



Department for
Infrastructure

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Safer Journeys to School

Consultation on overtaking and passing buses

Consultation Summary Report



1. Ministerial Foreword

I am pleased to present this summary report on the *Safer Journeys to School* consultation on overtaking and passing buses.

The safety of children and young people travelling to and from school is of paramount importance. As Minister for Infrastructure, improving road safety remains one of my key priorities, which is why I established the *Safer Journeys to School* programme to take forward a coordinated, evidence-led approach to making these journeys safer.

This consultation focused on one important aspect of that work: whether clearer and more targeted rules governing driver behaviour around buses, particularly when children may be boarding or alighting, could help to reduce risk and improve safety. The consultation provided an opportunity for stakeholders and members of the public to share their views on a preferred legislative approach, alternative options, and how any future measures might be applied in practice.

The responses highlighted a number of important themes. Many respondents expressed concern about the dangers associated with overtaking or passing stationary buses and indicated support for stronger controls in at least some circumstances. Respondents also emphasised the importance of ensuring that any future arrangements are practical, proportionate and capable of effective enforcement.

Overall, the findings point to broad support for considering further action in this area, alongside a clear expectation that any future measures should be accompanied by appropriate education, communication and enforcement activity.

The Department has carefully considered all responses received. The findings set out in this report will help inform the next phase of the *Safer Journeys to School* programme, including the introduction of legislative proposals to improve safety around school buses. They will also inform wider education, communication and road safety initiatives, recognising that improving safety requires a combination of legislative, behavioural and operational measures.

I would like to thank everyone who took the time to participate in the consultation and contribute their views.

Whilst the Department develops these measures, it remains paramount that drivers exercise particular care whenever children may be boarding, alighting from, or crossing near a bus. Drivers should slow down, remain vigilant and be ready to stop. Improving safety is a shared responsibility, and greater awareness and vigilance from all road users can play a vital role in helping to prevent serious incidents and keep children and young people safe on their journeys to and from school.

2. Introduction

The Department for Infrastructure's consultation, [Safer Journeys to School: Consultation on overtaking and passing buses](#), sought views on how driver behaviour around buses could be made safer, particularly when passengers are boarding or alighting. The consultation ran from 26 March to 21 May 2026 and formed part of the wider Safer Journeys to School programme, which brings together work on legislation, education, behaviour change, enforcement readiness and other practical measures to improve safety. The consultation focused on one specific issue: whether clearer and more targeted rules could help reduce danger around stationary buses, while remaining proportionate, practical and workable across Northern Ireland's varied road network. It considered both the risk of overtaking a stationary bus in the same direction of travel and the wider risks that can arise when vehicles pass a bus during boarding or alighting, including from the opposite direction.

The consultation asked for views on two broad areas;

- The Department's preferred proposal to prohibit overtaking a stationary bus in clearly defined dangerous circumstances.
- A wider set of options for future development, including road-specific speed limits, restrictions on passing a stationary bus in certain situations, and the possible use of warning lights or reduced-speed passing rules.

It also asked respondents about scope, clarity, practicality, likely impacts and any evidence or operational experience that could help refine the proposals.

This report summarises the views of respondents. It presents the main patterns in the responses, the key themes raised in written comments, and the main risks, delivery issues and minority views emerging from the consultation. It is intended to provide a clear and accessible account of the consultation findings. It does not set out final policy decisions. Any decisions on whether and how to proceed will be informed by the consultation evidence, alongside further analysis, legal advice and engagement with operational partners.

3. Methodology

Responses were received primarily through the Department's consultation process, with most submitted through the main consultation dataset and a small number of additional substantive responses received by email.

The report is based on the detailed question-by-question review undertaken during the consultation analysis process. For each question, closed-answer results were considered alongside the accompanying written comments. As not every respondent answered every question, totals can vary between questions. Written comments were reviewed to identify the main themes raised by respondents. Some respondents raised more than one point in a single comment. For that reason, thematic counts and percentages in the narrative analysis do not always add to 100 per cent.

The cross-cutting section of the report is intended to bring together issues that appeared across multiple questions, such as visibility, road layout, warning signals, enforcement, education, practicality and unintended consequences. It should therefore be read alongside, rather than instead of, the detailed question-level findings.

Throughout the report, care has been taken to present the consultation evidence fairly and proportionately. Where respondents did not provide a written explanation, reasons have not been inferred.

4. Overview of Responses

The consultation received a substantial level of engagement. The main dataset contains 601 response rows, with additional substantive organisation responses also received by email and reviewed qualitatively. The respondent profile and closed-answer summaries in this report are based on the Citizen Space dataset, while the email responses are reflected in the wider synthesis of themes, risks and minority views. Of the 601 Citizen Space responses, 572 (95.2%) were from individuals, 18 (3.0%) were submitted on behalf of an organisation, and 11 (1.8%) were submitted by businesses.

Most questions received around 600 responses, with particularly strong support for the view that overtaking a stationary bus can be dangerous and for stronger controls around overtaking or passing in at least some circumstances. Responses were more mixed on road-specific speed limits and wider scope across all buses, while more respondents opposed allowing reduced-speed passing. Across the consultation, respondents repeatedly highlighted the importance of visibility, road layout and speed, pedestrian movement, warning systems, legal clarity, enforceability and practical delivery. Overall, the findings suggest broad support for action, but also a clear expectation that any future approach should be proportionate, workable and supported by wider education, communication and enforcement measures.

5. Question-by-question summary

Question 1: respondent profile

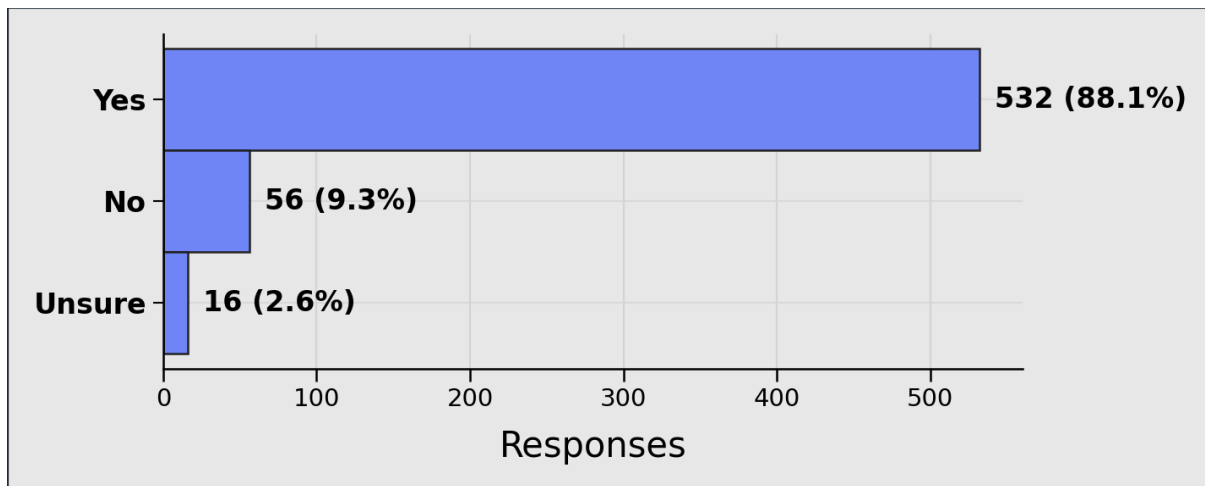
Question 1 asked respondents whether they were replying as an individual, a business, or on behalf of an organisation. There were 606 responses in total. The respondent base was overwhelmingly made up of individuals (573 responses), with a smaller number of responses from businesses (11) and organisations (22).

