

**Northern Ireland Road Safety Strategy 2010 -2020 Consultation Analysis Report
Annex F (5)**

**Record of responses received from Organisations and Individuals on proposals
for Safer Road User Groups**

Name	Safer Road User Groups Comments
British Motorcyclists Federation	We strongly support proposals to have an inclusive and user focused approach to road safety for motorcyclists and would fully expect to be involved in any discussions. One word of caution is that many attempts to include all parties in all discussions have been hijacked by groups not directly related by with their own agenda to discuss. Our suggestion would be a highly focused team of directly affected parties, i.e. motorcycle groups, police and civil servants for example.
	Any attempts to have a research led policy are broadly supported by the British Motorcyclists Federation.
	A strategy which covers motorcycling should not only focus on safety but on ways in which motorcycling could be further integrated into mainstream thinking as in Proposal 1 above.
	We can see no logical reason why this would either work in practice or offer any safety benefit. Motorcycles can travel at a range of speeds quite comfortably and without danger. Motorcycles travelling more slowly than the surrounding traffic would likely cause irritation and annoyance to other road users which in turn may cause them to attempt dangerous overtaking manoeuvres.
	This system appears to work well in Great Britain and has done much to improve the quality of training and the way it is perceived.
	There is no strong evidence to support the efficacy of fluorescent strips in preventing accidents. Recent evidence shows that it is inappropriate reactions or failure to look properly not an inability to distinguish motorcycles that causes accidents.
	The British Motorcyclists Federation has long supported the voluntary take up of appropriate protective clothing.
	Education is possibly the best response to the problem of motorcycle accidents, but there may be some technological solutions worth exploring.
	Unaccompanied provisional learning is commonplace across Europe when riding motorcycles. Its removal in Northern Ireland would be highly illogical and would likely lead to less people riding motorcycles thereby reducing the expectation of drivers to see motorcycles, greatly increase the likelihood of illegal riding and most importantly would prevent new riders from gaining valuable experience (by far the best way to reduce the likelihood of an accident). Furthermore, this would render the introduction of Compulsory Basic Training as pointless as all riders

Name	Safer Road User Groups Comments
	would need to gain a licence by accompanied learning. We would strongly recommend that unaccompanied learner riding be maintained to allow new riders to build up experience.
NI Commissioner for Children and Young People (NICCY)	NICCY welcomes the DoE's acknowledgement of the need to protect children as a key road safety challenge (as stated in chapter 3 of the consultation document). NICCY also agrees with the Department that the overrepresentation of 16-24 year olds is highly concerning in terms of road deaths and serious injuries and in terms of responsibility for collisions. It is important that the Department has named young people and young drivers as a key challenge.
	We note the welcome recognition of road safety in rural and border areas as a key challenge, and also the need to protect newcomers to NI, particularly those without English as a first language. We would recommend that the Strategy explicitly recognise children and young people falling within these categories – that is, newcomers, and children in rural and border areas – as groups at multiple risk of danger on our roads.
	We would recommend a minor, but important amendment to the wording on page 20 of the draft strategy, with regard to newcomers to NI from other countries. Paragraph 3.1 states that the new strategy should protect “new citizens of Northern Ireland, including those for whom English might not be their first language.” NICCY would point out that the term “citizen” may in practice restrict the road safety vision to citizens of NI only, when in fact, many, if not most, newcomers will not, or may not wish to, acquire British or Irish citizenship. This may seem a minor point, but it is crucial for Government to be explicit about its responsibilities. It is important that the correct language is used to ensure that the strategy will have broad application to all people in NI generally. We would like to see the reference to “new citizens” amended to reflect this.
	It is important that the strategy reflects the fact that children from rural areas are at multiple risk of danger on the roads. NICCY's Children's Rights Review identified a considerable number of concerns for rural children's road safety. We would take the opportunity to re-state the concerns that our Review suggests may put children from rural areas at greater risk: <ul style="list-style-type: none"> • The lack of pavements in rural areas • The longer distances children have to travel on buses to and from school • The irregularity of transport provision • The longer distances children have to walk to access public transport, often on unpaved and badly lit roads
	We also welcome two action measures for the strategy which concern visibility of children travelling to and from school. Action measure 163 would require the Department of Education (DE) to issue guidance on school uniforms and visibility,...
	...while Action measure 174 would require DoE (with DE as support) to

Name	Safer Road User Groups Comments
	investigate ways to improve the visibility of pedestrians, particularly children travelling to and from school. NICCY would recommend that these measures are addressed with priority.
	We also note that action measure 111 would hold DoE to “consider producing a new public information campaign highlighting the dangers associated with being a pedestrian on rural roads”. NICCY would welcome a particular focus on children and young people in any such campaign.
	While we welcome [action measures 133 and 148], we would like to see the Department be clearer with regard to what action it will take to reduce the likelihood of child pedestrians deprived areas falling victim to collisions. For example, we would recommend that DoE clearly state how it will work in partnership with the appropriate Departments to address the fact that the research findings suggest that the presence of schools, traffic activity, crime, whether the area is urban or rural and proximity to services, all contribute to the link between deprivation and child pedestrian casualties. We also note that the trend for pedestrian casualties is higher for males than females – this finding demands an appropriate response.
	<p>NICCY has previously considered the area of GDL and we understand that various forms of GDL operate in some jurisdictions, allowing new drivers to gradually build up their driving skills and experience over a set period. NICCY welcomes some of the research evidence from jurisdictions operating GDL schemes which show a positive impact on road accidents following the introduction of GDL.</p> <p>There would clearly be some potential negative impacts on young people.</p> <p>There could also be potentially positive impacts. However, without knowledge of the proposals for the GDL consultation, we are unable to comment in detail at this stage.</p>

Name	Safer Road User Groups Comments
	<p>The proposed changes to the learner driver scheme with also have potentially negative impacts on young people, mainly the added cost of learning to drive. Clearly, there could potentially also be positive impacts, for example, if driving education could be provided free of charge through school or training colleges, or where the increased driver education would bring down the cost of insurance. However, it is difficult to comment on potential impacts without knowing the extent of the proposals for learner and restricted driving schemes and the introduction of GDL. It will be crucial that the Department engage seriously with young people to achieve buy-in on any proposals.</p> <p>NICCY would recommend that the upcoming 'Learner and Restricted Driving Schemes and Introduction of GDL' proposals seek to appropriately mitigate any negative equality impacts on young people. NICCY would also recommend that DoE consider whether it should carry out a separate Equality Impact Assessment of the learner driver and GDL proposals prior to the issuing of the consultation.</p> <p>NICCY further recommends that the GDL consultation process include appropriate and meaningful consultation with young people.</p> <p>Subject to these recommendations, and assuming that there will be support for the impending proposals – NICCY would agree that changes to learner and restricted driving schemes take place, and that a GDL programme be introduced for newly qualified drivers in NI, based on examples of best practice from elsewhere.</p>
British Medical Association	<p>The BMS calls for any new proposals for Driver Training, Testing and Licensing should contain proposals on how the scheme could include alcohol and drug awareness programmes as part of passing the test to become a restricted driver.</p>
	<p>BMA calls for Cycling to be promoted as a safe, healthy and sustainable alternative to car use.</p>
	<p>BMA calls for Introduction of compulsory wearing of helmets for all cyclists.</p>
	<p>Pedestrians and cyclists are vulnerable road users relative to motorists, and have high rates of fatality and injury per million miles travelled. While safety has improved for motorists and passengers in terms of advances in vehicle design, it is likely that the decrease in pedestrian and cyclist injury can largely be attributed to risk aversion and the decrease in walking and cycling levels, rather than improved pedestrian and cyclist safety.</p>

