

Northern Ireland Road Safety Strategy 2010 - 2010 Consultation Analysis Report Annex F (3)

Record of responses received from organisations and individuals on proposals for Safer Roads

Name	Safer Roads Comments
Ballymena Borough Council	The need to repair potholes and maintain road surfaces to a good standard was emphasised.
	Attention was drawn to the need to ensure that road signs, e.g. speed limits, 'Stop' signs, were cleaned and maintained.
	The provision of lorry park/rest area was deemed important and availability of tea/coffee and toilet facilities highlighted as being particularly beneficial to long distance lorry drivers as this would avoid the need for them to enter towns for refreshments.
	The need to tidy/cut back the edges of minor roads to widen the roads was emphasised.
Ards Borough Council	20 mph speed limits should be introduced at and near schools.
	The strategy should contain a reference to bicycles and the requirement for cyclists to travel single breast and obey the Highway Code.
	Road Safety Committees should be reinstated as, historically, they have played a pivotal role in improving Road Safety in Northern Ireland.
Jeff Ard	No matter what is proposed it will be important that it is properly policed. On the motorways in particular many drivers fail to comply with the speed limit. Many also fail to comply with good road safety such as leaving it too late to move into the appropriate lane well in advance of exiting and this leads to back-ups and indeed accidents. There is little evidence of a police presence and therefore the threat of a penalty is simply not there at present. This needs addressed before any further measures are introduced. It has to be said that hitting such offenders in their pockets will get the message across. Revenues raised should be used to underpin safety initiatives.
British Motorcycle Federation	This is an excellent policy. It is often the case that motorcyclists were simply not considered in the design phase of new roads or changes to existing ones and a policy that redresses that mistake is broadly supported.
	We broadly support these measures as they have proven successful elsewhere.
	We'd be very interested to see how this could work in practice. Many accidents are caused by drivers not anticipating the presence of motorcyclists.
NICCY	We welcome the fact that the draft strategy gives considerable recognition to the road safety issues in rural areas. We note the draft strategy's commitment "subject to available funding" to "develop a programme of part time 20mph speed limits at rural schools on roads where the national speed limit applies" (para 6.9 of the consultation document).
	We finally note a number of welcome action measures which would target the reduction of speeding and speed limits on rural roads. We would recommend that any revenue raised from speeding fines is earmarked for the promotion of road safety or preventative measures.
British Medical Association	BMA (NI) calls for the introduction of speed cameras, traffic calming and 20mph speed zones in towns, especially in residential areas.

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	<p>Rural road safety has not improved at the same rate as built up and urban roads while they account for only 42 per cent of traffic volume, 62 per cent of road fatalities occurred on rural roads in 200712.</p> <p>Rural roads face different safety challenges – older winding roads with 60mph speed limits have been identified as the most dangerous rural roads. Common factors in a crash include speeding, or inappropriate speed for the road conditions, and loss of control. Drink driving, fatigue, and distraction are not, however, more common contributing factors than in urban crashes. Some studies indicate that engineering solutions to modernise rural roads, such as speed management, self-explaining roads, and vehicle-activated signs, would improve rural road safety.</p>
Dungannon and South Tyrone Borough Council	School safety should also be given consideration during times of road construction (this would seem to be an add-on rather than part of the planning). Council has received concerns from parents during the construction phase of the A4 regarding drop offs and collections of children at dangerous locations, due to road works.
NILGA	Local government commends the success of the pilot schemes at two primary schools developing 20 mph speed limits at rural schools on roads where the national speed limit applies. It is hoped that DOE Road Safety Division can identify a budget to roll-out this scheme to install 20mph speed limit zones around all schools in Northern Ireland.
	It is strongly advocated that DOE Road Safety Division research the use of road signage in other jurisdictions in order to improve road signs in Northern Ireland. This could include increased use of flashing lights and road markings to indicate the location of schools, larger speed limit signs and fatality toll signage (as utilised in Rol) or 'smiley' LCD signs as utilised in some areas of Scotland.
	Members put forward the idea that white line marking at the edge of all roads could be introduced, to help road users identify road edges, particularly when driving in poor visibility conditions.
	Suggestions were also made to increase the maximum speed on motorways to 75 mph and to include more over-taking lanes to allow road users to pass slow moving vehicles.
British Vehicle Rental and Leasing Association (BVLRA)	We welcome the commitment to investigate introducing a 'live' digital speed limit database to replace the current manual map based system. This will allow the market to develop various speed compliance driver aids.

