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SAFER JOURNEYS – DISCUSSION DOCUMENT

SUBMISSION TO THE MINISTRY OF TRANSPORT

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BACKGROUND TO IPENZ

The Institution of Professional Engineers New Zealand (IPENZ) is the lead national professional body representing the engineering profession in New Zealand. It has approximately 10,000 Members, including a cross-section from engineering students, to practising engineers, to senior Members in positions of responsibility in business. IPENZ is non-aligned and seeks to contribute to the community in matters of national interest giving a learned view on important issues, independent of any commercial interest.

This submission is a joint submission with the Transportation Group – a Technical Interest Group of IPENZ. The Group consists of approximately 1,000 transportation and traffic engineering and planning professionals working in central government, local government, academia, and the private sector.

To assist with the preparation of this submission, IPENZ sought input from members of the Transportation Group. It also ran a series of seminars in the main centres and is very appreciative of the attendance and participation of the Ministry of Transport at these seminars.

EXECUTIVE SUMMARY

We support the proposed long-term road safety vision, the proposed "safe system approach" and proposed priority areas. In particular, we agree that the high-priority areas are:

- reducing drink driving
- increasing the safety of young drivers
- safer roads and roadsides
- safer speeds

- increasing the safety of motorcycling.

In regard to each of the areas of high concern, we specifically support the following initiatives which we consider will be the most cost-effective means of reducing crashes and achieving a safer road system:

- lowering the (blood alcohol content) BAC to 0.05, and zero for high-risk drivers, including drivers under 20 and recidivist drink drivers, supported by a comprehensive public education programme
- raising the driving age to 16, without any general exemption for rural youth, and extending the learner licence period to 12 months
- strengthening the restricted licence test, to emphasise hazardous detection and risk-averse driving
- raising public awareness of young driver crash risk, particularly to encourage parents to support the conditions of learner and restricted licences
- re-invigorating targeted programmes to address high-risk crash sites, based on a comprehensive programme of safety investigations including black-spot investigations, crash reduction studies, safety audits and safety inspections
- adopting safety standards which are cost effective to improve the safety of roads and roadsides
- strengthening enforcement, specifically targeted at drink driving and speed
- encouraging road controlling authorities to implement appropriate speed zones particularly on high risk rural roads
- promoting Intelligent Speed Assistance vehicle systems
- promoting the use of high-visibility and protective clothing by motor cyclists.

In regard to the areas of medium concern and areas of continued focus, we consider the following initiative to be the most cost-effective means of reducing crashes and achieving a safer road system:

- promoting the rapid uptake of advanced vehicle safety systems
- raising public awareness of the risks posed by distractions
- conducting a targeted programme to increase the use of rear seatbelts.

We do not think New Zealanders are generally poor drivers. We nevertheless think there is a need to use education to develop a safety culture amongst future generations to gradually improve driver behaviour.

We think the crash reduction monitoring system should be implemented on a more consistent and systematic basis – this system is well respected internationally but has fallen into disrepair in recent years with the constant changes to institutional structures governing the industry and the accompanying loss of institutional knowledge.

This submission follows the structure set out on line for making submissions on the discussion document. On this basis, we have addressed the individual questioned posed in order as follows.

GENERAL COMMENTS

Do you think we have identified the right priority areas for improving road safety? If not, what would you change?

We support the vision of "a safe road system that is increasingly free of road deaths and serious injuries". Although it may be impractical to achieve a target of zero crashes, at least in the short term, we nevertheless think the vision should be zero crashes, consistent with the position that crashes are unacceptable. In other industries which have taken a position that crashes are unacceptable, it has often been surprising how close they have got to achieving zero crashes.

We support the safe system approach based on safer road users, safer vehicles, safer roads and roadsides, and safer travel speeds. In accordance with this approach, we generally agree with the priority areas. We think these priority areas will provide the greatest benefit in terms of reducing the cost of road crashes to the community.

A key concern we have is with the current funding and reporting arrangements. Funding for safety is scattered over a number of activity classes in the NLTP with no indication of the overall safety budget. Further, there is no reporting of the relative effectiveness of safety expenditure under each activity class.

The proposed initiatives will require additional funding for their effective implementation. We believe that each initiative needs to be costed, properly evaluated and prioritised and that a realistic budget then needs to be developed for implementing each initiative as part of an overall safety programme.

SPECIFIC COMMENTS

1. AREAS OF HIGH CONCERN

1.1 REDUCING ALCOHOL/DRUG-IMPAIRED DRIVING

a) Which of the suggested initiatives to reduce alcohol/drug-impaired driving do you support?