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	<p>Increasing walking and cycling does not lead to increased road traffic casualties, in fact a 'safety in numbers' effect has been observed in countries where more journeys are made by bicycle. The BMA promotes cycling as a safe, healthy and sustainable alternative to car use and identified a number of measures to improve cyclists' safety, including:</p> <ul style="list-style-type: none"> • Publicity and education campaigns in order to raise drivers' awareness of more vulnerable road-users. • The creation of a safer cycling environment (e.g. improving cycle routes). • Reductions in vehicle speeds and traffic volume in urban areas. • The provision of cycling training for all children. • Recognising road safety, including cycling proficiency education, as part of the curriculum for all school children. This should include basic cycle maintenance, and safety precautions (e.g. lights, reflective clothing), information on the health benefits of cycling, as well as encouraging cycle helmet use. • Ensuring the correct fitting of cycle helmets as poorly fitted helmets are less effective. • Advertising standards officials should ensure that the public are protected against misleading safety claims from manufacturers. • Cycle manufacturers and retailers should consider supplying a free cycle helmet (or helmet voucher) with every bike sold. • Helmet costs should be reduced substantially. <p>The 2008 Board of Science web resource Promoting safe cycling highlights that best evidence supports the use of cycle helmets as they have been shown to reduce the risk of head injury and its severity should it occur. It concludes that as a part of a range of measures to improve cycling safety, cycle helmet wearing should be made compulsory.</p>
British Red Cross	<p>We would also encourage the Department of the Environment to include road safety specific first aid education as a central part of road safety campaigns. Vulnerable groups such as school children, young people, pedestrians, cyclists, motorcyclists and horse riders should be a focus for particular attention.</p>
	<p>First aid is often – wrongly – perceived to be “too little, too late” in road safety terms. In fact, it can be a powerful preventative measure. Early first aid can prevent an injury deteriorating and causing lasting harm or death.</p> <p>There is a body of strong clinical evidence showing how first aid in itself is effective – particularly in the first ten minutes after an accident has occurred. Learning how to deal with common scenarios such as bleeding and blocked airways is simple and takes a few minutes.</p> <p>One common cause of a road accident fatality is the casualty suffering from anoxia – loss of oxygen supply – caused by a blocked airway. On average, it takes less than four minutes for a blocked airway to cause death. In these situations, it is often the case that bystanders and those</p>

Name	Safer Road User Groups Comments
	<p>already at the scene of an accident are in the best position to prevent these deaths from occurring.</p> <p>A study carried out in Staffordshire by Hussain and Redmond into pre-hospital deaths showed that “at least 39% and up to 85% of preventable pre-hospital deaths may be due to airway obstruction” and all pre-hospital deaths reported occurred before the arrival of the emergency services.</p> <p>Hussain and Redmond concluded: “Death was potentially preventable in at least 39% of those who died from accidental injury before they reached hospital. Training in first aid should be available more widely, and particularly to motorists as many pre-hospital deaths that could be prevented are due to road accidents”.</p> <p>Professor Matthew Cooke, Professor of Emergency Medicine at Warwick Medical School in England, states that “preventable deaths in pre-hospital care are rarely due to availability of advanced techniques but more often to failure [for example] to treat basic ABC [airway, breathing, and circulation] problems”.</p>
	<p>The Red Cross believes that in order to make the roads as safe as possible in Northern Ireland we must do everything we can. In order to make sure that we can reduce the number of road deaths and serious injury we must consider reviewing the way drivers are trained to ensure that they are better equipped to drive safely on NI roads.</p>
	<p>The Red Cross has been urging the Government in the UK to introduce first aid scenarios in the theory section of the driving test, and has successfully increased first aid content both in written questions and in the computer-based scenarios. This aims to enable learner drivers to understand more about staying safe, handling emergencies and basic first aid.</p>
	<p>The Red Cross supports the specific focus on children and young people in the new strategy for road safety. The Red Cross supports all of the action measures outlined in the consultation documents concerned with children and young people.</p>
	<p>The Red Cross appreciates the commitment of the DOE to working in partnership with voluntary and community groups, and we look forward to contributing to a multi disciplinary motorcycling forum to help protect bikers from serious injury or death.</p>

Name	Safer Road User Groups Comments
	<p>We understand that a new pre-driver qualification in safe road use is being introduced in England, Scotland and Wales. This includes sections on knowing what to do if you come across an incident. We would encourage the Northern Ireland Executive to introduce a similar scheme. We support the inclusion of the following in any road safety specific first aid:</p> <ul style="list-style-type: none"> > Incident management; > Care of unconscious casualties in and out of car; > Management of blood loss. <p>In several European countries such as Austria, Estonia, Germany, Hungary, Latvia, Switzerland and Lithuania holding a first aid certificate or having completed some form of first aid training is required before a driving licence is granted.</p>
	<p>The Red Cross welcomes the measures detailed in the consultation documents for improving the safety of Pedestrians as road users. Other than the action measures mentioned in the documents we would encourage the DOE to consider a first aid element to any new public information campaigns as mentioned in the action measures 108 and 109. The Red Cross would be willing to support the DOE with this and has expertise and resources that may be suitable to include in these campaigns.</p>
	<p>The Red Cross believes that cyclists are often be more vulnerable to accidents on roads and would support the DOE with any measures that will reduce the number of deaths or serious injuries occurred.</p>

Name	Safer Road User Groups Comments
	<p>We believe that more can be done in Northern Ireland to deliver training on handling emergencies and basic life-saving skills to young people in schools, colleges and the workplace.</p> <p>The Red Cross does a huge amount of work with young people through our humanitarian education programmes. We recognise that young people often respond best to other young people and believe that more emphasis should be placed on recruiting young people from high-risk communities across Northern Ireland to be trained in first aid and to deliver road safety messages to other young people.</p> <p>Learning basic, road-safety specific first aid really helps young people to think about what could happen on the road, and the risks associated with driving. We have learnt this through our work on road safety in partnership with other organisations. For example, Megadrive, which is a pre-driver educational scheme, set up by Road Safety Departments, which encourages a positive attitude to safety and understanding in young drivers. Each Megadrive covers a range of topics, including a session from the Red Cross on immediate post accident procedures where students learn how to keep the scene of an accident safe, basic first aid skills and course of action.</p> <p>In addition to this important impact on attitude and potentially behaviour, a basic knowledge of first aid can help reduce injury and save lives on the road. Alongside teaching first aid in a road safety context, young people would explore topical issues such as the risks of joy riding, speeding or drink and drug driving.</p>
	<p>The Red Cross welcomes the specific action measure to ensure the safety of older people. The Red Cross is concerned with helping vulnerable people whoever and wherever they may be. We are happy to support the DOE and help with further consideration to the safety of older people on the roads in Northern Ireland.</p>
	<p>The Red Cross would encourage the Department of Education to consider first aid training and our humanitarian education programmes as part of the development of training under the new strategy. As mentioned previously we have a range of methods and delivery styles in first aid training that could help encourage drivers to become safer on the roads and better prepared to deal with a crisis.</p> <p>The Red Cross is happy to assist the Department of Education in delivering its action measures.</p>

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Courts and Tribunals Service Criminal Policy and Legislation Division	<p>Is the Department in a position to provide more details on the nature of the above proposals; is it intended that the graduated fixed penalties would be administered independently of the courts? Can the Department clarify what minimum penalties are proposed for road transport offences?</p> <p>As the proposals plan to extend the application of the current penalty point scheme and introduce minimum penalties for certain road transport offences, this may have the potential to increase the number of prosecutions coming before the Court. Can the Department provide any information as to whether the extension of the penalty point scheme or the other proposals are likely to lead to an increased number of prosecutions coming before the court, and if so, can an estimate of the increase, if any, be provided?</p> <p>We would appreciate being kept informed generally as the policy develops.</p>
Dungannon and South Tyrone Borough Council	<p>A major issue for the Dungannon & South Tyrone Borough area is the need for focus on School Bus Safety. There have been incidents in the area regarding child safety whilst travelling to school and it is proposed that more robust measures are put in place similar to good practice in the United States, such as; flashing lights and passing restrictions, and accompanying/escorting of children disembarking from buses across busy (major) roads. A related issue to this is the importance of the location of bus stops that they are provided in a location that provides for maximum safety.</p>
	<p>The proposal for intervention in areas of deprivation, given the increased safety implications on child pedestrian casualty rates, is welcomed. It is recommended that measures linked to areas of deprivation are referenced within the Strategy, as often if not identified at this stage they do not receive further attention and funding.</p>
NILGA	<p>Local government wishes to highlight the issue of young people who work late night shift patterns; for example in the hospitality industry or in health care, especially since a large amount of fatalities occur on rural roads, late at night, in border areas.</p>
	<p>Local government welcomes proposals for novice drivers to demonstrate a competence of driving in different conditions such as at night-time, on the motorway and during wintry weather, as well as a post-test restriction on the number of passengers that can be carried. A note of caution was aired in relation to demonstrating experience of motorway driving for rural dwellers. Novice drivers in Fermanagh, for example, would have 1 hour to travel to reach either a motorway or a dual carriageway.</p>
	<p>The issue of cross-border travel was highlighted as an issue of concern. It was asserted that it is not clear on many cross-border roads that a driver has crossed into the other jurisdiction. This causes problems for</p>

