



Department for
Infrastructure
An Roinn
Bonneagair
www.infrastructure-ni.gov.uk

**A Consultation
on the Proposed Content
of the new Road Safety Strategy
for Northern Ireland to 2030**

Towards Zero: Connecting Communities: Safer Roads for All



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Ministerial Foreword



// I am delighted to share with you this consultation document on the development of a new Road Safety Strategy for Northern Ireland (NI) to 2030.

Road Safety is an issue that impacts on all of us in our everyday lives. While we all have a personal responsibility to drive, cycle, wheel or walk in a way that keeps ourselves safe, we need to be mindful that responsibility is all the greater where we have the potential to do greater harm to other road users. As Minister for Infrastructure, I am aware of the ongoing challenge that road safety presents to us all and am committed to the ongoing development of a safe and sustainable transport network that prioritises walking, wheeling and cycling, connects communities, keeps us free from road traffic harm and meets the needs of all of our citizens.

The previous strategy set out the government's approach to improving road safety for all road users over the 10 year period to 2020. While the progress against the targets and indicators that has been evidenced is promising, there is a need for us to remain diligent and to build on the successes to date. This includes my Department's ongoing Share the Road to Zero road safety community campaign which aims towards zero road deaths in NI. Every death or serious injury is of immense regret and we must strive to remain focused on making greater gains in improving the level of road safety here.

In the current context, the Executive continues to face many challenges as we emerge from the Covid-19 pandemic; however road safety remains a priority. The new Road Safety Strategy will play a pivotal

role in supporting policies across a number of Executive priorities including sustainability, economic development, climate change and active travel.

My plans for the future strategy are to build on work that has been taken forward over the course of the previous strategy and to address the challenges that have been identified by setting out, at a strategic level, the direction upon which future road safety policies and actions will be based. This document sets out my proposal for the new Road Safety Strategy to be founded on the internationally recognised 'Safe System' principles and to adopt an outcomes based approach, reflecting the Executive's commitment to taking such an approach in the development of its Programme for Government (PfG). This means that there must be a focus on safe road use; safe roads and roadsides; safe vehicles; safe speeds; and better post-crash response as well as a range of associated activities, including performance monitoring and reporting.

The purpose of the consultation is to seek your views on this proposed approach to road safety and the issues that we need to address. The consultation is aimed at everyone, recognising that all road users have a part to play in the success of the strategy by helping to keep our roads safe for themselves and others. It sets out a renewed focus on making our roads safer to use for all - particularly those who are more vulnerable - and reducing the number of people killed or seriously injured on our roads. One life lost is one too many and there is more we can and must do.

Once the responses to the consultation have been analysed, my officials will provide me with a report for my consideration so that a final strategy can be issued in spring 2022. I encourage you to consider this document and look forward to hearing your views which will help to shape and inform the way ahead.

Nichola Mallon MLA
Minister for Infrastructure

1: Introduction

// The latest World Health Organisation (WHO) Global Status Report on Road Safety 2018 reports that the number of deaths on the world's roads remains unacceptably high, with an estimated 1.35 million people dying each year¹.

While a number of countries have seen success in reducing road traffic deaths over the recent years, progress varies significantly between the different regions and countries of the world. The progress that has been achieved in a number of countries to stabilise the global risk of dying from a road traffic crash has not occurred at a pace fast enough to compensate for the rising population and rapid motorization of transport taking place in many parts of the world. The report does however show that progress is being made in improving key road safety laws, making infrastructure safer, adopting vehicle standards and improving access to post-crash care. Further progress will depend upon the future success in addressing the range of significant challenges which remain.

In a Northern Ireland context, it is clear from the data that there has been considerable success in recent years. The most recent Northern Ireland Statistics and Research Agency (NISRA) Northern Ireland Road Safety Strategy to 2020: Annual Statistical Report 2021² confirms that 3 of the 4 targets in the Road Safety Strategy to 2020 have been achieved. Deaths and serious injuries (KSIs) have reduced by 55% and 30% respectively

in 2019 from the strategy baseline (2004-2008). Children (-44%) and young people KSIs (-53%) also showed large decreases. It should be noted that the Covid restrictions mean that data for 2020 is more difficult to interpret in terms of meaningful trends.

This consultation seeks views on the proposed approach to a new Road Safety Strategy to 2030. The purpose of the strategy is to continue our efforts in addressing important road safety issues by providing a framework for government and other road safety stakeholders to establish their own road safety plans, objectives and interventions to eliminate road crashes which result in serious injuries or fatalities.

The challenge is for the strategy to avoid complacency and to build on the progress that has been made towards saving lives and preventing injuries so that Northern Ireland continues to have one of the lowest death rates in Europe. This will ensure that the benefits achieved against the previous strategy and targets can be built upon and enhanced.

This strategy is being developed using the Outcomes Based Accountability (OBA) approach, which provides an evidence based way of working and focuses attention on the outcomes we seek to achieve and the impact of our actions on our people. This approach is consistent with the Executive agreed approach to the development of its Programme for Government (PfG), an essential aspect of which is government working in partnership with people and communities everywhere to identify and deliver actions to improve people's health and wellbeing. This strategy, and the outcomes that it seeks to achieve, will support the PfG, when developed, by outlining the key road safety outcomes through which we will seek to deliver a real and lasting impact on road safety and in turn contribute to the wellbeing of our people.

1. https://www.who.int/violence_injury_prevention/road_safety_status/2018/en/

2. <https://www.infrastructure-ni.gov.uk/system/files/publications/infrastructure/ni-road-safety-strategy-to-2020-annual-statistical-report-2021.pdf>

It is proposed that the new strategy will be informed by the Safe System principles which involve a holistic view of the road network and interactions among various types of road users, roads and roadsides, travel speeds and vehicles. It is hoped that the application of the Safe Systems approach to road safety, which addresses all elements of road safety in an integrated way, will facilitate further long term reductions in fatalities. These Safe System principles recognise that some road users are more vulnerable, and that people will always make mistakes and may have road crashes, but that those crashes should not result in death or serious injury.

We all have a role to play to make every journey safe. This includes engineers building better roads, agencies such as the Driver and Vehicle Agency (DVA) testing and enforcing vehicles to ensure they are safe and roadworthy, the Police Service of Northern Ireland (PSNI) ensuring the rules of the road are being adhered to, health professionals providing after-crash care, and individuals making informed and careful choices to ensure that they connect safely and arrive at their destination without harm to themselves or others.

Following the closure of this consultation, the results will be analysed, along with other sources of evidence, and a report provided to the Minister for her consideration in advance of the next steps being taken (see Section 4).

