

**Northern Ireland Road Safety Strategy 2010 – 2020 Consultation Analysis Report  
Annex F (4)**

**Record of responses received from Organisations and Individuals on proposals  
for Safer Vehicles**

Name	Safer Vehicles Comments
British Red Cross	<p>The Red Cross is not a specialist in Vehicles. However, we do recognise that accidents on the roads will happen and whilst it's important to try and reduce them as much as possible it is inevitable that they will occur. For this reason we believe that by simply making sure that every vehicle has a first aid kit drivers can be better prepared to deal with a crisis.</p> <p>In several European countries such as Austria, Belarus, Croatia, and the Czech Republic, some hire car companies have compulsory items such as first aid kits, hazard triangles and fire extinguishers in their hire cars. This makes the driver and the vehicle better prepared should an accident occur.</p>
Dungannon and South Tyrone Borough Council	<p>A key concern for Council and one it has raised previously with the Minister is the need for increased impact fortification/rear material strengthening at the back of buses for greater protection in the case of a crash. At present any level of impact on the back of a school bus can result in serious injury and death to those travelling, and unfortunately this occurred a year ago with the sad death of a young girl in the area.</p>
British Vehicle Rental and Leasing Association	<p>Fines - We would suggest that the fine regime for driving uninsured is still not penal enough, there are still too many drivers who would consider not buying insurance and running the risk of an occasional fine. There needs to be a significant increase to the fine to ensure people do not avoid purchasing insurance, our recommendation would be a minimum £2,000 fine and a custodial sentence for persistent offenders.</p>
Right To Ride	<p>Right To Ride disagrees with this action measure and the regulatory impact comments that this would have - Negative Impact: slight additional administrative burden. If we understand this action measure it would be required for a vehicle to have a test certificate if not used on the road and SORN (Statutory Off Road Notification) is in force which requires the vehicle keeper to declare that the vehicle is not in use or being kept on a public road.</p> <p>We assume this because, unless excused under limited exemptions is not explained in the action measure. This would need explained.</p>
Young Farmers' Clubs of Ulster	<p>We welcome the proposals in the document around ensuring safer vehicles on our roads, especially where agencies have direct control over the safety of vehicles. We feel that this will ultimately contribute to enhanced safety on rural roads generally and in villages and rural towns in particular.</p>

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Michael Haslett	A further point on the question of speeding is the ridiculous situation we are presently faced with whereby almost every if not all cars sold to-day are capable of exceeding by a large margin the legal road speed limits - the most recent Lexus LFA can be bought for £55,000 and is capable of 202mph. All motor vehicles should be governed to have top speeds of no more that 5mph in excess of legal limits which I suggest should be 60mph and regulations should be applied to acceleration speeds to limit these to say max 0 - 60 of something like 15 secs. Some simple method should be devised to insure that these regulations are applied and kept in good working order, perhaps road side checks or mot rules with earlier mots even for new cars and some form of sealing to stop tinkering. Severe penalties should be applied for abuse of these rules.
Road Safety Committee - North Down and Ards	We are in broad agreement with all the proposals but feel that it is now timely to consider moving Vehicle Testing over to private firms similar to GB to ensure that MOTs can be obtained at short notice with the option for the testing company to undertake on the spot remedial work.
Ulster Farmers' Union	The UFU accept and support the need to improve information, understanding and delivery. Currently delivery of information on vehicles on the road is very poor and can be inconsistently enforced. In an effort to improve understanding, the UFU took the initiative to publish a booklet detailing regulations relating to agricultural vehicles on the road.
	The UFU accept these proposals but would warn that any enforcement procedures must be applied consistently throughout NI.
	The UFU feel the focus should first be on preventing the accident. It was our understanding that this already happens.
	The UFU stress there must be a consistent examination process across Northern Ireland.
	The UFU accept the importance of tacographs in certain situations such as long distance lorry drivers. However, Northern Ireland is too small to have many tacographs fitted to vehicles that simply travel internally. Therefore, we do not feel that this measure should be given priority and we feel PSNI officers should already have completed sufficient training in this area.
	The UFU do not understand how this measure could apply to new tractors.
	We would accept this measure provided that it is enforced pragmatically e.g. the expired MOT is significantly out of date.
	The UFU feel is premature for the department to include reference to operator licensing as this is currently only at consultation stage with DOE. If enforced on all freight operators this could have significant implications on small businesses.
Belfast City Council	A possible additional action in the safer vehicles section of the draft might make reference to new vehicle technologies. BCC is working with officials