The dominance of individual responses (94.6%) means the consultation evidence is primarily public/user-facing in character. This is important context when interpreting the later qualitative responses, as the themes are likely to reflect personal experience, parental or passenger perspectives, and general road-user concerns.

Question 2:

Do you agree that overtaking a stationary bus can be dangerous, particularly when children or other passengers are boarding or alighting?

There were 604 responses to this question. Of these, 532 respondents (88.1%) answered Yes, 56 (9.3%) answered No, and 16 (2.6%) answered Unsure. A total of 194 respondents provided a usable written explanation.



The responses show strong agreement that overtaking a stopped bus can be dangerous. The clearest reason given was the immediate risk that a child or other passenger may step into the road unexpectedly, cross in front of or behind the bus, or be hidden from the view of approaching drivers. Respondents also linked risk to driver speed, impatience, poor visibility and road conditions, particularly on rural roads or in places without footpaths or safe stopping areas.

Another important theme was that safety also depends on passenger behaviour and road-safety education. Some respondents said children, parents and other passengers should be encouraged to wait until the road is clear and the bus has moved away before crossing. Others argued that the level of risk depends on the circumstances and that overtaking may not always be inherently dangerous. Practical concerns about congestion, delay and how any future rule would operate were also raised, although these were minority views.

Excerpt from respondent:

“Children can be unpredictable and run across the front or behind a bus at the stop before it drives away causing a serious potential accident”

Overall, the responses suggest a clear public understanding that overtaking a stopped bus can create a serious and immediate safety risk, especially where children may emerge suddenly into the carriageway. At the same time, the written comments point to the importance of clarity, proportionality and supporting education if any new rule is taken forward.

Question 3:

In your view, what is the best way to define “dangerous circumstances” so that rules are clear, objective and enforceable?

The amended dataset contained 533 usable responses to this open question.

Most respondents attempted to describe the kinds of situations where overtaking a stopped bus would be dangerous. The most common points related to road layout and roadside conditions, poor visibility, speed or unsafe driving conditions, passengers crossing the road, and unsafe bus stops or lack of safe infrastructure. These responses suggest that respondents generally understood danger as arising from a combination of factors rather than from one single trigger.

A sizeable group preferred a simpler rule that vehicles should not pass a stopped bus at all, rather than relying on drivers to judge risk. Others focused on supporting measures such as warning lights, signs, cameras, safer stopping places, education and awareness. Across the responses, there was an emphasis on the need for any definition to be clear enough for drivers to understand and for enforcement to apply consistently.

Respondents also raised an important practical challenge: many of the factors they identified often overlap in real life. Rural roads, specifically mentioned in a number of responses, may involve a combination of poor lighting, narrow carriageways, higher speeds and limited safe crossing points. This means that a very detailed definition could become hard to apply, while an overly broad definition could risk being seen as disproportionate. Some respondents therefore supported guidance or examples alongside any legal rule, rather than relying on legal wording alone to cover every scenario.

Excerpt from respondent:

“The definition of “dangerous circumstances” must be clear, simple and not rely on individual driver judgement in the moment. In my view, the safest and most effective approach is to treat any situation where a bus is stopped to pick up or drop off passengers as inherently dangerous, particularly where children are involved”.

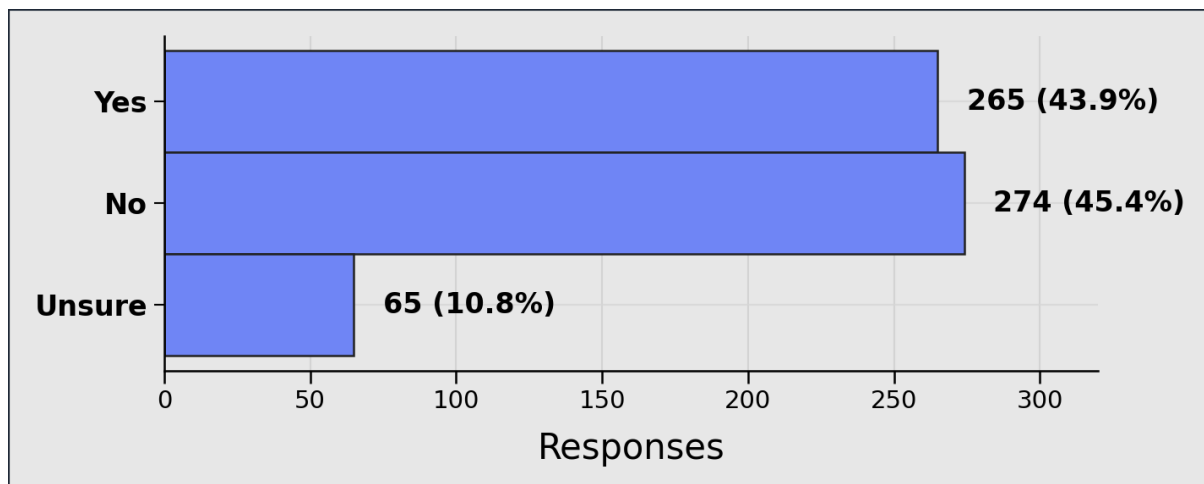
Overall, the responses suggest that most respondents were able to identify practical features that make overtaking a stopped bus more dangerous. The strongest themes

were visibility, speed, road layout, likely passenger movement and the safety of the stopping place itself. The key issue emerging from the consultation is how to reflect these factors in regulations that are sufficiently clear, proportionate and enforceable in practice.

Question 4:

Are there any circumstances where overtaking a stationary bus should remain permissible without being considered dangerous?

There were 604 responses to this question. Of these, 274 respondents (45.4%) answered No, 265 (43.9%) answered Yes, and 65 (10.8%) answered Unsure.



The responses were closely split, with a slightly larger group saying overtaking should not remain permissible. The largest single view was that a simple rule would be safer and easier to understand, because passengers can move unpredictably and visibility around the bus can be blocked. Many respondents in this group felt that allowing exceptions could introduce confusion and weaken compliance.

At the same time, a substantial number of respondents supported limited and clearly defined exceptions. These fell broadly into three categories. First, exceptions for special operational circumstances, such as emergency vehicles, a broken-down bus, or a bus that is not in service. Second, exceptions where the bus or passengers are clearly separated from live traffic, for example in a lay-by, bus bay or on a wider multi-lane road. Third, carefully controlled overtaking, such as at very low speed, with good visibility and sufficient space.

A smaller number of comments focused on wider issues such as education, infrastructure and traffic flow. These respondents often argued that behaviour, bus stop design and road-user responsibility also need to be considered. Although these were not the dominant themes, they are relevant to delivery and public messaging.

