



Submission on Pedestrian and Cyclist Safety Framework (Nov 2003)

Introduction

The Cycling Advocates Network (CAN) is pleased to present this submission on the above document. The national committee of the group has prepared this submission, with feedback from CAN members. CAN has based its submission on reviews of the relevant discussion document, as well as our involvement in the earlier consultation meetings. Some of the points below have been raised previously and we feel they still need addressing. If you require any clarification of the points raised by us, please feel free to contact us as detailed below.

Because of the nature of our organisation, many of our comments relate specifically to cycling aspects within the Framework. However a number of issues are equally applicable to both pedestrians and cyclists, recognising some of the common attributes and challenges that these modes face.

General Comments

CAN welcomes the initiatives being developed by LTSA under its Pedestrian & Cyclist Safety Framework (PCSF). It is pleasing to see the enthusiasm with which LTSA are now tackling the many challenges in this area, although it did seem to require specific Governmental direction before this occurred. We also welcome the very open consultation process that has taken place over the past year or so, and appreciate the regular dialogue that has been sought from CAN on specific matters.

We are disappointed that the Framework still concentrates on interventions that primarily target cyclists and pedestrians (e.g. their behaviour, or facilities for them) rather than the overall transport environment and culture of users, planners and policy makers.

It seems to us that most of the measures proposed only scratch the surface and will never make the really fundamental changes to the overall system that need to be made in order to ultimately benefit pedestrian and cycling safety.

For example, we know that 17 to 25 year old males are relatively bad drivers and that when kids turn 15 they are all waiting to start driving and get their own car. Therefore, if we want to have more people walking and cycling and we want safer drivers, raising the driving age is an obvious tool.

Similarly, the present situation of people being able to easily afford cars (that in other countries would hardly be considered roadworthy) is supported by very cheap imports and very low fixed costs of owning cars. An appropriate strategy therefore might be to significantly raise the standard of what can be imported. Also, introducing compulsory third-party insurance, would make owning a car more of a burden and having the nice side-effect of not leaving a third party out of pocket in case of a crash. With the current situation seeing the country getting flooded with ever more cheap cars, it is no wonder that many teenagers stop walking and cycling and that families buy a second car instead of a bike. We need to start thinking about changing that culture.

While examples like this may seem rather unrelated to this Framework, it illustrates how many "structural" elements of our transport system in New Zealand conspire to work against walking and cycling. Some discussion on these issues should be included in the Framework, and policy pieces developed for Government to consider.

The Framework places emphasis on the traditional "3 E's" of Engineering, Enforcement and Education. Yet any cycle planner will tell you that for cycling there is the fourth "E" of Encouragement. This has a role in a Safety Framework because experience and research here and overseas¹ indicates that simply having more cyclists (and pedestrians) out and about improves their relative safety. Initiatives like behavioural marketing programmes and institutional travel plans could fall under this category.

A number of the initiatives listed in the work programmes are rather broad or brief in their description, so it is not always clear whether they will include all issues that we would like to see. We would like to see in the final Framework programme a précis summary of what is envisaged for each work item listed.

Specific Comments

We have a number of specific comments on the content as outlined below. Where no specific comments are made, then tacit support can be assumed.

General Principles of the Framework (p.5)

The 'General Principles' are fine as far as they go, although the "numbers killed and injured" argument for focusing on urban areas is not so clear-cut, given the greater amount of walking and cycling in urban areas anyway. A better rationale is that there is a greater potential to get more people walking and cycling in urban areas, where many trips are relatively short.

The difficulty with an "integrated collaborative approach" (outlined in the fifth principle) is that, in practice, there is no obligation for RCAs to implement the Framework. Smaller and/or rural RCAs are mostly not interested in cycling issues. It is not good enough that RCAs can choose to do nothing, so some thought needs to be given as to what "sticks and carrots" are available (e.g. Transfund funding procedures).

A principle that is missing is that those who impose a risk on others should bear the burden of reducing that risk. Otherwise, the first principle could mean (as it so often has in the past - a consequence of the motorist-centred policy bias) that cyclists and pedestrians will be 'protected' so much from risk that using their chosen mode becomes so indirect or otherwise compromised, it is not practical. Forcing cyclists to use an off-road path is one example of that. Putting fences along footpaths to prevent pedestrians crossing the road at a desired point is another. Both are often done so that the cyclists/pedestrians won't inconvenience the (terribly important) motorist. This point could be addressed by amending the first bullet point to read: *"walking and cycling are legitimate transport modes and should not have undue risks imposed on them"*.