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	from DOE and DRD on a proposal to promote the use of electric powered vehicles. It is important that all road safety consequences are considered.
Freight Transport Association	<p>FTA welcomes the mention of carbon constraints and is already in discussions with the Department for Transport in relation to the FTA members voluntary Carbon Reduction Scheme which has been in operation since January 2010.</p> <p>The suggestion for increased use of smaller lighter vehicles presumably relates to the general public and not the freight sector.</p>
	<p>Whilst it is acknowledged there has been a general improvement in Road Safety on both sides of the border with a downward trend in recorded deaths and serious injuries the facts remain that we continue to record high levels of non-compliant commercial vehicle operations.</p> <p>There is a need to convince Irish government Ministers of the need to urgently address this problem and recommend the same steps being taken by the Northern Ireland Assembly.</p>
	<p>Vehicle Safety Technology - In order to invest in vehicle technology – be that for road safety or for long-term, sustainable reductions in greenhouse emissions – operators must have cash available. The harsh economic conditions have shown a marked decline in investment in new vehicles; this will mean that safety advancements which have come into the showrooms this year will not make it into the working fleet as quickly as they normally would through cyclical fleet renewals of large companies. Government policies which have the effect of reducing cash available to companies to invest – either through increased in fuel duty by the Treasury or ongoing fee increases – will have a similar effect of stunting the roll-out of existing safety technologies into the working fleet.</p> <p>Government must acknowledge the negative impact on investment in safety technologies that results from increasing operating costs imposed by Government in the form of fuel duty and increasing enforcement agencies' fees used to plug the gap of financial mismanagement.</p>

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	<p>Regulations and Policies: The findings contained in the Driver and Vehicle Agency (DVA) Goods Vehicle Compliance and Condition Report 2009 for Northern Ireland give serious cause for concern. There is no evidence of improvement over previous years despite a wide range of educational and enforcement activities undertaken by the DOE Road Safety and Enforcement Branch, Road Safety groups and various trade associations including FTA.</p> <p>These statistics are submitted to the EU enforcement authorities and highlight the fact that vehicles from Northern Ireland are most likely to be non-compliant. This has resulted in a relentless programme of targeted enforcement activity by enforcement authorities in GB and many European countries. There is strong evidence to support the fact that delays and disrupted delivery schedules through the 'supply chain' have adversely affected exports.</p> <p>The Environment Committee must ensure there are no further delays to the legislative procedure for the introduction and application of powers contained in the Secondary legislation for the Goods Vehicle (Licensing of Operators) Transport Bill. Any further delays will mean non-compliance figures will remain high.</p> <p>FTA is keen to work with and assist the DOE in helping to educate the industry on aspects of preventative maintenance on all types of commercial vehicles.</p>
	<p>FTA strongly supports the [following] proposed Action Measures contained in Annex B: Action measures: 55, 56, 58, 61, 65</p>
	<p>DOE/DVA should immediately embrace the Operator Compliance Risk Score (OCRS) system operated by DfT/VOSA in GB. This system is transparent to everyone and will enable targeted enforcement at both roadside and premises checks. This is a measure that will provide strong encouragement for operators to carry out continuous vehicle maintenance and road safety checks.</p>
	<p>The widespread abuse of EU drivers hour's regulations will be greatly reduced once the PSNI Road Traffic Branch enforcement officers are fully trained on tachograph regulations.</p>
	<p>The issuing of Fresnel lenses by DOE to left hand drive commercial vehicles will help to reduce collisions.</p>
	<p>DOE must ensure the O-licensing regulations for all operators are introduced without delay.</p>
	<p>Graduated Fixed Penalties: Section 8.24 should include the provision to allow fixed penalties to be graduated according to the seriousness of vehicle roadworthiness defects. This has applied in GB since May 2009 but appears to have been omitted from this text.</p>

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John Doherty	<p>Make all Trailers and caravans have tax books with specific serial numbers like motor vehicles. Have them MOT like motor vehicles If the mot station or police at a road stop find that this trailer / Caravan does not match the data base they have the power to seize this item until the owner proves they are indeed the owner There was eight people killed in Northern Ireland last year with breakaway trailers.</p> <p>Think of the police time coroner time hospital time and other agencies the cost of each death is over half a million pounds</p> <p>My sister in law had a serious accident where a trailer broke away from a car the driver drove on there was no identification plates on the trailer so no one was held accountable This Mot and serial numbers would Change all this and stop trailer/ caravans thefts and guarantee they are road worthy</p>
	<p>All trailers and caravans and other towed gadgets should be MOT and serial numbers and a tax book like cats and vans thus stopping the theft of trailers.</p> <p>Trailers should have Chain to keep connection to vehicle in the event of trailer Caravan breaking away the wire system that pulls on braker is a waste of time and gives false security</p>
	<p>I think a car electronic monitor similar as that used in aeroplane would reduce accidents save up to 20% of police accident and emergency after care for injured people legal time and Insurance claims Coroners time and more</p>
NI Assembly Environment Committee	<p>As mentioned previously the Committee is aware of the development of technology for vehicle use such as black box and speed limiters. The Committee is very supportive of the development of technology which may make a contribution to the reduction of death and serious injuries on our roads.</p> <p>The Committee recommends that the Department continues to liaise with the Department for Transport to encourage car manufacturers to continue research and development of technology that will improve vehicle safety.</p>
Synopsis of the evidence taken by the Environment Committee from organisations on the Road Safety Strategy Consultation	<p>Strongly support proposed Measure 65 to extend freight operator licensing to all vehicles over 3.5 tonnes and Measure 66 to extend the "O" licensing system to all freight operators (RHA)</p>
	<p>Government must acknowledge the negative impact on investment in safety technologies that results from increasing operating costs imposed by Government in the form of fuel duty and increasing enforcement agencies' fees used to plug the gap of financial mismanagement. (FTA)</p>
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