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Right To Ride	<p>Right To Right welcomes this action measure as in our opinion road design, maintenance and construction are generally directed towards the needs of multi-track vehicles, with the needs of motorcycles often not taken into consideration.</p> <p>A possible explanation could be a lack of experience or awareness by engineers and maintenance personnel.</p> <p>The Institute of Highway Incorporated Engineers (IHIE) in the U.K. has, in consultation with motorcyclists, produced road infrastructure guidelines for motorcycle safety, for personnel working on road construction and maintenance.</p> <p>Standards need to be revised and developed to reflect the needs of motorcyclists, by encouraging motorcycle-friendly design, construction and maintenance procedures.</p> <p>Above all there is a need for quality audits to be undertaken on a regular basis, in which the needs of motorcyclists are included.</p>
	<p>Transport and infrastructure policy - It is a fundamental motorcycle safety requirement that, by default, Powered Two Wheelers (PTWs) should have a place in overall transport policy and infrastructure policy/management.</p>
	<p>Guidelines for the development of road infrastructure - Each level of government should include in their infrastructure guidelines, measures for accommodating PTWs, developed with input from relevant stakeholders. The guidelines should be relevant to the needs of the jurisdiction concerned and coordinated with other jurisdictions and levels of government. An international transfer of best practices is also recommended.</p>
	<p>Training for road designers - The needs of PTWs should be included in the basic training for road designers, highway and traffic engineers.</p>
	<p>Roadway design: Identification and resolution of roadway design problems (e.g. accident black spots & "corridor" analysis of a sequence in the road structure) should include input from rider organisations and relevant experts.</p>
	<p>Right To Ride welcomes this action measure which reflects our answer above about taking the needs of motorcyclists into consideration. However we have concerns particularly regarding that the text suggests that only popular motorcycle 'runs' will receive specific route treatment for motorcycle 'friendly' barriers. Motorcycle friendly barriers that are added to barriers in place should be considered and fitted where ever there is a risk to motorcyclists hitting barriers and consideration to the placement of new barriers and a review/audit of barriers already in place.</p>
	<p>There should be a reconsideration of the use and placement of Wire rope Barriers in Northern Ireland. One engineering solution that has seen a proliferation in Northern Ireland is the fitting on new and the retrofitting of terminal ends to existing crash barrier systems. There are variants in the design that seem to be more motorcycle friendly and protective "cushions" are available to lessen impacts. There are also "crash cushions" available for roadside objects, such as "Biker-Mate" for lamp-post, road signs or telegraph poles. Although if possible, any site identified should be considered for modification to remove any danger that the barrier is trying to protect the motorcycle from in the first place.</p>

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	Regarding additional signage, we assume that this is signage to warn or advise motorcyclists or any other road user of possible dangers such as bends/intersections. These should be relevant so that the sign itself is not a hazard or overburdening the rider/driver with unnecessary information.
	Right To Ride welcomes this action measure especially on popular motorcycle 'runs'. Such signage has been used in the rest of the UK and Right To Ride can see no disadvantage to this action measure if implemented correctly.
Young Farmers Clubs of Ulster	The YFCU welcomes the commitment to improving safety on rural roads but feel this should involve more than just improving the visibility of road markings. Clearly this must be linked to increasing information and understanding of poor road user behaviours rightly identified throughout the document.
	The commitment to undertake investigations into the nature of collisions on rural roads is also to be welcomed but we feel this should be strengthened to ensure that engineering based solutions are not just considered but carried out if they are believed to mitigate future risk.
	Also, if, based on evidence, reducing speed limits will contribute to a reduction in collisions resulting in fatalities and serious injuries on rural roads, the YFCU would be supportive of such measures.
Guide Dogs for the Blind Association	Guide Dogs was pleased to see the proposal in paragraph 6.7 on page 37 to research the outcome of urban speed reduction initiatives in GB and to consider the wider introduction of enforceable and advisory 20mph speed limits in residential areas and other urban areas where there is a significant presence of vulnerable road users. We believe this would encourage more cyclists to cycle safely on the road and not on the pavement where accidents and potential accidents are a product of such practice as identified in the TNS-BRMB survey findings.
	Guide Dogs supports Action Measure 5. However we seek clarification as to how the introduction of 20mph speed limits in residential areas and other urban areas where there is a significant presence of vulnerable road users can be both enforceable and advisory. As previously stated we believe this measure could encourage more cyclists to safely cycle on the road and not on the pavement where accidents and potential accidents are a feature of such practice as identified in the TNS-BRMB survey findings.
	We would welcome Action Measure 6 and the proposal to pilot enforceable 20mph speed limits as an opportunity to encourage more people to cycle on roads rather than on pavements.
	Guide Dogs supports Action Measure 12 . We were pleased to note that the enforcement of such a scheme would be backed up with 'red light' safety cameras.
	Guide Dogs has concerns over Action Measure 23. Such proposals should be considered on a site specific basis and involve prior consultation with disabled people, including blind and partially sighted people and mobility experts. Pavement parking is a significant risk not only to blind and partially sighted people but also to those who use wheelchairs and who may be forced out on to the road because of inconsiderate parking. If guardrails, which have hitherto, prevented pavement parking, are to be removed then consideration needs to be given to other measures to tackle this anti-social behaviour: bollards can also have unintended consequences unless they are well designed and positioned. Consequently, we concur with the negative social inclusion impact that this measure may have on visually impaired

