



**GUIDING  
LIFE'S  
JOURNEYS  
FOR OVER  
110 YEARS.**

New Zealand  
Automobile  
Association



# **Safer Journeys for people who cycle**

NZ AA submission

**The New Zealand Automobile Association Incorporated**

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NEW ZEALAND

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Gerry Dance and Margaret Dugdale  
Cycling Safety Panel  
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Dear Gerry and Margaret,

**SAFER JOURNEYS FOR PEOPLE WHO CYCLE – DRAFT REPORT AND RECOMMENDATIONS – AA  
SUBMISSION**

The New Zealand Automobile Association (AA) appreciates the opportunity to comment on “Safer Journeys for People who Cycle”.

The AA is an incorporated society with over 1.4 million Members. Originally founded in 1903 as an automobile users’ advocacy group, our mandate today is to represent the interests of Members who drive, cycle, walk and take public transport. Collectively road users pay over \$2 billion in taxes each year through fuel excise, road user charges, registration fees, ACC levies, and GST and this revenue funds the transport system in New Zealand.

The AA’s advocacy role is focused on articulating the voice of the reasonable motorist on key transport issues, and ensuring that the decisions over transport investments advance Members’ safety, provide value-for-money, and increase mobility. Our goal is a safe, sustainable, and strategically aligned transport network that provides greater mobility options for our Members.

We have grouped our comments below under two broad themes:

- a) Cycling specific recommendations
- b) Structure and language in the report

**(A) CYCLING SPECIFIC RECOMMENDATIONS**

**Provide more detailed supporting evidence for specific recommendations**

We have reviewed the excellent background research carried out by MOT and NZTA to help the Panel understand the nature and extent of the cycling safety problem. This work has helped the panel draw key conclusions about cycling crashes such as that 75% of urban cycling crashes happen at intersections and driveways, and two thirds of cyclists treated in hospitals were involved in crashes that did not involve a motor vehicle.

It is our view that an expert panel report should be strongly evidence based. Keen readers of this report will include professionals such as city planners and traffic engineers who will be more likely to adopt the recommendations when provided with a strong evidence base.

We recommend that an appendix to this report include a summary of the key facts and research provided to the panel that has led to the key safety conclusions and recommendations.

### **Ensure that statements of principle are supported by the evidence**

We found there to be no supporting evidence for the assertion that the report makes that there is “safety in numbers”. In fact, contrary to the comment in the report, the International Transport Forum (ITF) concludes there is no substantial proof of a safety in numbers effect. The ITF report (Cycling Safety: Key Messages ITF Working Group on Cycling Safety 2012) clearly states that increasing cyclist numbers without other policy initiatives is likely to result in more deaths and serious injuries.

There was some discussion at the Reference Group on this issue with some comment that while the evidence was mixed on this point a “common sense” view was that more visibility will drive more awareness. At the very least, with international evidence mixed on the validity of the safety in numbers theory, we consider that a clear, logical statement of the Panels’ position on this issue is necessary. We would also strongly recommend that the point made by the ITF that increasing numbers without increasing investment in infrastructure will likely lead to an increase in deaths and serious injuries is included in this statement.

### **Vision Zero for cycling**

The report includes as its central vision “A safe road network with zero fatalities and reduced serious injuries for people who cycle.” We appreciate that an aspirational vision can have significant benefits as a rallying point for action. However, this vision sits within a large and complex transport system that has as its central plank Safer Journeys, with a vision of “A safe road system increasingly free of death and serious injury.” This is not a Vision Zero, aspirational call, rather it is challenging but pragmatic vision that allows the balancing of mobility and safety. It is our view that by separating cycling out from the rest of the transport system we introduce a complication, and we will have difficulty reconciling the two standards. The AA supports a vision for the cycling sector that is aligned with the vision for the whole transport sector, rather than cycling being a special case.

### **Planning and investment in cycling**

The planning and investment criteria used by NZTA and the Economic Evaluation Model are highlighted as problems that dis-incentive cycling projects. The report notes that cycle projects score poorly in terms of strategic fit. It also notes that health and environmental benefits cannot be included in the evaluations.