There should also be some recognition of the wider benefits (social, environmental, health as well as safety) that more people walking and cycling bring to the community. We suggest

¹ for example, P. Jacobsen (2003), "Safety in numbers: more walkers and bicyclists, safer walking and bicycling", *Injury Prevention* 2003;9:pp205-209.

amending the second bullet point: *"The framework will encourage the increased use of walking and cycling, recognising the wider benefits to society from such increases"*.

Another principle is that in many cases cyclists and pedestrians need to take precedence over motor vehicles to achieve sufficient safety. This may include, for example, traffic-free areas, removing parking in narrow streets, street crossings that give priority to path traffic, and providing for cyclists to bypass traffic management restrictions. We suggest an additional bullet point: *"Where necessary to achieve adequate safety of walking and cycling, the existing privileges of motor vehicles may need to be restricted"*.

Pedestrian and Cyclist Safety (p.6)

We are disappointed that there is no specific discussion about the "road danger reduction" concept and how it applies to risk. A lot of the discussion in this section is related to recorded injury data, which does not always reflect the perception of danger by the community. More important than reducing injuries is preventing the crashes that cause the injuries; but more important than reducing the crashes is reducing the danger that causes the crashes. We are pleased to see that "safety perceptions" is a priority research topic however.

It needs to be clarified (or corrected) that the 84% of cyclist hospitalisations as a result of "off-road" accidents or not involving a motor vehicle does not include mountainbikers on tracks. This is also an important point though that needs to come out in public education, as many people have an oversensitive concern with cycling in traffic as opposed to off-road paths. Indeed, the data contradicts your initial statement that *"...cyclists are predominantly at risk from motor vehicles"* - we suggest qualifying this more clearly.

There appears to be no discussion on the significant issue of under-reporting of walking and cycling crashes; this is important as it means that the reported injury statistics need to be somewhat taken with a grain of salt. The recent research by Otago's Injury Prevention Research Unit² is worth highlighting here, and further research may be necessary in the future Framework work programme.

The "risk from crime" discussion seems largely focused on Police interventions. One of the greatest deterrents to cycling is the fear of theft and/or vandalism of the parked bike. Many cyclists have more than one bike and use the oldest for commuting purposes. Other cyclists refuse to use their bike for commuting purposes, as the risk of theft is too high. Safe bike parking facilities have the potential to make a big difference. Minimum standards need to be defined, the variety of parking options need to be promoted, and District Plans used as a tool to implement safe bike parking facilities.

Improving Pedestrian/Cyclist Safety: Approach (p.9)

Again, we reiterate that the 'fourth E' seems to be missing from the approach - Encouragement. Since the 'Safety in Numbers' effect is not disputed and the only issue is that it hasn't been properly quantified for New Zealand as yet, this seems to be an omission. Therefore, Encouragement should be added to the matrices.

The matrices demonstrate the problem of the Framework not being compulsory. Local authorities are "encouraged" to use various guides, but not taking up that encouragement has

² J.Langley (2003), "Missing Cyclists", NZ Cycling Conference, Oct 2003, North Shore.

no consequences for these local authorities (it has for the cyclists, though). It is interesting to note that Transfund has just announced that safety audits will be compulsory for projects that are to receive a subsidy. That is a precedent for forcing the take-up of Government initiatives.

The term "*local authorities*" should be replaced by "*road controlling authorities*", as it misses out an essential collaborator in the task of implementation: Transit NZ. While there may be (in many cases) a restricted amount of cycling that takes place along the State Highway network, there will always be a need for pedestrians and cyclists to cross State Highways, particularly where they intersect with urban areas. The ease with which highways can be crossed can be critical to the success of a pedestrian or cyclist route network.

A technique not mentioned for reducing the risk from road users is reducing the amount of motor traffic, either on a site-specific level or on a global level. As this directly affects the risk to walking and cycling, this is a serious omission from the matrices (and the Framework in general). If the reduction of motor vehicle volumes is acknowledged as an objective, this allows us to consider interventions on a (walk/cycle) route-by-route basis, or even on a network-wide approach.