We support:

- lowering the BAC to 0.05, based on robust and clear evidence of the crash reductions which will be achieved
- introducing infringement penalties for offences between BAC 0.05 and BAC 0.08
- informing New Zealanders about the impact of alcohol on driving
- introducing a zero BAC for certain high-risk drivers, subject to a reasonable tolerance to allow for medications and moderate alcohol consumption the night before
- introducing a zero BAC for recidivists and requiring them to install alcohol interlock devices in their vehicles.

Making penalties for drink driving more severe has proven to be ineffective. Most drink drivers with a very high BAC are recidivists and penalties do not influence their tendency to reoffend. Vehicle confiscation is generally not reasonable because the offender is often not the vehicle owner and use of the vehicle is often shared with family members and other innocent parties.

While we support the proposal to require recidivists to install alcohol interlock devices, these are very expensive and hence we do not think it is warranted to require that these

devices be installed on all vehicles or even to require commercial drivers or parents of young children to install these devices.

b) Which initiative to reduce drink driving is the most important to you?

Reducing the BAC to 0.05 is, we believe, the most important initiative.

We consider, however, that a full package of measures is required to address the issue of drink driving and that lowering the BAC should be seen as merely one element of the package of measures to reduce the number of crashes and fatalities where alcohol is a contributing factor.

c) Do you support lowering the legal adult BAC limit from BAC 0.08 to BAC 0.05?

On the basis of the evidence presented in the discussion document, reducing the BAC from 0.08 to 0.05 will significantly reduce the number of crashes where alcohol is a contributing factor. We also believe that lowering the BAC will reinforce the message that drink driving is unacceptable and reduce the incidence of drink driving at higher alcohol levels which is where the major problems with drink driving arise.

There is widespread public scepticism of the crash reductions which will be achieved by reducing the BAC from 0.08 to 0.05 and that the crash reduction which will be achieved does not warrant the inconvenience which will be imposed on social drinkers. This concern will need to be countered with information on the predicted crash savings – we understand that previous research has predicted that 15 to 30 lives per year will be saved by reducing the BAC to 0.05. It will also need to be properly explained that the proposed reduction in the BAC to 0.05 will still allow moderate social drinking.

d) How could rural communities be better empowered to address drink driving?

We believe that community-based education programmes is the best means of addressing drink driving in rural communities. These will encourage rural communities to take responsibility for reducing drink driving in rural areas, hopefully in the same manner as our youth being better at designating drivers than older people. In the past there have been comprehensive urban community education programmes and specific education programmes now need to be developed and tailored for rural communities.

e) Do you have other ideas for how we can reduce drink driving?

We believe that further consideration should be given to making licensees more accountable for drink driving by their patrons as a condition of their licences, particularly for liquor outlets in rural areas. We suggest that consideration be given to making licensees liable for patrons who drink drive, as in Sweden.

f) Do you think we should introduce random roadside drug testing for the presence of illegal drugs as technology allows?

We support the concept of random roadside drug testing as suitable technology becomes available.

We understand that there is a proposal to introduce a system of roadside co-ordination checks to identify possible drug-impaired drivers, who will be taken back to the Police Station for proper drug testing. This proposed system should be evaluated to assess whether the additional costs of random roadside drug testing is warranted by the predicted saving in crashes, taking into account the inconvenience which will be caused to other road users

Saliva, urine and blood can all be tested for drugs but none of these test methods are practical for random road-side drug testing. Saliva tests take about five minutes to

process, which is not an acceptable period of time to delay drivers. Urine tests provide an instant reading, but it is not practical or acceptable to the public to collect urine samples at the road side. Taking blood samples is intrusive and again it is not acceptable to the public to collect blood samples without good cause.

g) Do you have other ideas for how we can reduce drug-impaired driving?

We suggest consideration be given to confiscating licences for, say, 24 hours of drivers who fail the roadside co-ordination checks.

1.2 INCREASING THE SAFETY OF YOUNG DRIVERS

a) Which of the suggested initiatives to increase the safety of young drivers do you support?

We support all these initiatives for increasing the safety of young drivers.

Some of our members have advised of research apparently undertaken by John Toomath, former Road Safety Advisor to the Director of LTSA, into "lifetime" crash rates which are said to have shown that the safest drivers on a lifetime basis are drivers who got their licence at 15, the next safest were drivers who got their licence at 16, and so on. In other words, lifetime crash rates increased as the age when drivers obtained their licence also increased. Other members have queried this research but it may warrant a review to see whether such research was indeed undertaken and whether the research results, as claimed by some of our members, are indeed valid.

b) Which initiative to increase the safety of young drivers is the most important to you?

