



11 October 2013

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Safer journeys for rural schools guide Consultation Draft

Dear Mr Zöllner

The Cycling Advocates' Network (CAN) thanks NZ Transport Agency and Auckland Transport for publishing the consultation draft Safer Journeys for Rural Schools Guidelines.

CAN is the overarching body of the national network of cycling advocates. It is a voice for all cyclists - recreational, commuter and touring. Its membership includes over 400 paid members with more than 1500 additional 'friends' who are on an email network. As well as taking on board the extensive cycling experience of many of our members who are both commuting and recreational/sporting cyclists, our submission is also based on contributions from those well versed in broader road safety policy, engineering and research. This submission has been prepared by members of the Cycling Advocates' Network (CAN).

CAN supports any measures that will make the land transport system safer for people who ride bikes. To that end CAN strongly supports improved infrastructure for cycling as well as other road safety initiatives. CAN is pleased to see that a Guide has been developed. Our feedback below indicates a number of areas that need to be strengthened and expanded in order to make this a better tool for improving safety around rural schools.

General

CAN considers that it is necessary and indeed urgent for guidance and resources to be provided for rural schools and their communities in engaging with local and central government agencies to make journeys to and from rural schools safer for children and their caregivers and those travelling in the vicinity of routes to rural schools.

We see the desired result of guidance as:

safe, or (at the very least), much safer routes to, and in the vicinity of, rural schools especially for those using active modes (which in some places may include scooters).

For this to be achieved the guidance needs to be user-friendly and the approach needs to be integrated and inclusive of all modes. The current level of cycling to rural schools should not be underestimated and it should be assumed, all things being equal, that there will be growing interest in cycling within the immediate vicinity of many rural schools, reflecting the rapid growth in recreational cycling. We would like the section on page 11 change to include people on bikes i.e. Roads for pedestrians and people on bikes.

Underlying principles (p3)

In general, CAN supports these principles. However, while we support the principle of Shared Responsibility, we would want to emphasise that there may be differing levels of responsibility commensurate with resourcing and statutory responsibilities.

To these we would add the principles of **Good quality data** and **Consistency**. We see it as important to improve the evidence base and ensure for example that all crashes, near misses, however minor, involving any user (i.e. all ages) be recorded. As in urban areas, most minor injury or non-injury cycle crashes, along with near misses, are unreported. An accurate picture of safety issues cannot be obtained without good data.

Consistency is needed so that drivers from different areas are familiar with the expectations of driving behaviour in the vicinity of rural schools. In particular, a standard 30 km/h speed limit (discussed below) is

Key initiatives to achieve safe, or at the very least, much safer, rural school road environments

CAN considers that priority should be given to the following initiatives to achieve safe, or (at the very least), much safer routes to schools are as follows:

- 1) speed reduction on key routes and, in the immediate school environs, low vehicle speeds
- 2) off-road parking
- 3) school zones
- 4) cycle skills training

Some brief comments follow about each of these.

Speed reduction on key routes and, in the immediate school environs, low vehicle speeds

Transport planners at the local council will be able to work with the school to develop a school travel plan. This will identify key routes from the wider school catchment. These should be prioritised for speed reduction.

In the immediate vicinity of the school, the 30 km/h speed limit should be implemented using signage for school zones and in effect on days during school terms when the school is open.

Off-road parking

This is often a source of conflict between different users and uses of land. On page 12 the Guide refers to the need for “sufficient” parking. We question the inclusion of this. We support clear drop-off areas but we believe that increasing parking to cater for growing demand has detrimental effects on safety, amenity and discourages shared transport.

School zones

School zones need to be more consistently signed and enforced in accordance with the Consistency principle proposed above. We believe that New Zealand needs to rapidly conform to international

best practice which is a maximum of 30km/h in the vicinity of schools. In other countries and in NZ speeds are lowered when vehicles are passing school buses and so too we believe that this should be the case when passing schools.

We support the idea proposed by another submitter that school zones should be a 'safety bubble'.

Cycle skills training

Improving the skills of children who do bike and would like to bike is critical. There are many different types of rural communities in NZ and many are in settings where cycling to school is feasible. However, critically, the 'safety-in-numbers' effect which often is present in urban areas where there are small flocks of children biking to school is less likely to be present in rural areas where population density is so much lower. However, cycling is still very viable if other road users recognise the vulnerability of children and their unique needs (related to their age and developmental stage). Children in rural areas like their counterparts also need to have the opportunity to use active transport as much as possible and where the distance is not too great should be encouraged to bike to school as this will assist in reducing the demand for off-road car parking and will reduce vehicular traffic in the school environs.

Conclusion

At present most rural school roading environments and routes are not safe for children who walk and bike. As well as giving greater attention in the draft Guide to the needs of children who ride bikes and also the need to encourage more cycling to school, CAN recommends that emphasis be placed on three priority measures:

- 1) Reduced vehicle speeds overall and more comprehensive use of variable speed limits to achieve safer speeds on roads where there are hazards – e.g. limited visibility due to corners or hills, very narrow shoulders, etc.
- 2) Standardisation of consistent 1-1.5m shoulders on key biking routes and, in particular routes, where there is a significant number of cyclists and/or no alternative for cyclists.
- 3) Comprehensive consultation with national and local cycle advocacy groups in the development of draft guidelines for managing high risk rural roads and in design of rural roading projects.

We would like to see the Guide include more information on page 5 (and ideally accompanied by some case studies) about successful working with road controlling authorities. We consider that the guide oversimplifies this crucial aspect.

CAN looks forward to the final Guide. We recommend that a 2-3 yearly review of the Guide be undertaken (no later than December 2016) so that use and effectiveness of the Guide can be assessed and revisions made if necessary. The review should be undertaken by independent transport planners and engineers who have expertise in all modes of transport. As part of reviewing the Guide, feedback should be sought from parents, staff, children, staff of the road controlling authority, NZTA regional office staff, Police education staff, and other stakeholders in the wider community.

CAN thanks you for the opportunity to make a submission on the draft guide and is happy to provide further information if required. We look forward to the publication of the guide later this year.

Yours sincerely

Christine Cheyne
CAN Submissions Co-ordinator

cc: CAN Secretary, CAN Chair, CAN Project Manager