This is an important issue and the AA has spent some time talking with people who both administer the Investment Assessment Framework (IAF) and apply through it for funding. In conversations with NZTA and MoT we understand that:

- a. Recent changes to the definitions of which urban centres can be considered high priority have dramatically increased the number urban centres that fall under “high priority” from the 4 main urban centres and the two demonstration towns to around 25-30 centres around NZ
- b. A recent review of the EEM has improved the treatment of cycling; and as a result cycling, and walking projects generally get a good BC
- c. There are two forms of EEM – the simplified procedure and the full procedure. The full procedure already allows environmental and health benefits to be included in an assessment.

Notwithstanding these recent changes, there is still clearly some difficulty being experienced by RCAs applying to have cycling projects funded through the Investment Assessment Framework. In part, this appears to be due to the complexity of the process, and to different interpretations of how it should be applied. There also appears to be some inconsistency between regions in the advice that RCAs are receiving on how to best fit cycling projects into the application procedure.

Our conclusion from these conversations is that pursuing a technically focussed review of the EEM as recommended by the Panel may not lead to the conclusion sought. We believe that instead:

- NZTA should invest more heavily in providing clear and consistent advice to RCAs throughout New Zealand on how to best fit cycling projects into the IAF
- RCAs should expect to engage early with NZTA regional advisors and to receive assistance in shepherding cycling projects through the IAF.

The examples of successful funding that were raised with us seem to have in common a strong and early-formed relationship between the NZTA and the RCA with early agreement on the benefits of the project in concern. However, we would note that it is important that the IAF continues to put all projects through their paces, rigorously assessing them to ensure they are good investments and represent good value for money. This does mean that some cycling projects will fail just as some other transport projects do not succeed.

### **Don't overlook the important gains that could be made in focussing on cycle only crashes**

Early in the report it is noted that two thirds of crashes that involve hospitalisation do not involve a motor-car. This is a very significant fact and a very poor outcome for cyclists. However, as the report acknowledges, because of difficulties in collecting data on the nature of these crashes, no further investigation of safety improvements for crashes that do not involve cars is made, and there are no recommendations on these.

It is true that crashes with motorcars have, on average, more serious injuries. This is not always the case as non motor vehicle fatalities do occur. However, not attempting to address the majority of crashes that are happening seems to overlook a very important part of the puzzle.

There are recommendations made to address the lack of substantive data around these crashes, but these are only afforded a “medium” priority by the report. The AA considers that:

- Recommendations to improve the collection of data on cycle crashes (and indeed on participation rates) should be afforded a “high” priority as the evidence they collect will form the basis of well targeted interventions, and ongoing evaluation of improvements.
- In the absence of NZ specific data, more research must be sourced from other jurisdictions on the causes of cycle only crashes, and that recommendations to address this significant problem are included in the report.

### **Intersections and driveways are the key to safe, urban cycling**

The evidence is clear and is well expressed in the report - 75% of crashes in urban areas are at junctions (driveways, roundabouts etc) and are largely attributed to drivers of vehicles not seeing cyclists. The reasons for this appear to be a mix of issues including poor infrastructure design, drivers not expecting to encounter cyclists, poor driving or cycling behaviour. It is clear that much better visibility at intersections will be a critical part of improving cycling safety. Good infrastructure and separation at identified high risk sites will make a significant improvement, but we must acknowledge that where traffic and vulnerable users mix, there will always be some element of “looked but did not see” crashes.

Providing separation, and/or good intersection design is a very challenging, and potentially expensive area to address. The AAs observation is that some RCAs have attempted to address this intersection problem with a speed solution i.e. slow down vehicular traffic in urban areas. However, the evidence presented here suggests that speed is not the primary issue at intersections. At many urban intersections vehicle speed is already low – vehicles are slowing, turning, giving way. In Wellington mean vehicle speeds in the CBD at times of high cycle use are already close to 30km/h. Simply defaulting to a slower speed limit solution will be ineffective and over-looks the more challenging but more effective solutions of intersection design and conspicuity.

The AA would like to see RCAs supported to tackle the challenging but meaningful design challenges for separation and safe intersection design in urban centres. Use of the “heat map” approach used in Urban KiwiRAP clearly identifies these intersections. The report should make it clear that solutions to these intersection challenges are complex and require good design and adequate funding. As well as improving cycling safety they must also ensure that other users of the intersections, people in vehicles, can move freely and achieve their own mobility outcomes. As a result these “fixes” will take time, but meaningful improvements will be made.