Excerpt from respondent:

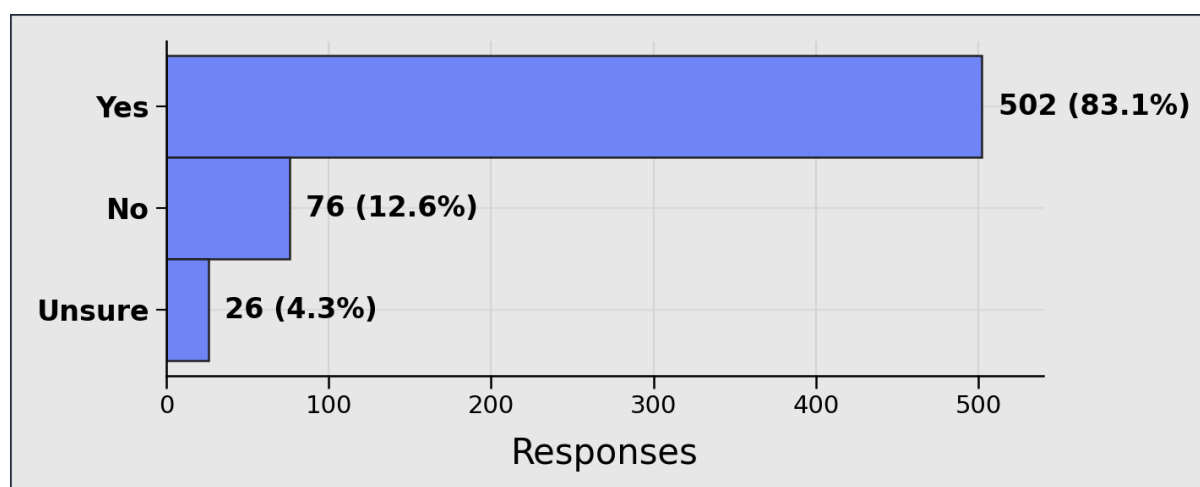
“You cannot see if a child is stepping out in front of the bus so they should not overtake”

Overall, the responses do not show a single consensus on whether overtaking should remain permissible in some circumstances. The largest view favoured a simple rule with no general exception, but there was also significant support for narrow, objective and easily recognised exceptions. The main issue raised by this question is therefore the balance between clarity and simplicity on the one hand, and targeted proportionality on the other.

Question 5:

Do you agree that overtaking a stationary bus should be prohibited in clearly defined dangerous circumstances?

There were 604 responses to this question. Of these, 502 respondents (83.1%) answered Yes, 76 (12.6%) answered No, and 26 (4.3%) answered Unsure.



The responses show strong support for the proposal in principle. Many respondents simply agreed without adding further explanation. Where reasons were given, they tended to focus on safety, clearer rules and the need to protect children and other passengers at the point where risk is highest. Some respondents also felt that the proposal did not go far enough and preferred either a broader default prohibition or a more specific school-bus rule.

The main concern raised by those who opposed the proposal, or who were unsure, was the meaning of “dangerous circumstances”. Respondents questioned whether the concept could be defined clearly enough for drivers to. Some also referred to existing

rules, passenger responsibility, possible congestion and the risk that unclear wording could create disputes or inconsistent compliance. A small number suggested supporting measures such as improved bus stop locations, better signs or warning lights, crossings, cameras, enforcement and education.

The responses therefore suggest broad support for the direction of travel, but also a clear expectation that any rule would need to be tightly framed. Respondents pointed to factors such as boarding or alighting activity, passenger crossing risk, poor visibility, rural or higher-speed roads and warning lights as possible indicators of heightened danger. However, they also warned against a rule that is either too vague or too complex.

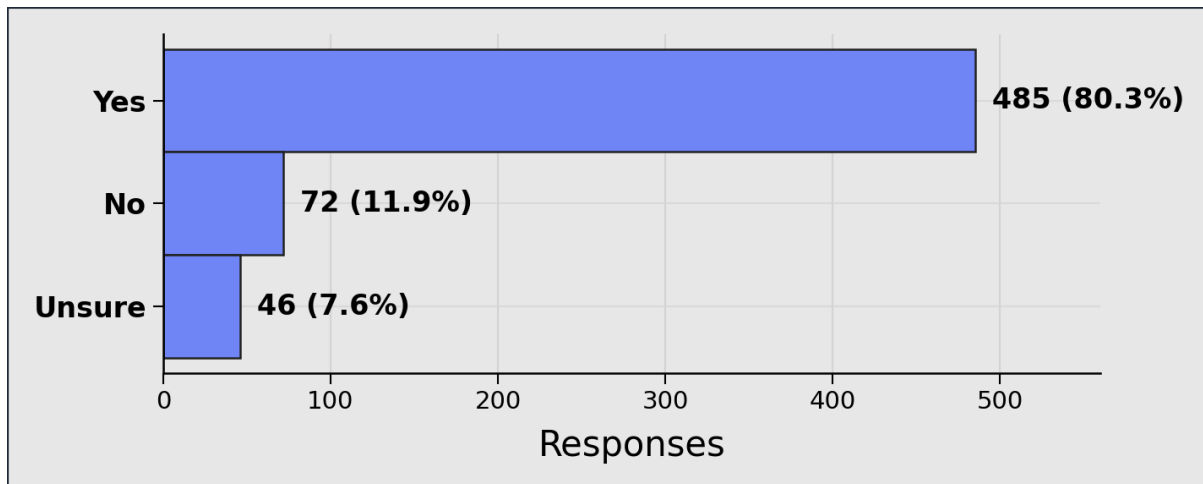
Excerpt from respondent:

“Yes, overtaking a stationary bus should be prohibited in clearly defined dangerous circumstances where there is a foreseeable risk to passengers, pedestrians, or other road users”.

Overall, the consultation responses show strong support for prohibiting overtaking a stationary bus in clearly defined dangerous circumstances. The central issue raised is not whether stronger protection is needed, but how to define those circumstances in a way that is clear, proportionate and workable in practice. The findings also suggest that legislation, if taken forward, would need to be supported by visible signals, public communication, education and practical enforcement arrangements.

Question 6: Do you agree that risks to children and other passengers may arise when vehicles pass a bus during boarding or alighting, even where no overtaking manoeuvre takes place?

There were 604 responses to this question. Of these, 485 respondents (80.3%) answered Yes, 72 (11.9%) answered No, and 46 (7.6%) answered Unsure. One response could not be grouped, and 153 respondents provided written comments.



The responses show strong overall agreement that risk can arise when vehicles pass a bus during boarding or alighting, even where the vehicle is not technically overtaking. The main concern raised in the written comments was the combination of passenger movement and restricted visibility. Respondents frequently referred to children or other passengers stepping into the road, crossing in front of or behind the bus, or being distracted at the point when drivers may be unable to see them clearly.

Respondents also linked risk to the wider road environment. Comments referred to rural roads, narrow carriageways, higher-speed roads, lay-bys and stops without footpaths or safe waiting areas. A smaller number of respondents focused on driver behaviour, road-safety education and practical delivery issues such as traffic flow or enforcement. These help explain why some respondents saw the issue as one of both behaviour and context.

A notable minority said the level of risk depends on the circumstances. These respondents pointed to factors such as road speed, visibility, road layout and whether passengers are likely to cross the road. A smaller number also questioned whether stronger restrictions would be practical where buses stop frequently, or raised uncertainty about the distinction between “passing” and “overtaking”. This suggests that any future approach would need to be clear in both policy and drafting terms.