How to respond

The 8 week consultation period will begin on 15th November 2021 and end on 10th January 2022. Responses should be submitted to: <https://consultations.nidirect.gov.uk/dfi-1/road-safety-strategy-for-ni-to-2030>

Please ensure that your response reaches us by the closing date.

If you would like further copies of this consultation document, it can be found on the Department's Website or you can contact the Department at safeandaccessibletravel@infrastructure-ni.gov.uk if you would like alternative or

accessible formats (Braille, audio CD, etc.).

When responding, please state whether you are responding as an individual or representing the views of an organisation or group. If responding on behalf of a larger organisation, please make it clear who the organisation represents and, where applicable, how the views of members were assembled.

Confidentiality & Data Protection

Information contained in your response may be made public by DfI. If you do not want all or part of your response made public, please state this clearly in the response by marking your response as 'CONFIDENTIAL'. Any confidentiality disclaimer that may be generated by your organisation's IT system or included as a general statement in your correspondence will be taken to apply only to information in your response for which confidentiality has been specifically requested. Information provided in response to this Consultation, excluding personal information, may be subject to publication or disclosure in accordance with the access to information regimes (this is primarily the Freedom of Information Act 2000 (FOIA)).

The Department will process your personal data in line with the Department's Privacy Notice. Personal data provided in response to this Consultation will not be published. If you want other information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence. In view of this, it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

As indicated above, the Department will publish a summary of responses following completion of the consultation process. Your response, and all other responses to the consultation, may be disclosed on request. The Department can only refuse to disclose information in exceptional circumstances. Before you submit your response, please read the paragraph below and it will give you guidance on the legal position about any information given by you in response to this consultation.

The Freedom of Information Act 2000 gives the public a right of access to any information held by a public authority, namely, the Department in this case. This right of access to information includes information provided in response to a consultation or a call for evidence. The Department cannot automatically consider as confidential information supplied to it in response to a consultation or a call for evidence. However, it does have the responsibility to decide whether any information provided by you in response to this consultation, excluding information about your identity, should be made public or treated as confidential.

2: Road Safety Context:



// Progress and Trends

The latest qualitative and quantitative data and engagement shows that good progress has been made during the lifetime of the NI Road Safety Strategy to 2020.

Stakeholder feedback has indicated a strong recognition of the work that has been progressed by the Department for Infrastructure (DfI) over recent years in addressing road safety including:

- effective partnership working with key stakeholders, including the PSNI, via the Northern Ireland Road Safety Partnership (NIRSP), and with Sustrans on the delivery of the DfI/PHA funded Active School Travel Programme;
- effective promotion and advertising campaigns, including TV and other media advertising, including a coordinated media calendar with the PSNI;
- effective delivery of education programmes on road safety issues, including driver

improvement schemes such as Speed Awareness Courses and the Cycling Proficiency Scheme;

- the joint protocol between the DfI and PSNI for managing incidents on the Strategic Road Network along with effective collision investigation and recording; and
- initiatives including the 20mph speed limit at schools, facilitating the introduction of Speed Indicator Devices (SIDs), the positive contribution to the elderly and disabled through the Community Transport Partnership (funded by DfI and DAERA), and the positive impact for motorcyclists on allowing them access to bus lanes.

Statistical analysis has shown progress on the 2020 strategy and against the 4 principal targets. Trends are shown over a number of years, not least because of the potential impact of the Covid-19 restrictions on the figures for 2020.

Target 1:

To reduce the number of people killed in road collisions by at least 60% by 2020.

In 2020, there were 56 such fatalities recorded by the PSNI. This represents a reduction of 55% from the 2004-2008 baseline figure (126), and no change from 2019. There has been a relative levelling off in the number of fatalities in the last three years. The 2020 target was not met, with six more fatalities being recorded than the target. (See Chart 1.)

Chart 1: Number of road traffic fatalities, 2004-2020



Target 2:

To reduce the number of people seriously injured in road collisions by at least 45% by 2020.

In 2020, 596 people were seriously injured (SI) in collisions on Northern Ireland’s roads. This is 46% less than the baseline figure of 1,111 and 15 fewer people seriously injured than the target, the first year that this has been achieved. SI numbers have fallen considerably since the baseline and the annual percentage decrease of 23% over the year to 2020 was the largest percentage decrease of the series. (See Chart 2.)

Target 3:

To reduce the number of children (aged 0 to 15) killed or seriously injured in road collisions by at least 55% by 2020.

In 2020, there were 55 children killed or seriously injured in road collisions in Northern Ireland; sixteen (23%) fewer than in 2019, the lowest number of annual child KSIs since the strategy began. The 2020 figure represents a reduction of 57% from the baseline figure (128) and is 5% below the target. (See Chart 3.)

Target 4:

To reduce the number of young people (aged 16 to 24) killed or seriously injured in road collisions by at least 55% by 2020.

In 2020, there were 128 young people killed or seriously injured in road traffic collisions in Northern Ireland, which was 26% less than the number recorded in 2019, and 65% less than the baseline figure of 366. This is the lowest annual number of young people KSIs recorded and the first time annually that the target has been achieved. (See Chart 4.)

Chart 2: Number of road traffic serious injuries, 2004-2020

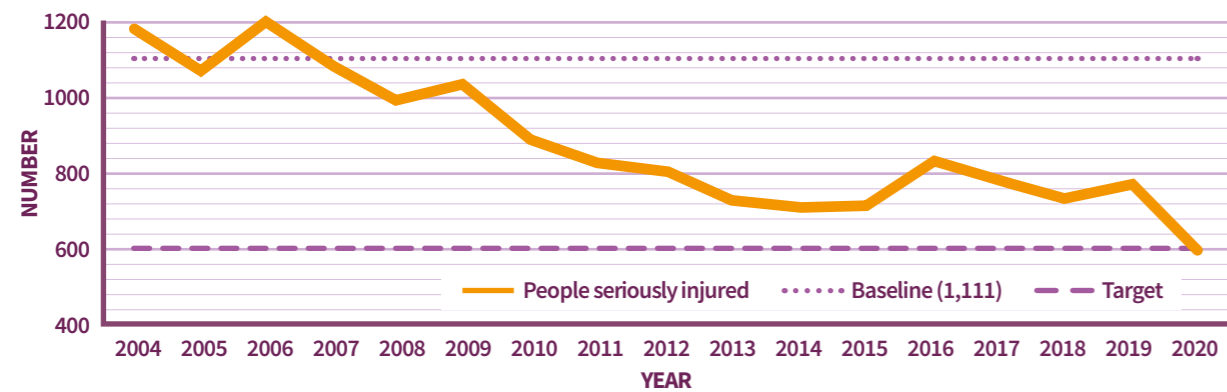


Chart 3: Number of children (aged 0 to 15) killed or seriously injured (KSIs) in road collisions, 2004-2020