Name	Safer Road User Groups Comments
	drivers particularly as speed limit signs are indicated in miles per hour in NI and kilometres per hour in the RoI. It is thought that this would be a particular problem for visitors and tourists to border areas.
	It is suggested that training for driving instructors should be reviewed, in order to ensure that instructor training is as robust as possible.
	Local government would support the introduction of 10 yearly eye-sight tests and theory tests to ensure that drivers and riders have adequate vision and knowledge of the Highway Code.
	Proposals for the Department of Education to engage with DOE, Education and Library Boards and the Educations and Skills Authority (once established) to explore how resources for schools on road safety can better empower children to make informed safe choices and decisions are welcomed by NILGA. It is suggested that Road Safety Events held in conjunction with NIFRS, PSNI and the Department of Education should be utilised to explain to young people how to deal with an accident or potential hazards on the road.
	Research indicates that brain development is still in progress during adolescence. The developing brain of the teenage years may help explain why adolescents sometimes make decisions that seem to be risky, as it is thought that a person's sense of danger signals are not fully developed until they reach their twenties. This research is particularly relevant to young drivers and NILGA would suggest that this information is publicised in order to encourage younger drivers to take more care on the roads.
	It is also suggested that research is carried out comparing the experiences of drivers who have undertaken the Advanced Driving test to those who have not. This may encourage others to undertake the Advanced Driving Test, if results prove that undertaking the course helps minimise the likelihood of being involved in a collision.
	Due to the current uncertainty surrounding local government re-organisation, NILGA would seek assurance from the Department that regardless of whether local councils will be operating on a 26 or 11 council model, local government will still be provided the opportunity to be involved in helping to improve road safety at a local level.

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British Vehicle Rental and Leasing Association	<p>Training for professional car and van drivers - We are supportive of the training ideas mentioned particularly relating to new drivers. However, our view is that the consultation is lacking in terms of a vision from the department on training and educational plans for professional car and van drivers. A few suggestions which we would be supportive of are:</p> <ul style="list-style-type: none"> - A vocational qualification for professional car and van drivers (NVQ1, driving only, for cars and NVQ2, driving and loading, for vans) – This would provide a set of standards for drivers to adhere to and provide a regular review cycle. It would also provide a national standard for employers to require their business drivers to achieve. - Minimum driver trainer standards – Currently, it is very easy for anybody to set up their business as a trainer of professional drivers, there are no set standards for trainers and we think this is a vital area which Government should set standards in. This is such an important area that the concept of licensing of these organisations should be considered.
Right To Ride	<p>Right To Ride welcomes this action measure, which we recommended in our “Motorcycle Safety in Northern Ireland – The Rider’s Perspective” document and at meetings with the DRD/DOE.</p>
	<p>Northern Ireland has active and experienced individuals within the motorcycling community and beyond that could provide expert advice to the government in order to find solutions to reduce the number of motorcycle casualties. The concept of Stakeholder collaboration is perhaps one of the more positive messages from the European Union, but also a priority of the International Transport Forum/OECD Workshop on motorcycle safety.</p>
	<p>In England and Wales, the Department for Transport initiated an Advisory Group on Motorcycling in 1997, the results of this was the publication in 2005 of “The Government’s Motorcycle Strategy”. An Advisory Group or National Motorcycle Council could include the Department for the Environment road safety division, the Department for Regional Development, district policing partnerships, trainers, motorcycle clubs, road safety officers, police, road engineers, local authorities, dealers, insurance companies and any other relevant body that has an interest in the continuation of motorcycling as a important part of road transport and the reduction of motorcycle casualties.</p>

Name	Safer Road User Groups Comments
	<p>By working together and identifying priorities within a framework of</p> <ul style="list-style-type: none"> • vehicle safety and security • integration and traffic management • environmental and fiscal • statistics • research <p>stakeholders would enable the government to have access at minimum cost to experts from a wide range of sectors for the benefit of the community at large.</p> <p>Our vision would be that the forum would advise and collaborate in the preparation of the development of a motorcycling safety strategy for Northern Ireland as considered in the preceding action measure 167.</p> <p>Any forum established must aim to have an outcome. It should not just be a “talking shop”. Achieving a motorcycle strategy for Northern Ireland should be its first priority. The forum must also be “politically” driven with the involvement of the respective ministers and respective committees at the Northern Ireland Assembly.</p>
	<p>OECD/ITF Workshop – Priority as Regards Policy Dialogue: To enable communication and build mutual confidence, meetings between motorcycle stakeholders and policy makers\road authorities (e.g. forums, councils,) should be established, in order to exchange views, discuss needs and secure the necessary financing\resources for safety counter measures.</p> <p>Cooperation: Working together to achieve common objectives.</p>
	<p>While in principle we support the objective of improving safety for motorcyclists through improved technology in order to create more reliable and functional motorcycles, we understand that the outcome of the European powered two wheeler integrated safety programme - PISa project - does not give guaranteed solutions. (http://www.pisa-project.eu/)</p> <p>In fact by visiting the front page of the PISA project website, there are two videos in which the representative of the consortium’s views about the motorcycles developed in the project is clear. He suggests that more road testing is required to ensure that the equipment developed in the project can offer the safety measures to ensure the safety of the motorcyclist.</p> <p>The aim of the PISa project is to develop and implement “reliable and fail-safe” integrated safety systems for a range of Powered Two Wheelers (PTWs), which will greatly improve the performance and primary safety (handling and stability) and can link to secondary safety devices.</p>
	<p>Ultimately further research to ensure the safety of motorcyclists is welcomed however we believe that there has not been sufficient</p>

Name	Safer Road User Groups Comments
	attention given to improved training and the attitude of the motorcyclist in general and specifically there is insufficient research focusing on hazards and hazard awareness for motorcyclists as well as inattentive blindness of car drivers.
	<p>Right To Ride welcomes the consideration given in this action measure for the development of a motorcycle safety strategy for Northern Ireland, especially as the considered development is inclusive of partnership with other key stakeholders.</p> <p>Any motorcycle safety strategy should have deliverables to achieve improved motorcycle safety. Right To Ride's opinion is that any recommendations or best practice contained in any strategy should have action points a time frame for implementing actions and should be overseen by the stakeholders involved in any motorcycle forum. Participants in any motorcycle forum must also be prepared to deliver any motorcycle strategy.</p>
	<p>A motorcycle strategy would have the ability to join up motorcycle safety in Northern Ireland; at present motorcycle safety appears to be carried out in isolation by various agencies and initiatives.</p> <ul style="list-style-type: none"> • Bikesafe in Northern Ireland, an initiative that Right To Ride supports • Ride It Right - initiative for biker routes www.rideitright.org • There are motorcycle safety campaigns, stand-alone road safety campaigns that may wilt and fail to have any long lasting positive effect for motorcycle safety. • Department of the Environment (DOE) launched its new road safety campaign focusing on biker vulnerability: the "Underneath" television advert initially ran from 14 May to 14 June 2009 and has been screened since. However subsequent requests to promote this campaign by Right To Ride has failed to materialize with those involved. • There is a lack of publications for motorcycle safety campaigns. • The DOE Road Safety website contains no relevant information regarding motorcycle safety.
	<p>The DOE in 2009 conducted a survey for motorcyclists to seek views from motorcyclists for the development of a new road safety strategy and published its report in 2010. We have commented to the recommendations in this response. [Note: See original response for additional comments]</p> <p>We have conducted our own near miss survey of motorcyclists to identify causes of accidents.</p> <p>A motorcycle safety strategy could identify the issues and consider new ways to tackle motorcycle safety in Northern Ireland.</p>
	Right To Ride opposes any introduction or even assessment of the potential for introducing different speed limits for motorcycles which we assume aims to be lower than other vehicles.

