

North Taranaki Cycling Advocates  
c/- 100 Hine Street  
New Plymouth 4310



21 October 2014

## **Re: The Safer Journeys for People Who Cycle**

### **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.

### **Our Position:**

The North Taranaki Cycling Advocates group supports the Panel's vision – to achieve “a safe road network with zero fatalities for people who cycle”. However, the report lacks a big vision for cycling in New Zealand and the big steps needed to get us there. We ask for a big picture vision from the panel about what cycling in New Zealand could look like ten years from now.

We believe that these activities should be put in place as a result of the findings from the Panel:

1. Put safe cycling at the heart of all future transport planning and tie funding to Road Controlling Authorities (RCAs) to actual safety and participation outcomes through key performance measures (KPIs). Comment: The Panel found that cycling is most-often an ‘afterthought’ during infrastructure planning and design stages. The problem starts at the top due to the economic criteria selected as being important – motorist travel time – versus other considerations like necessary alternative means of transport, health benefits, safety and emissions/pollution reduction. The Panel also questions whether RCAs’ “ad hoc and inconsistent approach to cycling” is delivering fit for purpose, value for money, well-assessed cycling infrastructure. By tying KPI's (e.g. increasing numbers of cyclists) to funding, we feel that this would ensure a better quality of spend.
2. Increase the funding available for safe cycling infrastructure through the Government Policy Statement setting actual funding targets. (We recommend \$100 million per year up from the current \$50 million per year.) Comment: The National Government invest less than one percent of the transport budget into cycling. National have announced additional funding but this falls far short of the \$260 million minimum investment recommended by the Ministry of Transport. We need to invest more per year on new cycling infrastructure over the next ten years to build a comprehensive cycling network making New Zealand one of the best places in the world to ride a bicycle.
3. Legislate for a minimum safe space when drivers pass people on bicycles: 1 metre for speeds up to 60km/h and 1.5 metres for speeds more than 60km/h. Comment: This is best practice around the world and the 1.5 metres is currently recommended in the New Zealand Road Code. Combined with education and enforcement campaigns, this move will send a strong signal to motorists to leave a safe gap when passing people on bicycles.



4. Prioritise safe routes for pedestrians and cyclists to work and school. Comment: We believe that it is a priority to build safe walking and cycling infrastructure around our schools and there should be an aim to see half of all children getting to school under their own steam by 2020. For every \$1 invested in safe walking and cycling infrastructure, NZ will recoup \$20 of health and education benefits.
5. Roll out cycle skills training to every child in New Zealand. Comment: Riding a bicycle is an intrinsic part of being a Kiwi kid but today less than ten percent of children actually ride to school. We can make it safe again by restoring cycle skills training in schools while rolling out new safe routes to schools.

Many of their other recommendations NTCA supports and we have outlined these in the appendix of our submission.

### **Summary**

NTCA commends the Cycling Safety Panel for the work they have undertaken on behalf of the New Zealand public. We would like to see some aspirational goals put in place that if achieved would assist New Zealand in becoming a more vibrant and prosperous country.

We strongly believe that their recommendations should be taken forward into Government policy and legislation to assist the prosperity and health of New Zealand.

Yours faithfully,

Graeme Lindup on behalf of the North Taranaki Cycling Advocate's committee

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## Appendix 1 - Overview of the CSP's Recommendations:

13 in all:

# OVERVIEW OF RECOMMENDATIONS

## SAFE SYSTEM ENABLERS

1. Safe provision for active modes is considered at all stages of road transport planning and investment and given higher priority status.
2. Establish strong leadership and accountability practices for safe cycling
3. Improve and expand cycling information collection and its use in policy and infrastructure development

## SAFE ROADS AND ROADSIDES

4. Take action to minimise conflict (crash risk) between people who cycle and other road users, especially heavy vehicles and at intersections – for instance, through:
  - separation of high volume freight traffic and cyclists
  - intersections, especially roundabouts, designed to be safe for people who cycle
  - complete, connected urban cycling networks
5. Provide safe on-road connections to the NZ Cycle Trail and other nationally significant cycle trails

## SAFE SPEEDS

6. Manage motor vehicle speeds to minimise cycle crash risk and severity

## SAFE ROAD USE

7. Mandate minimum passing distances for motor vehicles overtaking people on cycles – 1 metre where speed limits are below 60 km/h and 1.5 metres where speed limits are 60 km/h or over
8. Increase support for school travel plans and cycle skills training
9. Develop programmes to improve road user (both motorists and cyclists) behaviour and awareness
10. Encourage corporate responsibility for employed drivers and contractors so that they practise safe behaviour towards cyclists.
11. Refresh the legislative review of regulatory provisions relating to on-road cycling.