The most important initiatives are raising the minimum driving age, extending the learner licence period to 12 months and strengthening the requirements for obtaining a restricted licence.

We consider that other initiatives, such as raising public awareness of young driver crash risk, are also important. We think it is very important to dispel the myth that this risk primarily relates to a small group of young drivers, for example, boy racers, and to educate the public that young drivers generally do not have a well-developed sense of risk. More awareness of young driver risk by the public generally should make parents and guardians more responsible in enforcing the graduated driver licensing system.

c) Do you support raising the minimum driving age? If so, at what age should young people start learning to drive – 16 or 17?

Yes, we support an increase in the minimum driving age. Coupled with the proposals to extend the learner licence period to 12 months and strengthening the requirements for obtaining a restricted licence, we have a preference for the minimum age being raised, at least initially, to 16. It may be that, depending on the effects of raising the age to 16, together with the other proposed changes, further consideration could be given to raising the age to 17 at some later date.

There would be a significant loss in mobility if the driving age was increased to 17 and the learners' period was increased from six months to 12 months. An increase in the driving age to 16 and an extension in the learners' period by six months will extend the age when young people can obtain a restricted licence by 18 months, to 17. Increasing the driving age to 17 still with an extension in the learners' period of 6 months would extend the age when young people can obtain a restricted licence by two and a half years, to 18. We think that this is too-big a social change to happen at once.

d) Do you support extending the learner period by six months?

Yes, we support the learner period being extended from six months to 12 months, but only for young people. Combined with the raising the age to 16, this means that young drivers could not start driving on a restricted licence until they are at least 17 years old. For older drivers, unless there is evidence of the crash reduction which will be achieved, we think the learner licence period should be kept at six months.

We support the initiative to encourage 120 hours of supervised driving for learner licences. Further research is required into the means of providing supervised driving practice.

We also support the proposal to improve the quality of professional driver training in line with international best practice and to allow this training to be undertaken during the learner licence period. We support the proposal to remove the restricted licence period reduction from 18 months to 12 months for completion of an approved training programme on the basis that professional training should be mandatory.

One of our members has pointed out that in some Australian jurisdictions there is a three-year probationary period which cannot be completed before a driver is 20 years old. We suggest that further consideration be given to the approach adopted in Australia and the United Kingdom (termed the "Learning to Drive" programme).

We support the concepts in the discussion document for comprehensive, consistent and compulsory road safety education. This education should seek to make school pupils aware of young driver crash risk. We believe that school road safety education should be a part of the compulsory school curriculum of the Ministry of Education to complement professional driver training.

e) If the driving age was raised and the learner period extended, do you think there should be an exemption for rural youth who can demonstrate, via a practical test that they have the skills and attitudes to drive safely and competently?

No, on balance we do not think there should be any exemption for rural youth. Firstly, as the discussion document states, there are a disproportionate number of crashes in rural areas. Secondly, we believe there are serious practical and enforcement problems with different driving ages for urban and rural youth problems, for example, how do you define rural youth and how do you police home addresses? On the other hand, increasing the driving age will have more effect on the mobility of rural youth than on their urban counterparts.

In response to the arguments that the rural community will be disproportionally disadvantaged by raising the driving age to 16 or 17, the discussion document states that in the 2006 census only 7 per cent of rural 15 year olds drove themselves to work (compared to 6 per cent of urban 15 year olds). This must be part–time work and we consider that the proportion of rural youth engaged in such work activities does not warrant an exemption. Firstly, urban youth have other alternatives such as public transport, ride sharing, cycling and walking, secondly, rural youth are at higher risk of crashes and, thirdly, we expect there are significant practical and enforcement problems with an exemption for rural youth.

f) Do you support having compulsory third party insurance?

Yes, in principle, we support compulsory third party insurance because we think it is unfair to other users if drivers are unable to pay for damage to third parties. Without third party insurance, drivers, particularly young drivers with limited experience, can currently drive any car regardless of its performance without providing cover for third

parties and often without the means of meeting the cost of repairs to the vehicles of third parties in the event of a crash.

This is not a safety issue, in that compulsory third party insurance will not result in any significant saving in crashes. Rather, this should be considered as an equity issue between road users.

