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Draft Regional Road Safety Plan 2008-2012
Auckland Regional Transport Authority

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Dear Sir / Madam

AA Submission on Draft Regional Road Safety Plan

The New Zealand Automobile Association welcomes the opportunity to make a submission on ARTA's draft regional road safety plan 2008-2012.

The AA is an incorporated society with over one million members, including 265,000 Auckland motorists.

We congratulate ARTA on the draft plan, especially the parts relating to the safety systems approach; the explicit discussion of creating systems forgiving of real human behaviours and errors; the emphasis on road safety as a major public health issue; good use of the KiwiRAP resource; and its multi-agency approach.

The AA strongly endorses the comment that road safety action plans encourage a proactive approach by directing resources to address emerging trends as well as known high-risk areas. It is critically important to address emerging trends (for example text messaging, motorcycle risks) early before these become entrenched issues. International experience endorses this approach and a key concern has been the reluctance of agencies to get involved until many years have passed - in the meantime people have died unnecessarily.

We have several concerns relating to the draft plan that we would like to draw to your attention

Narrow focus – need to widen (eg include inattention, fatigue, drugs)

We are concerned with the blinkered emphasis on speed, alcohol, seat belts and intersections being taken. While the AA strongly supports evidence based policy and acknowledges the strengths of the crash database, it is a major issue that the inputs to the crash database (police crash reports) are not designed to be unbiased. Crash report structure leads towards an overemphasis on speed and alcohol as factors, while underreporting factors that are not listed on the crash reports, such as inattention,

fatigue, and drugs (which have to be proactively entered by the police officer). Police efforts are also naturally geared towards determining who is 'at fault' and if so, what enforcement is applicable. This obviates a neutral 'observational' approach aimed at detecting the full range of crash causation factors (especially with regard to both frequency and severity).

Both AA survey and international observational studies of crashes (the 100-car naturalistic driving study) indicate that inattention is the single largest factor - being implicated in up to 80% of crashes. For obvious reasons, this factor will not be accurately reflected in the crash database (an inattentive driver will not disclose negligence because of possible enforcement or insurance penalties). Inattention is not reflected in the draft regional road safety plan at all. If inattention is the largest cause, a focus on speed, alcohol, intersections and seatbelts will not deal with the majority of crashes. The AA therefore considers the goals that are phrased in terms of subsets of crashes (speed crashes, alcohol crashes etc) immediately directs the plan towards those approaches. That is, the goals immediately confuse inputs with outputs. The overall goal should be to reduce crashes to a set number of fatalities and injuries by 2012, irrespective of the crash causation factors.

Finally in this regard, the AA considers that there are decreasing returns to scale, as well as potentially unintended outcomes of the narrow focus on speed, alcohol and seatbelts. The majority of motorists have already heard these messages many, many times. The continual tightening of focus on these limited areas means less and less return for more and more cost, whether political cost or financial. The risk is that motorists will gain a false sense of overconfidence if they are repeatedly told that these are the only issues – if they are not speeding, drunk or unrestrained, they become blasé and actually are less careful about their own driving behavior (an “it’s the other guy” approach). An emphasis on only enforceable risks also drives a mentality that works counter to the stated aim of creating a safety culture – where self-responsibility is valued, people will take care of issues like fatigue, inattention, emotional distraction, cell phones, medicines, eyesight etc. Further, many 'good' motorists are extremely receptive to new information about how to be safer drivers. This 'low hanging fruit' is good value for money, whereas continued focus on well trodden areas is giving poorer value for money.

Road Hierarchy

This concept is alluded to in the draft plan but deserves much greater prominence. The appropriate road safety strategy depends on where the road stands in the road hierarchy. A map of the road hierarchy should be a fundamental starting point for any road safety strategy. Treatment of pedestrian safety, for instance, should be quite different on a motorway than on a suburban cul-de-sac. While it is encouraging to see good use of the crash maps, this is not linked to the role the road plays in the hierarchy. You would expect a higher crash density on a high volume high speed arterial versus on a low speed environment. The strategy needs to consider whether

the crash density for that type of road is out of the ordinary. That is, does a road stand out as a worse crash risk than other roads of its same type? And the strategy to address the issues will be different – a high speed road may need a grade separation or signals approach, while a low speed road may need traffic calming type approach.

Trade offs between road user groups

The AA supports the principle of considering all road user groups when designing for safety, particularly vulnerable users. However, we are concerned at the plan's approach which on occasion suggests that equity is achieved by making all groups equal in terms of vulnerability, road space etc. We would suggest that each mode has its own role, function and needs, and that such a principle has not been well thought through in terms of achieving the best road safety outcomes within a limited budget (value for money) nor indeed in achieving the wider balanced range of goals sought by the community. Further, the emphasis given to each mode will differ depending on the road hierarchy.

Integrated planning

The AA is strongly of the view that planning systems are structured around environmental outcomes, but ignore safety outcomes. That is, to achieve road safety outcomes, approval processes and consents need to consider the safety implications on transport systems. For example, where a development generates traffic flows across a top hierarchy road, there is increased risk of high speed intersection crashes, and it also reduces the long term functionality of the road's top hierarchy role. The developer needs to mitigate this by either assisting with payment for grade separation, for example, or by building exits onto low hierarchy feeder roads, which are suitable for turning movements, while limiting the number of intersections with the main road. The integration of safety outcomes into the planning process will enable early and lower cost interventions to avoid unsafe developments that have long term road safety consequences.

Self explaining roads

The AA strongly supports bringing forward in the plan the 'future development' option referred to as self explaining roads. One of the concerns with an enforcement focus on speed is that it ignores the human psyche. Where the road environment explains itself as a particular speed, compliance is consistently good. Where the road environment looks and feels a higher speed than the speed limit, compliance is consistently bad. There needs to be a focus on making speed limits consistent and appropriate for the same road environments, so that drivers unconsciously associate the look and feel with the appropriate speed; and where this is not the case, adapting the look and feel to explain the speed limit properly. There is currently a pilot self-explaining road project being undertaken by TERNZ in Manukau. We recommend you contact Hamish

Mackie of TERNZ to discuss how this concept may be more widely applied in the road safety strategy now, as opposed to a potential development for the future.

Miscellaneous

Throughout the draft plan it states that crashes cost \$990 million. The plan needs to clearly communicate that this is a social cost - currently this is not expressed until page 23, and as a result the statistic's true context is lost. An alternative approach would be to move the summary to the front of the document.

The AA is concerned by the annual \$72.4 million safety engineering underspend and urges the region to ensure this does not continue.

We do not support the region's goal of lowering the blood alcohol level as stated in the draft plan. This is targeting the wrong group of motorists - the drink driving problem is primarily one that relates to offenders who are significantly above the existing limit, and recidivist drink drivers.

The AA's support for greater use of demerit points is a matter of public record, however we do not support lowering the speed tolerance levels or the use of covert cameras.

AA involvement in road safety community

Improving road safety is one of the AA's key priorities. We look forward to working collaboratively with the regional agencies, and to this end value the opportunity to participate in ARTA's regional road safety meetings. We have resources that can be used to assist the Auckland region, and in particular ARTA, to attain its road safety goals.

If there is any part of this submission you wish to discuss please do not hesitate to contact us.

Yours sincerely

Simon Lambourne
AUCKLAND TRANSPORT SPOKESPERSON