The matrix 'Reducing risk from road users' seems to have an emphasis on getting pedestrians and cyclists to behave differently. We suggest the following alterations:

- Safer drivers : Engineering - Add "*Design of the roading system (to make it clear to all users that pedestrians and cyclists should be using it)*". This includes removing pinchpoints, avoiding speed-encouraging cross-sections, marking bus lanes for use by cyclists, putting in cycle lanes at critical points, narrowing traffic lanes to allow for a wide shoulder etc. Essentially "pedestrian and cyclist facilities" is just a subset of this - to some the present wording suggests that cyclists and pedestrians should be 'put out of harms way' onto separate facilities, when in fact they will normally be using the same roads as motor vehicles.
- Safer drivers : Education - Add "*Tighter driver licensing conditions*".
- Safer drivers : Enforcement - Add "*Review laws to give pedestrians and cyclists the same (or better) rights as motorists*", e.g. right of way over turning motorists at side streets, burden of proof in a crash on the motorist.
- Speed reduction : Engineering - Add "*Promotion of lower than 50 km/h zones*".
- Good skills : Engineering - While there is some merit in point-of-sale minimum standards, it is difficult to see an ongoing use for a cycle standard. There are very few cycle crashes that are genuinely attributable to poor equipment, and the likelihood of such a standard being enforced (or enforceable) is slim.
- Good skills : Enforcement - We are unaware of a standalone "Cycle Helmet Rule", as opposed to the relevant regulation in the forthcoming Road User Rule - please clarify.
- Less aggressive vehicles : Engineering - This needs to be more specific, e.g. "regulations allowing bullbars and tinted windows reviewed", "truck under-run protection", etc.

The matrix 'Reducing risk from physical environment' is similarly focused on pedestrian/cyclist issues rather than all road users. It is also obsessed with the specific Pedestrian/Cyclist Design and Planning Guides. This ignores the fact that most cycling and walking will take place on roads that have been primarily designed for motor vehicles, and so

road practitioners will not automatically refer to the pedestrian/cyclist guides for "general roading" projects. If the objective really is to ensure that "roads are designed for pedestrians and cyclists as well as motor vehicles", then it is the general roading guides that need to be targeted. For example:

- Road design : Engineering - Replace existing bullet point with *"Roading standards and guidelines"*. Add *"Transfund incentives (used to encourage good practice)"*. Unless there are some levers applied, there will be some road controlling authorities that continue to exist in the age of the (motorised) dinosaurs.
- Road design : Education - Add *"Training courses for engineers and decision-makers"*. There are unfortunately too many practitioners around who *don't know that they don't know* how to cater for pedestrians/cyclists.
- Road design : Enforcement - Add *"Regular safety audits done by suitably qualified auditors"*. Since so many practitioners and elected representatives don't really understand how to include pedestrians and cyclists in the transport system, there really needs to be a way of ensuring that 'business as usual' attitudes are challenged. Ideally Transfund funding would be linked to successful audits.
- Roads maintained : Engineering - Add *"Better equipment/techniques for maintenance"*. The way that sweeping of roads is done (or not done), for example, can have a huge impact on the cycle-ability of a hard shoulder, or of an adjacent off-carriageway path.
- Roads maintained : Enforcement - Add *"Liability for maintenance-related crashes clarified"*. Unless either the affected pedestrian or cyclist, or ACC, can sue the road controlling authority for damages, then fixing up badly maintained or constructed pedestrian and cyclist facilities (e.g. wheel-eating drain gratings) will continue to be a low priority for many authorities.

As discussed previously, the matrix 'Reducing risk from crime' needs to make specific mention of initiatives to encourage more (and better quality) cycle parking facilities. For example:

- Mitigate risk : Engineering - Add *"Cycle parking facility guidelines"*.
- Mitigate risk : Education - Add *"Information/training for road planners and commercial developers"*.
- Mitigate risk : Enforcement - Add *"Cycle parking requirements in District Plans"*.

Safe Routes (p.12)

While Safe Routes is a very fine idea, a mere 2-3 projects a year nationwide is not going to make a noticeable change in the overall environment. This should be expanded so that it runs independently in all local authorities; consider the take-up by RCAs in just one year from promoting and supporting Safety Management Systems. The recent Government announcement increasing the funding available for minor safety works should also be able to address funding concerns.