Excerpt from respondent:

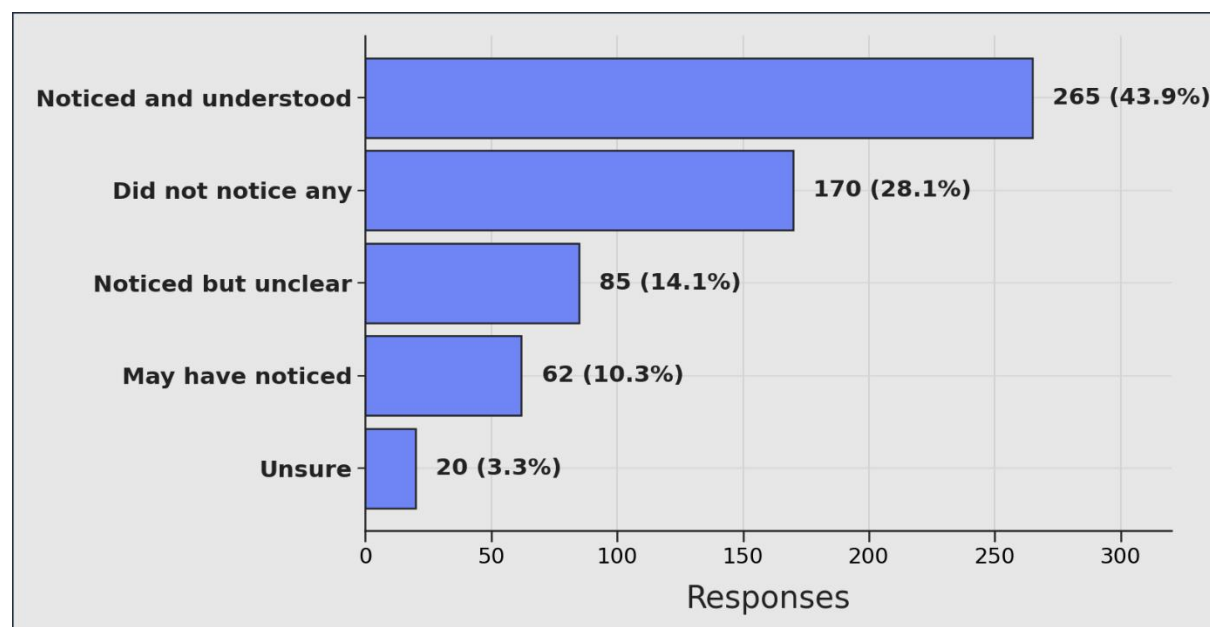
“Children just walk out behind or in front of a bus.”

Overall, the responses suggest broad agreement that passing a bus during boarding or alighting can create real risk, particularly where children or other passengers may move into the road while visibility is limited. The clearest message is that the danger often arises from a combination of movement, sightline problems and road conditions. The findings therefore support further consideration of measures that are clear,

proportionate and capable of addressing risk from traffic travelling in both directions, not only from vehicles passing from behind.

Question 7: Before this consultation, when you saw a bus stopped to let passengers on or off, did you notice any hazard lights or warning signals, and were you aware of what they were meant to indicate?

There were 604 responses to this question. Of these, 265 respondents (43.9%) said they had noticed the lights or signals and understood that they indicated increased risk to passengers, 170 (28.1%) said they had not noticed any lights or signals, 85 (14.1%) said they had noticed them but were not clear what they meant, 62 (10.3%) said they may have noticed them but had not given them much thought, and 20 (3.3%) answered Unsure. A total of 118 written comments were provided.



The responses show mixed awareness of warning lights. While a sizeable group said they had noticed the lights and understood their purpose, many others either had not noticed them, were unclear about what they meant, or had not paid much attention to them. This is important because later consultation questions explored whether warning lights could help support clearer rules about passing buses.

The most common point raised in the written comments was the need for warning lights or signs to be clearer and more visible. Respondents suggested brighter lights, larger signage or more explicit wording. A closely related theme was inconsistent use across buses. Some respondents said not all buses appear to have warning lights, while others said their use varies between drivers and services. Respondents also raised confusion

between warning lights and ordinary indicators, brake lights or hazard lights, suggesting that the current signals may not provide a distinct enough message to other road users.

Another recurring point was the need for public awareness and education. Some respondents said professional drivers or transport operators may understand the signals, but the wider public may not. A smaller number also suggested warning lights would not be enough on their own unless they were linked to a clear legal requirement or more explicit instruction to drivers.

Excerpt from respondent:

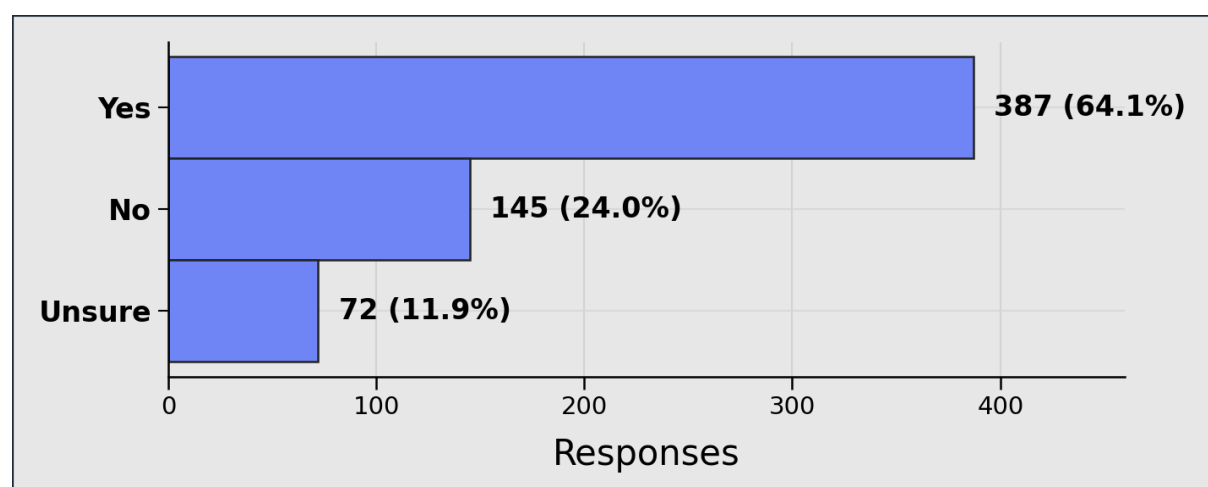
“Warning lights should be bigger and brighter.”

Although many respondents recognised warning lights as a sign of increased risk, many others did not. The findings suggest that warning lights could play a useful role in improving driver awareness.

Overall, the responses suggest that existing bus warning lights and signals are not consistently recognised or well understood. This highlights the need for clearer guidance around about what existing warning lights mean, where they are used and what drivers are expected to do in response. This will be particularly important if warning lights/signals are to form part of a future legal or operational approach.

Question 8: Do you consider that time-limited speed limits on specific roads (for example during school travel times) could help address passing-related risks in certain locations, and if so, where would this be appropriate or inappropriate?

There were 604 responses to this question. Of these, 387 respondents (64.1%) answered Yes, 145 (24.0%) answered No, and 72 (11.9%) answered Unsure. A total of 241 respondents provided written comments.