There are also a number of practical issues to resolve. An option is link the payment of third party insurance to the payment of vehicle licences but when this was the previous arrangement we understand there was evidence of anti-competitive behaviour amongst insurance companies. Further, this arrangement was largely ineffective because many, if not most, unregistered vehicles are also unlicensed. Based on overseas experience from the USA there is also a risk that compulsory third party insurance encourages fraud by claimants alleging damage by friendly parties. There is also a problem with compulsory insurance being negated by drink driving.

There are issues to be resolved with this proposal which should be viewed as an equity issue, not a safety issue.

g) Should we introduce vehicle restrictions (e.g. engine power) for young drivers?

Yes, in principle we support this proposal.

Although we can foresee difficult compliance issues with this proposal, we note in the discussion document that New South Wales and Queensland ban the use of V8s, turbo- and super-charged vehicles, modified vehicles and certain high-performance six-cylinder vehicles, and that these restrictions have been simple to administer and enforce.

As alluded to in the discussion document, we are doubtful whether this restriction will solve the problem of "boy racers" and hence what overall benefit will be obtained from such a restriction. Nevertheless, we think this proposal warrants further consideration.

h) Do you have other ideas for how we can increase the safety of young drivers?

We believe a major objective of the safety strategy should be to change the driving culture of many New Zealand drivers and to improve driving habits. While this is a general problem, not confined to young drivers, we believe that much more effort needs to be directed towards educating our youth, teaching good driving skills and more comprehensive testing of new drivers.

We suggest that practical testing for obtaining restricted licences should cover the full range of driving conditions. With current technology, especially simulators, this is now feasible.

1.3 SAFER ROADS AND ROADSIDES

a) Which of the suggested initiatives to make our roads and roadsides safer do you support?

We support all the proposed initiatives for providing safer roads and roadsides.

Most of these initiatives have been common practice for many years, in particular, targeted programmes to address run-off road, head-on and overtaking crashes on high-volume, high-risk rural roads, a targeted programme for high-risk urban intersections, treatments to make high-risk roads more self explanatory, and targeted crash reduction studies.

There is a need to resolve the problem of under-reporting of crashes which are believed to be quite variable between regions. A further attempt should be made to match CAS, District Hospital Board and ACC records of crashes so that a more accurate picture of crashes patterns can be achieved.

The Give Way rule change is supported to bring it in line with other countries around the world. Right-turn traffic is better placed to see all oncoming traffic while the left-turn traffic has to be aware of what is in front of them, what is behind them, and what is crossing parallel with them. This change would improve safety as the left-turning vehicle would have priority. This would also pertain where a motorist has indicated a left turn but is not turning (indicator left on) or will be turning left into a driveway which is located just after an intersection.

A change to the Give Way rule would provide benefits at signalised intersections by improving lane usage. This change would also reduce the severity of injury for pedestrians crossing parallel with traffic given that a pedestrian/left-turn vehicle impact is less severe than that of a pedestrian/right-turn vehicle impact.

The provision of flush medians and right-turn bays for right-turning traffic, advances in traffic signal controller technology and improved intersection design means that, at many intersections, right-turning traffic can now be better accommodated with a higher level of safety.

Overall, we expect that changing the Give Way rule would improve safety and intersection efficiency at little cost. We are mindful, however, that a change to the Give Way rule could have significant and unexpected operational consequences, particularly on traffic flows at intersections without flush medians or right-turn bays. Therefore, before this change proceeds we suggest that a thorough assessment of the possible operational side effects be undertaken, particularly on traffic flows, and that, where appropriate, changes be made, e.g., to traffic flow arrangements, to mitigate these effects.

Should this change to the Give Way rule proceed, we also suggest that the issue of priorities at driveways and other entrances be addressed. There continues to be confusion at present as to who has right of way where there is no form of traffic control.

In regard to the initiative to develop new approaches to safety on mixed-use arterial roads, we suggest that this initiative be extended to low-volume urban roads where currently there are trials internationally on new approaches to the management of these roads to improve safety, particularly for pedestrians and cyclists. In developing new approaches to the management of road space on high- and low-volume urban roads, we are concerned that when such initiatives have been considered in the past, there has been a tendency not to take account of the operational effects on traffic flows. Such effects should be properly taken into account to ensure that the interests of road traffic are not unduly sacrificed in the interests of other users of the road space.

b) Which initiative to make our roads and roadsides safer is the most important to you?

We believe that the most important initiative is to reinvigorate the programme of safety investigations including black spot investigations, crash reduction studies and safety audits in order to identify safety improvements which should be undertaken to remedy safety defects. The safety improvements and other activities to give effect to each initiative should then be properly evaluated and prioritised on the basis of their relative economic benefits and costs.