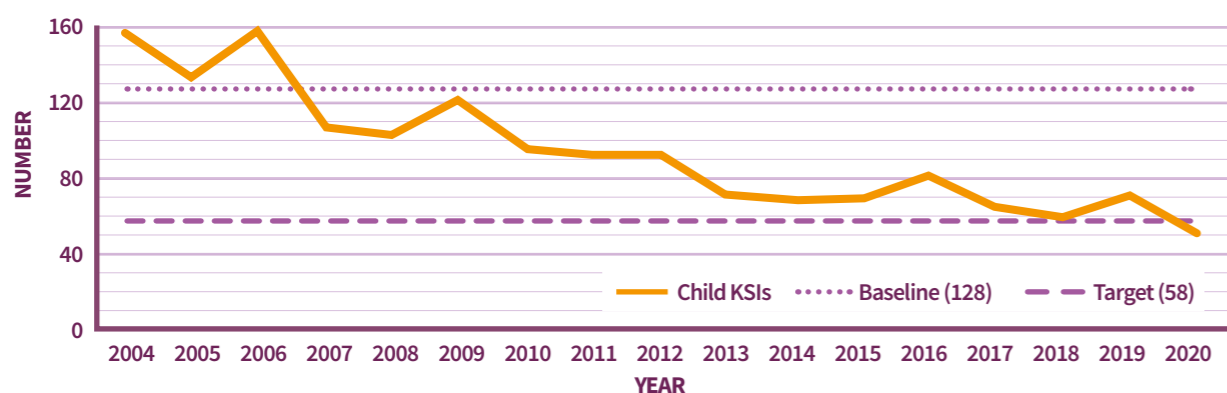
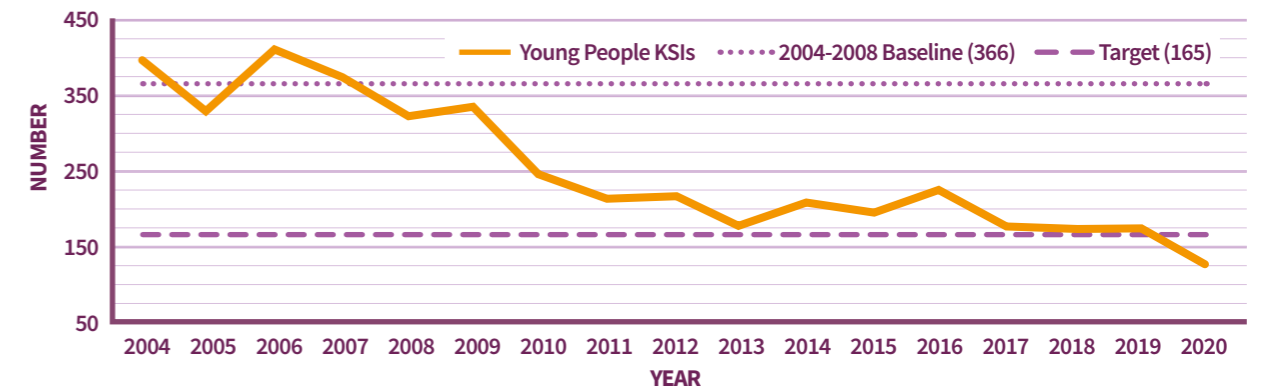


Chart 4: Number of young people (aged 16 to 24) killed or seriously injured (KSIs) in road collisions, 2004-2020



Since the strategy baseline, the period of greatest reduction in KSIs appears to be associated with falling numbers of driving tests applications, speeding and drink driving detections and increases in advertising spend and seatbelt wearing. There has also been greater exposure to risk from increased travel of those more vulnerable road users, which may to some extent, have offset the observed improvements in KSIs. The more recent changes in the KSI trend have coincided with either a slowing or reversal of trend in many of these key road safety factors. Covid-19 restrictions within the last year have had an impact on the fall in the number of road traffic collisions and casualties recorded.

A short paper which compares the Northern Ireland fatality rate in 2018 to other countries is available at **International comparison of road traffic fatalities 2018**.

Regarding the monetary value of avoiding casualties, in 2019, the Department for Transport set the average value of prevention per road traffic casualty at £2,029,237 for a fatality, £228,029 for a serious injury and £17,579 for a slight injury⁴. Review of other international strategies has identified that both International Road Traffic and Accident Database (IRTAD) countries and EU countries have adopted strategies and targets based on the **EU Road Safety Policy Framework 2021-2030 – Next steps towards ‘Vision Zero’**⁵.

