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Submission on Ministry of Transport Paper “Rail Safety Targets”

This submission has been prepared by the IPENZ Transportation Group.

**Submission to Ministry of Transport
March 2006**

Introduction

The IPENZ Transportation Group (“IPENZ TG”) is pleased to present this submission on the Proposed Revised Vehicle Exhaust Emissions Rule. IPENZ TG consists of nearly 700 transportation and traffic engineering professionals working in central government, local government, academia and the private sector. IPENZ TG represents a segment of considerable expertise in the fields of traffic and transportation and has a significant interest in managing the effects of transportation on society and in managing vehicle emissions.

This submission has been prepared for the management committee of IPENZ TG. Because of the diversity of members of IPENZ TG there is also a diversity of views on issues such as this and this submission may not represent the views of all members.

Submission

The Transportation Group acknowledges the importance that numerical targets can play in focussing attention on key safety issues. The Ministry of Transport has made a good case for using a seven year rolling average for three key target areas for safety associated with the rail industry.

Improvements in the safety of rail operations can probably be left entirely in the hands of rail industry participants. The Ministry has the ability, through the activities of Land Transport New Zealand (LTNZ) to monitor progress in this area.

The other targets, relating to level crossings, and vandalism and trespass, are much more complex to achieve.

Level crossings have some complicated aspects – legal status, changes in land use affecting crossing use, the variety and complexity of technical solutions, the role of education and enforcement as tools to improve safety, and the responsibility for fencing.

While section 81(2) of the Railways Act 2005 makes it mandatory for the rail access provider to consult the roading authority for the crossing, it does not appear to set out what should happen if no agreement is reached. In particular, it does not give any guidance about the provision of funding.

The Transportation Group understands that LTNZ is trialling a model developed by Queensland Rail for the assessment of the risk factors associated with level crossings. It seems entirely appropriate that LTNZ should provide leadership in this project.

Similar comments can be made about the target for vandalism and trespass. Both activities breach the law, but in the majority of instances probably do not attract Police attention because of their low priority compared with other criminal offences.

The reduction of vandalism and trespass is probably beyond the rail participants to achieve alone. More complex solutions involving community groups, local authorities, schools, Police, and the railways are probably required. It is also unclear where funding should come from so that it is both adequate, and fairly based.

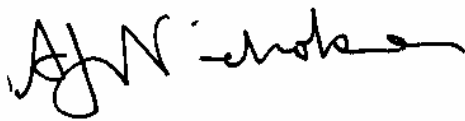
However, it is not clear who should initiate such studies and projects. Put another way, it is not clear who would be accountable if few projects with the ability to help achieve the targets are developed and implemented.

The Transportation Group believes that the Ministry's paper on rail safety targets would benefit from some further development around the responsibility for developing projects designed to help reach the targets, and the associated funding issues.

In respect of the adoption of 15% or 25% reduction from the base figures over the target period, the Transportation Group does not have sufficient knowledge of the data to offer an opinion.

For further clarification of the points raised in this submission, please contact the undersigned. We would be pleased to meet to discuss this proposal further.

Yours sincerely



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