Name	Safer Roads Comments
	people.
	We support Action Measure 37 to introduce progressively Puffin crossings to replace existing Pelican crossings and at new crossing sites, and also to extend the use of other controlled pedestrian crossings, including Toucan crossings provided that the latter, including the approaches to them, take full account of the needs of blind and partially sighted people (see comments above about shared use pedestrian/cycle paths). We agree with the positive social inclusion impact assessment of this measure.
	Guide Dogs welcome Action Measure 38 on page 58 to investigate technical innovations for increasing driver awareness of pedestrians at zebra crossings.
	We have concerns about the introduction of countdown timer signals at pelican or toucan crossing sites and are therefore pleased to see in Action Measure 39 on page 59 that there is to be a pilot of this proposal. Evaluation of those trials must include particular consideration of its impact on blind and partially sighted people, and other vulnerable pedestrians.
	Guide Dogs welcomes Action Measure 40 on page 59 to ensure that wherever possible, cyclists should be physically separated from vehicular traffic and that in urban areas where this is not possible consideration will be given to making the speed limit 20mph. We would draw your attention again to the findings of the TNS-BRMB research.
	We support the Action Measure 41 on page 59 and the commitment to continue to develop and maintain cycling infrastructure on appropriate routes to increase cycle usage and improve safety, subject to our comments above on shared facilities.
Michael Haslett	Reduce all speed limits above 20mph by 10mpg. This would mean 70 reduced to 60, 60 reduced to 50, 50 reduced to 40, 40 reduced to 30, 30 reduced to 20, this would basically mean the top speed would be 60mph which is exactly the same as Canada on the 401 and I have just returned from there. The regular town speed would be 20mph which is more that sufficient. There would be no problem with this, people would initially shout much as they do when you add 1p to the price of a pint at the cricket club, a few months later they forget there was an argument. Nobody would notice any noticeable difference to journey times, etc. but this one change would have a dramatic effect of road accidents.
	Improve all hardware. By this I mean the roads and the vehicles. The roads can be improved by applying a little sensible thinking - I have come across too many roads that have been planned by silly people and silly roads are dangerous. Good surfaces edges and markings make roads fool proof and much safer.
Road Safety Council – North Down and Ards	We welcome the wider introduction of 20 mph speed limits where there is a significant presence of vulnerable road users. In particular enforceable 20 mph speed limits but without road humps tables and cushions which can be counter product in that they can affect emergency service response times and can lead to premature and sometimes unnoticed suspension damage.
	We welcome the Review of Speed Limits but would wish to see all the evidence that a widespread reduction to 50 mph would make a significant contribution to reducing the KSI Rate. We are not convinced that significant numbers of motorists drive on rural roads at more than 50 mph where it is clearly an inappropriate speed. We welcome developments to address the lack of understanding between street lighting and 30 mph speed limits. Overall the proposals demonstrate a desire to move Roads Engineering from a reactive to a proactive role to accept that road users will make mistakes