Name	Safer Road User Groups Comments
	<p>Considering the general positive aspects of the consultation to improve road safety this seems to have come completely from “left of field” restricting one form of transport over others is inherently dangerous and totally uncalled for, because it would inhibit the free flow of traffic and in the case of overtaking, it could actually create the potential for collisions, not to mention frustration for other drivers.</p>
	<p>Right To Ride is represented in the stakeholders group which is delivering this action measure and generally supports this. However new riders must be offered cost beneficial training and instruction which should be the very best at this early stage in a rider’s progress.</p> <p>There should be assurance that the trainer they pick for whatever kind of training they have paid for is quality assured by the DOE through the Approved Motorcycle Instructor Register (AMI).</p> <p>Right To Ride understands that it is proposed that CBT will be introduced early in 2011 and that current provisional licence holders will have a period in which to take CBT. Therefore our opinion is that the publicity for the introduction CBT should be started at an early stage so that there is complete understanding.</p>
	<p>The examples given in this action measure are already undertaken by many riders with the availability of clothing and helmets that either have bright coloured or fluorescent strips or are wholly fluorescent.</p> <p>Right To Right has concerns that this action measure is actually considering measures that would mean mandatory fluorescent strips, these are also given as examples etc which would imply other measures would be considered. There is no reliable evidence available to demonstrate that high visibility jackets or fluorescent strips make any difference in reducing motorcycle crashes.</p>
	<p>The majority of motorcycles produced since 2003 have AHO (Automatic Headlights On) systems fitted meaning the headlight is always switch on and still other drivers are failing to look and see motorcyclists.</p> <p>We are aware and have replied to consultations from the RSA (Road Safety Authority) in Ireland regarding Daytime Running Lights (DRL) and National Motorcycle Safety Action Plan</p> <p>Regarding Day Time Running Lights – Dedicated Running Lights (Diode lights) both with the acronym (DRL) this part of a wider debate regarding motorcycling this issue and the issue of conspicuity is covered in-depth in our “Motorcycle Safety in Northern Ireland – The Rider’s Perspective” document.</p>
	<p>However regarding fluorescent strips in our response to the RSA National Motorcycle Safety Action Plan we stated that, too much focus on brightly coloured clothing removes attention away from far more important factors that can prevent collisions between cars and motorcycles, namely:</p>

Name	Safer Road User Groups Comments
	<ul style="list-style-type: none"> • Better awareness: theoretical and practical hazard perception tests must identify motorcycle awareness as a fundamental part of the testing regime of car drivers; • Better training: extend the testing and training of car drivers to look for vulnerable road users, including motorcyclists; • training and awareness techniques for motorcycle riders.
	<p>OECD/ITF Workshop – Priority as Regards Other Vehicle Driver Awareness - Other Vehicle Driver awareness: “To develop an awareness of PTWs and mutual respect between road users, education activities and campaigns should start from childhood, to emphasize that road safety means road sharing”.</p>
	<p>Right To Ride welcomes this action measure however the majority of riders in Northern Ireland recognise that personal protective equipment may help to reduce injuries and death.</p> <p>The Northern Ireland motorcycling community is safety conscious and riders have purchased protective clothing worth hundreds of thousands of pounds. In fact the response to a questionnaire by BikeSafe Northern Ireland, demonstrates that the overwhelming majority of motorcyclists use correct protective clothing.</p> <p><u>Protective Clothing and % of respondents</u></p> <ul style="list-style-type: none"> • Jacket with reinforced padding/ armour on the elbow, shoulders or back - 96.2% • Boots with reinforced padding/ armour on the ankle, knee or shin - 87.8% • Trousers with reinforced padding/ armour on the knee, outer knee or hip - 87.6% • Gloves with knuckle/palm guard - 80.5%
	<p>OECD/ITF Workshop – Priority as Regards Protective equipment for riders - Protective equipment for riders: “Where standards for protective equipment exist, they should be promoted; and where they do not, they should be developed, taking into account their safety performance, rider comfort, the ergonomics of their use, costs and the climate/regions where they will be used.”</p>
	<p>Right To Ride recognizes that the development of technology in order to improve the reliability and function of motorcycles is important within the context of commercial research and development strategies of motorcycle manufacturers. Voluntary development of technology enhances production and consumer choice.</p> <p>However we question mandatory “safety” technology as this tends to stifle innovation and progress. For example, while we recognize that ABS brakes have an important role in reducing skidding and the locking of brakes in critical situations, we also know that ABS brakes do not solve all problems in all circumstances and are not the only type of brakes that can assist riders to brake correctly. Combined braking</p>

Name	Safer Road User Groups Comments
	systems are also effective. Imposing legislation on a specific type of braking system would stifle innovation.
	This action measure would appear to be redundant as we understand this will be implemented through action measure 169 above regarding the introduction of CBT.
	Right To Ride has responded to the DOE consultation. We strongly disagreed with the consultation proposals, in our opinion the proposals are prescriptive and convoluted and badly thought through. The irony is that these proposals will effectively undermine the EU directive on all counts and encourage riders to become “permanent learners”.
	<p>In Great Britain a review of the motorcycle testing and training regime has been announced by Road Safety Minister Mike Penning. The DfT review will look at the manoeuvres carried out in both modules 1 (off-road) and 2 (on-road) that were implemented through the 2nd EC Driving Licence Directive and whether these manoeuvres could safely be conducted in the on-road test.</p> <p>The review will also look at other related motorcycle testing and training issues, including the options for training and testing for progressive access under the third driving licence directive and how any changes relate to wider proposals to improve motorcycle training and testing. The precise scope and terms of reference of the review will be determined following discussions with motorcycle groups and other interested parties, with the aim of concluding the review by the autumn.</p> <p>Right To Ride is of the opinion that a similar review should take place in Northern Ireland.</p>
	<p>Right To Ride considers that to deliver a road safety strategy for Northern Ireland regarding motorcycling that the action measures to “establish a Motorcycling Forum, including a range of stakeholders, which will consider an inclusive and strategic approach to motorcycling.” and the report “Motorcycle Casualties in NI – Statistical Analysis , Causes and Influencing Factors” recommendations from stakeholders and questionnaire respondents that this is an opportune time to look at the development of a multi-disciplinary Motorcycle Stakeholders Forum is the correct way forward.</p> <p>And that this forum can deliver any consideration of the development of a motorcycling safety strategy for Northern Ireland, advising on policy direction, strategy and dissemination of key road safety messages throughout the motorcycle community in partnership with other key stakeholders. “Engagement” with the motorcycle community, individual riders, clubs, groups and associations is fundamental to improve or promote safety measures.</p>
Disability Action	Disability would encourage the Department to ensure that policies are out in place to ensure that any of these measures do not adversely impact on learner drivers with a disability and in particular those with a

