



Registered Charity No. CC36909

12 November 2012

Safer Journeys  
Ministry of Transport  
PO Box 3175  
Wellington 6140

To whom it might concern,

### **SAFER JOURNEYS CONVERSATION PAPER 2012**

Thank you for your email of 4 October 2012 inviting our organisation to present our views for the next stage of the *Safer Journeys* road safety strategy. We appreciate the opportunity to put forward our thoughts and welcome any further engagement in the development and implementation of the resulting Action Plan and initiatives.

This submission has been prepared by members of the Cycling Advocates' Network with expertise in road safety.

#### **Background**

The Cycling Advocates' Network of NZ (CAN), the peak body of 22 local advocacy groups, is this country's national network of advocates for cycling and a more cycle-friendly environment. It is a voice for all cyclists - recreational, commuter and touring. Its membership includes nearly 1500 members with more than 2000 additional 'friends' who are on an email network. CAN has an Executive Committee and employs some staff.

We work with central government and local authorities, on behalf of people who cycle (or wish to cycle), for a better cycling environment. We have affiliated groups and individual members throughout the country and links with overseas cycling organisations. We also have a number of supporting member organisations that include local authorities, cycle retailers, cycling groups and environmental organisations.

#### **SUBMISSION**

##### **General Comments**

Firstly we would reiterate the point we have made before: many of the best safety initiatives for cycling (and walking) do not directly involve these modes, such as lower speed limits, give-way rules, driver training and drink-driving limits. While a very necessary part of the equation, simply providing (say) some more cycleways and cycle-skills training is not enough. To achieve better and safer provision for cycling in New Zealand requires very broad-ranging policy decisions across a variety of issues; hence our comments on many of them below.

Although we have been pleased to see a number of important road safety initiatives implemented in the first period of the *Safer Journeys* strategy period (e.g. raising driver licensing age, changing Give Way rules) we have been disappointed at the relative pace of other identified initiatives. This is particularly so in the case of the "Safer Speeds" area, which we see as crucial to the safety of all road users but with particular relevance to active travel modes.

We appreciate that the Government is wary of initiatives that involve considerable expenditure to implement (although we would argue that such investment is likely to produce more significant economic gains than those being demonstrated by many of the Roads of National Significance). However it seems that there are a number of important gains that can be made largely through legislative/regulatory or policy changes with relatively little cost to the Government or local authorities.

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We present below our responses to most of the questions posed (*NB: the order presented in the submission template differs from the discussion paper, which is not helpful*); in many cases we reiterate points made in our original submission to *Safer Journeys*<sup>1</sup>. In addition we have also listed other actions that we feel are worthy of consideration.

## Specific Responses to Consultation Questions

### **Safe Road Use No. 1: Move Towards International Best Practise**

- ***What opportunities can you see in progressing this action?***

This is an example where quick gains can be made relatively quickly and inexpensively by simply lowering the legal BAC limit to 0.05. This move was strongly supported by many submitters to the original *Safer Journeys* strategy.

- ***What do you still need to learn about this action?***

It is hard to see how the current New Zealand-specific research on adult BAC levels will provide any additional useful data to further justify the move.

- ***Who should be involved in this action?***

While the hospitality sector should be involved to help promote what a lower limit means in practice, it is equally important that their influence does not try to water down or abandon this initiative for fears of lost trade.

- ***What challenges might need to be overcome and how that might be done?***

There is a perception that changing the BAC level slightly only affects a small proportion of drivers currently between the two limits. However, more importantly it would change the general perception of what is "moderate" drinking, so that people don't misjudge this and change their drink-driving intentions later in the night.

- ***What is the next level of thinking that is needed?***

It is instructive to note that a number of countries have BAC limits below 0.05 (e.g. Sweden 0.02, Japan 0.03) and some even have zero limits, so it is not beyond the realms of possibility to look into these options. This may depend also on long-term evidence from our own under-20s zero limit.

### **Safe Road Use No.2: Enhance the Whole of Government Approach**

- ***What is the next level of thinking that is needed?***

While we support the use of a whole-of-government approach to alcohol, we would suggest that walking and cycling could benefit even more from a concerted joint effort. For example, much of the expenditure benefiting walking and cycling typically comes from the Transport budget, yet many of the benefits are typically ascribed to the Health & Environment sectors.

### **Safe Road Use No. 3: Wider Use of Alcohol Interlocks**

No comments but supported for further implementation

### **Safe Road Use No. 4: New Interventions for Drug Driving**

No comments but supported for further investigation

### **Safe Speed No. 5: Implement a Speed Plan**

- ***What opportunities can you see in progressing this action?***

This is potentially the most effective of the four road safety areas of the strategy. However it needs prompt conversion from too much discussion into action. For example, it would be relatively easy to provide national

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<sup>1</sup> See <http://can.org.nz/candocument/safer-journeys-2020>



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guidance on when 30 or 40 km/h speed limits should be introduced under the existing Setting Speed Limits rating process (even if that guidance were to be “tweaked” further later).

