

North Taranaki Cycling Advocates
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New Plymouth 4310

Safer Journeys
Ministry of Transport
PO Box 3175
WELLINGTON 6140



30 September 2009

Dear Sir/Madam

Thank you for the opportunity to consider and make a submission on the new road safety strategy discussion document, *2020 Safer Journeys*. This submission has been prepared by members of the North Taranaki Cycling Advocates (NTCA). NTCA would like to commend the Minister for undertaking this consultation process. We think the Discussion Document itself is clearly readable and the material provided on the website www.saferjourneys.govt.nz useful.

About NTCA

The North Taranaki Cycling Advocates group in New Plymouth are an affiliated group of the national Cycling Advocates' Network (CAN), looking after the interests of cyclists in North Taranaki. NTCA represents a broad cross-section of cyclists in Taranaki with both recreational and commuting members, road and mountain bikers and a wide range of ages. We work with central government and local authorities, on behalf of cyclists, for a better cycling environment in North Taranaki.

General Comments

NTCA welcomes the Discussion Document and endorses many of the proposed initiatives many of which affect the safety of the road users we represent. While we have some reservations, overall we support a safer systems approach which we note has proved to be successful overseas. However, we are concerned with the short consultation period and the emphasis on motor vehicles.

As this submission was being finalised, the media reported yet another cyclist fatality. The *Sunday Star Times* (20/9/09, pA2) reported that in the year to August 2009, nine cyclists have been killed and 881 injured. Official statistics, as is widely recognised, significantly under-report the incidence of injuries incurred by cyclists. The often dangerous and intimidating conditions for walking and cycling in New Zealand will require meaningful changes if our road safety is to significantly improve, enabling more New Zealanders to choose to walk or cycle more often.

This submission on the *2020 Safer Journeys* discussion document comprises three parts:

1. Initiatives that are strongly supported



2. Additional initiatives recommended for consideration
3. Key omissions and concerns

1. Initiatives strongly supported by NTCA

Below is our list of priority issues:

1. Change the legal onus of blame for road crashes to the motorist rather than pedestrians or cyclists.
2. Reduce the legal adult blood alcohol concentration (BAC) to 50mg per 100ml (BAC 0.05).
3. Introduce a zero blood alcohol limit for certain drivers (drivers under 20 years old, adults without a full licence, commercial drivers as per the Safer Journeys Discussion Document).
4. Raise the driving age to 17 and extend the learner licence period to 12 months.
5. Increase the adoption of lower speed limits in urban areas.
6. Change the Give Way rule for pedestrians.
7. Support a targeted programme for high-risk urban intersections.
8. Review speed limits on mixed-use arterials.
9. Create more speed zones (80km/h, 90km/h) on high risk rural roads.
10. Have stronger promotion of road user education, including targeted messages and run national "Share the Road" promotional campaigns educating motorists and cyclists on how to co-exist safely on the roads.
11. Add specific walking and cycling questions into driver licence testing so drivers are more aware of pedestrians' and cyclists' safety needs.
12. Develop and support new approaches to safety on mixed-use arterials.
13. Strengthen the effectiveness of enforcement by: increasing the number of road safety cameras; changing the penalty system to deter speeding (higher demerit points and lower fines).
14. Implement treatments to make high risk roads more self-explaining.
15. Improve techniques to integrate safety into land use planning.
16. Carry out crash reduction studies and make these more targeted.
17. Implement targeted programmes to address run-off road, head-on and overtaking crashes on high volume, high-risk rural roads.
18. Increase cyclists' skills training in schools and for adults.
19. Introduce compulsory 3rd party insurance.
20. Change the tolerance for motor vehicle speed limit enforcement from 10 km/h to a maximum of ten per cent of the posted speed limit.

1.1 Safer speeds are indeed a "High Concern" (pg 8 & 24).

The default speeds in New Zealand of 50 km/h (urban) and 100 km/h (rural) are generally too high. New



Zealand speeds limits are out of line with international best practice. Urban speeds should be reduced to 30 or 40 km/h. Rural speeds need to be reduced to 70 or 80 km/h (e.g.: recommend a blanket reduction of the LSZ maximum speed to 80km/h). However, some motorways may warrant an increased speed limit, e.g. high quality; modern motorways may be suited to a speed limit of 110 km/h.

New Zealand's Transport practitioners need guidance and tools to assist them in the implementation of cost-effective, unobtrusive techniques to support reduced traffic speeds on an area-wide basis.

We recommend changing the tolerance for motor vehicle speed limit enforcement from 10 km/h to a maximum of ten per cent of the posted speed limit.

1.2 Raise the driving age (pg 17)

NTCA recommends that the driving age be raised to at least 17 or 18 years old to coincide with the age at which most students leave school.

1.3 Strengthen the restricted licence test to encourage 120 hours of driving practice (pg 17)

NTCA recommends that this includes compulsory professional driving instruction.

1.4 Introduce vehicle restrictions (pg 19)

NTCA supports specific restrictions on vehicle type for younger drivers, e.g.: maximum engine cc ratings, non-turbo charged.

1.5 Introduce compulsory 3rd party insurance (pg 19)

By looking at gross averages in comparing NZ with the UK, we are concerned that the MoT may be missing one of the key benefits of compulsory third party insurance.

Compulsory third party insurance helps make the road environment safer, especially for the active modes, as it is an effective deterrent against certain types of high risk driver behaviour. Specifically, these include:

- Modified or high-performance vehicles being driven by inexperienced/young drivers. Such vehicles typically include turbo-charged/powerful engines/loud exhausts/etc which encourage more aggressive driving. Such vehicles are also intimidating to vulnerable road users such as cyclists and pedestrians. Compulsory third party insurance is an effective mechanism that encourages inexperienced/young drivers to not drive modified/high-performance vehicles
- Repeat dangerous driving. Compulsory third party insurance provides strong incentive for drivers to refrain from dangerous driving. This is because having a record of dangerous driving will result in substantially higher insurance premiums and/or restriction on the type of vehicle allowed to be driven.

