

Helen Irwin
Analysis Statistics & Research Branch
Department for Infrastructure
Room 4.13C
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23 August 2017

Dear Helen,

This is RoSPA's response to the consultation paper "**User Consultation of Northern Ireland Road Safety Strategy to 2020 Statistical Report – Upcoming Changes to the Publication**". It has been produced following consultation with RoSPA's National Road Safety Committee.

The Northern Ireland Road Safety Strategy to 2020 sets four casualty reduction targets and 199 action measures for improving road safety, and Key Performance Indicators to measure progress. Some of the Indicators use Travel Survey for Northern Ireland data for miles travelled by motorcyclists and pedal cyclists. However, as this data has a high level of uncertainty, the Analysis Statistics and Research Branch (ASRB) have recommended that two of the Indicators are changed to alternative data sources. Comments on the recommended changes are invited.

1a: Comments about the recommended change to KPI5: Rate of killed or seriously injured motorcyclists per 100 million motorcycle kilometres.

RoSPA Comments

RoSPA accepts this recommended change and the reasons for it. However, the new indicator should be clearly explained in the Report.

As the consultation paper explains, this Indicator is published with the following caveat, "*the very high levels of uncertainty associated with the distance travelled estimates means that no robust trend for this can yet be established... One cannot safely conclude at this stage whether there has been any real change in motorcyclist risk over the monitoring period.*"

Following a comprehensive review, the ASRB have concluded that the NI Travel Survey is not fit-for-purpose for the Motorcycle KPI due to the low numbers of motorcyclists in the sample. They have recommended that a rate of motorcycle KSIs per 1,000 licensed motorcycles be used instead. The data for this rate does not have the same sampling errors, and although, it does not take in to account how far each motorcycle travels, it is the next best estimator of motorcyclist casualty risk exposure.

1b: Comments about the recommended change to KPI4: Rate of killed or seriously injured pedal cyclists per 100 million kilometres cycled.

RoSPA Comments

RoSPA accepts this recommended change and the reasons for it. However, the new indicator should be clearly explained in the Report.

Like the motorcycling KPI above, the pedal cycle indicator is also published with a caveat, *"The wide confidence intervals around the distance travelled estimates for cyclists currently makes it very difficult to reach any firm conclusions on the annual changes in the rate indicator."*

The ASRB have concluded that the Travel Survey estimates used in this indicator are not fit for purpose due to the low number of cyclists in the sample and no robust trend can be established for pedal cyclists. They have recommended that a rate of pedal cyclist KSIs per 100,000 people that have cycled in the last 12 months be used instead. The data used for this rate still has sampling errors, but they are smaller than for kilometres travelled. Although it does not take into account how far each person travels by bicycle, and so assumes that all travel the same distance, it is the next best estimator of cyclist casualty risk exposure.

2: Comments about the required changes to:

- **KPI1: Rate of road deaths per 100 million vehicle kilometres**
- **KPI6: Rate of car users KSIs per 100 million kilometres (cars and vans)**
- **KPI7: Rate of fatal and serious collisions per 100 million vehicle kilometres**

RoSPA Comments

RoSPA accepts this recommended change and the reasons for it. However, the new indicator should be clearly explained in the Report.

The changes to the three KPIs are necessary because one of the primary sources of data for the indicators, the Vehicle Kilometres Travelled (VKT), is no longer collected due to budget constraints. Therefore, an alternative source of data is required to enable continued reporting and the Travel Survey for Northern Ireland (TSNI) is proposed. An analysis of using the new data source has shown that the rates produced are robust, and the ASRB have concluded that the TSNI will be sufficient for the reporting needs, and is the next best estimate, given that the Vehicle Kilometres Travelled (VKT) data is no longer collected.

RoSPA thanks the Department for Infrastructure for the opportunity to comment on the proposals. We have no objection to our response being reproduced or attributed.

Yours sincerely,



Kevin Clinton
Head of Road Safety