## SAFE VEHICLES

12. Investigate side under-run protection and other vehicle features to minimise the risk to cyclists from heavy vehicle crashes
13. Adopt improved standards for bicycle lights and the European Union standard for e-bikes

### Thoughts:

- Do these lack ambition and teeth?
- Are the recommendations big enough to effectively tackle the perceived lack of safety?

The Panel wishes to stress that while cycling could and should be made safer in New Zealand, it is not an inherently dangerous activity. There is approximately one fatality for every 2 million hours cycled. The perceived lack of safety is, however, a significant barrier to the uptake of cycling.

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Coroner Gordon Matenga noted in his review of cycling safety in New Zealand that 'a rethink of cycling safety in New Zealand is required, **that attitudes both of motorists to cyclists and cyclists to motorists need to change**'<sup>13</sup>. The Panel considers that this rethink needs to extend beyond cyclists and motorists to planners, engineers, government officials, police officers, schools, parents, councillors, corporations, employers and employees and anyone who uses the road network.

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The bulk of the draft report (*Pages 15 to 36*) goes through the 13 recommendations in more detail, what's happening now and what should be done etc. etc. There are good points that NTCA supports and we have listed these.

### **1. Planning and Investment - safe provision for active modes is considered at all stages of road transport planning and investment**

The Panel is concerned that **cycling is often an after-thought** during the infrastructure planning and design process. Cycle lanes are squeezed into roads that have been built for trucks and cars. Speed limits, intersections and parking are designed for motor vehicles, and people who cycle are most often considered too late in the process (if at all). Land designated for new roads often does not make allowance for safe cycling infrastructure.

And:

This is a consequence, in the Panel's view, of planning and investment criteria prioritising journey time impacts above safety and failing to include other benefits and costs at a population level.

Road Controlling Authorities (RCAs) do not have meaningful **accountability and key performance indicators (KPIs)** around cycling safety outcomes and participation. The Panel would like to see more accountability linking funding to safety outcomes regarding cycling safety in particular.

The Panel is concerned that there is an **ad hoc and inconsistent** approach to cycling and would like to see some assurance that RCAs are building fit for purpose, value for money, well-assessed cycling infrastructure. Better design auditing of cycling provision in all transport projects would help.

Thus we would like to see the Action 1 above occur to remedy these ad hoc practices. In addition, all new roads in urban environments should be made to have safe provisions for active transport as part of their design from the beginning. So RCA's should be measured for the measures they have put in place for all new roading.



## 2. Leadership and Accountability - establish strong leadership and accountability practices for safe cycling

For the reasons noted in recommendation 1, the cycling sector lacks visibility in planning and investment due to the **lack of strong leadership**.

### HIGH PRIORITY ACTIONS

- i. The NZ Transport Agency and Ministry of Transport establish and resource dedicated teams, with senior leaders, staff and funding, to plan, implement and evaluate investments in cycling. [Local government is encouraged to do the same where resources permit]
- ii. Overhaul of cycling infrastructure guidelines to update them in keeping with international best evidence about the effectiveness of different kinds of infrastructure and include minimum standards of continuity, consistency and quality.
- iii. Introduce KPIs for safe provision for cycling for Road Controlling Authorities.

All supported by NTCA.

### 3. Information collection systems relating to cycling safety be improved and expanded

Data capture in New Zealand is better than in most peer countries, however, it is weak and incomplete on many levels. Cycling accidents are under-reported, especially non motor vehicle crashes, in the Transport Agency's Crash Analysis System, making it difficult to measure the size of the problem. Data suggests two-thirds of on road injury crashes don't involve a motorised vehicle,

We agree that more data is needed.



#### **4. Minimise crash risk - RCAs take action to minimise conflict (crash risk) between people who cycle and other road users, especially heavy vehicles**

All these we support especially (ii) and (vi). For (iii) we would suggest that the parking guidelines also cover within 300 metres of schools as the opening of car doors is a hazard for those riding to school or passing by at the drop off/pick up times.

#### **HIGH PRIORITY ACTIONS**

- i. Identify urban and rural freight routes popular with cyclists. Where possible, consider alternative routing, for either freight or cycling. Where this is not possible, special care is needed to reduce heavy vehicle speeds and provide physical separation, intensive intersection treatments and wide protected turning and passing. Align and prioritise this work with the New Zealand Cycle Trail's Network Expansion Project.
- ii. Create consistent, continuous, convenient and complete urban cycle networks, in keeping with the best evidence - a whole of journey approach.
- iii. Parking: Progressively remove parking from arterial routes, which is consistent with the One Network Road Classification. Develop nationally consistent parking guidelines for arterial roads and other key cycling routes.
- iv. Research whether European roundabout design guidelines should be tried in New Zealand.
- v. Safe provision for cycling at other complex intersections, in keeping with international best practice.
- vi. Rural space management which includes shoulder widening and smooth surfacing, sight distance improvements, road markings, maintenance and regular debris removal on key cycling routes. Align this work with KiwiRAP.