Name	Safer Road User Groups Comments
	learning difficulty or those who may find it difficult to undergo tests or show that they have understood information. Disability Action is willing to work with the Department on this.
	Disability Action is pleased that the Department has mentioned the needs of Deaf people but we are disappointed that the needs of other disabled people have not been taken into account. People with learning, physical, visual, mental health and or hidden disabilities all are at additional risk as pedestrians and all new public information campaigns also need to take these groups into account. Disability Action will be pleased to assist the Department with any of these campaigns to ensure the needs of all people with disabilities are represented.
	Disability Action is disappointed as in our previous point that only the needs of deaf people have been mentioned. Again we would encourage the Department to ensure that any information provided is accessible for all types of disabilities. Disability Action is willing to work with the Department to ensure that any information produced is accessible for all groups of disabled people.
Young Farmers' Clubs of Ulster	We welcome the principle of broadening the range of stakeholders in monitoring and evaluating road safety and extending the traditional partnership to work increasingly with others who can provide support in improving road safety. As a regional voluntary youth organisation we are keen to lend our support to ensure the safety our members and rural young people generally.
	The YFCU believes that the commitment to extend the suite of educational materials to ensure there are no gaps and provide a continuous intervention from pre-school to young adult should be a priority for the Department. We would also urge the department to extend it educational work beyond schools and engage youth service and other non-formal education providers as indicated in action measure 102.
	The YFCU urge caution in relation to the development of a Graduated Driver Licensing scheme. The reality is that for many people living in rural areas the only feasible transport option is by private car. We believe that raising the age for a provisional or full licence and night curfews would have a disproportionate impact on young drivers living and working in rural areas. It would also have a negative impact voluntary organisation such as the YFCU which depends on our members being able to travel to meetings, training, competitions and social events to function effectively. Further, the lack of motorways or dual carriageways in many parts of Northern Ireland would also disadvantage learner drivers in rural areas - if enforced this could add significant cost to learner drivers in many rural areas.
	We welcome the commitment to enhance the effectiveness of police enforcement through intelligence lead policing strategies and technologies in border and rural areas and the focus on high risk behaviours and groups. However, we would urge caution that young

Name	Safer Road User Groups Comments
	people are not unduly targeted in the implementation of this proposal.
	We welcome the further measure proposed to review response times to collisions and benchmark nationally with other fire and rescue services and we would hope that this results in an enhanced and balanced distribution of emergency services across rurally isolated areas.
Guide Dogs for the Blind Association	<p>Key findings of the [Guide Dogs for the Blind publication: 'The impact of shared surface streets and shared use pedestrian/cycle paths on the mobility and independence of blind and partially sighted people' - March 2010] report in relation to road safety regarding shared surface streets include the following:</p> <ul style="list-style-type: none"> • Half of those who had experience of shared surface streets had had an accident (7%) or a near miss (42%) on at least one occasion. • Only 15% of these accidents were reported.
	<p>Key findings of the report in relation to road safety regarding shared cycle/pedestrian pathways include the following:</p> <ul style="list-style-type: none"> • More than 6 out of 10 of all respondents have experienced a collision with a cyclist (20%) or a near miss (45%). • 38% of incidents with cyclists occurred on shared use pedestrian / cycle paths where there was either no segregation at all or only a white line; while only 3% were on paths where the pedestrian and cycle segments were clearly separated. • Over half of the incidents (52%) occurred on pedestrian only paths or pavements where cyclists were thought to be riding illegally. • 74% of those who have had a collision or near miss with a cyclist feel it has affected their confidence.
	Other key findings within the report found that blind and partially sighted people dislike shared surface streets and shared pedestrian/cycle paths and many tend to avoid those areas where such schemes have been introduced.
	It is worth highlighting that the most common eye condition causing sight loss is Age Related Macular Degeneration which predominantly affects older people. The Department should also bear in mind that many older people whose mobility is affected because of changes in their sight may not be registered as blind or partially nor use a long cane or guide dog.
	We support the commitment in paragraph 8.4 and 8.5 on page 43 that the road safety education programme will continue to provide the Cycling Proficiency Scheme and to consider the value of introducing an additional cycle training element to Northern Ireland. Guide Dogs believe that such schemes should include an element on awareness of vulnerable pedestrians as this would encourage more responsible cycling and appropriate use of shared use facilities where such schemes exist.

Name	Safer Road User Groups Comments
	<p>Guide Dogs shares the views in paragraph 8.10 on page 44 that the safety of older people will have a likely increasing importance to the delivery of the objectives of the strategy and the implied closer working with the wider community and voluntary sector. Again we wish to highlight the relationship between age and sight loss and the implications this may have.</p>
	<p>Guide Dogs support the proposal in paragraph 8.33 on page 48 for the introduction of an Active Travel Forum to consider a broad strategic approach to, and the promotion of, active travel. We would welcome the opportunity to be involved in such a Forum.</p>
	<p>Guide Dogs welcomes Action Measure 107 on page 69 to set up an Active Travel Forum. We concur with the positive equality impact assessment of this measure to improve physical fitness, health and well-being of those who move to active and sustainable travel options. This may be considered as a positive social inclusion impact for blind and partially sighted people. We concur with the positive transport accessibility impact assessment of this measure.</p>
	<p>Guide Dogs welcomes Action Measure 108 on page 69 which will consider producing new public information campaigns addressing pedestrian safety taking into account the needs of people who are deaf. We believe that this should be extended to include people with sight loss. We concur with both the positive equality impact and the positive social inclusion impact of this measure by addressing the needs of those who are deaf but wish to see these positive impacts extended to people with sight loss.</p>
	<p>Guide Dogs welcomes Action Measure 112 on page 70 and the commitment to continue to monitor and where appropriate carry out Northern Ireland specific research into pedestrian and cyclist behaviour with a view to developing further effective policy interventions. Guide Dogs would very much welcome being involved in such research.</p>
	<p>We support the Action Measure 116 to develop a memorandum of understanding between all those attending a collision which would set out responsibilities and procedures. Guide Dogs is in discussion with the NIAS regarding a policy for the carriage of a guide dog where an accident involves a guide dog owner. We concur with the positive equality impact assessment of this measure.</p>
	<p>Although Guide Dogs welcomes Action Measure 131 on page 72 which will consider providing accessible advice and information for people who are deaf. We believe that this should also be extended to those with sight loss.</p>
	<p>Guide Dogs welcomes Action Measure 144 to introduce enhanced regulation of the bus, taxi and freight industries through the Review of the Bus Sector, the introduction of Taxis Act regulations and introduction of the Freight Bill and establishment of a Transport Industry Regulator.</p>

Name	Safer Road User Groups Comments
	<p>We would strongly encourage the Department to amend the current Public Sector Vehicle Accessibility Regulation (NI) to include the provision of audio-visual information for buses to achieve parity with the accessibility regulations for blind and partially sighted rail travellers. We concur with the positive Transport Accessibility impact assessment of this measure but believe the extension of the Accessibility Regulations would have a more significant positive impact. There would then be the potential for a positive social inclusion impact for this measure.</p>
	<p>We support Action Measure 153 on page 75 to work with partners to assess the value of introducing an additional cycle training element to Northern Ireland. We believe that this should include an element on awareness of vulnerable pedestrians to make cyclists more aware of visually impaired road users.</p>
	<p>Guide Dogs welcomes Action Measure 164 on page 77 regarding the safety of older people and that the Department will give further consideration to how we can work with partners including the wider voluntary and community sector to better understand the causes of collisions involving older people and develop strategies to tackle these. Guide Dogs again wish to point out the link between age and sight loss. We concur with the positive equality impact and social inclusion impact of this measure on age and gender, which should make using the road safer for older people and therefore increase their ability to more safely access services in their communities and beyond.</p>
<p>Road Safety Authority (RSA) (ROI)</p>	<p>I am also interested in your plans to develop Graduated Driving Licences to replace the restricted "R" system. The Road Safety Authority is reviewing our driver training, testing and licensing here.</p>
<p>Michael Haslett</p>	<p>An overall strategy should be designed to encourage all drivers to work for advanced drivers tests and regular up-dating tests - perhaps insurance companies could be encouraged to fund this by way of reducing premiums for those that are successful.</p>
<p>Road Safety Committee - North Down and Ards</p>	<p>We feel that the 45 mph speed limit is no longer appropriate with modern vehicles and roads and drivers should be trained to drive at the speed limit and be trained to modify their driving to suit the prevailing conditions.</p> <p>The existing arrangements for training and testing of new drivers is no longer adequate for the prevailing conditions and circumstances today and need to be updated at an early stage.</p>
	<p>The current Cycling Proficiency Scheme in NI is outdated and needs to be replaced with a Scheme of similar standard to the Cycling England Scheme.</p>