Name	Safer Roads Comments
	and engineering measures can make the difference between a crash and a serious injury or death.
Ulster Farmers' Union	The UFU concur that timely road maintenance activities are essential to improving road safety. Rural roads are often neglected, verges become overgrown, gully's become blocked, most small rural roads are not salted, pot holes become rife, unrepaired roadside verge erosion etc. These issues further infringe on road safety.
	The UFU have always highlighted the problem of narrow rural roads; farm machinery has evolved and increased in size, yet most roads remain narrow. Agricultural traffic is typically slow moving, yet other road users do not drive at appropriate speeds on rural roads to cope with the unexpected.
	Also the erection of kerbs at property entrances is becoming an increasingly common practise in the countryside which reduces the width of already narrow rural roads. During harvest time, farmers shift large machinery between fields and farm. When meeting other road users, high kerbs limit manoeuvrability and could potentially cause a serious accident. The UFU feel this practice needs to be controlled, policed and that property owners are made aware that they could be liable for any accidents caused by high kerbs.
	During spells of bad snowy/icy weather farmers clear rural roads of snow and utilize salt piles left at the sides of roads. After January 2010, it became apparent that the provision and availability of salt/grit has become limited in certain areas, resulting in more rural roads being left untreated. Greater partnerships between farmers and government could help increase road safety of rural roads and effectively improve road conditions during bad weather.
	The UFU agree with the proposal to introduce part time speed limits at schools, particularly if they replace the need for traffic calming engineering measures, which are often too narrow for agricultural vehicles. However, we would stress that schools need to provide sufficient off road parking. As it is, parents waiting in cars outside schools can obscure the vision of other road users and reduce room to manoeuvre. The UFU would also suggest provision of more right turn lanes at entrances to schools.
	The UFU accept that there may be a need to reduce the speed limit of certain roads if speed is determined as being the cause of incidents of death or injury. As part of the review, the department must first analysis the problem and tackle that specific problem rather than simply reducing the speed limit province wide. If a decision to reduce a speed limit is taken, this should be first trailed with an analysis of the number of accidents occurring on stretches, before and after introduction of lower limits.
	The UFU accept that these measures could be useful to further reduce speed on NI roads; however we do not feel that measures, such as these, should be given high priority. Road conditions should first be improved.
	Considering the application of this measure on rural roads we feel this would be unnecessary and wouldn't really benefit road safety. Line painting should be undertaken more frequently and particularly coming into seasons of poor visibility, where the road marking can be the only guidance on rural roads, in the absence of street lighting.
	The UFU accept that this measure could help improve vision on rural roads but it must be stressed that this must not reduce the width of already narrow roads. All sightlines must be well maintained.

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	The UFU accept this provision could significantly benefit road safety but would warn that these measures must not prevent farmers from accessing land at opposite's ends of busy roads. There must either be enough room for longer vehicles to sit safely in the middle of carriageways or other provision such as under/overpasses. Currently road improvement schemes, such as the proposed closure of central reservations on the A1 dual carriageway, will significantly disadvantage local farmers and simply force slow moving tractors to have to travel further on fast moving roads, enhancing the road safety risk. It is essential that provision is available to allow the safe passage of these vehicles.
	The UFU wish to highlight that lorry/tractor drivers have their vision obscured by road signs at the ends of roads and at junctions. These signs are not high enough for drivers of modern tractors to see over and their vision is obscured.
	These activities should already be properly policed by planning service. The UFU feel it would be a waste of resources to duplicate this duty.
	The UFU would like to see more information on this measure e.g. who would have the right of way etc. We are unsure as to how it could be implemented in NI and would question if it would be practical on our roads. In rural NI we have narrow roads and this measure could potentially further reduce the road width.
	The UFU agree with these measures but would stress that priority must be given to motor vehicles. Cycle lanes must not restrict or reduce motor vehicle driving space.
	The UFU would highlight that many reoccurring accidents on rural roads are never reported. We would suggest that the department encourages people living in rural areas to report reoccurring accidents in their area which can then be investigated.
Belfast City Council	BCC would wish to support pilot schemes regarding 20mph speed limits in residential and other urban areas and other urban speed reduction initiatives (Action 5, 10, 12). We would note, however, that air quality obligations residing with local authorities may be impacted by speed limits in urban locations. It is assumed that appropriate environmental assessment of the consequences of lower speeds and associated increases in vehicle emissions will be conducted.
	BCC would wish to be consulted on pilot schemes to consider removal of pedestrian guard railings (Actions 23, 30) and would support measures to reduce illegal road side trading and advertising to reduce the risk of collisions caused by driver distraction.
	In addition to the measures outlined, Belfast City Council would wish to have more prominent reference to accommodating people with disability, particularly those with visual impairment (Actions 37-39, 108-109)