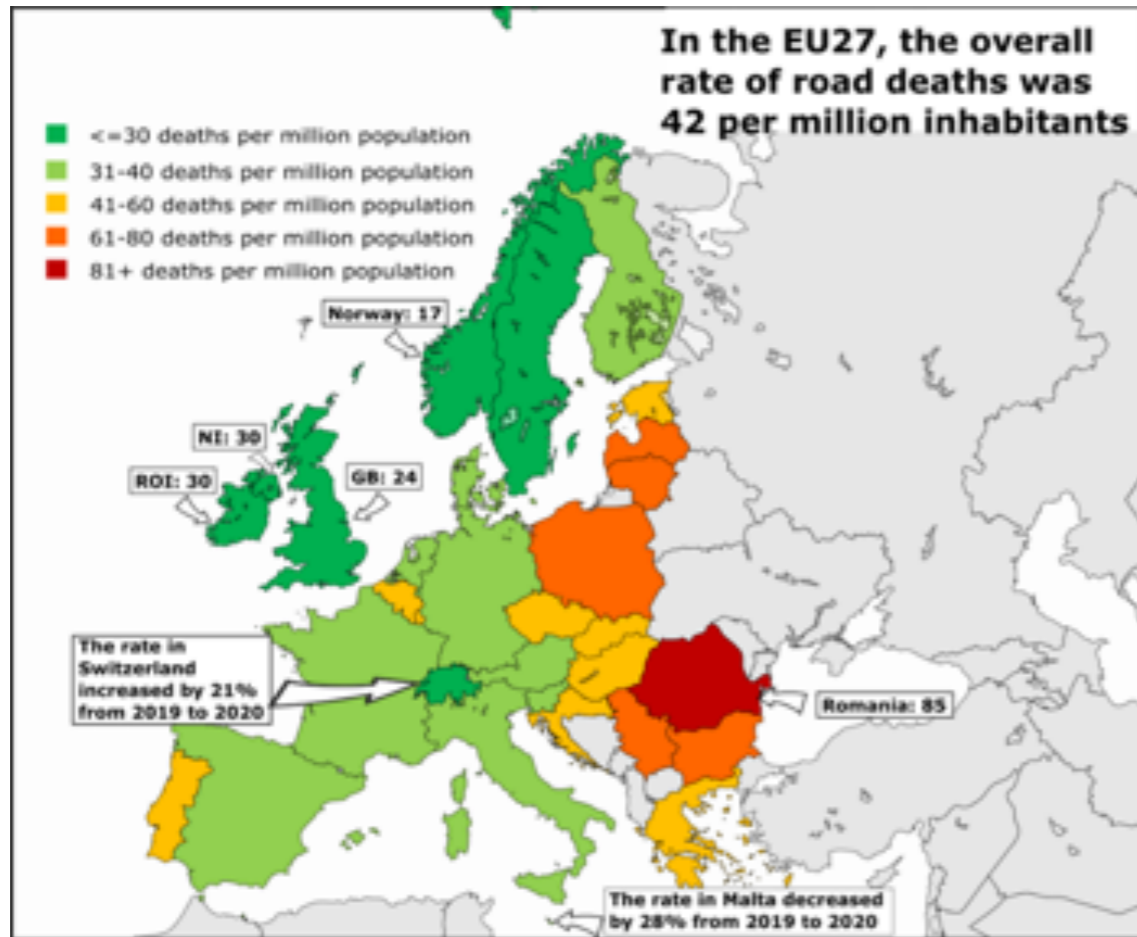
Road Safety in an International Context

Comparison of international data 2020³ shows that NI is one of the best performing EU countries in terms of road safety and in an international context, Northern Ireland has a similar death rate to the Irish Republic (approximately 30 per million inhabitants) and a higher rate than Great Britain (24). Elsewhere in Europe, Norway has the lowest (17) while Latvia and Romania have the highest (73 and 85 respectively). (See Map 1)

This framework is based on the Safe System approach which is derived from European best practice and now recommended globally by the World Health Organization and reframes road safety policy by focusing it on preventing deaths and serious injuries. Most developed countries recognize that, in order to achieve further reductions in KSIs a step change in road safety delivery is required: from providing focus for improved joint working, to embedding the Safe System ambition and approach into the delivery of national and local activity.

3. 15th Annual Road Safety Performance Index (PIN) Report | ETSC
 4. <https://www.gov.uk/government/statistics/reported-road-casualties-great-britain-annual-report-2020/reported-road-casualties-great-britain-annual-report-2020>
 5. <https://op.europa.eu/en/publication-detail/-/publication/d7ee4b58-4bc5-11ea-8aa5-01aa75ed71a1>

Map 1: EU27 Road Deaths



3. Our Road To Safety:



// Strategic Approach

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

For example road safety has close linkages with policies on transport, infrastructure, planning, health, education, emergency services, energy, environment, technology and justice, among others.

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

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

It is intended that the Road Safety Strategy for Northern Ireland to 2030 will be directly linked to the outcomes framework which was developed and consulted on to support the Programme for Government (PfG). This outcomes framework adopts the Outcomes Based Accountability (OBA)⁶ approach which provides a blueprint for cross-cutting and collaborative working - both within central government and with a wide range of delivery partners in other sectors: in local government, in the community and voluntary sectors and with the private sector.

The Road Safety Strategy is following a similar approach. The strategy proposes 4 ambitious targets to 2030, and in line with the OBA approach, it is intended that, following analyses of consultation responses, Key Performance Indicators (KPIs) will be established which set out the changes we want to achieve through our strategy. Detailed action plans will also be co-produced and co-designed with stakeholders and delivery partners, which will shape our collective efforts, inspire collaboration and frame a shared vision for the future to improve road safety delivery.

Safe System Approach

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

The internationally recognized Safe System approach is based on well-established safety principles and requires a shared responsibility between all of those who use the road transport network; from system providers (including government, industry organisations that design, build, maintain and regulate roads and vehicles) to road users for safe travel outcomes on the road network.

6. Friedman M (2005) *Trying Hard is not Good Enough: How to produce measurable improvements for customers and communities*. Trafford Publishing

The approach is based on an ethical position where it can never be acceptable that people are seriously injured or killed on our roads with the long-term goal of elimination of death and serious injury on roads.

The five pillars of the Safe System approach are:

Safe Road Use:

- road users who decide the most sustainable way to travel, know and comply with road rules and take responsibility for the safety of themselves and others, especially the vulnerable.

Safe Roads and Roadsides:

- road design encourages safe and sustainable travel so that they are predictable and forgiving of errors.

Safe Speeds:

- road users understand and travel at appropriate speeds to the conditions and within the speed limits.

Safe Vehicles:

- well-maintained vehicles reduce the risk of collisions and in the event of a collision reduce the harm to road users, cyclists, horse riders, pedestrians, motorcyclists, vehicle occupants and those who may have a disability.

Post-crash Response:

- allow an effective and appropriate response to collisions. Road victims receive appropriate medical care and rehabilitation to minimize the severity of long-term impact of their injuries. Learnings from collisions are captured and acted upon.

The Safe System's ethical goal of serious casualty elimination requires a long-term timeframe for actions to be developed and implemented in successive timeframes,

to deliver incremental serious casualty reductions and support progress towards the long-term goal.

Adoption of a long-term Safe System approach is identified good practice and is supported by other key international road safety stakeholder organisations such as The Organisation for Economic Co-operation and Development (OECD) and International Transport Forum (ITF) (OECD/ITF Towards Zero Ambitious Road Safety Targets and the Safe System Approach 2008⁷. The recently adopted (September 2020) United Nations (UN) Decade of Action for Road Safety 2021 - 2030 and the WHO and UN Global Plan for the Decade of Action, released in October 2021, emphasise the need for a holistic approach to road safety and call on government and partners to implement an integrated safe system approach⁸.

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

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

// Proposed Targets for the new Strategy to 2030

This strategy takes cognizance of targets which have been set in a wider UN/EU/UK context. For example, the EU Road Safety Policy Framework⁹ sets out the EU Safe System results hierarchy which it encourages its members to follow, namely:

- Long-term goal of Zero deaths and serious injuries by 2050
- Interim targets of 50% fewer deaths and serious injuries between 2020 and 2030
- Intermediate outcome targets based on Key Performance Indicators directly linked to reducing deaths and injuries

The UN Decade of Action for Road Safety 2021-2030 and the UN and WHO Global Plan for the Decade of Road Safety include ambitious targets of preventing at least 50% of road traffic deaths and injuries by 2030¹⁰.