In the past, safety studies have been undertaken extensively across the network to identify safety defects with the road network. In recent years the use of safety studies has, to some extent, fallen into disrepair, and hence these studies are no longer

providing information on safety defects in a comprehensive manner that was previously the case. These studies should be undertaken systematically by road controlling authorities.

For some types of treatments such as skid-resistant surfaces, rumble strips, guard rails and median barriers target particular types of crashes, such as run-off crashes, which have insufficient crashes at individual sites to determine where expenditure should be targeted most cost effectively. For these types of treatments, we support the establishment of threshold criteria based on road type, site conditions and traffic volumes. For example, we agree there should be thresholds for the installation of median barriers on high-volume rural highways as proposed in the discussion document. We support the ongoing development of these threshold criteria based on proper economic analysis. These treatments should then be priorities against other safety improvements based on the assessment of their economic merit.

We are concerned with the current prioritisation which has been adopted by the New Zealand Transport Agency, where the adoption of poorly defined criteria such as "strategic fit" and "effectiveness" could result in a misallocation of funds away from efficient safety improvements. It may also be appropriate to review the "value of life" used for the purpose of economic evaluations to ensure that safety improvements are properly prioritised against other types of road improvements.

c) Is there anything we have left out in our suggestions for making our roads and roadsides safer?

We support the concept outlined in the discussion document for the adoption of specific safety standards for road design. In giving effect to these standards, however, it is necessary to take into account the cost of achieving the desired design standards. In circumstances where they are not cost effective to implement, the standards may need to be adapted appropriately, depending on road topography, geotechnical conditions, traffic volumes, etc

Although design standards may not be consistently applied, the aim should be to provide roads that drivers can readily read what is the safe driving speed for the prevailing conditions by means of appropriate signs and markings.

Road controlling authorities need to become more aware of the move towards creating a forgiving environment through passive safety in support of The Passive Revolution to promote safer roadsides.

1.4 SAFER SPEEDS

a) Do you support the suggested initiatives to reduce speed-related crashes?

Yes, we broadly support the initiatives to reduce speed-related crashes. We recognise that speed is a major cause of crashes and increases crash severity. We therefore strongly support the aim of achieving safer speeds.

We think that the focus should be on setting speed limits which are appropriate to the road and climatic conditions, rather than relying on a standard speed limit of 100km/h, which tends to be the current practice, notwithstanding the recent provision in the regulations which allow for variable speed limits to be set by road controlling authorities. We think posting (nearly) all rural roads, whether they are a motorway/expressway or a windy narrow two-lane unsealed road with a 100km/h speed limit with warning signs is the wrong approach. Rather, roads should be posted with speed limits which are most

appropriate to the conditions with significant hazards clearly defined, delineated and, where necessary, protected.

We specifically support the proposals to create more speed zones on high-risk rural roads and the proposed review of speed limits on mixed-use urban arterials. We do not support an increase in the allowable speed limit above 100km/h even for rural expressways on the basis of overseas evidence that this will increase crash rates and crash severity. We do, however, suggest that consideration be given to increasing the speed limit on passing lanes to make these more effective in allowing faster vehicles to safely pass slower vehicles. An alternative to increasing the speed limit for passing lanes could be for the Police to exercise more discretion in the enforcement of the speed limit on section of roads with passing lanes.

We support further research into Intelligent Speed Assistance (ISA) systems. With the variable alignments of the New Zealand road network, particularly on rural roads, we believe that these devices could be a valuable aid to assist road users driving to the road and climatic conditions.

b) Which initiative to reduce speed-related crashes is the most important to you?

We believe that the creation of more speed zones, appropriate to the road and traffic conditions on each section of road, is an important initiative. Such a system would encourage road users to drive to the conditions rather than to the speed limit.

We are also keen on the concept of ISA devices for signalling to drivers when they are driving above the safe driving speed for the prevailing road and climatic conditions.

c) What else could we do to reduce speed-related crashes?

We suggest consideration be given to average speed enforcement through cameras spaced apart and more self-enforcing speed zones in urban areas.

We also believe that the use, ownership or sale of radar detecting and jamming devices should be banned.

d) Do you support having higher demerit points and lower fines for speed-related offences?

We understand demerit points are a more effective deterrent than fines. If so, we support an increase in demerit points for speeding and other infringements.

1.5 INCREASING THE SAFETY OF MOTORCYCLING

a) Which of the suggested initiatives to increase the safety of motorcyclists do you support?

