety as an important consideration in both decision taking and plan making. Regional Strategic Objectives for Transportation within DfI's Strategic Planning Policy Statement (SPPS) provide for, amongst other things, the promotion of road safety. The SPPS sets out a number of other policy areas, for which road safety is also a consideration, including Renewable Energy and Development in the Countryside.
- The preparation of Local Development Plans (LDP) provides Councils with the opportunity to assess the transport needs, problems and opportunities within their plan areas and to ensure that appropriate consideration is given to transportation issues, which may include road safety, informed by local transport studies and engagement with the Department, including DfI Roads where relevant

Key priority areas for the new strategy



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Whilst the contribution and impact on road safety of the work which is currently being undertaken by the Department will continue to be monitored, the following high level priority areas have been identified as meriting attention under the new strategy to enable us to achieve the outcome of '**Our Roads Will Be Safer for All**', the implementation of which will be subject to available budgets.

Road Engineering and infrastructure: taking forward measures aimed at improving the standards of our roads to enhance the safety of the road system for all road users and reduce the likelihood and/or severity of a collision, recognising that human errors will occur. Examples include:

- considering a speed management review which could look at a number of areas including the general speed limit system here; specific speed limits such as for HGVs; and reducing speed limits in urban/residential areas;
- undertaking an investigation into the nature of collisions on rural roads to identify common factors and seek solutions to potentially mitigate risk;
- investigating approaches that provide more focus on the needs and vulnerability of motorcyclists when designing new roads and implementing safety measures on existing roads; and
- formulating an approach to tackle inconsiderate pavement parking.

Policy/legislation/regulation: consideration of existing policies, laws and regulations, and developing new policies, aimed at improving the safety of the road infrastructure and strengthening the enforcement of this. Examples include:

- developing an audit approach to identify potential hazards on strategic roads (motorways and dual carriageways) to meet requirements of the European Road Infrastructure Safety Management (RISM II) Directive;
- formulating a programme of works to resolve any issues identified by the RISM II audit; and
- examining the potential for utilising risk mapping or a road protection scoring system on our strategic roads to determine how this information could be used to identify priorities for future road safety engineering action.

Technology: Consideration of new and emerging technologies and leveraging of this information to ensure the safety of our roads.

Do you agree that these are the key priority areas which will help to deliver on the outcome of safer roads for all?

RoSPA response

Yes.



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Do you have any views on the high-level actions that have been identified?

RoSPA response

RoSPA is supportive of the existing high-level actions within the strategy but would also welcome a commitment to maintaining existing infrastructure to a high standard and introducing new infrastructure to encourage active travel and keep pedestrians and cyclists safe, such as segregated cycle routes.



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Safe vehicles: our vehicles will be safer

Safer vehicles are relevant given that well-maintained vehicles reduce the risk of collisions and in the event of a collision reduce the harm to all road users, including pedestrians, cyclists, horse riders, motorcyclists and vehicle occupants. Continuous improvement in vehicle design and the incorporation of new technologies increase the level of protection for occupants and other road users when vehicles are involved in collisions. Awareness of the necessity to maintain vehicles also needs to be reinforced.

Statistical Analysis

Latest statistical data from the DVA is available from the Departmental website via the link below. This relates to Quarter 1 (April-June) 2021-22, and includes trends in vehicle testing.

<https://www.infrastructure-ni.gov.uk/publications/dfi-driver-vehicle-operator-and-enforcement-statistics-2021-22-quarter-one>

Enforcement Activities

DVA Enforcement falls within the DVA's Compliance and Enforcement directorate. Roadside Enforcement is responsible for the enforcement of legislation pertaining to roadworthiness standards and licensing requirements at the roadside.

Covid-19 continues to present a number of challenges for enforcement activity. The DVA continues to develop and revise risk assessments in-line with the latest PHA guidance, to ensure the safety of staff, drivers, and operators.

- During quarter 1 2021-22, DVA checked 858 vehicles; of these, the largest volume was for heavy goods vehicles, accounting for over three in five of all vehicles checked. Enforcement checks this quarter are 25% higher than the last quarter and seem to be trending back to levels recorded prior to Covid-19.
- DVA enforcement officers issued 160 fixed penalty notices during this quarter. Whilst this was significantly more than last year's quarter one, it is the second lowest number of fixed penalties issued for this quarterly period.
- There were 85 successful convictions during the quarter, accounting for 268 offences. This was the third largest quarterly total for over six years.