In addition, the Stockholm Declaration¹¹ agreed by UN Member States in February 2020, includes calls for a reduction in road traffic deaths and serious injuries by at least 50% from 2020 to 2030.

Review of our road safety targets up to 2020, as detailed in Section 2, show that 3 of the 4 targets have been achieved. While Target 1 was not met, it is important to consider the change from the 2004-2008 baseline position. Importantly the trend assessment comparing the baseline with the most recent 5 year rolling average, provides for a more robust assessment of progress against targets and has identified a decrease in trend.

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

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

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

Do you agree with these proposed targets?

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

7. <https://www.itf-oecd.org/sites/default/files/docs/08targetsummary.pdf>

8. <https://www.who.int/teams/social-determinants-of-health/safety-and-mobility/decade-of-action-for-road-safety-2021-2030>

9. <https://op.europa.eu/en/publication-detail/-/publication/d7ee4b58-4bc5-11ea-8aa5-01aa75ed71a1>

10. <https://www.who.int/teams/social-determinants-of-health/safety-and-mobility/decade-of-action-for-road-safety-2021-2030>

11. <https://www.government.se/492199/contentassets/2b0b907242fc407da58757bf2b70370e/stockholm-declaration-english.pdf>

Strategic Outcomes

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

Consideration of this early engagement and review of best practice has informed the proposed way forward for the new strategy.

Three outcomes for the Road Safety Strategy have been identified:

1. Safe People:
Our People Will Be Safer On Our Roads

2. Safe Roads:
Our Roads Will Be Safer For All

3. Safe Vehicles:
Our Vehicles Will Be Safer

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

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

1. Safe People: Our People Will Be Safer on Our Roads

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

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

Evidence: what is known?

Statistical analysis

Gender: nearly 3 out of 4 (71%) of fatalities that occurred on the roads in 2020 were male.

Age: in 2020 those aged 35 to 49 accounted for the greatest percentage (25%) of fatalities and those aged 50-64 accounted for the greatest percentage (21%) of KSIs.

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

In the vast majority of cases (90% to 95%) human error was identified as the cause of collisions. Careless driving accounted for

almost three quarters (72%) of all collisions in 2020 with the top three causation factors being inattention or attention diverted, driving too close and emerging from minor road without care. Excessive speeding, despite showing a reduction of 73% in fatal and serious collisions compared to the 2004-08 baseline, was the second highest causation factor for fatal and serious collisions in 2020, followed by impairment by drugs/alcohol – driver/rider as the third highest factor.

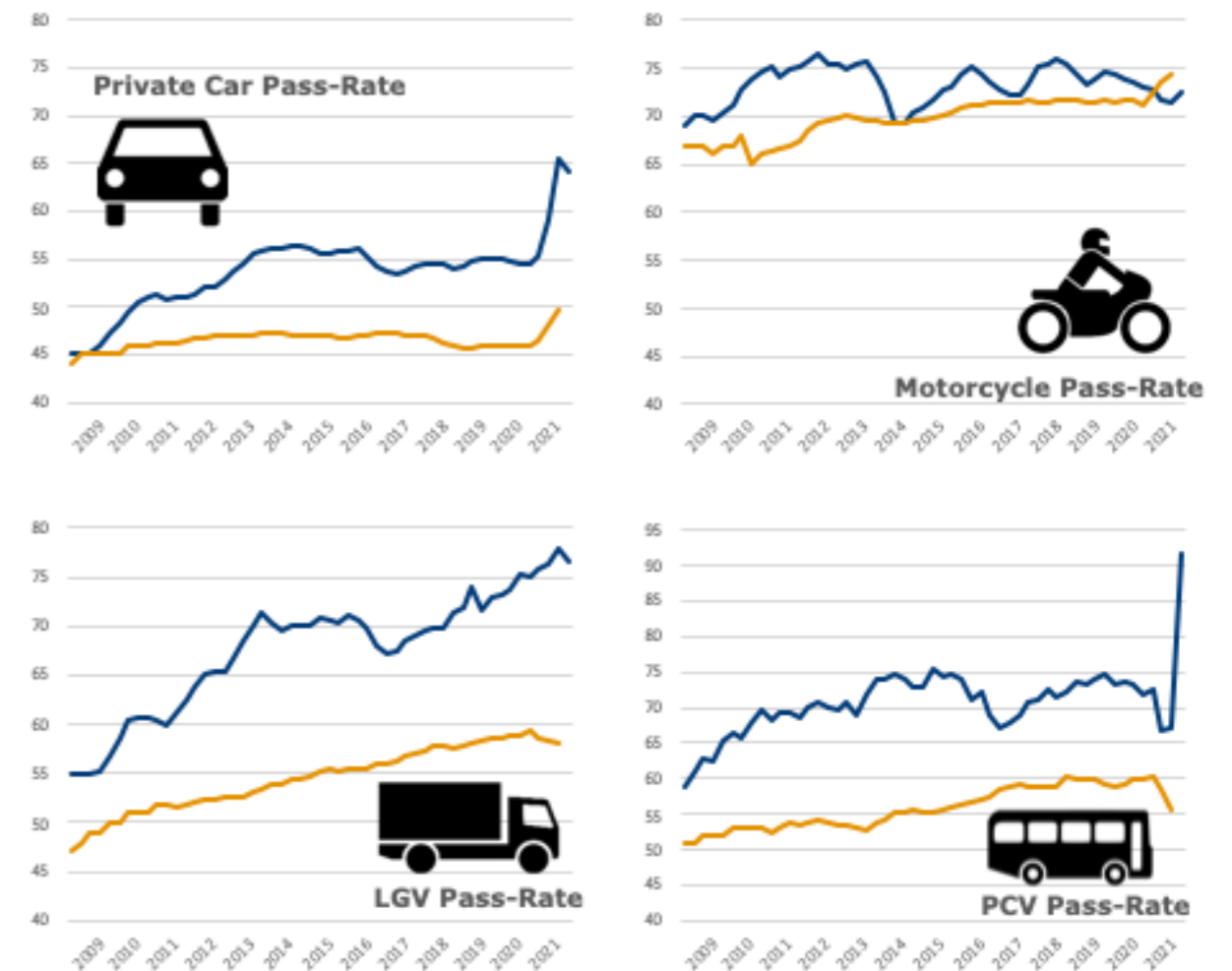
Active travel: pedestrian and pedal cyclist perceptions and associated road traffic casualties continue to be a potential barrier to increasing active travel. The Travel Survey NI (TSNI) (2017 - 19) <https://www.infrastructure-ni.gov.uk/system/files/publications/infrastructure/tsni-in-depth-report-2017-2019.pdf> data shows common reasons for both pedestrians and cyclists are heavy traffic, motorists without consideration and speeding traffic.