We support the adoption of specific road maintenance safety standards for motorcyclists, particularly on popular motorcycle routes, subject to this proposal being practical and economically justified. We expect that these standards would primarily relate the treatment of potholes, corrugations and other rough surfaces, and the removal of loose metal, particularly pea gravel, from corners and roundabouts.

Motorcycle crashes tend to be scattered and generally are not concentrated at motorcycle blackspots. We therefore doubt if this initiative is meaningful.

We support improved training of motor cyclists and the promotion of high visibility and protective clothing to improve motorcycle safety.

In regard to the other initiatives to require ABS on motorcycles by 2015, to introduce an engine size levy, and to licence moped riders and require WoF tests for mopeds, we are not sufficiently informed to provide comment.

b) Which initiative to increase the safety of motorcyclists is the most important to you?

From the perspective of the engineering profession, the most significant initiative is the proposal to adopt some road maintenance standards specifically targeted at increasing the safety of motorcycling. The practicality of this proposal requires further consideration.

One of our members suggested that motor cycling should be encouraged as an alternative mode of transport. Given that a major contributing factor to the reduction in fatalities in the last 20 years has been the reduction in the numbers of motor cyclists, it is a mute point whether motor cycling should be encouraged or discouraged. If motor cycling is to be discouraged, we support the concept of increasing the license fees for motor cycles and relating these fees to cc ratings.

c) Do you have other ideas for how we can increase the safety of motorcyclists?

We understand that many crashes involving motorcyclists are not their fault. If so, driver education of motorists could help to raise their awareness of all vulnerable road user groups.

2. AREAS OF MEDIUM CONCERN

2.1 IMPROVING THE SAFETY OF THE LIGHT VEHICLE FLEET

a) Which of the suggested initiatives to help make our vehicle fleet safer do you support?

We do not support (electronic stability control) ESC being made mandatory on all new and used vehicles entering the New Zealand light vehicle fleet. All new vehicles now have ESC but these are of varying standards and specifications and it is not practical to set standards as a WoF requirement. Rather, it is preferable to develop performance standards.

We fully support the promotion of advanced vehicle safety systems so that owners of light vehicles are aware of the safety benefits of these systems when they make vehicle purchases. We support the three ways suggested in the discussion document for promoting advanced vehicle safety systems.

Similarly, we support the general promotion of safer vehicles including the purchase by vehicle owners of newer vehicles with improved safety features. We have doubts about the idea of restricting the entry into New Zealand of light vehicles over, say, eight years old. This could make vehicles less affordable and encourage vehicle owners to hold on to older vehicles that may be even more unsafe.

We support the concept of strengthening WoF standards to include advanced vehicle safety features such as airbags, depending on the additional costs that this proposal would impose and the resulting safety benefits.

We are conscious that these all initiatives for improving the safety of light vehicles will impose some costs on vehicle owners. Therefore our support for these initiatives is dependent on their cost effectiveness.

b) Which initiative to help make our vehicle fleet safer is the most important to you?

Although we have not seen any research of the relative cost effectiveness of the various initiatives, we expect that the promotion of advanced vehicle safety systems is the best means of improving the safety of light vehicles.

c) What else could we do to improve the safety of the light vehicle fleet?

We consider that good tyres are the most essential safety feature on light vehicles. We suggest that consideration be given to increasing tyre standards for obtaining WoFs and that more publicity be given to the importance of good tyres.

Vehicle technology has come a long way in the last 10 years. Vehicles now have better braking systems and road handling capabilities, and provide more protection in crashes. These vehicle features will become mainstream as the vehicle fleet turns over.

Further technologies to improve the safety of the light vehicle fleet include:

- on-vehicle anti-collision (sometimes called collision-avoidance) systems allowing vehicle weight to be decreased without compromising safety
- vehicle-to-vehicle communication systems and traffic management systems to enable safer operation of vehicles.

The development of these systems should be monitored but the uptake of such systems will generally need to await their adoption internationally.

d) Do you agree that we should make electronic stability control compulsory for cars entering the fleet by a particular date?

We agree in principle, depending on the practicality and cost effectiveness of this proposal.

2.2 SAFER WALKING AND CYCLING

a) Which of the suggested initiatives to make walking and cycling safer do you support?

We fully support the concept of integrating safety, including the safety of pedestrians and cyclists, into land-use planning. Nevertheless, while we consider that this integration of safety and land-use planning is already occurring, we believe there is always room for improvement and that, in particular, more attention needs to be given to the provision of safer roads for pedestrians and cyclists.