The responses show that a majority of respondents thought time-limited, road-specific speed limits could help in some locations. Support was strongest for targeted use rather than a blanket approach. Respondents most often referred to roads near schools, school pick-up and drop-off points, bus stops, rural roads and higher-speed roads where children or other passengers may be more likely to cross or be exposed to risk. Many felt that lower speeds could give drivers more time to react and reduce the severity of any collision.

However, respondents also raised important practical concerns. A common issue was enforcement and compliance, with some questioning whether drivers would follow time-limited restrictions or whether there would be sufficient enforcement capacity. Others highlighted timing and delivery challenges, noting that school transport does not always follow fixed patterns and that buses may operate over wide areas, at different times, and outside the standard school day. Some respondents also felt that speed limits could help, but would not fully address the main risk if vehicles were still permitted to pass a stationary bus while passengers were boarding, alighting or crossing.

A smaller number raised concerns about possible unintended effects, including congestion, driver frustration and confusion where lower speed limits apply but no bus or children are present. These comments do not outweigh the overall support for targeted speed management, but they point to the importance of clear design and communication if such an approach was taken forward.

Excerpt from respondent

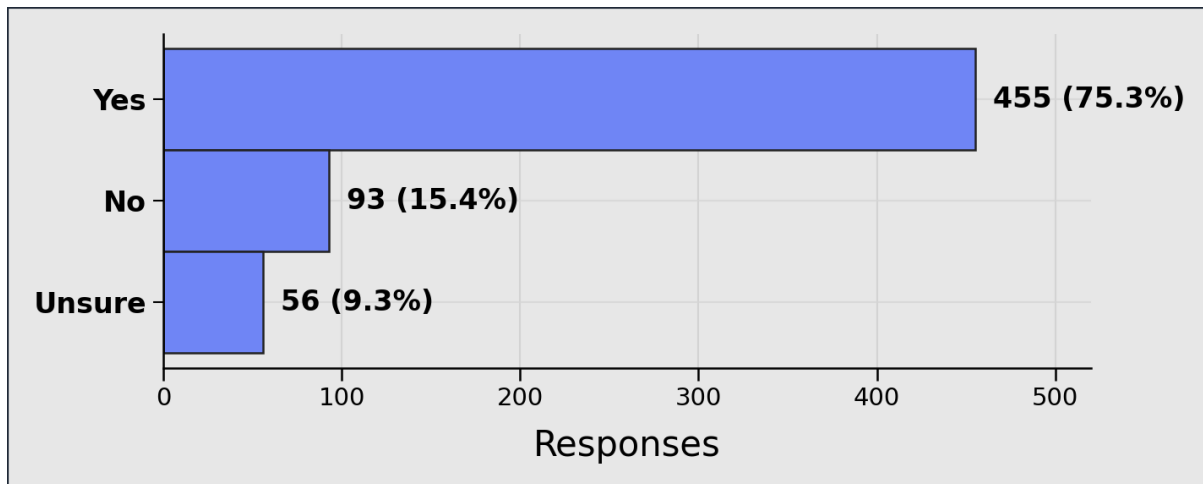
“For example like the time limited 20mph outside schools during school hours.”

Overall, the responses suggest that time-limited, road-specific speed limits are seen as a potentially useful supporting measure, particularly in predictable higher-risk locations. However, they were not generally seen as a complete solution on their own. The findings point to the need to consider enforcement, clarity, local context and the relationship between speed control and wider rules on passing or overtaking stationary buses.

Question 9:

Do you consider that restricting whether vehicles may pass a stationary bus during boarding or alighting could improve safety in some circumstances, and if so, where might this be appropriate or create additional risk?

There were 604 responses to this question. Of these, 455 respondents (75.3%) answered Yes, 93 (15.4%) answered No, and 56 (9.3%) answered Unsure. A total of 207 respondents provided written comments.



The responses show strong support for the idea that restricting passing could improve safety in at least some circumstances. Respondents most often supported this because of the risk to passengers, especially children, who may cross the road, move close to traffic or be hidden from the view of drivers. Support was particularly strong where respondents referred to rural roads, narrow roads, roads with poor visibility, locations without footpaths, and school-related journeys.

A recurring theme was the appeal of a clear and simple rule. Many respondents felt a straightforward requirement not to pass a stationary bus during boarding or alighting would be easier for drivers to understand and would reduce the need for judgement in the moment. At the same time, many also stressed that any such approach would need clear signs, warning signals and enforcement. Respondents referred to flashing lights, signage, cameras and other visible indicators as ways to support driver understanding and compliance.

Respondents also raised practical concerns. These included congestion, tailbacks, driver frustration, sudden stopping and the possibility of other unsafe manoeuvres if traffic is repeatedly held behind buses. Some also argued that passenger behaviour and road-safety education remain important, particularly where children may assume that all traffic has stopped. A number of respondents identified possible exceptions or lower-risk settings, such as lay-bys, bus bays, dedicated bus lanes or locations where passengers are clearly separated from live traffic.

Excerpt from respondent

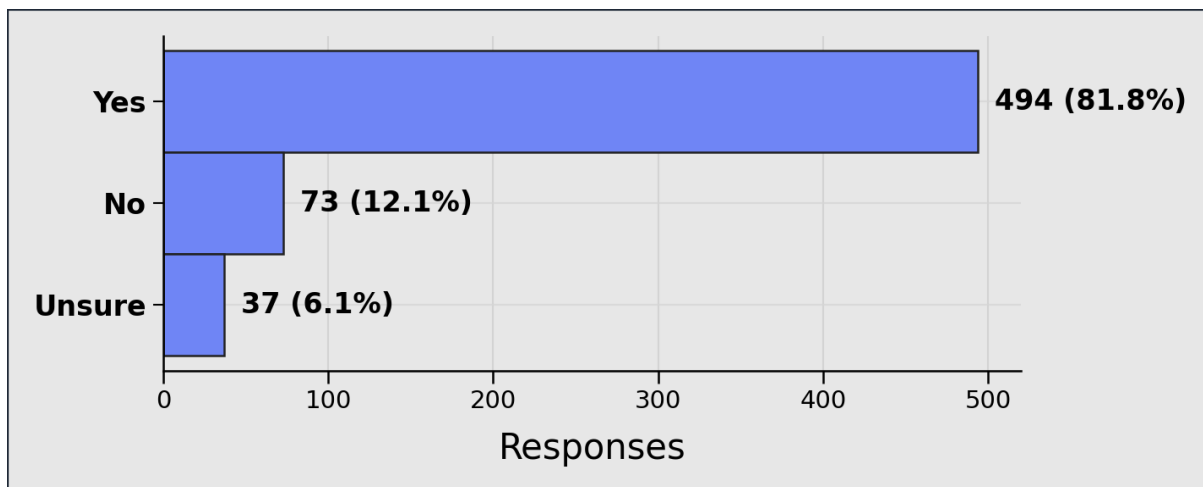
“If a school bus has stopped cars should wait and not pass at all.”

Overall, the responses support further consideration of restrictions on passing a stationary bus during boarding or alighting. The findings suggest many respondents see a strong safety case for such restrictions, but also expect any approach to be clear, practical and proportionate, with careful attention to road layout, visibility,

enforcement, driver behaviour, passenger education and whether limited exceptions are needed in lower-risk situations.

Question 10: Do you consider that prohibiting vehicles from passing a bus when it is displaying prescribed warning lights would provide greater clarity and protection for children?