Stakeholder analysis

The most recent stakeholder engagement analysis has identified challenges which may impact on our ability to ensure we have safer vehicles. These include:

- The ongoing importance of vehicle safety both in terms of vehicle maintenance and road worthiness. Issues such as the safety of modified cars and the need to ensure enforcement of the law have been raised.



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- The benefits and risks associated with technological advances, including 'in-vehicle' developments, such as electric vehicles, e-bikes and e-scooters and their impact on vehicle, road and road user safety were identified.
- Issues in relation to the size of agricultural vehicles, their licensing requirements and the consequential impact on road safety, particularly in rural country roads.

Do you agree that the challenges identified represent the key challenges that may impact on our ability to deliver on the outcome of safer vehicles for all?

RoSPA response

Yes.



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Safe vehicles: key priority areas for the new strategy

Current context

Since the introduction of the 2020 Strategy there have been ongoing developments aimed at ensuring that our vehicles are safer and which, going forward, may contribute to addressing the challenges that have identified. These include:

- Enhancing the use of Information Technology during roadside spot checks to help identify and target non-compliant vehicles used by operators and drivers with a poor compliance record, including those that use poorly maintained vehicles.
- Using modern portable vehicle test equipment to help detect and prohibit the continued use of defective vehicles at the roadside.
- Continuously updating and evaluating HGV and Bus Operator Compliance Risk Scores (OCRS) based on roadside encounter data and referring licensed operators with a poor compliance record to the Transport Regulator for regulatory consideration.
- Visiting the operating centres of licensed HGV and Bus Operators with a poor compliance history in order to investigate their poor performance and offering advice and guidance in order to help improve vehicle safety and promote a compliance culture.
- Increasing multi agency working with other enforcement agencies in order to maximise the benefits of sharing staff skills, knowledge and experience and ultimately improve operational effectiveness.
- Using up-to-date digital drivers' hours analysis tools to identify lorry and bus drivers who operate in breach of maximum driving time and minimum rest limits and therefore are more likely to suffer driver fatigue.
- Increasing the roadworthiness compliance checks that are conducted as part of the periodic vehicle testing regime and the removal of exemptions from testing for some vehicle types.

In August 2021 Minister Mallon issued a Call for Evidence (CfE) seeking views on the option to introduce biennial testing (every two years) for private cars, light goods vehicles under 3,500kg and motorcycles, as compared to the current annual testing arrangements. It is recognised however that, even if a change to biennial testing was introduced for newer vehicles, an annual testing regime could remain in place for older vehicles to protect road safety. The responses provided will be considered in the context of road safety and other issues.

Key priority areas for the new strategy

Whilst the ongoing actions identified will continue to be monitored in terms of their impact on road safety, the following priority areas have been identified as meriting attention under the new strategy to enable us to achieve the outcome of '**Our Vehicles Will Be Safer**', the implementation of which will be subject to available budgets:

Policy/law/regulation: consideration of existing policies/ laws and regulations aimed at ensuring the safety of vehicles and the enforcement of these laws. This will involve keeping abreast of legislative and policy changes, both in other jurisdictions and in an international context. Examples include:



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- reviewing the findings of the controlled e-scooter rental scheme trials that are currently taking in place in Great Britain and are due to end in March 2022 to inform further consideration of the policy position regarding e-scooters and their potential use on our roads;
- consulting on the banning of the use of tyres aged 10-years and older on the front axles of heavy goods vehicles (HGVs), buses, and coaches, and on any axle of a minibus if the tyres are fitted in single configuration;
- increasing testing for diesel emissions in light vehicles; and
- consideration of the outcome of the call for evidence on the potential introduction of biennial MOT testing.

Technology: Consideration of new and emerging technologies and leveraging of this to ensure the safety of our vehicles.

Do you agree that these are the key priority areas which will help us deliver on the outcome of achieve safer vehicles for all?

RoSPA response

Yes.

Do you have any views on the high-level actions that have been identified?

RoSPA response

RoSPA agrees with the measures identified, but on top of this, calls on the government to adopt the measures outlined in the EU General Road Safety Regulation, to ensure that the UK remains a leader in vehicle safety.