Name	Safer Road User Groups Comments
	<p>All road users need to be continually reminded and encouraged on proper road user skills to enable them to cope safely with modern traffic conditions and standards. The use of high profile TV advertising campaigns with a local flavour undoubtedly influences better behaviours. However this must be complemented and supported by ongoing campaigns and the dissemination of road safety information to ALL Road User Groups. The DoE Road Safety Education Officer Service seems to be principally concerned with encouraging Teachers at Primary School level to promote and teach Road Safety. The Road Safety Materials readily available seem to only support that programme. The DfT by comparison has a large range of promotional and informational materials which are readily available for most situations and user groups. Some materials are available from PSNI.</p>
	<p>The Strategy plans to Audit the Road Safety Education Service but that seems to suggest checking compliance with existing procedures. We feel that a full review should be undertaken of the existing arrangements. The review to consider where Road Safety Officers should be in the Organisation. Surely the Highway Authority should also have full responsibility for Road Safety. There is a role for Road Safety at local council level which is much closer to the problem. The Review should also consider the qualifications and training for Road Safety Officers. Recruitment of Road Safety Officers should be open to the Public rather than by internal selection as is present. This would ensure that recruits could be attracted from people with a wider range of skills and experience e.g. teachers, police etc.</p>
Ulster Farmers' Union (UFU)	<p>We welcome the suggestion that DOE will look to include a wider range of stakeholders in the monitoring and evaluation of road safety in Northern Ireland. This can bring particular skill and expertise to the discussion and allows a greater understanding of how ideas could be implemented in practice.</p> <p>As an organisation representing most rural road users and with particular expertise, in a particularly confusing area such as agricultural vehicles, we would be happy to lend our support.</p>
	<p>The UFU welcome the commitment to audit road safety educational services if it helps create a more reflective and effective educational service.</p>
	<p>The UFU would have concern over the introduction of a Graduated Driver Licensing system. Raising the age, passenger restrictions and night-time curfews would have a disproportionate effect on young drivers living and working in rural areas. There is an already poor transportation service in parts of rural Northern Ireland, putting a curfew on young drivers and adults will have a negative impact on accessing employment and socialization outlets for young people in Northern Ireland. The reality is that for young people living in rural areas the only feasible transport option is by private car.</p>

Name	Safer Road User Groups Comments
	Raising the driving age would simply push the problems onto an older age group.
	The UFU agree that, as part of the process of learning to drive, learners should have experience of driving on a motorway or dual carriageway. However, we would caution this may not always be feasible for those from rural areas. E.g. those living in the West of the province may have to travel relatively long distances to access a carriageway/motorway. In reality, if enforced, this could add significant cost to lessons and could simply prevent compliant young people from commuting to college, work or social activities.
	The UFU agree that there should be more effective training of new drivers however a competency based approach should be followed. For example, new drivers that originate from farms may have already gained a good competency level from driving agricultural equipment.
	The UFU would suggest the department works closely with insurance companies to try to devise greater incentives for good driving and the completion of further training e.g. a reduction in insurance premiums if certain courses are completed e.g. night-time driving.
	During driver training young drivers need to be tested more on how to react to certain situations e.g. passing livestock on the road, overtaking a horse rider etc.
	The UFU accept that this could be an effective deterrent for unroadworthy vehicles/drivers but feel that it is unworkable. Freight drivers could end up reaching the maximum permitted penalty points very quickly. If such a system was to operate then there would need to be either an extension to the number of permitted penalty points or there should be two scales of points e.g. one for driving offences and one for other offences. This issue would need further discussion.
	The UFU feel this measure should be the other way round i.e. higher penalties for no insurance. It is highly probable that those driving without insurance would not have a valid MOT thus may be driving an unroadworthy motor vehicle.
	The UFU would suggest the enhanced use of digital display boards showing speed of vehicles. This makes people more aware of the speed they are doing.
	The UFU would be concerned about this measure, as a person on-foot cannot effectively judge speed of passing vehicles.
	There must be a strong case presented, outlining the evidence of value for their erection.
	The UFU feel some road signs can be distracting and just represent information overload for drivers.

Name	Safer Road User Groups Comments
	The UFU consider it important to allow the continued use of hands free kits.
	The UFU feel this would be very useful and should not only cover HGV's but also other large vehicles such as tractors and trailers etc
	The UFU feel this measure needs further discussion. This would be over bureaucratic for small businesses, whose employees may only drive for work occasionally.
	The UFU agree with this measure, as this is particularly relevant for rural roads which are often not connected to street lights. We would suggest that this measure applies to all cyclists, pedestrians and horse riders.
	We suspect the process outlined in this measure already happens in reality and do not see why a paper trail needs to be created.
	We strongly oppose this proposal; it is unfair to impose this extra cost onto companies.
	We do not consider this measure necessary. We would however suggest, more public education/communication of agricultural operations, what to expect and when to expect it. E.g. During May there will be a lot of tractors and silage trailers on the road requiring a wide swing into field entrances.
Belfast City Council (BCC)	In relation to the comments above [Note: see Annex F (2) and BCC comments on working with local authorities] the measures relating to "lower level" road safety plans, allowing local government to link with and influence the overall government framework are welcomed (Actions 115, 117). The report acknowledges links between deprivation and higher levels of accidents. The localised approach advocated is deemed beneficial to address specific community circumstances in Belfast.
	BCC is strongly supportive of the need for clear lines of responsibility to be agreed and adhered to. Leadership of the Roads Safety Strategy needs to be clear as does accountability for delivery of respective actions.
	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)
	BCC is committed to promoting cycling as a means of sustainable travel in the City. We would seek reassurance that all available measures are put in place to enhance safety for cyclist road users including extended provision of dedicated or shared cycle lanes. While acknowledging in Action 112 to carry out research on cyclist behaviour, we note that statistics relating to road accidents involving cyclists are not included in the document. We would request that such statistics are included in the final strategy to draw attention to the need to improve safety measures for cyclists.

Name	Safer Road User Groups Comments
	The Council endorses the proposal for the establishment of an Active Travel Forum and would seek to be represented on the forum
	BCC welcomes the commitment to work with representatives and associations to promote and assure road safety. In particular we recognise the need to support migrants who comprise an increasing proportion of the local population.
	We would seek involvement in the ambition to work with sporting associations given Council's role in sports development.
	The proposal to develop measures to educate on legal and safety issues regarding vehicles not normally used on public roads is important. BCC is currently addressing the unlawful use of vehicles such as quads on Council open spaces. We would welcome the opportunity to have input to the development of this measure.
Institute of Public Health In Ireland	Facilitating active travel - The strategy also has a number of cross-cutting themes which will impact on active travel ie move from a reliance on private cars to walking, cycling and increase use of public transport. Reducing motorised traffic speed limits can enhance active travel such as walking and cycling, thus increasing physical activity levels in communities. This will help to decrease greenhouse gas emissions which can contribute to combating climate change and thus support the Department for Regional Development (DRD) drive for a Sustainable Transport system and modal shift towards active travel. The health outcomes from active travel include increasing physical activity levels which can contribute to tackling obesity in Northern Ireland.
	IPH welcomes the establishment of an Active Travel Forum but would like to highlight that the DRD has just set up such a group. IPH recommend that one group is established to look at a range of active travel issues concerning DoE, DRD and others. Health is a key sector which needs to be represented on the group. This will also promoted joined-up working between sectors to enhance information sharing practices and initiatives in identified areas.
	IPH strongly supports cycling as a means of increasing physical activity as well as being good for mental health but recognises that the vulnerability of cyclists compared with other road users can have potentially negative impacts on health. While the evidence clearly shows that wearing a helmet is protective, particularly for some groups, there is some evidence which suggests that making the wearing of helmets compulsory for all groups may reduce the likelihood of some people cycling. IPH would support a thorough and objective review of the evidence both for and against legislation in relation to cycle helmets.
	Cross-sectoral work is essential to promote road safety. Education and health are key sectors alongside local authorities. Local transport plans are proposed for local government under the Review of Public Administration which will promote local involvement. Road safety is a