This recommended action covers an on-going issue we have in New Plymouth:

- ix. Require managers of road works and building sites to be considerate of cyclists and allow adequate space for them when undertaking temporary traffic management on roads. Strengthen the requirements for providing safe passage for cycling in the Code of Practice for Temporary Traffic Management.

We support these recommendations. The 30 kph speed zone in New Plymouth's CBD has worked fine since its inception and we believe that this should spread further afield for those non-arterial streets in built up areas.

## **6. Manage Motor Vehicle Speed - to minimise crash risk and severity**

Increases in speed disproportionately affect crash severity and also increase the likelihood of a crash happening. Impact speed influences the survivability of a crash – particularly for cyclists, who do not have the protective shell of a car or truck. Occasionally, tools intended to manage speed, such as pinch points, can also add to cycling's safety risk if not well designed.

### **High Priority Actions**

- i. Reduced motor vehicle speeds (using traffic calming, self-explaining street treatments and lower speed limits) around key destinations, such as schools and shops, along key cycling network routes where separated facilities are not present and in local neighbourhood streets.
- ii. Reduced motor vehicle speeds in conjunction with physical separation where cycle and freight routes are unable to be separated.
- iii. Reduced and more appropriate speeds on rural roads where cyclists are most at risk.



A recommendation worth pursuing - move the passing gap into regulation and not just be a recommendation in the Road Code:

### **7. Minimum passing distances - mandated via the Land Transport Act and Regulations**

Cyclists, particularly those on the open road who are being overtaken at high speeds, are vulnerable to being squeezed off the road, sucked towards passing trucks or hit by the vehicle overtaking them. Cyclists are reliant upon balance, and will wobble and fall if their space is impinged upon. In conjunction with

#### **HIGH PRIORITY ACTIONS**

Legislate for a minimum space when drivers overtake cyclists [1 metre is suggested for speed limits up to 60 km/h, and 1.5m for more than 60 km/h roads]. Use such legislation as the foundation for road safety education and enforcement campaigns that support active mobility.

Roll this out as per above:

### **8. School Travel Plans and Cycle Skills Training - increased support from the Transport Agency and local government**

#### **HIGH PRIORITY ACTIONS**

- i. Increase cycle skills training in schools and increase the effectiveness of road user education to make it safer to walk and cycle is reprioritised from medium to high in the Safer Journeys Road Strategy. Cycle skills training should have an increased focus on Grade 2 and above to school aged children, as this level has a greater emphasis on on road riding and dealing with traffic and intersections.

The Grade 2 training should be increased for those children aged 10 years and older with the Grade 1 training given to those below that age.



And their Medium Priority Actions:

- ii. Encourage wider delivery and increased funding of 'Bikes in Schools' as it provides a very good introduction to cycling for many children who may not otherwise have the opportunity.
- iii. Ensure school travel planning initiatives integrate roading infrastructure improvements with cycling, parking and travel speed. Instil a principle of shared responsibility between schools, communities and their councils. Make existing travel planning guidance more accessible to schools.

Both supported by NTCA:

**9. Road User Behaviour and Awareness - the Transport Agency to develop programmes to improve road user (both drivers and cyclists) behaviour and awareness**

**HIGH PRIORITY ACTIONS**

- i. Encouraging drivers and cyclists to share the road safely is reprioritised from medium to high in the Safer Journeys Road Strategy. This will be done by adopting best practice to effectively communicate with the general public about safe road use for people who cycle.
- ii. Add questions to the driver licence test regarding passing cyclists and interaction with pedestrians and cyclists. Investigate if driving instructors are appropriately qualified, and have relevant resources, to teach young drivers to be mindful of cyclists.



NTCA feels there should be some sticks as well as carrots for company vehicles:

**10. Corporate responsibility - WorkSafe New Zealand and ACC and other stakeholders encourage corporate responsibility for employed drivers and contractors so that they practise safe behaviour towards cyclists**

Being mindful of increasing expectations and standards for occupational health and safety (OSH), the Panel considers it imperative that all relevant OSH standards extend to responsible road and vehicle use, where the vehicle can be considered a workplace.

**HIGH PRIORITY ACTIONS**

- i. Encourage corporate responsibility by ensuring that all employees who drive a motor vehicle as part of their employment receive cycle safety specific driver training
- ii. Training for truck and other professional drivers and cyclists on how to be aware of each other, and actions to reduce risk. Consider expanding the current programmes to also include taxi drivers and driver training instructors.
- iii. Reward corporate responsibility and actions to improve cycle safety through ACC levies and insurance premiums.



## **11. Legislative Review - the Ministry of Transport refresh its legislative review of provisions relating to cycling.**

Many existing pieces of traffic regulation were designed largely with motorists and pedestrians in mind; in many cases they are not always equally sensible when cyclists are involved. Such rules include overtaking on the left, riding between traffic lanes, riding on footpaths and using zebra crossings.