1.6 Change the second Give Way rule for pedestrians (pgs 22 & 23)

NTCA supports this initiative as it greatly enhances safety for pedestrians, especially children to and from school. This supports reduced car use, thus improving safety for cycling.

1.7 Develop and support new approaches to safety on urban mixed-use arterials (pg 23)

New Zealand's arterial roads are too often highly unsafe for cycling. European treatments of arterials have shown how the different road users can be provided with safer and more efficient access.

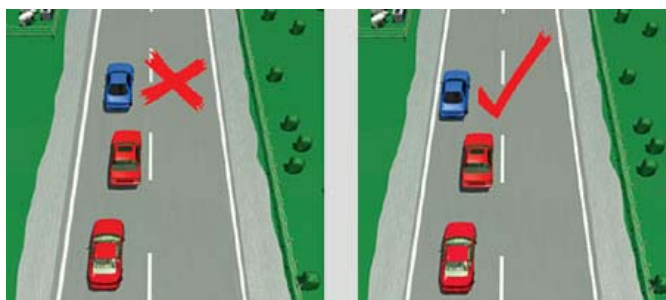
1.8 Implement treatments to make high risk roads more self-explaining (pg 23)

Cost effective, non-intrusive techniques need to be used to encourage slower, safer driving speeds. The traditional approach of larger roads, wider lanes, longer sight lines, bigger signs, etc. to improve safety actually encourages faster speeds, which means crashes are more severe and walking and cycling conditions are typically degraded.

2. Additional initiatives recommended for consideration

Other initiatives that NTCA recommends are as follows:

1. Include education and testing on how to take care around cyclists as part of the licensing system and driver instruction (including bus and truck drivers).
2. Initiatives that encourage mode share shift away from private motor vehicle use, this includes improved public transport, Travel Demand Management and promotion of walking and cycling.
3. Change funding and audit processes to make sure that all roading projects cater for improved walking and cycling conditions.
4. Require re-sitting of the driver's licence theory test to coincide with the 10 yearly renewals.
5. Higher taxes on vehicle registration and use based on vehicle efficiency thus reduce vehicle air pollution.
6. Legalise the use of footpaths by cycling children under 10 years old and their guardians (maximum speed of 10 km/h and give-way to pedestrians).
7. We support a national campaign to encourage all vehicle drivers to provide a 1.5 m gap when passing cyclists.
8. Given that the New Zealand's speed limits on residential and rural roads are generally too fast for the safety of all road users, it is recommended that the Road Code should be updated to remove reference to vehicles that are travelling much slower than the speed limit as "slow drivers" who must "keep as close to the left side of the road as possible" as shown below...



The above driving practice (as recommended by the Road code) is unsafe for cyclists and encourages



unsafe overtaking practice. It should only apply to vehicles that are travelling far slower than the speed limit, e.g.: tractors or construction equipment.

9. Ban the use of radar detectors by drivers of motor vehicles.
10. Restrict vehicle modifications, e.g. tinted windows, loud exhausts, un-muffled blow-off valves, etc which can be intimidating to vulnerable road users.

3. Key omissions and concerns

3.1 The need for a broader vision (pg 6)

The vision “A safe road system that is increasingly free of road deaths and serious injuries” is too narrow.

The above definition:

- Excludes cyclists who are knocked off their bikes and suffer only “minor injuries”; such injuries can be traumatic for this group of road users;
- Ignores the issue of motorised vehicle emissions cause more premature deaths each year than the road toll
- Is overly focused on death and injuries, to the detriment of users’ *perception* of safety. Because cycling is regarded as too unsafe relatively few people use this mode, ironically exacerbating the safety levels for cyclists.

We recommend that the road safety vision be changed to:

- Recognise the importance of perception of safety, especially for the active modes and how this impacts on travel choice.
- Recognise the wider costs of unsafe roads, such as sedentary lifestyles and lack of independence for children.
- Recognise the wider detrimental environmental impacts of private motor vehicle use, such as air pollution, CO₂ emissions and noise pollution, which affect the health and well being of New Zealanders.

3.2. The Safe Systems approach risks being somewhat simplistic (pg 7).

The Safe System approach has merit, but potential flaws include:

- It appears to place greater focus on motorised vehicles, this is to the detriment of walking, cycling and public transport users
- It under-emphasizes the opportunity to prevent unsafe roading environments through mode share shift, this includes initiatives such as improved public transport, Travel Demand Management, promotion of walking and cycling, etc.
- It appears to ignore the problem that “5-star” roads (traditionally regarded as wider lanes, longer sight lines, larger clear zones, bigger road signs, etc.) actually encourage faster vehicle speeds. Thus “5-star” roads need to be carefully defined to support slower traffic speeds and provide greater safety for vulnerable road users.

3.3. Safer walking and cycling should be a High Concern (pg 3)

As traffic volumes and vehicle speeds have increased in New Zealand over the past decades, walking and cycling conditions in New Zealand have generally become perceived as much less safe, resulting in a



dramatic decline in these travel modes, resulting in more traffic congestion, less active life styles and increased air pollution.

If road safety is improved for the active modes (being the most vulnerable users) then it is highly likely that road safety for all road users is improved. Consequently safer walking and cycling should be in the Highest Concern – not a Medium Concern.

Yours sincerely,

North Taranaki Cycling Advocate's committee

www.ntca.org.nz



Theme: "**Communities, connections and the economy**".

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