There were 604 responses to this question. Of these, 494 respondents (81.8%) answered Yes, 73 (12.1%) answered No, and 37 (6.1%) answered Unsure. A total of 167 respondents provided written comments.



The responses show strong support for the idea that vehicles should not pass a bus when prescribed warning lights are displayed. Many respondents saw warning lights as a way to give drivers a clear visual signal that children or other passengers may be getting on or off the bus, and that greater caution or a restriction on passing should apply at that point. Respondents often linked this directly to improved protection for children and other passengers.

However, support was often conditional on careful implementation. Respondents repeatedly stressed that any warning-light system would need to be clear, visible, standardised and consistently used. Some suggested brighter lights, clearer signage or more distinctive signals so that drivers would immediately understand what was required. Others raised concerns about inconsistent use between buses or drivers, the possibility of equipment failure, and confusion with ordinary hazard lights or other vehicle signals.

Public awareness was another important issue. Some respondents said warning lights would only improve clarity if drivers and the wider public understood what the lights mean and what action they are expected to take. A smaller number also raised

concerns about false reassurance for passengers, possible congestion or driver impatience, and questions about scope, including whether a rule should apply only to some buses or more widely. This is relevant to deliverability and communications.

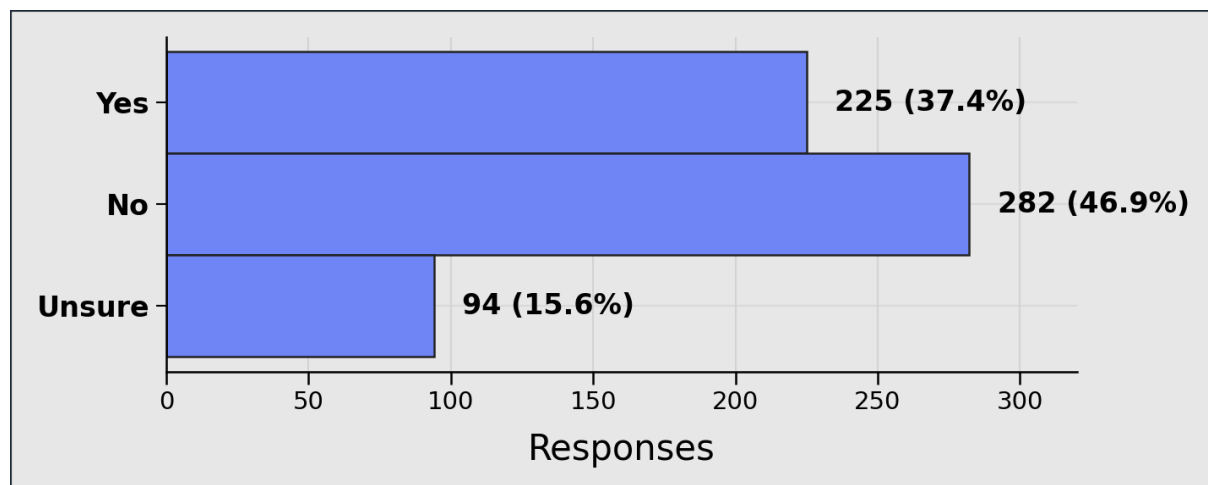
Excerpt from respondent

“Flashing lights would help alert drivers that they should not pass stationary buses..”

Overall, the responses suggest strong support for a warning-light-based restriction on passing, but they also make clear that the success of any such approach would depend on clarity, consistency and public understanding. The findings therefore support further consideration of warning lights as part of a future approach, while underlining the need to address how the lights would operate in practice, how widely they would apply, and what supporting education, signage and enforcement would be needed.

Question 11: Do you consider that allowing vehicles to pass a stationary bus only at or below a specified speed should be explored as a longer-term option, even if this would require primary legislation?

There were 601 responses to this question. Of these, 225 respondents (37.4%) answered Yes, 282 (46.9%) answered No, and 94 (15.6%) answered Unsure. A total of 219 respondents provided written comments.



The responses show that more respondents opposed allowing vehicles to pass a stationary bus at a reduced speed. The most common reasons for opposition were concern about enforcement and a preference for a clearer no-passing rule. Many respondents felt a reduced-speed rule would be difficult to monitor, hard to police and less likely to change behaviour. Others argued that, even at a lower speed, a moving vehicle could still pose a serious risk where children or other passengers are hidden from view or step into the road unexpectedly.

At the same time, a substantial minority supported the idea as a possible compromise. These respondents generally felt lower speeds could improve reaction time, reduce stopping distance and allow traffic to keep moving where a full no-passing rule might be difficult to operate. However, support was often conditional. Even among those in favour, many said the approach would only work if it were backed by clear speed limits, clear signs and a realistic enforcement plan.

A further theme was that suitability depends heavily on location and road type. Some respondents thought reduced-speed passing might work better on wider roads, in lay-bys or in lower-speed urban settings where visibility is good. Others felt it would be much less suitable on rural roads, on bends, at complex junctions or wherever visibility is limited. Respondents also referred to the need for warning lights, signage, bus stop design and wider safety measures if such an option were ever considered.

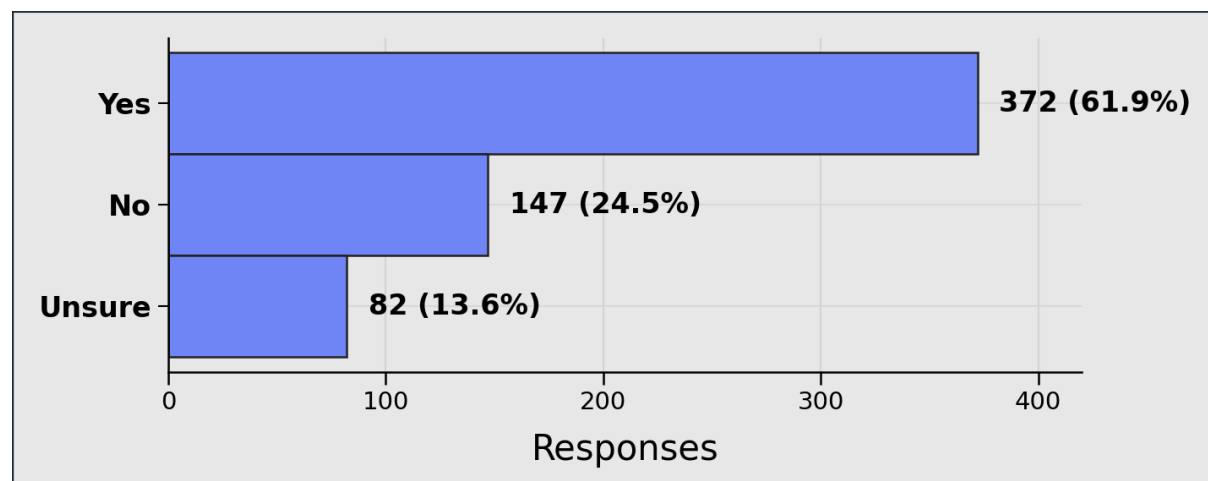
Excerpt from respondent

“No I don’t think vehicles should be allowed to pass at any speed.”