Driving Test Pass-Rates

For April to June 2021, the pass-rate for private-car driving tests was 63.5%, up by 8.6 percentage-points compared with the 54.9% average of the five years prior to the pandemic. Prior to the pandemic, pass-rates for all categories of vehicle remained broadly unchanged over the five years up to the onset of Covid restrictions in 2020. It is too soon to say whether this is indicative of a change in the under-lying trend or just a temporary effect of the pandemic.

Using rolling 4-quarter averages pass-rates across all four main vehicle categories, pass rates here are higher than the pass-rates in Great Britain. The exception to this is for motor cycles with the GB (74.3%) pass rate now slightly above that for NI (72.8%) - though the figure for GB lags one quarter behind that for NI, as the Q1 figure for GB is not available at the time of publication.

Figure 1: Driving Test Pass-Rates (Rolling 4-quarter Averages)



Part of the difference between NI and GB pass-rates may be attributable to regional driving conditions including the volumes of traffic and complexity of available road networks for testing.

Stakeholder analysis

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

- Human error is still recognised as a key source of road traffic collisions with attributing behaviours including speeding, driver distraction, use of mobile phones, drink/drug driving and higher risk of collisions involving both young drivers and older drivers.
- The need to change the habits, behaviours and attitudes of all road users and gain

their acceptance that the road is a shared space.

- Concerns surrounding the risk to vulnerable road users (identified as pedestrians, cyclists and motorcyclists) and the need to ensure they are safer on the roads.
- The need for promotion of sustainable modes of transport as well as walking, wheeling and cycling and to address the barriers to active travel.
- The need for policy to be proactive as opposed to retrospective, that is, the need to identify and apply local intelligence as opposed to historical data to target problem areas and prevent collisions instead of responding to them. The need for more enforcement of existing regulations relating to our roads was identified as a key challenge with suggestions that more PSNI/DVA presence is required on our roads.

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

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

If not, what other challenges do you feel merit consideration and why?

Current Context

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

- Legislative change including:
 - The Road Traffic (Amendment) Act (NI) 2016 which introduced a range of measures aimed at improving road safety.
 - The Road Traffic Offenders (Amendment) Order (NI) 2020 and the Road Traffic (Fixed Penalty) (Amendment) Order (NI) 2020 which came into effect on 3 February 2021 and provided for 6 penalty points and a fixed penalty fine of £200 for mobile phone use while driving.

- Ongoing programme of measures to promote road safety and provide advice and guidance by the Department for Infrastructure including the Cycle Proficiency Scheme, Practical Child Pedestrian Safety Training scheme, Active School Travel Programme (co-funded by DfI and the Public Health Agency (PHA) and delivered by Sustrans and the annual Teacher Aid Calendar.
- Ongoing road safety public information programme which aims to encourage behavioural change by targeting the main causes of road traffic casualties as identified by PSNI data. These include excessive speeding, drink/drug driving, and careless/inattentive driving. In addition emphasis is also given to more vulnerable road users such as people walking, wheeling or cycling and those riding motorcycles. Awareness of the lifesaving benefits of seatbelt wearing and the dangers of rural roads are also addressed. In addition new public information campaigns are developed to make the public aware of changes in legislation, for example, the increase in penalty points and fines associated with the use of handheld mobile devices.

// Key Priority Areas for the New Strategy

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

Education/training:

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

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



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

Communication/awareness:

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

Active and Sustainable Travel:

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

Policy/legislation/regulation:

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

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

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

If not, what other priority areas, in your view, should be considered and why?

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

// 2. Safe Roads: Our Roads Will Be Safer for All

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

Evidence: what is known?

Statistical analysis

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

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

Approximately three-fifths (62%) of pedal cyclists were killed or seriously injured on urban roads¹² and 85% of pedestrians were killed or seriously injured on urban roads¹³.

Stakeholder analysis

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

- The ability to deliver on the statutory requirement for ongoing road maintenance and the funding challenge this presents.

Examples include minimising the impact of overgrown hedges/trees/verges and unfilled potholes on road safety.

- The need to consider planning policy, road design and infrastructure provision in an integrated way to improve the safety of all road users. Specifically, it was emphasized that major roads projects may need to be taken forward in order to improve road safety figures. In addition, planners need to be involved when new developments are being designed to ensure the consideration and allocation of safe road space.
- The need for improved infrastructure to encourage and ensure safe, active and sustainable travel and which also contributes positively towards addressing the climate emergency and health impacts for our people. Examples include the development of walking and cycling infrastructure outside schools and the need for segregated cycle lanes.
- The impact of new technologies and forms of mobility and their impact on road capacity particularly when operating in mixed conditions alongside 'traditional' vehicles. Examples include the risks associated with the lack of noise from electric vehicles, particularly on rural country roads; concerns over the safety of e-bikes and e-scooters, both to riders and pedestrians; and the impact of in-vehicle driver distractions enabled by technology, such as allowing drivers to send text messages.
- The risks associated with rural (identified as any single carriageway with a speed limit greater than 40 mph) and rural country roads presented due to a lack of driver awareness of these roads, slow moving large agricultural vehicles, poor maintenance, including no footpaths, and less visible enforcement; and
- The need for the wider adoption of 20mph speed limits outside schools along with

12. Pedal Cyclist KSI Casualties in Northern Ireland, 2014-2018 (Department for Infrastructure

13. Pedestrian Killed and Seriously Injured (KSI) Casualties in Northern Ireland, 2013-2017

the desire for wider adoption of Speed Indicator Devices (SIDs), particularly in rural areas.

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

If not, what other challenges do you feel merit consideration and why?