A legislative review of provisions for vulnerable road users was initiated in 2006. At the same time changes were made to the give way rule and driver licensing. Other recommendations were delayed until the new give way had become firmly embedded with road users.

As more SBF's come to be built using the extra money asked for in Activity 2 above, we also see a need for clarity in the rules. Priority phasing for those using active transport should also be encouraged in legislation.

Separated bicycle facilities (SBFs) are an emerging issue, as they have been a prominent infrastructure type in the US and Australia for a few years, and are increasingly being built in New Zealand (e.g. Beach Road in Auckland). There is much legal ambiguity, for example in relation to give way rules, and the current integration of these facilities into traffic signal operation is compromised by the fact that the rules are written for drivers.

### **HIGH PRIORITY ACTIONS**

Review how the provision of separated bicycle facilities fits into the legislative framework.

### **MEDIUM PRIORITY ACTIONS**

Legislative recommendations from the work commenced in 2006 be revisited and revitalised. This could be done in conjunction with work to mandate minimum passing distances.



Here the Panel comments on high-vis and helmets. NTCA also believes along with the panel that mandatory high visibility clothing will not improve cyclist safety. We suggest that the compulsory helmet wearing law in NZ should be reviewed outside of the CSP's deliberations to evaluate whether the benefits of having compulsory helmet-wearing outweigh the costs/dis-benefits. Since the law's inception in 1994, this has never been done before in NZ in a comprehensive manner (although some studies have looked at just the crash data), and we think should be undertaken.

*Comment about Clothing and Helmets - status quo for high visibility clothing (voluntary) and cycling helmets (compulsory)*

**Helmets** The Panel does not believe that cyclist safety would be improved by revoking the legislation that makes helmets compulsory.

**High visibility clothing** is an issue often raised by Coroners and journalists. The Panel encourages people to wear bright clothing and reflective garments when cycling (especially in busy or dark environments), but does not support suggestions that these be mandated. Available research does not demonstrate a significant cause and effect between wearing high-vis clothing and reduced risk of death or serious injury.

NTCA supports this high priority recommendation:

**12. Truck Side Under-run Protection - investigation of side under-run protection and other vehicle features to minimise the risk to cyclists from heavy vehicle crashes**

Trucks are over-represented in crashes causing cycling deaths and serious injuries. Between 2003 and 2012, trucks were involved in 33 percent of urban cyclist deaths. The seriousness of trucks mixing with cyclists has recently seen Transport for London ban unauthorised heavy vehicles from the central city (see insert). As well as roads and roadsides measures (see 4 above), there is scope for in-vehicle enhancements to reduce both the risk and severity of such crashes.



## HIGH PRIORITY ACTIONS

- i. Ministry of Transport and the Transport Agency to complete investigations of the cost-effectiveness of truck side under-run protection and other vehicle technology improvements such as collision detection systems, additional mirrors or cameras.

### **13. Bicycle Lights and E-Bikes – the Transport Agency adopt improved standards for bicycle lights and the European Union standard for e-bikes**

Lack of cyclist conspicuity is one of the biggest factors contributing to a crash. Sorry Mate, I Didn't See You (SMIDSY) is often the response of motorists. A well-lit bicycle is one of the easiest ways for a cyclist to be more visible at night and reduce the risk of a crash.

NTCA supports these high priority recommendations:

## HIGH PRIORITY ACTIONS

- i. A new international ISO bike light standard is being developed. In the interim, the Panel recommends raising the standard in the Road Code as follows:
  - one or two white or amber headlights that can be seen from a distance of 200 metres (one of these headlights may flash).
  - one or more red rear-facing light that can be seen from a distance of 200 metres (this may be steady or flashing)

Note: The existing provision that lights should not dazzle or confuse other road users would remain.



There then is a short section on Evaluation and Monitoring:

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The Panel has discussed how the success of its recommendations can be measured. The main “Key Performance Indicators” will be progressive reductions in on road cycling fatalities until our Vision Zero is achieved, accompanied by on-going reductions in serious injuries. If these results are achieved alongside increasing participation in cycling, then we will be very pleased with the results.

The Panel has not been established as an on-going performance monitoring body for cycling safety. Once central and local government have decided which recommendations will be implemented, it will be essential for their work programmes to include monitoring and evaluation requirements so that results can be measured and evaluated accurately. The Safe System approach involves continuous improvement as lessons are learned about what works and what doesn't and then fed back to the next planning and investment round. The improvements in data collection and analysis suggested under Recommendation 3 are vital to this process.

NTCA would like the CSP to recommend on what should be set up within the MoT/NZTA to report on the on-going performance of the measures put in place as regards safety for those who cycle.