Outcomes (p.13)

Under 'outcomes', the measures suggested again target the cyclists/pedestrians - not for being the cause of crashes (luckily), but certainly as being the ones linked with risk. It is misleading to just have outcome measures that look at reduction in risk imposed on

cyclists/pedestrians without also having outcome measures that look at reduction in risk imposed on others by (and experienced by) other modes. Otherwise, it is difficult to make a valid comparison. In order to make a fundamental change, we probably need a more uncomfortable approach: whatever the crash rates of walking and cycling, they are of course very safe modes when looking at the harm that they cause. So we should be looking at the 'carnage rate' of the various transport modes.

While "risk/rate" measures are certainly preferable to a simple "numbers" approach, we do not seriously expect that *"it is possible that with increased numbers... there may be an increased number of death and injuries."* In conjunction with the other proposed cycle/pedestrian initiatives and the known research on the "safety in numbers" effect, this should not be a likely outcome.

Given that increased cycling and walking also promotes safety of these modes, another performance measure should be how many more people cycle and walk (and conversely, how many fewer people drive or are driven).

Ever-increasing traffic volumes are likely to run counter to a crash risk reduction, or an injury or death risk reduction. Increasing traffic volumes are also likely to be detrimental to an improved perception of risk. Hence, it is suggested that motor vehicle traffic reduction should be considered as a performance indicator outcome measure.

Given that traffic speed is a major factor in the actual and perceived safety of walking and cycling (particularly in the urban area), some measures related to this are essential. Two possibilities are targeting a reduction in the mean/85th percentile urban speeds and an increase in the amount of low-speed (<50 km/h) zones in our towns and cities.

We support the development of some safety perception measures for walking and cycling; it could perhaps be something as simple as *"how comfortable do you feel about walking/cycling in your neighbourhood?"* It may be of interest to consider the usefulness of the perception data collected annually by Christchurch City Council for cycling, and see whether that is a suitable model.

Best Practice: Work Programmes (p.13)

We would like to see the 'intervention areas: work programmes' points put in order of importance. Speed management should be at the top, with education and legal review as next priorities.

Engineering (p.14)

The list of initiatives in this area still appears to be largely focused on cycle/pedestrian-specific engineering, rather than changes to the transport environment as a whole. For example, there is no discussion of how the planning and design of urban form influences transport patterns and ultimately the viability of walking and cycling. Also, there appears to be no planned review of general roading/transport standards and guidelines to ensure that they are "friendly" towards cyclists and pedestrians. While the development of national guidelines for walking and cycling is welcomed, there is a danger that they will only get referred to when planners/designers feel that they are doing a "pedestrian/cyclist" project.

The IHT "Hierarchy of Treatments"³, commonly referred to in cycle planning, neatly illustrates the point by identifying the following priority order:

- (1) Reduce traffic volumes
- (2) Reduce traffic speeds
- (3) Intersection treatment and traffic management
- (4) Reallocation of carriageway/corridor space
- (5) Specific cycle facilities

To summarise the hierarchy, changes to the environment that don't actually target cycling can be more important in achieving a good cycling environment than providing cycle facilities (which, in the priority of measures, is the least important approach). It is significant however that, in this Framework, there is very limited mention of traffic volume reduction as a strategy.

Conversely, there are many general roading "improvement" projects that in fact adversely affect walking and cycling. Therefore we also need to add *"Review of funding/audit procedures for general roading projects"*, so projects that reduce the safety of cyclists/pedestrians can't get implemented as they are.

The development of local area traffic management guidelines should include guidelines for "homezone" creation, like the UK practice (there are some legal issues here that also need to be resolved). Separate guidelines for school access facilities (similar to previous & current NSW guidelines) should also be produced to promote safe "school gate" environments, school travel plans and "safe routes to schools".

The guidelines for pedestrian crossing design need a major overhaul. The traffic control devices in use are too weak a measure to be effective (particularly with negligible enforcement) and, as a consequence, RCA's have a preference of removing crossings, as they are often considered to be unsafe.

The setting of speed limits process does not encourage the use of lower than the default urban speed limit. This is a major drawback for greatly improved urban environments. Therefore additional guidance and assessment tools need to be developed so that local practitioners are comfortable introducing these speed limits. This should also include guidance and promotion of the part-time School Speed Zones, successfully trialled in Christchurch.