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Institute of Public Health in Ireland	<p>Reducing speed limits in school zones to 20mph has been shown to be an effective measure for reducing road traffic casualties and if appropriately targeted can help achieve a relative reduction in inequalities in road-injuries and deaths. Alongside creating safer roads introducing 20mph zones may also make a positive contribution to encouraging walking and cycling which will impact on physical activity levels. This is important because the number of young people walking or cycling to school has rapidly decreased in Northern Ireland in both urban and rural areas. In 1994 61% of young people walked to school which reduced to 50% in 2004. Parental concerns over road safety has been cited as one reason for this reduction. Being physically active can help to reduce the likelihood of being overweight or obese. According to recent studies, 22% of children in Northern Ireland are overweight or obese. Obesity can lead to diseases such as diabetes, heart disease and some forms of cancer.</p>
	<p>Walking or cycling to school also offers more opportunities for social interaction with subsequent benefits for both mental and physical health.</p>
	<p>The speed at which a car travels at impacts on the severity of the injury and reduced speed limits therefore impact on fatality rates. One of the biggest ways to make streets safer is to reduce speeds and 20mph zones should be investigated in not only urban areas but rural villages as well. In residential areas traffic should move at speeds appropriate to sharing with people. Traffic calming measures can reduce speed as well as the volume of traffic, and the frequency and severity of traffic accidents which can lead to increased walking and cycling which is beneficial for physical activity levels.</p>
	<p>Other initiatives include the development of Home Zone areas which physically alter the street landscape forcing drivers to travel through the area at slower speeds and with greater care. Home Zone areas have been shown to turn streets into valued public space and encourage a sense of community. A greater use of the streets by people leads to an increase in natural surveillance, which in turn acts as a deterrent to crime. Encouraging more people to use the streets can contribute to a reduction in congestion and noise pollution and can improve air quality. Many residents, particularly elderly ones, may feel isolated from their immediate neighbours. Returning the streets to areas where residents can socialise can lead to a reduction in social exclusion.</p>
	<p>Road safety is a crucial element of any new regeneration programme. This has the potential to create safer environments, impact on levels of walking and cycling and ensure public money is invested to benefit public health.</p> <p>Planning Policy Statement 13 reviews transport and land use and identifies 'innovative measures should be developed for the safe and effective management of traffic' which includes road safety. Greater emphasis needs to be given to road safety in the implementation of PPS13. Different urban forms need to be considered for example shopping areas provide on-street parking which can attribute to urban collisions. Examples from American States show that introducing planning legislation has a major focus on accommodating all road users, including cyclists, pedestrians and children.</p>

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	<p>The location and accessibility of crossings are important in improving pedestrian access. The risk of crossing the road increases with age, especially after 79 years, with injuries to older people (over 65 years) tending to be more serious and more often fatal than injuries to other groups. Surveys of older pedestrians in the UK found particular concerns about crossing busy roads. While only 35 per cent of roads crossed by older pedestrians were main roads, 85 per cent of this group's injuries were on these roads. This can also result in social isolation as older people may have enhanced fears when crossing road leading to reduced access to services and interaction with others.</p>
	<p>There is a need to consider the link between the pedestrian and traffic movement. Kensington High Street recently removed unnecessary clutter such as kerbs at junctions, the number of street signs and contrary to conventional wisdom on road safety removed most of the guard railings. This has been shown to reduce casualties by 47% compared to before the redesign showing that improving the quality of streetscapes can improve safety. The use and types of pedestrian crossing sites therefore need to be carefully considered in relation to the built environment into which they are being placed.</p>
	<p>Modifying infrastructure to facilitate filtered permeability (the extent to which urban forms permit (or restrict) movement of people or vehicles in different directions) has been successful in restraining car use by giving walking and cycling an advantage, in terms of speed, distance and convenience, over private motor traffic. This can lead to safer journeys for pedestrians and cyclists.</p>
	<p>IPH welcome a move to more integrated information systems particularly with the National Roads Authority in Ireland.</p>
Daniel Mulholland	<p>This could be achieved by the following measures:</p> <p>A National speed limit of 55 Miles per hour. – Northern Ireland is a small geographical area. Most journeys could still be completed in less than an hour. It would also have the added benefits of:</p> <ul style="list-style-type: none"> • A reduction in road deaths • Better fuel economy for drivers • Identification and prosecution of speeds would be made easier as they would be apparent in traffic flow at 55 MPH. • It would reduce Co2 emissions contribute to climate change targets • It would reduce the wear and tear on our roads infrastructure and save on maintenance. • A reduction in congestion as traffic flows would improve.
	<p>The changing of the 40 miles per hour speed limit to 30 miles per hour.</p>

