



20 December 2004

## **Heavy Vehicle Safety to 2010 – Discussion Paper**

Comments from Cycling Advocates Network prepared by John Gregory and reviewed by Robert Ibell and other members of CAN.

1. Nearly all the initiatives in this Discussion Paper have the potential to benefit cyclists as well as Heavy Vehicle (HV) drivers and other road users.
2. We support the focus on HV safety.
3. *“To achieve New Zealand’s overall road safety goal for 2010, it is important that we aim to reduce heavy vehicle crashes by at least the same proportion as overall crashes. Should the reduction being sought from heavy vehicle crashes be the same proportion as for overall crashes, or should it be a greater proportion?”*  
Crash reductions should be in greater proportion because the 7% of road usage by HVs is resulting in 20% of fatal crashes.
4. *“Do you agree that the performance measures suggested for the general heavy vehicle crash goals are the best measures available to us? These measures are:*
  - a. *the social cost of road trauma resulting from heavy vehicle crashes,*
  - b. *the number of deaths from heavy vehicle crashes, and*
  - c. *the number of serious injuries resulting from heavy vehicle crashes.”*  
We agree. We support using Police records of serious injuries resulting from HV crashes (refer p2, para 9).
5. *“Do you agree that the priority areas for action to improve heavy vehicle safety are:*
  - a. *engineering safer roads*
  - b. *managing speed*
  - c. *reducing driver impairment*
  - d. *dealing with repeat/serious offenders*

e. *increasing the use of restraints; and*

f. *improving vehicle and load safety”*

We agree. However, while the fatal crashes involving HVs (20%) outweigh their usage (7%), a further priority should be encouraging some transfer to safer forms of transport eg rail and coastal shipping.

6. Table 8 *Advisory speed signs*. Advisory speed at present is based on cornering stability using a “ball bank gauge”. I believe corners with limited visibility require slower speeds to comply with Road Code stopping distances.  
If HVs (and other vehicles) reduce their speed in accordance with the Road Code eg so they can stop within the length of clear lane they can see in front of them, before blind bends or before blind humps, all road users will be safer. Unfortunately this aspect of the Road Code is not well understood or widely followed. More education is needed.  
Advisory speed sign guidelines need to be reviewed and changed so that where safe stopping governs a slower speed is posted.
7. Safe following distances. Given the longer stopping distance of HVs, they should be encouraged to slow sooner and avoid “tail gating” of slower vehicles.
8. Table 8 We support *encouraging the installation of under-run protection on HVs*. We wish to see this to become mandatory (eg through the Rule process).
9. Table 9 We strongly support *compliance with urban road speed limits*. Most cycling is done within urban limits.
10. Specific items which will benefit cyclists. Refer Table 8 and 9  
*“Crash prevention measures*
  - a. *Wider shoulders*
  - b. *Sealed shoulders*
  - c. *Audible edge lining”* – The last, however, will be a benefit only if there is a sealed shoulder beyond the edge lining wide enough to ride in.
  - d. We support *investigating the feasibility of improving “left turn safety” of HVs for cyclists*.
  - e. *Improve the focus on safety issues in driver training re cyclists*. Eg The Road Code advises “give cyclists plenty of room when passing them. Ideally, allow at least 1.5 metres between you and the cyclist”. Some education of bus drivers is taking place. More widespread education of HV drivers is needed.
11. Designs which add danger to cycling
  - a. Audible edge lining without sufficient sealed shoulder beyond because otherwise cyclists are forced to ride further out in the road to avoid the edge lining.

- b. Passing bays with zero shoulders on either side of the road. There is insufficient room for three vehicles and a bicycle. Often the extra width for a passing lane is at the expense of shoulder width.
  - c. Insufficient passing bays. Passing motorists sometimes squeeze cyclists off the road if there is no other oncoming traffic and use the lane the cyclist is in as a passing lane, but in the opposite direction to the cyclist already using the lane!
  - d. HV design which causes enough turbulence to push or suck cyclists sideways. Of special concern is the gap between truck and trailer. Turbulence from HVs is a reported concern from many cyclists and needs checking when new designs are proposed.
12. Omissions from the discussion paper?
- a. Additional passing lanes and slow traffic bays. Has the benefit of these been covered in the discussion paper?
  - b. Legal speed limit reduction. A priority is given to managing speed. The management options of reducing the legal speed limit and/or the tolerance before prosecution are not covered.
  - c. Wet road rain spray reduction. A very significant reduction in visibility occurs when rain spray is thrown out beyond HVs. Design improvements are needed. For cyclists, the fine spray, sometimes dirty, sticks to the outside of glasses or goggles and obscures vision – much worse than during rain. Also other motorists may not see cyclists when cyclists are enveloped within the spray cloud of a passing HV.

Thank you for the opportunity of contributing to the discussion.

John Gregory  
for CAN