We note that the current wording in the report at pp 25 could suggest a new default speed limit in all urban and residential areas of 30km/h. The public will not support this. Where they are proposed, 30km/h zones should focus on areas of high cyclist activity or high pedestrian traffic e.g. large number of street-side cafes. Where both high density and high risk as demonstrated through careful analysis of crash reports exist, it is appropriate to consider 30km/h zones. This needs to be done in close consultation with stakeholders, the community and local businesses.



## **Prioritising access and use appears to be a pragmatic approach with considerable potential**

There are several references in the report to prioritising routes for certain types of users (heavy vehicles, cycles) in order to encourage separation of vehicle types that simply don't mix well together. The AA strongly supports this approach. The reality is that we are dealing with a limited or finite resource in the roading corridor and in some high demand corridors we are unable to safely meet the demands of all users. In arterials, such as Dominion Road for example, there are heavy demands from drivers, cyclists, PT users, retailers and residents. These cannot all be safely catered for. Similarly there are some narrow rural roads that are popular as both cycle and freight routes.

The AA supports, in this vein, the example given of the Wangoom Training Circuit where clear and bold signage warns motorists that cyclists may be present. Of course, we expect that these routes will be carefully selected to be safe, that investment will be made to provide adequate shoulders and other features to allow cyclists and motorists to mix as safely as possible, and that signage will be well designed to assist all users.

Where a route is prioritised for freight, for example, while it is not possible (or necessarily desirable) to exclude vulnerable users, education, information and route signage should be used to warn cyclists that this is a high danger area and that alternative routes will provide safer, and more enjoyable cycling. This does mean that those with an expectation that they can cycle any route and any time with similar levels of safety will need to temper this expectation. This is reasonable in a situation of limited resource and competing demands.

## **Removal of parking from arterials**

In most of the cycle infrastructure projects that AA Districts have been consulted on, the most contentious issue has been the removal of parking. As a transport system dominated by the private vehicle and the benefits that this brings, New Zealanders have a high expectation of being able to park close to the services they wish to access, close to their homes and close to their places of work. As the report notes, the One Network Road Classification strategy will implement a process of removing some parking from arterial roads where the movement of traffic and other users is identified as the primary purpose of the road.

Where parking is being removed it is not certain that all of the benefits will be positive. While there is a tendency to concentrate on international examples where there have been significant advantages in removing parking, there are local examples that were highlighted at the Reference Group where businesses have failed after the removal of car parks as customers shifted away. We have also observed that in Wellington where residential parking is proposed to be removed, there is significant cost to the ratepayer in providing alternatives for residents who do have a right to expect parking close to their homes.

There was also some discussion at the Reference Group that noted that by removing parking, there is a chance that vehicle speeds will be increased and that this needs to be properly managed if cycle facilities are put in place and cycle safety managed.

The AA would like to see the Panel report acknowledge that parking is a service provided to the community that is highly valued and that removal of parking must not be assumed to be automatically positive. Any removal must be assessed in terms of costs and benefits. Any removal of parking must include the provision, where the demand exists, of alternative parks for people who chose to drive to access services.

### **Trialling of mandatory passing distances.**

The recommendation to trial mandatory passing distances of cyclist received media attention on the release of the draft report. The AA made public comment that we supported the idea of a trial. We noted that the system is being tested in Queensland, and that we should be closely observing this trial. We also made the very important point that were such a regulation to be introduced here, there must be a very effective education and information campaign run alongside it. The primary purpose of introducing this regulation would be to raise the profile of what a safe passing distance is so that road users (cyclists and motorists) are more informed and practicing safe passing. Of course, in the unfortunate circumstance of an incident, the rule will allow for an enforcement action to be taken. We consider that a trial is likely to be more acceptable to the public creating time for the public to accept the change. It is our view that moving straight to a mandatory rule could be in advance of public support – and public support will be critical to success. The AA suggests that the panel recommends investigating the reasons why Queensland opted for a trial.

In addition to the review of the passing rule, the conversation at the time the report was released shows that there are law changes needed to using flush medians to pass and education on crossing the yellow line.