Overall, the responses suggest more concern than support for allowing reduced-speed passing. The main reasons were continuing risk to children, the difficulty of enforcement and a preference for a simpler safety message. While a sizeable minority saw reduced-speed passing as a possible practical compromise, the findings suggest that, if explored further, it would need to be tightly defined, clearly communicated and carefully tested against local road conditions and deliverability.

Question 12: Do you agree that any new legislative provisions should apply to all buses, rather than being limited to school-specific services?

There were 601 responses to this question. Of these, 372 respondents (61.9%) answered Yes, 147 (24.5%) answered No, and 82 (13.6%) answered Unsure. A total of 188 respondents provided written comments.



The responses show that more respondents supported than opposed applying any new provisions to all buses. The strongest reasons for support were that all passengers should be protected, not just schoolchildren, and that many children travel on ordinary public services rather than only on dedicated school buses. Respondents also pointed out that drivers cannot always tell in real time whether a bus is a school service, and that a single rule applying to all buses could therefore be simpler and clearer for road users.

Those who opposed a wider rule, or preferred a narrower approach, most often argued that schoolchildren remain the highest-risk group and should remain the priority. Some accepted that broader coverage might be considered later, but suggested beginning with school buses. Others were concerned that applying provisions to all buses could create congestion, delay, driver frustration or practical difficulties on constrained roads and in busy urban areas. These comments suggest that, even where respondents accepted the principle of wider coverage, many still wanted careful attention to setting, scope and proportionality.

Respondents also stressed the need for any wider rule to be supported by clear signs, warning systems and wider safety measures. Some referred to bus markings, warning lights, safer bus stop design, lighting, crossings and education for drivers and passengers. A smaller number questioned whether further legislation is needed at all, but these were minority views rather than the dominant pattern in responses.

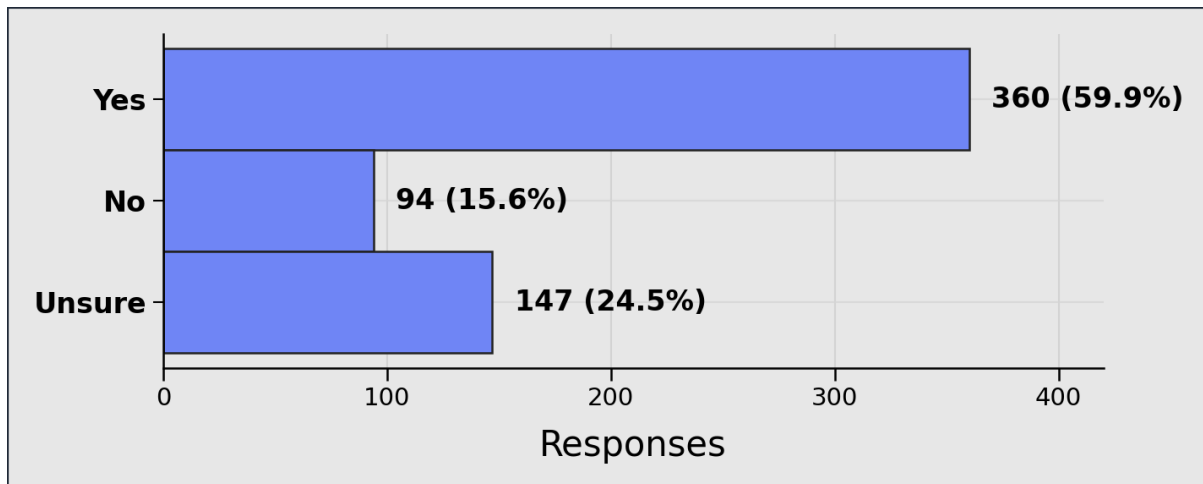
Excerpt from respondent

“A single, clear rule that applies to all buses is easier to understand, enforce and follow”.

Overall, the responses suggest that a wider all-bus approach has a stronger level of support than opposition. The main reasons are clarity for drivers and broader protection for passengers, including children who use ordinary public services. However, the findings also underline the need to address concerns about proportionality, traffic impacts, road layout and practical delivery if a wider rule is taken forward.

Question 13: Do you consider that any of the proposed approaches could have different impacts across rural and urban areas, on particular groups, or lead to unintended changes in driver behaviour elsewhere on the road network?

There were 601 responses to this question. Of these, 360 respondents (59.9%) answered Yes, 94 (15.6%) answered No, and 147 (24.5%) answered Unsure. A total of 185 respondents provided written comments.



The responses show that most respondents thought the proposed approaches could lead to different impacts or unintended behavioural effects. The most common concerns were that drivers might try to overtake before a bus stops, take risks to avoid waiting behind it, or that changes could lead to congestion, delay and knock-on traffic effects. Respondents also frequently referred to driver frustration, with some warning that delays could encourage impatience, aggressive driving or poorer decisions.

A number of respondents said the likely effects would differ between rural and urban settings. Rural roads were often associated with higher speeds, poorer visibility and fewer safe places for buses to pull in, while urban roads were more often linked to frequent stops, traffic build-up and practical difficulties on already busy streets. This suggests that many respondents did not see the issue as lending itself to a simple one-size-fits-all answer.

Importantly, not all respondents treated these possible impacts as reasons for inaction. Some accepted that there could be congestion, delay or behavioural change, but still felt that these effects should be managed rather than used to avoid stronger safety measures. Respondents also referred to the need for clear rules, visible enforcement, communication and, in some locations, supporting infrastructure or phased introduction to help road users adjust.

Excerpt from respondent

“Rural roads, drivers may try to overtake while the bus is moving or just as it's braking to avoid the delay while children are entering or exiting the vehicle.”

Overall, the responses suggest broad recognition that stronger measures around buses could have wider impacts beyond the bus stop itself. The most prominent concerns were pre-emptive overtaking, traffic effects and differences between rural and urban roads. The findings therefore point to the importance of considering not only the direct safety benefit of any measure, but also its likely behavioural and operational effects,

and how these might be mitigated through design, enforcement, communication and supporting measures.

Question 14: Are you aware of any evidence, data or operational experience that could assist the Department in refining these proposals? This was an open question, rather than a closed-answer question. 233 narrative responses are recorded for this question.

Overall, respondents emphasised that any final approach should be based on real-world evidence as well as consultation views. Many referred to international examples, deaths and injuries, near misses, and wider lived experience as reasons for taking stronger action to improve safety around buses. Respondents also pointed to the importance of looking closely at local road conditions, particularly in rural areas where children may get on or off buses on higher-speed roads, at poorly lit stops, or in places without footpaths, crossings or formal bus stop infrastructure.

A smaller but important group highlighted that legislation on its own may not be enough. These responses referred to the need for road-safety education, clearer warning signs or lights, better evidence gathering, and practical input from drivers, operators, schools and enforcement bodies. Some also raised issues about equality and communication, including the need for awareness materials to be accessible to different communities. Taken together, the responses suggest that respondents want any future policy to be evidence-led, practical and focused on the highest-risk situations, rather than relying on legal change alone.

Overall, Question 14 reinforces the importance of using the consultation findings alongside practical data, operational experience and local knowledge to shape the final policy approach. The clearest message is that stronger protections should be informed by evidence about where risk is greatest, how the proposals would work in practice, and what supporting measures may also be needed.