District Plans specify safety standards for new subdivisions and territorial authorities approve of survey plans in accordance with S 223 of the Resource Management Act. Professionally qualified engineers are generally involved in the design of new subdivisions and other land-use developments using as a guide "NZS 4404: Land Development and Subdivision Engineering". These standards are based on well-established road design principles and parameters for safe road design. Further, many local authorities have signed up to the New Zealand Urban Design Protocol of the Ministry for the Environment which covers walking and cycling.

Territorial authorities should be encouraged to ensure that road safety issues, including the safety of pedestrians and cyclists are properly considered in the preparation of District Plans and in the approval of subdivisional designs and road layouts. Further, road standards and best practices for designing safe roads should be reviewed regularly

since there is always room for improvement. While we would submit that this is a matter of "business as usual" for the engineering profession, in all aspects of road design, the safety of pedestrians and cyclists should be a key consideration.

We also strongly support the development of neighbourhood accessibility plans (NAPs). Our members have been extensively involved with the development of many such plans and, we believe, they can significantly improve safety for cyclists and pedestrians.

We generally support the other initiatives to improve the safety of pedestrians and cyclists. We specifically support the "share the road" promotion and the use of variable speed limits.

b) Which initiative to make walking and cycling safer is the most important to you?

For our members, the integration of safety into land-use planning is most important, as this provides the opportunity to create a safer environment for pedestrians and cyclists. For the traffic engineering profession, this is "business as usual".

The most important new or recent initiatives are the development and implementation of NAPs and the use of variable speed limits.

c) What else could we do to make walking and cycling safer?

We are concerned at the growing expectation that all roads should be made safe for cyclists. In the context of the New Zealand terrain and road network, we do not believe this is practical and it is not cost effective to bring the entire road network up to a standard suitable for cyclists. We are most concerned that, without better guidance, cyclists are currently using routes that are unsuitable for this use. We believe this is an issue which needs to be addressed.

There is a need to ensure that all road users are aware of their responsibilities and obligations. For those obtaining driver licences, there is the need to ensure that testing includes hazard perception, especially in areas of highest risk for vulnerable road users.

2.3 IMPROVING THE SAFETY OF HEAVY VEHICLES

a) Which of the suggested initiatives to improve the safety of heavy vehicles do you support?

We support an Operator Safety Rating System (OSRS) which, we understand, is currently under development. We believe that the system should rate operators, not drivers, and that the ratings should be made public. We expect that the design of such a system may be quite complex and that it will need to be designed carefully to ensure that it is not unduly biased against operators in urban areas where there tends to be more enforcement.

While we believe that the use of ESC on heavy vehicles should be encouraged, this is not a major safety issue. It is not practical or economic to require ESC to be installed retrospectively on used vehicles and any mandatory requirement on new vehicles is dependent on the international adoption of ESC on new vehicles. We believe that, in regard to any mandatory requirement for ESC on new vehicles, New Zealand should probably follow the lead of Australia.

We consider there may be a need to assist some heavy vehicle operators to improve their safety. We believe, however, that this assistance should be targeted at high-risk operators which should be identified from the OSRS.

We support the adoption of a "safe and fuel-efficient driving" programme. We suggest that such a programme be made available to operators to implement.

b) Which initiative to increase the safety of heavy vehicles is the most important to you?

We believe that the completion and implementation of the OSRS is the most important initiative.

c) Do you have other ideas for how we can increase the safety of heavy vehicles?

We believe that a "share roads" education programme is required to educate light vehicle drivers on safe driving practices in regard to heavy vehicles. Car users are generally not conscious of the needs of heavy vehicles and hence they do not tend to make due allowance for heavy vehicles.

2.4 REDUCING THE IMPACT OF FATIGUE

a) Which of the suggested initiatives to reduce the impact of fatigue do you support?

We are attracted to the use of roadside stopping places but believe that, generally, there are already sufficient stopping places to enable drivers to stop regularly.

We suggest more driver education on the need for regular stops every, say, two hours, to reduce driver fatigue. Drivers should also be educated on the signs of fatigue. There is a lot of information available in regard to fatigue and microsleeps as evidenced in many of the TAIC Rail Occurrence Reports especially relating to "signal passed at danger", i.e., "running the red".

We doubt if it is practical to make driver fatigue an offence.

b) Which initiative to reduce the impact of fatigue is the most important to you?