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Freight Transport Association	<p>FTA supports the principle of reducing speeds where appropriate as a means to reducing road accidents. However a greater threat to road safety is significant differentials in travelling speeds between vehicles travelling on the same stretch of road. This is a differential which often many car drivers do not understand when they find themselves stuck behind a goods vehicle travelling at 40mph on a road where other traffic is allowed to travel at 60mph. FTA has campaigned for some time for proper trials to be undertaken to investigate for speed limits on single carriageway roads for vehicles over 7.5t to be increased from the current 40mph to 50mph. The possible benefits of the speed limit increase could be:</p> <ul style="list-style-type: none"> - a reduction in car drivers making dangerous overtaking manoeuvres through impatience - a reduction in stress for lorry drivers – aware they are causing inconvenience for other road users - shorter overall journey times meaning drivers spending less time behind the wheel unnecessarily - improved fuel efficiency and reduced tailpipe emissions.
	The road safety benefits of modern goods vehicles not exceeding 40mph on roads considered suitable for cars to travel at 50 or 60mph are not clear.
	The use of SPECS average speed cameras has proved to be a major deterrent to speeding drivers and further use of these is supported by FTA.
	It has already taken a long time for the Department for Transport to initiate a trial of a raised speed limit for vehicles over 7.5t on single carriageway de-restricted roads. This existing differential shows no road safety benefits, carries significant dangers and may be detrimental to the UK's ambitions to cut greenhouse gas emissions; an historical relic which is preventing modern vehicles from operating at the their most efficient levels.
	Twenty mph speed limits are an innovative approach and we have watched with interest the impact of such moves in various locations. However, there is a concern that this policy is at odds with other Government policies on emissions of greenhouse gases and local pollutants. Local Authorities are under significant pressure to improve local air quality and these improvement targets are now enshrined in European Law. Failure to meet air quality targets will result in penalties imposed on Government by the European Commission and our industry remains concerned that, when faced with the need for draconian reduction measures they will be meted out on the road haulage industry. At this time Local Authorities need help in meeting air quality targets rather than opposing Government policy from different departments.
	<p>Allocation of 20mph limits should be targeted where there is a need rather than applied as blankets or made a default position. FTA opposes the use of engineering measures to slow vehicles such as speed humps or chicanes which damage vehicles, prevent fuel efficient driving techniques and can cause some road users to take dangerous evasive manoeuvres to avoid them.</p> <p>FTA objects to blanket 20 mph speed limits which run counter to fuel efficient driving efforts. Twenty mph limits should be targeted and appropriately enforced rather than rather than using physical engineering methods.</p>

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	<p>Rest Areas/Lorry Parking: FTA notes that Action Measure 29 of Annex B relates to the provision of additional rest areas. It is vital to ensure that the Strategic Road Network has parking for goods vehicles which ensures they can be parked safely and securely, and allow for services to drivers which provide dignified facilities. This will ensure that goods vehicle drivers are less tired, less stressed and therefore safer on the roads.</p> <p>FTA strongly recommends that the DRD increases the provision of suitable rest areas and lorry parking. With appropriate provision supported by effective enforcement, drivers could be encouraged to use facilities that are suitable, and support drivers and operators' obligations under drivers' hours rules.</p>
Institute of Lighting Engineers	<p>I read with interest your report but was disappointed to find very little relating to accidents at night and the benefits of good street lighting.</p> <p>In a report by the AA in 2005 it was noted that Only a quarter of all travel by car drivers is undertaken between the hours of 19.00 and 08.00, but it is in this period that 40 percent of fatal and serious injuries are sustained by drivers. This indicates that car travel at night carries a greater risk of being killed or seriously injured than does travel during the day.</p> <p>It would be interesting to see if the local or national police have the information available to enable these statistics to be confirmed or otherwise for Northern Ireland.</p>
	<p>Assuming these figures are correct it is also interesting to note that young men and people over 60 are more likely to have accidents at night, of course other factors may have a greater bearing than street lighting or lack of it, on the likelihood of them being involved in an accident. These may well include the higher risk of new inexperienced drivers at one end or failing eyesight at the other. However good street lighting can have a part to play in either scenario.</p>
	<p>Therefore one of the greatest potential night-time accident reduction measures is to provide appropriate lighting on the highway network. The attached ROSPA report accurately summarises the current situation and concludes that the presence of lighting not only reduces the risk of traffic accidents, but also their severity. [Note: See original response for RoSPA report]</p>
	<p>A full understanding of the variety of lighting levels to be chosen and applying the correct technology to deliver this lighting is imperative with rising energy costs. Enabling the correct lighting to be there when required, yet possibly dimmed to a low but safe level when not is an opportunity not to be missed. Providing new or updated lighting systems that can respond to local demand and provide a safe traffic environment yet save around 50% energy against an existing traditional lighting system is now achievable.</p>
	<p>Not only does good lighting reduce night time accidents, it also has the recognised benefit of the reducing crime and the fear of crime, supporting local public transport and boosting the evening economies of local centres.</p>