Current Context

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

- Upgrade of TrafficWatch NI website and an increase in the number of CCTV camera feeds available online including CCTV on the A6 to allow the public to

update themselves on weather and traffic conditions when planning a journey;

- Street lighting: ongoing replacement of street lights with use of LED road lighting units and use of energy from sustainable sources, which in the next two years, will result in a reduction of approximately 38% in energy consumption since 2016;
- Identification and development of a Strategic Road Improvement Board with one objective being to improve standards for traffic volumes and reduce collision rates;
- Variable Message Signs (VMS): use of VMS to warn road users of incidents and for road safety messages with messages consistent with DfI and PSNI campaign calendars;
- Close liaison with PSNI to manage serious incidents on the strategic road network;

- Ongoing monitoring of progress on Cooperative – Intelligent Systems and Services (C-ITS) and Connected and Autonomous Vehicles (CAVS) in the UK and Ireland including their impact on road safety
- Camera enforcement: work with NIRSP to operate speed cameras and red light running cameras; and
- A continuous programme of planned road maintenance to prevent deterioration of the roads network, depending on funding available. This includes a system of regular safety inspections to ensure safe passage for road users, routine roads maintenance activities to public safety including street lighting maintenance, grass cutting to prevent obstruction of sightlines and traffic signs;
- An annual programme of Local Transport and Safety Measures (LTSM) including:
 - Highway improvements, such as minor road re-alignments and widening;
 - Traffic management measures including traffic signing and junction improvements;
 - Collision remedial measures;
 - Traffic calming measures particularly in residential streets;
 - Facilities to enhance walking and cycling;
 - Safe Routes to Schools Initiative/ Active Schools Travel Programme– phased roll out of part time 20 mph speed limits at schools;
- Reducing inconsiderate and unsafe parking by: providing dedicated on-street parking facilities; restricting waiting and stopping where necessary for traffic management and road safety reasons; enforcing existing restrictions and requirements; and making preparations for a call for evidence on the topic of pavement parking; and
- Reducing roadside hazards by: providing vehicle restraints; and providing passively safe street furniture.
- Regional planning policy recognises road safety as an important consideration in both decision taking and plan making. Regional Strategic Objectives for Transportation within DfI's Strategic Planning Policy Statement (SPPS) provide for, amongst other things, the promotion of road safety. The SPPS sets out a number of other policy areas, for which road safety is also a consideration, including Renewable Energy and Development in the Countryside.
- The preparation of Local Development Plans (LDP) provides Councils with the opportunity to assess the transport needs, problems and opportunities within their plan areas and to ensure that appropriate consideration is given to transportation issues, which may include road safety, informed by local transport studies and engagement with the Department, including DfI Roads where relevant.



// Key Priority Areas for the New Strategy

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

Road Engineering and infrastructure:

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

- considering a speed management review which could look at a number of areas including: the general speed limit system here; specific speed limits such as for HGVs; and reducing speed limits in urban/residential areas;
- undertaking an investigation into the nature of collisions on rural roads to identify common factors and seek solutions to potentially mitigate risk;
- investigating approaches that provide more focus on the needs and vulnerability of motorcyclists when designing new roads and implementing safety measures on existing roads; and
- formulating an approach to tackle inconsiderate pavement parking.
- formulating a programme of works to resolve any issues identified by the RISM II audit; and
- examining the potential for utilising risk mapping or a road protection scoring system on our strategic roads to determine how this information could be used to identify priorities for future road safety engineering action.

Technology:

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

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

If not, what other key priority areas, in your view, should be considered and why?

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

Policy/legislation/regulation:

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

- developing an audit approach to identify potential hazards on strategic roads (motorways and dual carriageways) to meet requirements of the European Road Infrastructure Safety Management (RISM II) Directive ;

**// 3. Safe Vehicles:
Our Vehicles Will Be Safer**

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

Evidence: what is known?

Statistical analysis:

Latest statistical data from the DVA is available from the Departmental website: www.infrastructure-ni.gov.uk/publications/dfi-driver-vehicle-operator-and-enforcement-statistics-2021-22-quarter-one. This relates to Quarter 1 (April-June) 2021-22, and includes trends in vehicle testing.

Vehicle Test Pass-Rates

In quarter one 2021-22, the overall pass-rate for full tests was 72.6% (Table 1). This is the

lowest pass-rate since 2008. However, we need to be careful with this comparison, as due to the TECs issued during 2020 and 2021, the mix of vehicles tested was substantially different from previous quarters (age and body type in particular). The recent drop in vehicle test pass-rates could also suggest that people have not maintained their vehicles fully during periods of exemption.

For the previous full financial year, the overall pass-rate for full tests was 82.7%, the highest annual pass-rate on record, albeit with the same caveat on the mix of vehicles as above. This annual pass-rate for full tests varied by category, from 78.1% for light goods to 89.1% (for categories where there were at least 2,000 tests) (See Figure 2).

The pass-rate for re-tests during quarter one was 93.1%, which is similar to previous quarterly trend.

Enforcement Activities

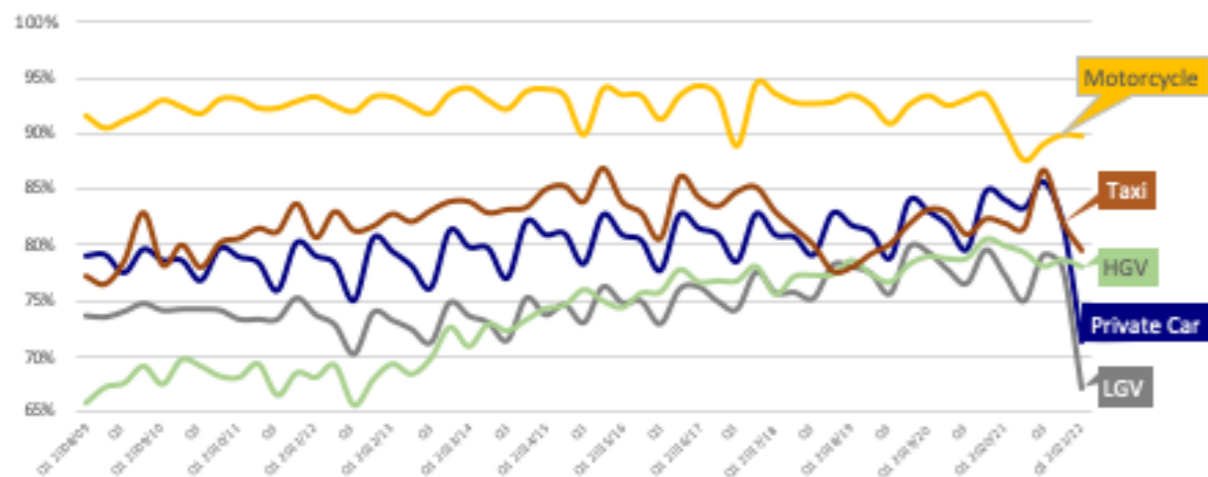
DVA Enforcement falls within the DVA's Compliance and Enforcement directorate. Roadside Enforcement is responsible for the enforcement of legislation pertaining to roadworthiness standards and licensing requirements at the roadside.