- ***What do you still need to learn about this action?***

There is still relatively limited understanding locally by practitioners about the effects of different speed management treatments (e.g. traffic calming devices, road widths), including the effect of changing speed limits. However that should be all the more reason to trial things further in New Zealand (with appropriate monitoring and evaluation).

- ***Who should be involved in this action?***

Local authorities nationwide need to be strongly engaged to be pro-active in this area. Researchers are also needed to build up the evidence needed to support introducing various safe speed treatments.

The “public conversation” on speed also needs to go beyond the effects on motorists; work should be done to focus on the impacts of speed on others, including pedestrians, cyclists, schools, residents, etc. The recent lower speeds in Christchurch to minimise ground vibrations for residents is a case in point.

- ***What challenges might need to be overcome and how that might be done?***

Inertia and “fear of the unknown” are the biggest impediments to introducing safer speeds by RCAs. This can be helped by more pro-active policies and guidance that encourage RCAs to depart from traditional speed limits and road designs.

Another potential issue is if “economic productivity” is only interpreted as meaning “*getting from A to B as quickly as possible*”, thus reducing the political/public attractiveness of lower speeds. It needs to be made quite clear that there are also economic productivity gains to be made from lower speeds, such as significant crash reductions (safety benefits), increased walking & cycling (health benefits), and greater retail trade on slower streets (retail benefits).

- ***What is the next level of thinking that is needed?***

In the same way that a central “champion” was appointed to promote Safety Management Systems to RCAs, perhaps there needs to be the appointment of a suitable champion within NZTA or MOT to oversee the promotion and implementation of safer speeds in New Zealand.

### **Safe Speed No. 6: Enhance Automatic Speed Enforcement**

- ***What opportunities can you see in progressing this action?***

Clearly these tools can be a fairly cost-effective way to efficiently monitor the behaviour of road users; their success has been demonstrated here and overseas. This countermeasure would be supported even further by a ban on the use of radar detectors by vehicle drivers - there is no reasonable legal need for any driver to have one of these; their sole purpose is clearly speeding evasion.

- ***What do you still need to learn about this action?***

Very little further work is needed at the policy level; rather, a pragmatic implementation plan needs to be developed promptly.

- ***Who should be involved in this action?***

The Police and local RCAs need engagement to quickly map out a prompt course of action.

- ***What challenges might need to be overcome and how that might be done?***

It has been over a year since the Auckland red-light camera trial conclusively illustrated the benefits of this treatment; but the policy implementation has been dragging its heels over issues of funding and control. Similar procedural issues bogged down the implementation of hidden speed cameras. The Government needs to take a more aggressive stance against the potential hurdles raised (e.g. privacy, legal challenges) and focus on the safety benefits to be achieved.

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- ***What is the next level of thinking that is needed?***

It is clear that too many people still view speed enforcement as revenue gathering; thus alienating them from the safer speeds conversation. Shifting to a strong emphasis on demerit points instead (with only nominal fines to cover administrative costs) would send the clear message that this is about safety, while giving people concern about the prospect of losing their licence.

### **Safe Roads and Roadsides No. 7: Improve High-Risk Roads and Intersections**

- ***What opportunities can you see in progressing this action?***

Engineering treatments provide the opportunity to create long-lasting safety benefits, unlike education and enforcement initiatives that require ongoing support.

- ***What do you still need to learn about this action?***

Although there are always things to learn (and demonstration projects can help here); we already know what are many of the main ways to improve safety on our roads and intersections – it's just a lack of sufficient funding that is the major problem.

- ***Who should be involved in this action?***

As well as including local authorities, it is important that various road user groups are involved to identify sites of concern to them. In many cases, their specialist local knowledge will be able to determine concerns that are not (yet) evident from just conventional crash statistics. CAN and its local groups would be happy to help assist with this process.

- ***What challenges might need to be overcome and how that might be done?***

Something like a "top 100" programme for high-risk intersections might actually prove difficult – we probably don't have that many "high-risk" intersections nationwide using conventional blackspot criteria. However it would be *very easy* to find at least 100 intersections nationally that are of significant concern to people walking and cycling. They may not be identified by crash statistics however, either because of under-reporting or because these road users are deterred from using these sites.