Name	Safer Road User Groups Comments
	key issue which needs to be included in these plans alongside consideration as part of the community planning process and the power of wellbeing.
	A number of groups are identified as being particularly vulnerable in relation to road safety which include children and young people, older people and people from lower socioeconomic groups. IPH welcome the consideration of additional measures to protect these groups.
Daniel Mulholland	<p>In reality there are only four types of road users:</p> <ul style="list-style-type: none"> - Those who use our roads safely - Those who kill / cause injury to themselves. - Those who kill / cause injury to other road users - Those who kill / cause injury to themselves and to road users.
	Increasing the age to 18 that you can apply for a provisional license.
	<p>Evidence from research carried out in America showed that the only way to reduce road deaths amongst young drivers was to raise the age that they were permitted to drive. No other measures were effective in doing this!</p> <p>Training does not reduce road deaths or accidents by young drivers the most significant factor is the age at which they first drive on the road.</p>
Freight Transport Association	<p>We fully support any work between the governments of Northern Ireland and the Republic of Ireland so that common standards are applied throughout both sides of the Land Border.</p> <p>This is essential for all of the enforcements bodies and road users as the road safety practices, policies and operational arrangements need to be more closely aligned with each other.</p> <p>All enforcement bodies should establish and share a comprehensive database of non-compliant operators in the commercial HGV and PCV sectors.</p>
	The Irish government plans to modernise its data recording systems and there may be scope for assistance from NI and GB to ensure compatibility of systems for the future sharing of information.
	The DVA driver licence database needs to be linked to DVLA Swansea so that the GB enforcement agencies can readily view data recorded for visiting NI drivers. Currently NI commercial vehicle drivers are subject to uncertain delays when stopped at roadside checks in GB.
	Road Safety Education: It is clear that there is a problem with some aspects of the sharing of road space between cyclists and heavy vehicles – particularly articulated vehicles. Reports have indicated that more than half of the cyclist deaths on inner city roads each year have involved a commercial vehicle. There is often a tendency, however, to assume that because the commercial vehicle is bigger and the cyclist is

Name	Safer Road User Groups Comments
	<p>the victim it must be the lorry driver who is at fault. In order to be addressed the problem must be better understood. The Freight Transport Association has taken a number of positive steps to address the situation.</p>
	<p>The two sides of the problem need to be dealt with by awareness training.</p> <p>Recent legislation requires Commercial vehicles to be retro fitted with additional mirrors to minimise 'blind spots' to the near side and frontal areas when viewed from the driving seat. Cyclists need awareness training in relation to the wide turning swing required by Buses and HGV's when turning left at road junctions. Cyclists are often between a vehicle and the kerb heading straight on at road junctions, whilst a large Bus or HGV is indicating to turn left but the cyclist is not aware of this. More training is required to educate HGV and PCV drivers to think about cyclists and equally cyclists require more education and training on how to position themselves when in the vicinity of large vehicles.</p>
	<p>FTA supports the call for analytical work to be undertaken to investigate the causes of cyclist deaths involving commercial vehicles and for its findings to be acted upon. The need for cyclist training in road awareness must be recognised and the Cycling Proficiency Scheme must place greater emphasis on riding in the vicinity of buses and HGVs. Training for both cyclists and HGV/PCV drivers should be encouraged and should include an element of CHANGING PLACES so that each other is fully aware of the risks involved.</p>
	<p>Highway Code: It is clear that collisions often occur because road users are caught out by unexpected – although natural and correct – behaviour of large commercial vehicles, particularly articulated trailers. Collisions could be avoided if road users were more aware of their own responsibilities around lorries. At present, the Highway Code includes sections on how to behave around other cars, cyclists, motorcyclists and even those using powered mobility scooters.</p> <p>The Highway Code should include a specific section on sharing the roads with large commercial vehicles which would be testable at both theory and practical driving tests for car drivers and motorcyclists.</p>
	<p>Driver Training/Driving for Work: FTA encourages the development of a voluntary learning initiative for Light Van Drivers. This should include the correct procedures for securing loads in vans. It should also state the legal requirements for the carriage of passengers in vans.</p>
	<p>Employers should be regularly made aware of their legal obligations to manage occupational road risks. The Driver Certificate of Professional Competence (DCPC) is now mandatory and should deliver significant benefits to all the self-employed as well as employers through a wide variety of training modules. Advanced Driver training has also been shown to contribute to reduced collision levels within the industry.</p>

Name	Safer Road User Groups Comments
	<p>Graduated Driver Licensing: FTA supports a speed review linked to Graduated Driver Licensing.</p> <p>We also support the plan to provide motorway driving and variable road condition driving experience for younger drivers.</p>
The British Horse Society	<p>Motorists and motorcyclists require education, as part of the driving test, on how to approach and behave around horses and riders. (Motorists who approach and pass at speed and do not understand nor heed the requests of horse riders are extremely dangerous. Simple courtesy on both sides would produce a safer and more harmonious outcome.)</p>
	<p>Cyclists and walkers likewise would benefit from education on how to approach and behave around horses and riders. (Simply speaking to the horse rider can alleviate many dangers for both parties)</p>
	<p>Horse Riders would benefit from education on how to dress for safety on the roads and how best to negotiate the dangers of riding on our busy roads. We would advocate the compulsory wearing of riding hats to an approved safety standard and hi-viz clothing when riding on the roads.</p> <p>(The wearing of hi viz clothing would increase the visibility of horse and rider to all other road users and therefore increase the response time, enabling the road user to reduce speed sufficiently to safely pass the horse and rider).</p>
	<p>It should be made compulsory that all horse riders must wear riding hats to an approved standard whilst riding on the roads and that they must also wear appropriate reflective and fluorescent clothing in all weathers.</p>
	<p>Safer Roads - should read:- "Urban roads, where small increases in speed, between 20 to 30 mph and 30 to 40 can significantly change the outcome of collisions involving motor vehicles and pedestrians, cyclists and horse riders.</p> <p>Horse riders excluded, should read: - "The revised strategy will take a balanced approach to travel needs, including public transport and active travel such as walking, cycling and horse riding. The safety of all users of the transportation network will continue to be an important part of the revised Strategy and we will continue to consider the needs of all road users including vulnerable users such as motorcyclists, children, cyclists and horse riders, when designing new transportation infrastructure and implementing safety features on existing network."</p>
	<p>The BHS Riding and Road Safety Test should be promoted as a valuable addition to training and education of road users.</p> <p>The BHS Riding and Road Safety Test and associated knowledge and information can be used to develop the education of drivers, whether they are learners or established drivers. We have worked with the Road</p>

Name	Safer Road User Groups Comments
	Safety Education Office and the Department of the Environment to produce a number of educational booklets: 'Horse Sense for Riders and Motorists' and 'Safer Towing'.
	Case studies on how to drive around horses and horse riders should be included within the foundation certificate. (Cross – reference Action Measure 101, 105)
	The Active Travel Forum should include representation from Horse Riding i.e. the Equine Council for NI – the British Horse Society.
Julian Black	Mention is made in the consultation document of introducing an additional cycle training element. May I respectfully suggest that it is the motor vehicle drivers who require cycle awareness training, not the other way around? The average motorist will rarely if ever have attempted to negotiate the roads by bike. Most cyclists will however also be vehicle drivers. Only those few drivers who also cycle can properly appreciate the dangers posed to unprotected cyclists by their motor vehicles. Why then does the consultation document wish to increase the awareness of cyclists and not, as is appropriate, drivers?
NI Assembly Environment Committee	<p>The Committee is aware that for any strategy to work there must be effective enforcement of the actions contained within it. Members heard concerns from the Driving Instructors Association NI that there was an unchallenged increase in illegal instructors and that there was a general disregard for legislation in relation to driving instructors. The Department has written to the Committee informing members that the provision of training is not currently regulated and, as such, the Agency does not routinely undertake spot checks.</p> <p>The Committee recommends that the Department undertakes an urgent review of driving instructor licensing with a view to introducing regulations that will implement improved training of driving instructors, better information about instructors and ensure that effective enforcement is introduced.</p>
	<p>The Committee is open in principle to and recognises the potential benefits of the introduction of a Graduated Driving License Scheme but believes that the introduction of such a scheme must be based on best practice in other areas. Members are aware that there are potential negative areas for young people within such a scheme but the Department could try to mitigate these by talking directly to young people to achieve buy in. There are also potential cost implications for young people and Coleraine Road Safety Committee and NICCY suggested to the Committee that that assistance with the costs may help to get support from young people.</p> <p>Representatives from the road haulage industries, Coleraine Road Safety Committee and NICCY were all in support of a Graduated Driving Licence Scheme as the feeling is that there is a real need to put the emphasis on training drivers to have a life skill and be fit to drive on the road in all conditions and not simply on passing a one-off test.</p>