We note that the report has some inconsistency in the wording of this recommendation; in places it is recommended that it is explored, in others its full introduction is recommended.

### **Funding of cycling infrastructure**

Discussions at the Reference Group touched several times on the level of funding made available for investment in cycling infrastructure. There was some comment that the \$100m injection from the government was not sufficient to address the shortfall in investment in cycling infrastructure.

The AA considers that it would be useful to provide some commentary around the level of funds now available for investment. A very rough calculation of non-NLTP and NLTP contributions shows that there is over \$300m available if you include FAR contributions from RCAs, over the next four years. This is a considerable investment and the focus should now turn to making value for money



investments into safer cycling infrastructure, and demonstrating the benefits that this brings. Once all the funding has been committed, the discussion can begin on providing further funding.

## **(B) STRUCTURE AND LANGUAGE USED**

### **Structure of the report and recommendations**

The report, by necessity, includes recommendations that cover a lot of ground. Recommendations are structured “vertically” i.e. from broad outcomes such as establishing clear leadership and accountability, through to quite specific actions such as establishing minimum standards for width and delineation. They are also structured horizontally across the topic i.e from provision of hard infrastructure to changes in culture for cyclists and drivers. When compiled the impression is of a shopping list of outcomes and actions without clear linkages between them.

There was discussion at the reference group, which the AA supports, that restructuring the report’s recommendations into a clear hierarchy of recommendations would allow strong line-of-sight link between recommendations. This would also assist to identify and remove repetition in the recommendations (for example guidelines and minimum standards are recommended in at least 5 recommendations). A suggestion from the meeting that a division between “infrastructure” and “culture” as a framework for organising the recommendations looks logical to us.

### **The language of the report is inconsistent and at times conveys ideology**

As a report from an Expert Panel on safety, it is our opinion that the tone and language used are important. A report such as this must be technically strong and very evidence based. Statements that are, or could be perceived to be, biased, should be carefully avoided. Examples of language that could be perceived to show bias include reference to “outrage as the space taken up by motorists” (pp11) and “a large number of exempted vehicles are killing cyclists” (pp 35).

There is also some inconsistency in the report in the way that cyclists and motorists are referred to. In places there are references to cyclists, and in places people who cycle. People who drive cars are always referred to as motorists. Consistency is important so as not to distract from the key, important messages.

We recognised that it can be a challenge to craft such complex reports in a manner that provides both technical authority, and conveys appropriate urgency. We recommend engaging appropriate, independent writer/editors such as the Write Group to review the next draft of the report and assist in getting the language and tone of the report consistent.

### **Importance of staying close to the mandate**

The Expert Panel on Cycle Safety has a clear mandate – to provide innovate, comprehensive and practical recommendations to improve cycle safety. The Panels’ mandate is not to promote an

increase in cycling per se, or to pursue population wide health or environmental benefits. This is not to say that these benefits would not be a welcome, positive externality from efforts to improve cycle safety. However, we consider that up front and central references to these positive externalities ( for example in the Chairman’s Forward and the Executive Summary) takes focus away from the central, safety purpose of the report, and the Panel’s mandate.

### **Develop an action plan**

Some commentary at the Reference Group was critical of the lack of firm actions, timeframes or allocation of budgets. It is our view that the role of an overarching report such as this is to develop a clear set of prioritised recommendations supported by a firm evidence base. With this in place and general agreement to it, the various players can then develop more detailed actions.

That said, we think that it would be beneficial if the report set out a clear expectation that key players such as NZTA and the MoT will respond to this report, with an action plan. An expectation of when this will be completed should also be made.

The AA and indeed all of those involved in the panel and reference group want to see the recommendations actioned. We suggest that including a recommendation that agencies report back to the Associate Minister of Transport responsible for Road Safety on Progress on implementing the panel’s recommendation in 12 months from the release of the report. This would add emphasis to agencies to implement the recommendation in a timely way.

Finally the AA would like to record our appreciation for the work of the panel and the agency staff who supported the panel to produce this important report on ways to improve the safety of people who cycle in Aotearoa.

Yours sincerely,

**Simon Douglas**  
**National Manager Policy & Research**