British research indicates that vehicle-based speed limiters could reduce their road toll by up to 30%. We strongly suggest that this should be investigated for the New Zealand context.

There are many innovative treatments for walking and cycling in use worldwide, but in New Zealand we are hampered in their take-up by the reluctance for RCAs to trial them (possibly because of their concerns about their legality and LTSA requirements) and their ability to usefully assess them. We suggest that LTSA should take the lead in initiating trials of potentially useful engineering treatments (although other interested parties may suggest initial ideas to them). LTSA could call for "expressions of interest" by RCAs to trial various

³ IHT (Institution of Highways and Transportation), Cyclists' Touring Club, Bicycle Association, & Department of Transport (1996), *Cycle-friendly Infrastructure: Guidelines for Planning and Design*. London, UK.

initiatives seen overseas, then select suitable locations for testing, and carry out appropriate "before and after" surveying. With LTSA providing this leadership, technical support, and perhaps financial support, we are far more likely to see a quick uptake of successful new initiatives.

The light vehicle safety strategy needs more specifics on what is proposed. Issues such as frontal impact zones, bull-bars, window tinting, and external protrusions are all relevant to the safety of pedestrians and cyclists.

Education (p. 15)

The points under 'education' should also be put in order of importance, with education of motorists at the top.

We are disappointed at the planned timeframe for a 'Share the road' campaign. Although there are already excellent examples overseas to model, a finalised local campaign is not envisaged for another 2-3 years. This should be accelerated. Similarly, the innovative Waimakariri "don't burst their bubble" campaign⁴, already being repeated elsewhere in the country should be picked up and promoted nationally.

The rationale for the interventions chosen is again mostly based on the approach of looking at who suffers the crashes, rather than who causes them. For example, the issue of driver licensing appears to be focused more on changes to the Road Code than driver training issues. Meanwhile, CAN has initiated discussions with the NZ Institute of Driving Instructors, who are keen to see a tailored presentation on cycling issues given around the country to their branches and a "condensed" list of cycling issues provided to all members. This would appear to be the kind of initiative that will more directly improve the safety of motorists towards cyclists; no doubt a similar initiative could be developed for pedestrians.

We strongly endorse the point that *"pedestrian and cyclist safety education will be more effective when combined with promotion of the modes."* We would like to see the rest of the Framework match up to that by starting from the (undeniable) premise that cycling/walking are good things, to be encouraged. That approach must lead to measures that tackle those who impose risks or difficulties on the use of those modes.

Some education (and encouragement) of professional groups needs to be implemented prior to 2005/06, particularly in conjunction with the various engineering standards and guidelines being developed. Ideally it would be useful to develop a "Fundamentals of Planning and Design for Walking" training course, to complement the one recently developed for cycling. LTSA should also support ongoing technical forums on walking and cycling issues, either as part of wider conferences (e.g. NZ Cycling Conference) or as separate workshops. CAN is also aware of a suggestion to develop a technical practitioner support network for walking/cycling issues and this should be explicitly identified in the Framework.

A specific stated aim should be for LTSA and other relevant agencies to support the ongoing work of BikeWise, whose current Health sponsorship is under threat. BikeWise provide a valuable interagency forum for developing and supporting numerous cycling education and encouragement initiatives, including the highly successful National Bike Weeks.

Additional suggested education interventions are:

⁴ LTSA (2003), "Motorists urged to not burst the bubble!", *Road Safety New Zealand*, May 2003.

- Development of resources for Road Safety Coordinators providing them with a range of promotions and campaigns to use in their districts (we note for example, that "cycling safety" promotions often only consist of helmet wearing campaigns).
- Establishment of permanent cycling skills courses in all regions for all ages.
- Subsidising the Safe Cycling Book to make it free (and/or place on the internet or CD-ROM resource).
- Testing and certification of child cyclists (this could happen on the permanent cycling skills courses - this is how it is done in Denmark).

Enforcement (p.17)

This section is still very generalised and vague, making it difficult to assess the value of it. While acknowledging the need for some research to identify key enforcement issues, this should not prevent some known initiatives from being undertaken right now.