Name	Safer Roads Comments
The British Horse Society	<p>We would like to make Road Service aware how dangerous Northern Ireland's roads are becoming for horse riders. There are currently over 46,000 registered equines in Northern Ireland and with very few places in which to ride off road (only approx 14 miles of bridleways in total, which are unconnected and do not lead anywhere in particular.) equine related road accidents are increasing.</p> <p>We therefore suggest that Road Service might consider the Quiet Lanes initiative, adopted by the Department of Transport in England and Wales which has resulted in people driving more carefully along the adopted lanes and more people out getting healthy, using the lanes for horse riding walking and cycling. Please see link for more details http://www.dft.gov.uk/pgr/roads/tpm/tal/trafficmanagement/quietlanesa</p>
Julian Black	<p>I am a regular car driver, pedestrian, bus and rail passenger and frequent cyclist. However, in all of these situations, it is only when I take to the roads on my bike that I feel I am faced with life-threatening circumstances. The circumstances are life-threatening because there is virtually no provision made for cyclists on roads. This is in sharp contrast to the provision made for vehicle drivers, pedestrians and public transport passengers.</p>
	<p>By way of example, living where I do, it is the case that neither Balmoral Avenue, Malone Road nor Lisburn Road have any provision whatsoever for cyclists. Cyclists on the Lisburn Road (and, where available on the Malone Road) are expected to use the bus lane. If anyone has ever attempted to cycle in heavy traffic in a bus lane it will be appreciated this is quite unacceptable. The direct and heavy pollution experienced from cycling behind buses is intolerable for cyclists. Added to this is the lack of protection for cyclists from the buses themselves and other vehicles entering the lane or stationary cars opening doors onto the lane.</p>
	<p>It may be said that resources do not permit the construction of protected cycle routes. In response to this I point to the recent and ongoing repaving of Belfast city centre. As a motorists, pedestrian and public transport user, it is clear that I am to be well catered for as a user of the city centre roads.</p>
	<p>Is the Department aware that, but for a few cycle stands, there has been no provision whatsoever made for cyclists in this multi-million pound scheme? This is not a resource issue. Did the Department attempt to lobby the Council on the lack of provision for cyclists? Does the Department have an effective policy which would require such developments to incorporate provision for cyclists? I don't think so and was unable to find anything along these lines in the consultation document.</p>
	<p>I have just returned from a trip to Trier in Germany and to Luxembourg City. Both cities are of similar size to Belfast. Cyclists in those cities have clearly been considered, if not as a priority then at least as having equal priority, along with vehicle drivers, pedestrians and public transport users. I am sorry to report that your consultation document gives me further cause to believe that cyclists in Northern Ireland are considered, if at all, by your Department only as a low priority.</p>
	<p>What do I think? I think the Department's position on provision for cyclists on public roads continues to be woefully unacceptable. This remains so whether considered from an economic, environmental or safety point of view.</p>

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Environment Committee	<p>In its evidence sessions on the consultation the Committee focused on rural roads as the majority of deaths and accidents occur on these roads. Members heard concerns that roadside garden hedges were too close to roads, that kerbs or large boulders erected at roadside entrance to properties are dangerous, that road signs are not high enough and that an upgrade on road signage and surfaces is needed.</p>
	<p>There were also concerns raised that there is a significant difference in the quality of road surfaces in rural areas when compared to the main arterial routes that criss-cross Northern Ireland. The Committee heard from the Road Haulage Association that chevrons may be a useful way of ensuring that convoys of heavy goods vehicles are curtailed in terms of speed when leaving ports.</p>
	<p>The Committee recommends that rural roads are improved in terms of markings, lighting and surfaces.</p>
	<p>The Committee heard from the PSNI and the Driving Instructors Association NI that speed limits are dictated by the nature of the road but fewer changes in regards to limits would be preferable. This is a point that members are in agreement with as one stretch of road may involve several different speed limits which makes it confusing for the driver and more difficult to adhere to.</p> <p>The Committee recommends fewer changes in regards to speed limits.</p>
	<p>Members would also welcome a review of the speed limits on rural roads as although many are subject to the national speed limit this gives drivers the impression that the road is safe to drive on at that speed when, in reality, this is not the case due to road conditions.</p> <p>The Committee recommends a review of speed limits on rural roads.</p>
	<p>The Committee also heard from NICCY that the 2 most vulnerable groups of children are those living in rural and deprived areas with those in deprived areas being 5 times more likely to be injured on the roads. Members also heard that the splitting of residential developments is leading to a lack of safe play areas which could in turn lead to more accidents. The Committee expressed concern at this practice and believe more needs to be done to ensure housing developments have adequate provision of safe play areas.</p> <p>In order to protect children in rural and deprived areas members recommend the introduction of a temporary 20mph limit around schools and that appropriate variable signage rather than speed humps is used.</p>
	<p>During the course of evidence sessions the Committee was made aware of the introduction of technology into vehicles such as a black box or speed limiters. Members are supportive of the introduction of technology as long as it is proven and would support trials of intelligent speed limiters. The Committee was informed by RoSPA that a database of speed limits is a pre-requisite for any trial. DRD advised the Committee that a speed limit database is at an early stage but requires funding.</p> <p>The Committee recommends that the Department for Regional Development continues with its project to introduce a speed limit database and that funding is made available to carry out this important piece of work.</p>
	<p>The Committee also recommends that DRD increases the provision of suitable rest areas and lorry parking in Northern Ireland.</p>