Table 1: Vehicle Test Pass Rates by Test Category - Full Tests

Annual	Private Car	Motor cycles	Light Goods	Heavy Goods	Omni-bus	Trailers	LPCV	Taxi	Total
2008/09	78.8%	91.4%	74.1%	67.4%	76.3%	78.3%	75.1%	78.7%	78.3%
2009/10	78.5%	92.8%	74.2%	68.6%	77.3%	77.8%	73.8%	78.9%	78.2%
2010/11	78.5%	92.9%	73.9%	68.2%	78.2%	76.4%	73.0%	81.6%	78.1%
2011/12	78.4%	93.1%	72.8%	67.8%	77.4%	76.9%	72.1%	81.6%	78.0%
2012/13	78.9%	93.1%	73.0%	70.0%	79.4%	78.3%	72.6%	82.9%	78.5%
2013/14	79.8%	93.7%	73.4%	72.3%	80.5%	78.6%	75.5%	83.3%	79.4%
2014/15	80.8%	93.5%	74.4%	74.9%	82.0%	79.9%	77.9%	85.2%	80.5%
2015/16	80.5%	93.3%	74.7%	75.9%	83.3%	79.2%	80.4%	83.2%	80.3%
2016/17	81.0%	93.6%	75.8%	77.1%	84.2%	81.7%	79.3%	84.3%	80.9%
2017/18	81.0%	93.3%	76.3%	76.9%	85.1%	80.7%	78.4%	82.1%	80.9%
2018/19	81.5%	93.0%	77.8%	77.8%	84.1%	85.3%	77.6%	79.7%	81.8%
2019/20	82.0%	93.2%	78.2%	79.3%	83.9%	86.7%	78.1%	82.3%	82.1%
2020/21	83.1%	89.1%	78.1%	78.5%	88.3%	85.9%	71.9%	83.1%	82.7%
2021/22	71.3%	89.9%	67.2%	78.1%	88.0%	85.4%	74.1%	79.4%	72.6%

Please note not all test categories were included in the table above.

Figure 2: Full Vehicle Test Pass-Rates



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

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

Stakeholder analysis

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

- The ongoing importance of vehicle safety both in terms of vehicle maintenance and road worthiness. Issues such as the safety

of modified cars and the need to ensure enforcement of the law have been raised.

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

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

If not what other challenges do you feel merit consideration and why?

Current Context

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

- Enhancing the use of Information Technology during roadside spot checks to help identify and target non-compliant vehicles used by operators and drivers with a poor compliance record, including those that use poorly maintained vehicles.

- Using modern portable vehicle test equipment to help detect and prohibit the continued use of defective vehicles at the roadside.
- Continuously updating and evaluating HGV and Bus Operator Compliance Risk Scores (OCRS) based on roadside encounter data and referring licensed operators with a poor compliance record to the Transport Regulator for regulatory consideration.
- Visiting the operating centres of licensed HGV and Bus Operators with a poor compliance history in order to investigate their poor performance and offering advice and guidance in order to help improve vehicle safety and promote a compliance culture.
- Increasing multiagency working with other enforcement agencies in order to maximise the benefits of sharing staff skills, knowledge and experience and ultimately improve operational effectiveness.

- Using up-to-date digital drivers' hours analysis tools to identify lorry and bus drivers who operate in breach of maximum driving time and minimum rest limits and therefore are more likely to suffer driver fatigue.
- Increasing the roadworthiness compliance checks that are conducted as part of the periodic vehicle testing regime and the removal of exemptions from testing for some vehicle types.

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

Key Priority Areas for the New Strategy

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

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

- reviewing the findings of the controlled e-scooter rental scheme trials that are currently taking in place in Great Britain and are due to end in March 2022 to inform further consideration of the policy position regarding e-scooters and their potential use on our roads;

- consulting on the banning of the use of tyres aged 10-years and older on the front axles of heavy goods vehicles (HGVs), buses, and coaches, and on any axle of a minibus if the tyres are fitted in single configuration;
- increasing testing for diesel emissions in light vehicles; and
- consideration of the outcome of the call for evidence on the potential introduction of biennial MOT testing

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

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

If not, what other priority areas, in your view, should be considered and why?

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

4. Next Steps

// The views and comments received during the consultation process will be analysed and inform the preparation of the final Road Safety Strategy which will be published in spring 2022. At this stage, we will also include a high level action plan for 2022/23 outlining measures to be taken forward in the short term.

In line with the OBA approach, following publication of the final strategy and its targets and an action plan for 2022/23, a small number of key performance indicators (KPIs) and related priority actions will be co-designed and co-developed with stakeholders and key delivery partners. These KPIs will seek to measure the effectiveness of the actions taken and their impact in terms of realising improvements in population outcomes. They will keep our focus on delivering the most important actions that will make a positive difference. As part of this process NISRA will conduct user engagement sessions to consider if the current road safety indicators used to measure the 2020 Road Safety Strategy need to be altered to reflect the new strategy. Information on the current indicators can be found at <https://www.infrastructure-ni.gov.uk/publications/northern-ireland-road-safety-strategy-2020-annual-statistical-report-2021>

Following the stakeholder engagement and co-design process, a finalised action plan setting out the actions that will be required to achieve progress and the indicators that will be established to measure success of the Road Safety Strategy to 2030 will be

published later in 2022/23. This action plan to 2030 will be kept under regular review and will be subject to available budgets.

Governance Processes

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

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

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

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

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

If so, do you feel that this should be chaired at Ministerial level?



Do you think other governance arrangements should be put in place and if so, what should they be?

Funding

Resources will be required to ensure funding is available for the work of the strategy. Co-funding initiatives will need to be examined and considered where actions to deliver under the strategy need to be implemented on a partnership basis. Delivery of the strategy within available budgets will require the sharing of resources, data and information among the key stakeholders as appropriate.

Impact Assessment

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

The Department has engaged with a small range of S75 groups as part of the pre-consultation process.

High-level Equality Impact, Rural Needs, and Human Rights screening exercises have been completed for the draft strategy consultation document and no issues have been identified. Equality screening is a live process that will be considered alongside the Strategy development process as it evolves and as such the Department would be particularly interested in any further data that may be available as well as views from representatives from the following S75 categories:

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

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

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

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

If so please provide details.

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

If so please provide details.



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