"Safe cycling" enforcement campaigns are a nice idea, but in practice have been problematic because of an incomplete understanding of the issues by many in the police force. Despite the statistics regarding liability of fault in motorist-cyclist crashes, the end result is often mostly cyclists being ticketed. This tends to reflect the status quo in general traffic enforcement too. The only way around that is to (a) educate the Police and (b) put them on bikes.

A very successful initiative in Wellington has been to run training courses for the local Police on cycling safety issues, including a bike ride to illustrate many of the points first-hand. This model could be successfully taken elsewhere around the country. We understand that the Police have also undertaken some initial specialist training in pedestrian/cyclist crash investigation, and we would support wider staff training.

Similarly, further Police bicycle units for general urban enforcement (not just for special events) should be encouraged. Not only do they help Police officers to appreciate many of the difficulties facing cyclists, they also prove to be very effective for crime prevention (particularly in congested areas).

CAN believes that there are many reasons for pedestrians and cyclists breaking traffic rules (e.g. for increasing their own, or at least perceived, safety) and that much of this behaviour cannot be targeted by enforcement. If this perceived dangerous behaviour is addressed by enforcement, one consequence may be that pedestrians and cyclists may just switch modes. A potentially better way is to research the reasons why pedestrians and cyclists display this risky behaviour, and what lessons policy makers designers and Police can draw from this, e.g. alter road rules, provide facilities to legitimise behaviours, educate pedestrians/cyclists on better approaches.

CAN also suggests a review of police policy on crashes involving pedestrians or cyclists, the level of investigation, and blame assigned. To promote walking and cycling, enforcement of the protection of these modes needs to have priority, not considered below motor vehicle cases. There is some anecdotal evidence however that this is not happening.

Speed Management (p.17)

As a key deterrent to walking and cycling, the focus on speed management is a welcome one. We would suggest the following initiatives be included:

- Development of best practice guidelines for developing low-speed (30-40 km/h) areas
- Further guidelines and industry training on setting of appropriate speed limits, and the use of various perceptual/design tools to produce slower speed environments.
- More targeted speed enforcement in urban areas. (most of the recent safety gains appear to be in rural speed zones)
- Guidance and training on better geometric design of roundabouts to reduce through speeds of motor vehicles.
- Education/promotional campaigns to encourage slower speeds by motorists when passing cyclists and pedestrians.

Given the importance of speed reduction to the actual and perceived safety of walking and cycling, we see these initiatives as being of high priority in relation to the other work programmes.

Review of Legal Changes (p.18)

It would be better to rename this section "Review of Legal and Policy Changes", as it is not always mandatory regulations that cause problems, but simply Government agency policies.

This programme should include investigation of changes that would encourage walking/cycling as well as improving safety. This may need to consider a wide range of cross-sector issues beyond traditional transport ones, for example, school policies on walking and cycling to school, and land-use planning controls.

CAN is pleased to see that the unresolved issues we raised with regard to the Traffic Control Devices and Road User Rules are to be reviewed. Many of those proposed are quite fundamental changes required to allow for a safer walking and cycling environment, e.g. "shared streets", and path priorities over roads.

CAN strongly supports the idea of adopting the 'burden of proof' approach, used overseas. This is the principle that drivers of motor vehicles have to prove that they were not at fault for accidents between their vehicle and a bicycle or pedestrian.

A review of Rules should include the Glazing Rule, which CAN has expressed grave concerns about in the past. Other Rules that CAN has submitted on include Vehicle Dimensions and Mass, Heavy Vehicles, Vehicle Lighting, and Setting of Speed Limits. We ask that our previously stated concerns with these Rules also be checked again.

A review of the rules regarding children cycling on footpaths under certain circumstances should be investigated.

An urgent legal review required is that relating to carrying bikes on buses. It seems incredibly bureaucratic, for example, that vehicle dimension technicalities and unfounded concerns about pedestrian safety are hindering implementing initiatives like front-mounted bike racks, when there are tens of thousands of them operating successfully in the United States. At the very least, some trials of bikes on buses should be programmed for the coming financial year.

CAN has heard anecdotally of suggestions that motorists involved in cycle crashes are receiving lighter sentences (if any) than similar motor vehicle only crashes (we are not sure if there is a similar issue for pedestrian crashes). We suggest that an investigation be done

comparing recent prosecutions and sentences applied to confirm (or otherwise) this assertion.