Name	Safer Roads Comments
Synopsis of the evidence taken by the Environment Committee from organisations on the Road Safety Strategy Consultation	<p>Significant difference in the quality of road surfaces in rural areas when compared to the main arterial routes that criss-cross Northern Ireland (RCN)</p> <p>Narrow rural roads (RCN)</p> <p>Slurry spreading, silage cutting and crop gathering adversely impacts many rural roads (RCN)</p> <p>Hedge cuttings represent a danger to other road users (RCN)</p>
	<p>Road signs not high enough (UFU)</p> <p>Roadside verge erosion (UFU)</p> <p>Mud left on roads (UFU)</p> <p>Kerbs or large boulders erected at roadside entrance to properties are dangerous (UFU)</p> <p>Roadside garden hedges too close to roads (UFU).</p> <p>Grass/hedge cutting – cutting in rural areas need to be more frequent (UFU).</p> <p>DOE needs to be more pragmatic about situations where road drains have been cleared or roads washed for road safety reasons. The same would apply to cleaning sheughs, if there is a road safety issue this should be exempt from GAEC (UFU).</p>
	<p>Road upgrades, signage and surfaces needed (Association of Driving Instructors Association NI)</p> <p>Revised speed limits – up and down (Association of Driving Instructors Association NI)</p>
	<p>Rumble strips have a part to play in safer road conditions (PSNI)</p> <p>Speed limits are dictated by the nature of the road but less changes in regards to limits would be preferable, Roads Service issue (PSNI)</p> <p>Support for lower national speed limit (PSNI)</p> <p>Speed awareness courses a key strategy in reducing offences and changing driver behaviour (PSNI)</p>

Name	Safer Roads Comments
	<p>Implement the Principles of safer road design set out in DfT Cycle Infrastructure Design and the Manual for Streets. (CTC)</p> <p>Introduce and enforce 20 mph limits in urban and village areas, not just where there is high usage by pedestrians and cyclists. Evidence shows when 20 mph limits are introduced there is an immediate reduction in casualties, reduction in noise and GHG emissions, walking and cycling become a more viable and attractive modes for short journeys of less than 5 miles. (CTC)</p> <p>Introduce and enforce 40 mph limits for rural roads and less for minor rural roads. Speed limits are simultaneously the mildest, most straight forward, the least intrusive and most egalitarian of road safety measures. Pedestrians and cyclists have no option but to use the existing road network for door to door journeys. (CTC)</p>
	<p>We support the proposals to improve safety on rural roads (RHA)</p> <p>Use chevrons to reduce speed of lorry convoys (RHA)</p> <p>Increase investment at accident black spots – rather than have a blanket reduction on speed limits on certain roads. (RHA)</p>
	<p>Speed limits crucial for improving road safety on rural roads (RoSPA)</p> <p>Support for trials of intelligent speed limiters for which a database of speed limits is a pre-requisite (RoSPA)</p>
	<p>Welcome 20mph limits around schools (NICCY)</p>
	<p>FTA objects to blanket 20 mph speed limits which run counter to fuel efficient driving efforts. Twenty mph limits should be targeted and appropriately enforced rather than rather than using physical engineering methods. (FTA)</p> <p>Trials of 50mph speed limits on safer roads should be introduced (FTA)</p> <p>Any introduction of 20mph speed limits should involve signage but not speed humps as they damage HGVs and result in more emissions (FTA)</p>
	<p>Would welcome better signage when approaching a restricted speed area such as a 30mph zone as used in Scotland. (Coleraine Road Safety Committee)</p> <p>Encourage more use of 20mph zones in residential and built up areas and around schools. (Coleraine Road Safety Committee)</p>
	<p>Traffic calming measures failing to take into account the size of modern farm machinery (UFU)</p>
	<p>Ensure the availability of secure, overnight truck stops (RHA)</p>
	<p>FTA strongly recommends that the DRD increases the provision of suitable rest areas and lorry parking. With appropriate provision supported by effective enforcement, drivers could be encouraged to use facilities that are suitable, and support drivers and operators' obligations under drivers' hours rules. (FTA)</p>
	<p>Would like to encourage cooperation between all Government Departments, overall the benefits of providing safer roads for vulnerable road users is far reaching. (Right to Ride)</p>