In 2018, TRL published the "Cost-effectiveness analysis of Policy Options for the mandatory implementation of different sets of vehicle safety measures – Review of the General Safety and Pedestrian Safety Regulations"². They predicted the casualty and cost benefits for the simultaneous introduction of the 17 different measures. The introduction of the new measures was compared with a predicted future where current trends of voluntary fitment continue. The cost-effectiveness analysis indicated a positive benefit cost ratio and predictions of around 25,000 fatalities prevented over a 16-year period on EU roads. As of 2022, new safety technologies will become

² TRL (2018) 'Cost-effectiveness analysis of Policy Options for the mandatory implementation of different sets of vehicle safety measures – Review of the General Safety and Pedestrian Safety Regulations'

https://clepa.eu/wp-content/uploads/2018/05/2018_TRL_cost-effectiveness-analysis_for-GSR_March2018_ET0217486ENN.en-1.pdf

Date accessed: 18/11/2021



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mandatory for new EU approved types of vehicles to protect passengers, pedestrians and cyclists. Adopting this legislation will be key to achieving safer vehicles.



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Governance processes

Governance processes will be established to monitor and report against the strategy to 2030. It is intended that the strategy's actions and performance measures will be reviewed and evaluated and new developments and innovations considered on an annual basis. This will help to ensure that, throughout the lifetime of the Strategy, there will be a focus on the future and best practice to ensure that Northern Ireland can respond to road safety challenges and embrace innovative solutions.

As part of the 2020 strategy, a non-statutory advisory Road Safety Forum was introduced with the aim of supporting the Minister in achieving the envisaged casualty reductions. The Road Safety Forum, which was chaired by the Department, met twice yearly and provided a medium for stakeholders to engage with the Minister to discuss key issues, their impact on the 2020 strategy and how to address them. It also provided an opportunity to develop partnerships that encouraged social responsibility for the safety of all road users.

Stakeholder feedback reflected the need for more engagement with local road safety groups/organisations with a strong appetite for the Road Safety Forum to be re-established as a means of ensuring a strategic and joined-up partnership buy-in to the Road Safety Strategy.

Stakeholders also proposed that new local level stakeholder forums be established which would allow local road safety representatives to engage and cooperate to allow for the sharing of experiences and resources.

Do you agree that a new Road Safety Forum should be established?

RoSPA response

Yes.

If you responded 'Yes' do you feel that this should be chaired at Ministerial level?

RoSPA response

Yes.

Do you think other governance arrangements should be put in place?



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RoSPA response

RoSPA would also welcome the development of new local level stakeholder forums.



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Impact Assessment

The Road Safety Strategy is being designed to create a framework for policy actions to improve road safety in Northern Ireland and will contain specific outcomes that we seek to achieve. Government Departments and their agencies, and other strategic partners, will contribute to the implementation of the strategy through their own policy actions.

The Department has engaged with a small range of Section 75 groups as part of the pre-consultation process. High-level Equality Impact, Rural Needs, and Human Rights screening exercises have been completed for the draft strategy consultation document and no issues have been identified. The Department has, as is required, published the equality impact assessment screening on the Departmental website.

Equality screening is a live process that will be considered alongside the Strategy development process as it evolves and as such the Department would be particularly interested in any further data that may be available as well as views from representatives from the following S75 categories:

Age - those representing children (0 - 15 years old)
Age - those representing young people (16 - 24 years old)
Sexual Orientation
Men and Women generally
Disability

Views and comments from representatives of rural communities would also be welcomed.

Further equality screening (and, if deemed appropriate) Equality Impact Assessments (EQIAs) will be carried out when policies are being developed in response to the strategy. While it is considered that the strategy will not have a detrimental impact on any of the section 75 categories, or have detrimental impacts on rural needs, the policies contributing to the implementation of the strategy will be screened where appropriate to ensure that this is the case.

Are there any equality impacts that you feel need to be considered?

RoSPA response

No.

Are there any rural needs impacts that you feel need to be considered?

RoSPA response

No.



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RoSPA has no further comments to make on the consultation process, other than to thank the Department for the opportunity to comment. We have no objection to our response being reproduced or attributed.