The other big challenge is simply funding – we could implement a lot of highly cost-effective safety projects right now if land transport funding wasn't so constrained by the needs of the RoNS projects. This is poor value for money. It is particularly critical for projects that would improve walking and cycling safety as they also tend to increase demand for these activities, thus providing additional societal benefits over and above safety.

- ***What is the next level of thinking that is needed?***

Our traditional safety approach needs to shift from "injury reduction" and "crash reduction" to one of "danger reduction" (see <http://rdrf.org.uk/> for more information about this approach). The road danger reduction approach to achieving safer roads seeks to reduce danger at source (e.g. speeding traffic), rather than treating the symptoms (e.g. high-visibility clothing to reduce cycle crashes).

### **Safe Roads and Roadsides No. 8: Target Safety Improvements on Local Roads**

- ***What opportunities can you see in progressing this action?***

With local roads (esp. in urban areas) the needs of people walking and cycling are even more important. Therefore, unlike KiwiRAP, a local road risk rating system could consider how it best meets the needs of all road users.

- ***What do you still need to learn about this action?***

It may be that existing qualitative walk/cycle rating systems like Community Street Reviews could provide a useful way to rate and prioritise safety treatments in local areas. Further work is needed to validate these reviews with more quantitative measures that can be more easily assessed on a larger scale, as was done recently in NZTA Walkability research.

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- ***Who should be involved in this action?***

Given the technical difficulties in develop a similar rating system for local roads, further involvement from the wider road safety research community might be of use. Again, feedback from local road user groups might also provide valuable assessment/prioritisation information.

- ***What challenges might need to be overcome and how that might be done?***

As mentioned before, many local authorities are ready and willing to commit to more safety projects (including many treatments for cycling); however they are currently being constrained by a highly inequitable national funding system that leaves little support for their initiatives once state highway projects (esp. RoNS) have been prioritised.

- ***What is the next level of thinking that is needed?***

Priority rules for path users along road corridors should be revisited to provide right-of-way over turning traffic. This would improve driver behaviour towards pedestrians and cyclists at intersections and also allow RCAs to provide off-road facilities that most people would find convenient to use. The subsequent increased numbers of people walking and cycling would also have resulting safety benefits.

#### **Safe Vehicles No. 9: Improve the Quality of the Vehicles Entering the Fleet**

- ***What challenges might need to be overcome and how that might be done?***

There is a danger with many of the technological advances being introduced (e.g. Electronic Stability Control, Collision Avoidance Detection) that drivers will behave in a less safe manner and actually “out-drive” the safety capabilities of their vehicles.

- ***What is the next level of thinking that is needed?***

Specific safety measures for heavy vehicles that help protect active road users need to be implemented into new vehicles in New Zealand, as implemented in Europe. These include truck front/side under-run protection and “blind spot” mirrors. These issues were particularly pertinent when analysing NZ cycle fatality data as part of the recent Coroner’s Inquiry.

#### **Safe Vehicles No. 10: Encourage the Exit of Vehicles from the Fleet**

- ***What is the next level of thinking that is needed?***

At present there is no difference in vehicle registration costs for new or old motor vehicles. Some other countries have sliding scales of registration fees based on age or safety features (it can also incorporate environmental features too like alternative fuels); these serve to encourage people to dispense with their older vehicles as time goes on.

#### **Safe Vehicles No. 11: Change Consumer Purchasing Behaviour**

- ***What opportunities can you see in progressing this action?***

As a major purchaser whose vehicles are then typically onsold to the private market, the Government and its agencies play a very important role in determining whether safer vehicles get into the NZ “market”.

- ***What is the next level of thinking that is needed?***

The obvious missing factor here is compulsory 3<sup>rd</sup> Party Motor Vehicle insurance. This can provide a financial brake on those who desire to own a vehicle that has poor safety features or is too high-powered for their needs or capability. It can also temper the behaviour of those who have historically displayed a poor driving record. The recent MoT investigation into vehicle insurance did little to minimise these benefits.

#### **Demonstrating the Safe System No. 12: Safe System Signature Projects**

- ***What opportunities can you see in progressing this action?***

We strongly support the concept of introducing demonstration safety projects around the country; the Model Walking & Cycling Communities have demonstrated how this approach can provide a useful catalyst to effecting real change. However, it may not be necessary to have just “large, high profile projects”; smaller

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safety demonstration initiatives may also provide value if they are more readily implemented nationwide later (low speed “home zones” and “neighbourhood greenways” are two examples).

- ***Who should be involved in this action?***

Road controlling authorities are obviously key to implementing these projects. So a process needs to be identified where RCAs can “bid” for particular projects (or particular RCAs could be invited to bid). It is also important that robust evidence of the safety effects are identified, such research skills are typically not available in RCAs. Therefore universities and other researchers should be engaged to help properly create trials, determine appropriate monitoring indicators, and analyse the resulting findings.