We believe the most important initiative is to provide more information to road users on the risks of driving fatigued and to provide more guidelines on how to manage fatigue.

c) Do you have other ideas for how we can reduce the impact of fatigue?

We submit that more use should be made of rumble strips to alert drivers that they are diverging off the carriageway or across the centre line.

2.5 ADDRESSING DISTRACTION

a) Do you support the suggested initiative to reduce the impact of distraction?

We believe that insufficient recognition is given to the risk imposed by distractions such as the use of mobile phones and that the ban now proposed on hand-held mobile phones should be extended to hands-free phones. We suggest that consideration also be given to regulations on the use of GPS devices.

We support more public education on the risks imposed by driver distraction and means of reducing and managing these risks.

b) Do you have other ideas for how we can reduce the impact of distraction?

We suggest more research be undertaken on the causes of driver distraction.

3. AREAS FOR CONTINUED FOCUS AND EMERGING ISSUES

3.1 INCREASING THE LEVEL OF RESTRAINT USE

a) Do you support aligning our requirements for child restraints with international best practice? (This would mean that children over five years of age could use adult seat belts only when they reach 150cm in height).

We support aligning New Zealand's chid restraint requirements with international best practice. We suggest that New Zealand take its lead from Australia in this regard.

We support an ongoing education programme on the correct use of child restraints.

We also support targeted programmes, firstly, on the use of rear seatbelts in regions below the national average and, secondly, on the use of seat belts by commercial drivers.

b) How could we improve seatbelt wearing rates among commercial drivers?

If there is the move to advanced safety systems, it may be such that a vehicle cannot start until seatbelts have all been fastened correctly.

3.2 REDUCING THE IMPACT OF HIGH-RISK DRIVERS

We strongly support the proposed legislation to ban street racing. We believe that a strong message should be given that cars should not be used on public roads as "toys" and that the community should adopt a non-compromising attitude to such use.

3.3 INCREASING THE SAFETY OF OLDER NEW ZEALANDERS

a) Which of the suggested initiatives to increase road safety for older New Zealanders do you support?

We recognise that the safety of older drivers is an increasing issue as the New Zealand population ages. We note that older people are at more risk of serious injury. We therefore support the proposal to educate older people on the use of safer vehicles and to increase education of older drivers on ways of reducing risks. The use of alternative transport options such as public transport should be encouraged.

We support the proposal that consideration should be given to older drivers in the design of roads, particularly the design of intersections. We do not think it is practical or cost effective to target road or roadside improvements on the needs of older drivers. Road standards need to be consistent taking account of the needs of all categories of road user.

b) Which initiative to improve road safety for older New Zealanders is the most important to you?

We consider the most important initiative is to educate older New Zealanders on the use of safer vehicles.

c) Do you have other ideas for how we can improve road safety for older New Zealanders?

There should be a review of the requirements for driver licensing of persons 75 years and older with a view to a reintroducing practical testing. The review should include the use of experience from countries that have less (or more) onerous conditions on re-licensing of older drivers and the New Zealand crash statistics, while taking the older drivers' rights into account.

It is suggested that doctors should be able to place older driver applicants into the following three broad categories.

- Medical condition indicates the applicant is currently an unacceptable risk to other road users and themselves.
- Medical condition may increase the risk of a crash, but on balance the rights of the older driver indicate that the license should be reissued.
- Current medical condition indicates that increased risk of a crash is low enough to approve an immediate renewal.

We are concerned that the basis of the Fitness to Drive Guide (for doctors) has not been reviewed for some time and a comprehensive review should be undertaken. We would also like to draw attention to the report "Older Driver Crash Statistics" by Charles Sullivan of Capital Research.

Given the issues of older drivers being able to judge distances and approach speeds, we believe that tests of older drivers should specifically cover these competencies.

3.4 ROAD SAFETY EDUCATION

a) Are we putting enough emphasis on road safety education? What would you change?

There is need for road safety education to be targeted towards achieving road user behaviour change for future generations now. This requires an emphasis on providing road safety education through the school curricula, from pre-school through to high school, in order for all road users to develop and practise positive road safety behaviour.

b) In your opinion does our current road safety advertising work well? What would you change?

Road safety education is getting to the stage where it is not working as effectively as it should. It does not always reach those who need it most. If it is to continue, there is the need to ensure that it better delivers in changing driver behaviour.

c) How can we better link our education efforts with other road safety initiatives?

Good question, to which we don't know the answer.

CONCLUSION

IPENZ appreciates the opportunity to make this submission and is able to provide further clarification if required.

Tim Davin

Director – Policy