6. Cross-cutting themes

Across the consultation, several issues recurred across multiple questions. This reflects the fact that the consultation was structured around two related but distinct policy questions:

- whether overtaking a stationary bus in clearly defined dangerous circumstances should be prohibited (Pillar 1); and
- how wider risks should be managed where vehicles pass buses during boarding and alighting (Pillar 2).

Responses to individual questions often overlapped across these two pillars, with respondents addressing both the specific proposal and the broader safety context.

Pillar 1: Overtaking a stationary bus in dangerous circumstances

Across Questions 2 to 5, the clearest and most consistent theme was the immediate risk to children and other passengers at the point of boarding, alighting and crossing and strong overall support for action under Pillar 1. Respondents repeatedly linked danger to people stepping into the road unexpectedly, crossing in front of or behind the bus, or being hidden from the view of approaching drivers.

A second strong theme was the importance of road environment and visibility. Respondents often referred to rural roads, higher-speed roads, narrow carriageways, bends, poor sightlines, poor lighting and the lack of footpaths or safe stopping areas. These factors were repeatedly identified as increasing risk and making driver judgement more difficult in practice.

Respondents also highlighted a tension between the appeal of a simple rule and the need for a proportionate approach. Many favoured a clear prohibition because they felt it would be easier to understand and enforce. Others accepted the safety case for stronger rules, but argued that limited exceptions might be needed in clearly lower-risk situations, such as where a bus is fully in a lay-by or where passengers are separated from live traffic. Taken together, the responses suggest that the main Pillar 1 challenge is how to design a rule that is both clear and workable.

A further recurring theme was the need for legal clarity and enforceability. Respondents repeatedly stressed that any rule would need to be objective, understandable and capable of being applied consistently. Many comments suggested that supporting guidance, visible signals and clear public messaging would be important alongside any legal change.

Pillar 2: Wider risks from passing buses during boarding and alighting

Across Questions 6 to 11, respondents showed broad recognition that risk can arise not only from overtaking, but also from the wider set of situations where vehicles pass a bus during boarding or alighting, including from the opposite direction. Again, the strongest recurring concern was the combination of passenger movement and restricted visibility, but in this part of the consultation respondents were more focused on how those risks should be managed in practice.

One of the strongest themes was the role of warning lights, signage and public understanding. Respondents often saw warning lights as potentially useful because they could provide drivers with a clear signal that passengers may be boarding or alighting. However, support was often conditional on warning systems being visible,

distinctive, standardised and consistently used, and on drivers clearly understanding what they mean.

Another recurring issue was the relative merits of movement-based and speed-based controls. Some respondents supported restrictions on passing because they felt a simple no-passing rule would be easier to understand. Others saw some value in time-limited or reduced-speed approaches, especially in targeted locations, but many questioned whether those measures would address the point of greatest risk. Respondents were often more certain about the existence of the risk than about the best mechanism for addressing it.

Practical delivery concerns were also more prominent in this part of the consultation. Respondents frequently referred to enforcement, driver compliance, congestion, tailbacks, driver frustration and the possibility of unintended behaviour, such as overtaking before a bus stops or risky manoeuvres after delay. These concerns did not remove the overall support for stronger protection, but they did shape the way respondents thought such measures should be designed.

Wider themes across the consultation

Across both pillars, respondents repeatedly suggested that legislation alone would not be enough. Many referred to the need for education, public awareness, signage, warning systems, enforcement and infrastructure improvements as part of a wider safety package. This is consistent with the wider Safer Journeys to School programme, which has been framed as combining legislative, educational, behavioural and practical measures.

Questions on scope, impacts and evidence also reinforced several wider issues. These included whether provisions should apply only to school buses or more widely to all buses, the likelihood of different impacts across rural and urban settings, and the importance of continuing to ground the final policy approach in practical evidence, operational experience and local road conditions.

Overall cross-cutting interpretation

Taken together, the consultation responses show a clear and consistent concern about safety around buses at the point where passengers, especially children, are most exposed to risk. Across both pillars, respondents repeatedly linked danger to passenger movement, visibility, road environment, and the need for clear and enforceable rules. The overall message is that any future approach will need to balance safety, clarity, proportionality and deliverability, and is most likely to command support if it sits within a broader package of education, communication, enforcement and practical safety measures.

6. Risks, delivery issues and minority views

The consultation responses, including the additional organisation responses received by email, identified a number of issues that are important for policy design, legal clarity and implementation. These issues did not alter the overall direction of the findings, but they highlight the main conditions that would need to be addressed if any proposals are taken forward.

Legal clarity and enforceability

A recurring concern was that any new rule would need to be clear, objective and capable of being enforced in practice. Respondents repeatedly warned against rules that depend too heavily on subjective judgement, unclear warning signals or inconsistent application. Additional operational responses, including from policing, reinforced that any future approach would need to be observable, practical to enforce and capable of being evidenced.

Warning systems and public understanding

Where warning lights or signs are used as a trigger for legal duties, respondents stressed that they would need to be standardised, visible, reliable and consistently used. There was also a clear expectation that drivers and the wider public would need to understand what such signals mean and what action they require. The responses suggest that warning systems could support compliance, but only if they are clear in both design and meaning.

Rural risk and infrastructure limitations

A strong delivery issue was the extent to which risk is shaped by rural road conditions and the stop environment itself. Respondents referred to higher-speed roads, limited footways, poor visibility, narrow carriageways, unlit stops and informal boarding locations. These issues matter because they may increase both the level of risk and the difficulty of implementing and enforcing any new rule consistently across different settings.

Passenger behaviour and false reassurance

A smaller but important concern was that children or other passengers may assume traffic will stop, or may take less care, if new rules are introduced. Some respondents also emphasised the continuing importance of road-safety education for children, parents and passengers. This suggests that, even where stronger legal protections are introduced, education and communication would remain important alongside legislation.

Traffic impacts and unintended behaviour

Respondents also raised practical concerns about congestion, delays, driver impatience and unintended behaviour, including risky overtaking before a bus stops or

unsafe manoeuvres after delay. These issues were not the dominant message of the consultation, but they were raised often enough to be relevant to proportionality and operational design.

Scope and supporting measures

A further recurring issue was whether any future provisions should apply only to school buses or more widely to all buses, including ordinary services used by children and after-school journeys. Additional responses generally supported wider scope to reduce ambiguity but also highlighted the need to define clearly which vehicles and services would be covered. Across the consultation, respondents also repeatedly referred to the need for supporting measures, including education, public awareness, signage, enforcement, cameras and infrastructure improvements. The overall message was that legislation alone is unlikely to address all of the risks identified.

Overall interpretation

Taken together, these minority views and delivery issues do not undermine the broad support for stronger action around buses. However, they do show that any future approach would need to be clear, proportionate, enforceable and supported by wider practical measures. In particular, the responses point to the importance of legal clarity, warning-system consistency, rural and infrastructure-related risks, public understanding, and the management of unintended traffic impacts.

7. Overall conclusion

Overall, the consultation responses show broad support for action to improve safety around buses, particularly where children and other passengers may be boarding, alighting or crossing nearby. Across the consultation, respondents consistently recognised that risk can arise both from overtaking a stationary bus and from vehicles passing a bus during boarding or alighting. The additional organisation responses received by email reinforced the main findings from the Citizen Space responses, particularly the need for measures that are clear, practical and enforceable, and that reflect the different risks present across rural and urban settings.