- ***What challenges might need to be overcome and how that might be done?***

The biggest impediments are likely to be financial. For a local authority to want to commit to these projects they may require incentives like higher financial assistance rates. Monitoring and research may also require sufficient funding to produce useful findings, and means of disseminating these findings to other practitioners also need to be considered.

- ***What is the next level of thinking that is needed?***

As safety initiatives are constantly evolving worldwide, this shouldn't be viewed as a short-term exercise to just try out a few things. Rather, it should be viewed as the start of a programme of continuous improvement for road safety in New Zealand.

### **Demonstrating the Safe System No. 13: Corporate Partnership Programme**

- ***What opportunities can you see in progressing this action?***

Financial/tax incentives remain a powerful to motivate businesses. For example, fringe-benefit tax exemptions for employee car parking (but none for public transport or cycling assistance) were hardly conducive to encouraging a shift in travel behaviours. Similarly, FBT could encourage greater use of purchased/leased motor vehicles with safety features. ACC could also more strongly reward those companies with better accident records by reducing levies.

- ***What challenges might need to be overcome and how that might be done?***

Changes to financial/tax systems can be unpopular if they are perceived as just additional revenue gathering. For the best support, any new systems should be fiscally neutral, i.e. businesses that demonstrate better road safety practices will be better off, and vice versa.

- ***What is the next level of thinking that is needed?***

The new ISO 39001 standard for “road safety management systems” provides a radical way of thinking about road safety within an organisation, where every linkage (employees, customers/clients, suppliers, advertising, etc) has the potential to influence road safety outcomes. Work is needed to promote this approach to organisations within New Zealand, particularly larger ones.

### **Demonstrating the Safe System No. 14: Align Polices and Strategies with the Safe System**

- ***What opportunities can you see in progressing this action?***

Empowering local/regional government to be more responsible for road safety in their area would be more effective if they were also given more self-determination about funding for road safety. For example, “block funding” to a district for road safety could be simply tied to achieving long-term reductions in overall crashes. Whether they used that for education, engineering or enforcement would be up to them and their local road safety partners.

- ***What is the next level of thinking that is needed?***

The *Safer Journeys* programme still fails to recognise its role in influencing broader transport patterns. For example, in the case of active transport modes like walking and cycling, many lesser incidents, while not serious from an injury perspective, significantly affect people's perceptions about the relative safety of these modes and hence affect their use of them.

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Conversely, one of the best ways to improve safety for these modes is by having more people take them up (the "safety in numbers" effect, well documented here and overseas). Hence, strong positive travel behaviour change efforts must also form part of the road safety equation.

### **Other actions that could be Strategic Priorities**

The relative role of safer speeds in this strategy still seems to be significantly underplayed. The talk of "progress so far" in this area to date was very underwhelming; various background discussions but little actual action. The discussion paper notes that *"steps have been taken to create an enabling environment for RCAs to set speed limits"*; whilst "technically" that is true (and has been since 2005), in practice there has been little by way of incentives or guidance to encourage RCAs to depart from the default 50/100 limits.

The discussion paper states that *"alcohol/drug impaired driving... [has] the most potential to be a strategic priority."* However this has already been a focus for the past generation with notable success; other than a change in legal BAC it is hard to see how this could be taken further in terms of "low hanging fruit". Conversely, "safe road use" areas like walking/cycling and distraction/fatigue have had very little attention given to them over the past few decades, yet have the potential to significantly impact on crash statistics (especially in urban areas, where walking/cycling can make up a third of all fatalities). The recent trial "Safer Cycling" projects by CAN/BikeNZ for NZTA demonstrate the potential for relatively inexpensive initiatives to improve cycling and motorist behaviour through training and promotional activities.

It is not clear whether there is specific monitoring of road user sub-groups for crash numbers and crash rates (in conjunction with Travel Survey data). This is important as otherwise major trends (like the significant reduction in fatalities in 2011) may be masking trends in smaller groups. It was notable for example during the early 1990s to early 2000s that, while the motor vehicle crash rate dropped considerably, the pedestrian crash rate stayed virtually constant and the cycling crash rate increased.

Yours faithfully

Graeme Lindup  
Chair  
Cycling Advocates' Network

### **Contact address:**

Patrick Morgan, Project Manager  
Cycling Advocates' Network (CAN)  
PO Box 25-424,  
Panama Street, Wellington 6146  
phone: 04 210 4967 cell: 027 563 4733  
email: [patrick@can.org.nz](mailto:patrick@can.org.nz)

CAN website: [www.can.org.nz](http://www.can.org.nz)