Research (p.18)

CAN is very pleased to see a review of cycle helmets proposed (after years of asking for one); although we would have thought that this issue was better placed in the "Review of legal changes" section. It is important to remember that the "effectiveness of wearing helmets" is quite a different research question to the "effectiveness of helmet-wearing laws".

There seems to be a distinct lack of proposed local research into the effects of various engineering treatments. To date, such "operational" research has been carried out locally by RCAs in an *ad hoc* manner. For example, it would be of use to study

- The effectiveness of bus-bike lanes
- Perceptions/behaviours with different lane/path widths
- The behavioural impact of coloured surfacing
- Effect of various pedestrian crossing measures
- Benefits and costs of low-speed traffic management zones

The health benefits of cycling and walking are often stated, particularly in relation to the perceived road safety risks, however there is little local data to quantify this. Mayer Hillman's famous "20:1" ratio⁵ of years gained/lost from health and safety effects of cycling is commonly quoted by cycling proponents; yet many Government officials here appear to dispute the figure, arguing either an incomplete consideration of all factors or inapplicability to New Zealand. Clearly, local research is needed in this area to resolve this debate.

Further areas for the research work programme are:

- Review of provision of covered/locked cycle parking and other end-of-trip facilities at major institutions and schools
- School policies for encouraging/discouraging pupils cycling (including minimum age to start cycling, cycle training programmes, uniform requirements)
- Better quantification of benefits for infrastructure projects that help walking and cycling, to provide a sounder base for Transfund project evaluation.

Implementation (p.20)

The approach of voluntary uptake by regional and local authorities is fundamentally wrong. Some Government direction or incentive will be required to get adequate uptake on contentious issues like traffic-restricted/calmed areas and funding for walking/cycling projects. While it is appreciated that "buy-in" by councils is important, attempting to tread completely "softly softly" may result in mostly inaction in some key areas for walking/cycling safety.

A number of suggested implementation measures include:

- Hold seminars and workshops for councils and consultants

⁵ British Medical Association (1992), *Cycling towards Health and Safety*, Oxford University Press.

- Consider financial "carrots and sticks" for implementing safe walking/cycling environments. For example, general road subsidy funding tagged to sufficient provision for walking/cycling, additional funding available for "showcase" walking/cycling initiatives.
- Consider the UK model of promoting "centres of excellence" for RCAs that have demonstrated an expertise and enthusiasm for encouraging walking/cycling. As well as providing financial incentives for them to do more (e.g. trials and research), they can be delegated to provide specialist advice to other RCAs.
- Encourage local councils to send staff to relevant walking/cycling conferences and training courses (e.g. provide subsidy funding, promote in wide range of industry journals).
- Ensure all new guidelines and information packages reach the correct people in RCAs.

Again, the term "*local authorities*" should be replaced by "*road controlling authorities*"; to include Transit NZ.

Monitoring/review (p.21)

While we support the monitoring/review process suggested, the ultimate test of the success of this Framework will be an improvement in the safety of pedestrians and cyclists and ideally a corresponding increase in the use of these modes. It is not clear from this draft how that will be measured, although presumably the Outcomes section, the research work programme and the targets from the Road Safety 2010 Strategy will dictate the best approach. We would like to see some elaboration on this aspect of monitoring/review.

Appendix 2 (p.23)

It should be made clearer within the main text, rather than just in a small footnote, that these statistics are based on five years of crash data.

Appendix 3 (p.26)

It might be useful, for comparison, to also list the relevant statistics for car trips. Otherwise some incorrect assumptions may be made by some readers. For example, the trip purpose data might imply that walking and cycling are primarily for recreational/leisure purposes (as opposed to the work/business nature of car trips); yet the Travel Survey data suggests that there is little difference, for example, in the proportion of travel-to-work trips made by all three modes. Similarly, trip-length data for car trips would also help illustrate how many of these trips could potentially be made by walking or cycling instead.

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The Cycling Advocates' Network of NZ (CAN) Inc is this country's national network of cycling advocate groups. It is a voice for all cyclists - recreational, commuter and touring. We work with central government and local authorities, on behalf of cyclists, for a better cycling environment. We have affiliated groups and individual members throughout the country, and links with overseas cycling organisations. In addition, several national/regional/local government authorities, transportation consultancies, and cycle industry businesses are supporting organisations.