Name	Safer Road User Groups Comments
	<p>The idea of a night time curfew for young drivers was also discussed at evidence sessions that the Committee held and members agreed with the Ulster Farmers' Union view that it would have a serious impact on rural communities as there is no viable alternative transport system to avail of and that such a system would be unenforceable and unworkable. An alternative suggestion to a night time curfew may be that young drivers could have a limit on the amount of passengers allowed.</p>
	<p>The Committee recommends that the potential of a graduated driving license for Northern Ireland is examined; looking in particular at best practices in other areas. Potential negative impacts of such a scheme for young people should be mitigated by engaging directly with young people to encourage their 'buy-in'. Mechanisms for reducing and assisting with cost implications should also be examined.</p>
	<p>The Committee heard from Right to Ride that driver attitude to other road users remains a big problem and that there needs to be a campaign by the Department aimed at promoting greater awareness of other more vulnerable road users. The group also informed members that current cycle training is not appropriate as it was established in 1932 and has not developed to today's road conditions and that there needs to be an urgent review of the training.</p> <p>The Committee recommends that the Department reviews the current cycling scheme within the next 6 months and that the Department launches an awareness campaign highlighting the dangers for vulnerable road users such as cyclists.</p>
	<p>The Committee also recommends that the Department makes use of social networking sites to convey the road safety message to a young audience and that there is a joined up approach with the Department of Education when it comes to building road safety into the curriculum.</p>
	<p>Representatives of the road haulage industry informed the Committee that more work needs to be done in educating other road users about the different manoeuvres HGV drivers have to make because of the size of the vehicle. Members supported the organisations' calls for the need to develop a publicity campaign, possibly including the preparation of a DVD or an internet video clip, to educate car drivers, cyclists and pedestrians.</p>
	<p>The Committee is very supportive of the advertising campaigns run to date by the Department but recommends that the Department enhances the road safety message by linking up with sporting organisations to target the most vulnerable group when it comes to road safety, 17 – 24 year olds.</p>
	<p>The Committee is keen to see more innovative approaches that provide incentives for better driver behaviour and see a role for technology in this regard having been briefed by a company offering black box vehicle technology.</p>

Name	Safer Road User Groups Comments
	The Committee recommends that the Department continues to liaise with insurance companies to encourage them to avail of modern technology that will provide insurance incentives for all drivers, but young drivers in particular.
Synopsis of the evidence taken by the Environment Committee from organisations on the Road Safety Strategy Consultation	<p>Suitable Sentencing - let the time fit the crime (Association of Driving Instructors Association NI)</p> <p>Effective Enforcement needed (Association of Driving Instructors Association NI)</p>
	<p>Cross border enforcement operations extremely important (PSNI)</p> <p>Wider application of SPECS technology needed (PSNI)</p>
	<p>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. (FTA)</p> <p>The DVA driver licence database needs to be linked to DVLA Swansea so that the GB enforcement agencies can readily view data recorded for visiting NI drivers. Currently NI commercial vehicle drivers are subject to uncertain delays when stopped at roadside checks in GB. (FTA)</p> <p>FTA supports a speed review linked to Graduated Driver Licensing (FTA).</p> <p>We also support the plan to provide motorway driving and variable road condition driving experience for younger drivers. (FTA)</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. (FTA)
	Preparation for using the road is just as important as how the road is actually used (RCN)
	<p>Amendments needed to the Driving/Riding Test (Association of Driving Instructors Association NI).</p> <p>Retesting and Advanced Driving needed (Association of Driving Instructors Association NI).</p> <p>Re-evaluation of a Driving Licence - not a right (Association of Driving Instructors Association NI)</p>
	<p>Night-time and rural driving should be a training requirement in order to complete the driving test, for all drivers (UFU).</p> <p>The UFU is opposed to the idea of a night time curfew as it would have a</p>

Name	Safer Road User Groups Comments
	serious impact on rural communities as there is no viable alternative transport system to avail of. Such a system would be unenforceable and unworkable. It was suggested that, instead of a curfew, young drivers could have a limit on the amount of passengers allowed (UFU)
	<p>The reported Low Standard of persons entering the Driving Instructor Profession as Trainees (Association of Driving Instructors Association NI)</p> <p>The uncontrolled issuing of both Full and Trainee Instructor Licences by DVA ADIs 2008 (1003) 2009 (1126) 2010 (1150+) averaging over 2 new per week over 100+ per year (Association of Driving Instructors Association NI)</p> <p>Stop the issuing/reissuing of PDI licences which allows unqualified persons to teach Learner Drivers for reward and also withdraw all existing PDI licences (Association of Driving Instructors Association NI)</p>
	Supportive of Graduated Driving Licence Scheme (PSNI)
	Support for GDL based on best practice in other areas, there are potential negative areas but DOE should seek to mitigate these by talking to young people to achieve buy in. Cost implications for young people are a potential negative but assistance with cost may help (NICCY)
	Driver training must reflect the importance of safe attitude and reconnect drivers to the risks and outcomes arising from improper and antisocial driving behaviour (CTC)
	More emphasis should be put on training drivers to be fit to drive on the road and not simply on passing a one off test. Very much in support of GDL. (Coleraine Road Safety Committee)
	Education in Primary Schools - pupil power (Association of Driving Instructors Association NI)
	<p>Social networking sites may be another way of getting the road safety message across to young people (NICCY)</p> <p>Use of groups such as the Participation Network may help the Department in getting the message across (NICCY)</p> <p>Need for joined up approach with the Department of Education when it comes to building road safety into the curriculum to build life skills (NICCY)</p>
	Develop publicity campaign , including preparation of a DVD , to educate car drivers , cyclists and pedestrians about the different manoeuvres HGV drivers have to make because of the size of the vehicle e.g. when turning corners, changing lanes etc. (RHA)

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	<p>FTA supports the call for analytical work to be undertaken to investigate the causes of cyclist deaths involving commercial vehicles and for its findings to be acted upon. The need for cyclist training in road awareness must be recognised and the Cycling Proficiency Scheme must place greater emphasis on riding in the vicinity of buses and HGVs. Training for both cyclists and HGV/PCV drivers should be encouraged and should include an element of CHANGING PLACES so that each other is fully aware of the risks involved. (FTA)</p>
	<p>More resources should be given to PSNI Road Policing to promote their road safety education role in conjunction with the DOE Road Safety Education Officers. (Coleraine Road Safety Committee)</p>
	<p>FTA encourages the development of a voluntary learning initiative for Light Van Drivers. This should include the correct procedures for securing loads in vans. It should also state the legal requirements for the carriage of passengers in vans. (FTA)</p>
	<p>Employers should be regularly made aware of their legal obligations to manage occupational road risks. The Driver Certificate of Professional Competence (DCPC) is now mandatory and should deliver significant benefits to all the self-employed as well as employers through a wide variety of training modules. Advanced Driver training has also been shown to contribute to reduced collision levels within the industry. (FTA)</p>
	<p>Legislation needed for compulsory cycle helmets etc (Association of Driving Instructors Association NI)</p>
	<p>There is anecdotal evidence that drivers who have undertaken third level on road cycle training make better progress when learning to drive and become safer drivers. The value of cycle training for bus and lorry drivers should be explored. (Right to Ride) Current cycle training not appropriate – established in 1932 and has not developed to today’s road conditions (Right to Ride)</p> <p>Need for the introduction of new cycle training – Bikeability – currently extremely successful (IPSOS/MORI survey 2010) and available to 80% of schools in England and Wales. This includes an on road element not just playground based as the current DOE Cycle Proficiency Scheme. Current system is no longer fit for purpose (Right to Ride)</p> <p>Pilot schemes have already proved highly successful in NI; however the need now is to review the current system within the next 6 months and would urge the Committee to support this issue. (Right to Ride)</p>
	<p>Driver attitude – greater awareness of other more vulnerable road users is essential and could achieved easily through similar successful Departmental campaigns like those on drink/drug driving. (Right to Ride)</p>