Submission to the Ministry of Transport

Road to Zero - Road Safety Strategy Consultation

16th August 2019

Introduction

This is the submission from Auckland Transport (AT) on the proposed Ministry of Transport (MOT) Road to Zero 2020 – 2030 Road Safety Strategy (RTZ), incorporating feedback from Auckland Council. Local board specific views on the proposed strategy are also attached. AT appreciates this opportunity to comment on the proposed strategy.

AT's address for service is: Auckland Transport, Private Bag 92250, Auckland 1142. Please direct any enquiries about this submission to Bryan Sherritt (contact details supplied).

AT is a council-controlled organisation of Auckland Council. AT takes the lead in Auckland's transport planning and delivery, working collectively with Auckland Council and others (NZ Police, NZ Transport Agency, ACC, Auckland Regional Public Health) toward a common goal of progressing safe transport for Auckland.

AT is the road controlling authority (RCA) for Auckland's transport system and has responsibilities for all local transport services across the region (excluding state highways), serving customers and citizens driving, walking, cycling, parking, and taking trips on buses, trains and ferries. Auckland Transport plans, builds and maintains infrastructure - from roads and footpaths to stations and wharfs. Auckland Transport's day-to-day activities keep Auckland's transport system moving.

AT strongly support the concept of a Vison Zero goal and strategy for road safety in New Zealand that places clear focus on reducing death and serious injury from local transport as an ethical priority for RCAs. In Auckland a priority has been given to maximising safety and moving to a safe transport network free from death and serious injury (Direction 3 and Focus Area 6, Auckland Plan 2050). To ensure we can achieve this we require strong leadership and direction from MOT and congratulate the government on taking the first step with the Road to Zero strategy, and for including AT in the Road Safety Strategy Reference Groups as part of the Strategy development.

The following provides an overview of the key themes within our submission and some opportunities where we believe the strategy can be strengthened.

Key themes of this submission:

1. **AT strongly support a focus on leadership, capability and capacity** to deliver a Vision Zero approach. Insufficient leadership and priority for road safety in policy and decision making was identified through both the Auckland Road Safety Programme Business Case and the 2015 independent review of Safer Journeys as a key factor that prevented the full delivery of a safe system. Success in this area will require strong leadership by MOT and Government to ensure key partners, NZ Transport Agency, NZ Police and RCAs are held accountable to national targets and maintain an operational focus on keeping people safe.

   o A new strategy with the same governance and leadership arrangement that oversaw rapidly increasing deaths and serious injuries from 2013-2017, may not be enough. We suggest the National Road Safety Committee could be given a function similar to the Parliamentary Commission for the Environment for greater political support and leadership.

2. **AT strongly support MOT in the move towards a Vision Zero approach to road safety**. Strong leadership from MOT and Government here will make it easier for Auckland and other regions to progress on transport safety issues, to save more lives sooner, and to reduce costs while doing so. Vision Zero is a proven approach being applied by many jurisdictions globally, it is customer focused and human centred, and telling this story at a national level will help build trust across New Zealand communities that people's safety is at the heart of what we do.

- o The Auckland Plan identifies that our transport system creates unacceptable levels of harm to people (and the environment) and we should be guided by the Vision Zero movement aiming to eliminate transport-related deaths and serious injuries. Vision Zero gives safety a higher priority in decision making and is in line with health and safety legislation which gives people the highest level of protection against harm (Transport and Access Outcome – direction 3 'Maximise safety and environmental protection' and Focus Area 6 'move to a safe transport network free of death and serious injury', Auckland Plan 2050)

- o Suggest using the RTZ strategy to encourage greater health and safety compliance by extending the act to drive greater accountability by RCAs and commercial work places for preventing road trauma. This could start with ensuring 'all reasonable steps' are taken to protect workers who drive and the general public who could be affected by them.

3. **The target which has been adopted in Auckland is more ambitious than the RTZ strategy and we believe the national target should be stronger**. In Auckland we have publicly committed to a reduction of 60% by 2027 through the Auckland Transport Alignment Project (ATAP). The *Vision Zero for Tamaki Makaurau* (VZfTM) strategy seeks to extend this further to approximately 65% by 2030. Ambitious targets are successfully used within Vision Zero strategies around the world to create urgency and drive innovation.

4. **Urban transport safety needs to be given a strong mandate in the RTZ** to support Auckland's efforts to eliminate death and serious injury (DSI) for all transport modes. The RTZ consultation document has a strong focus on rural road safety, while in Auckland 72% of DSI in the past 5 years occurred on the urban network. As Auckland's population continues to grow we anticipate that our urban network will be under increased pressure. We would like to see RTZ include the following urban road safety references:

- o Urban multi-modal movements in complex and busy places require a different approach to that of rural road safety. In Auckland 72% of DSI are urban, mostly on 50km/hr multi-modal arterials. Almost half of all New Zealand DSI are urban (48% for 2014 -2018).

- o Includes discussion of land use planning and mode shift to public transport as opportunities for reducing *exposure* to crash risk. The risk of DSI is a product of *exposure* of people to un-survivable crash forces, the *severity* of outcome and the design *likelihood*. A long-term view of reducing the need for private travel through safer public travel options in urban environments makes it possible to lower exposure to crash forces and injury risk at both the personal and network level. Integrated land use planning reduces the distances travelled and increases options for safe access to goods and services locally. As public transport is the safest mode, quality service and safe access to stations and stops will increase the number of low-risk trips. Both land use planning and public transport reduce exposure for everyone by reducing vehicle kilometres travelled (VKT) on the network. Mode shift could be considered another pillar to a safe system.

- o Equally, for new and existing urban networks safe public transport trips rely on people feeling safe while walking or cycling to the stop or station.

- o RTZ includes wellbeing and liveable places as a principle but does not adequately link this to urban road safety examples. For example, using place data such as landuse and population density as a guide for determining latent walking trips, crash-risk exposure, and density of conflicts with other modes; all of which would in turn reflect the type of interventions required (e.g. slow speed zones).

- o Include reference to how increasing safe and sustainable trips as a high-level measure links climate change goals to vision zero goals for an integrated policy approach to all harms from transport.

5. **Set speed limits according to Safe System principles**. We note RTZ's use of IRTAD 2018 research on defining 'reasonable' speeds as 'around 30-40kph' for vulnerable road users and 'around 70-80kph'

for head-on vehicle crashes on undivided roads. We recommend using the IRTAD 2018 Speed & Crash Risk Research Executive Summary recommendations for survivable speeds as follows:

"The design of the road system and the speed limits set for it must consider the forces the human body can tolerate and survive. Working towards a Safe System, reasonable speed limits are 30 km/h in built up areas where there is a mix of vulnerable road users and motor vehicle traffic. In other areas with intersections and high risk of side collisions 50 km/h is appropriate. On rural roads without a median barrier to reduce the risk of head-on collisions, a speed limit of 70 km/h is appropriate. In urban areas, speeds above 50 km/h are not acceptable, with the exception of limited access arterial roads with no interaction with non-motorised traffic. Where motorised vehicles and vulnerable road users share the same space, such as in residential areas, 30 km/h is the recommended maximum".

6. We note that **RTZ is relatively silent on many issues relating to Māori road safety**. We recommend that the strategy be strengthened by specific actions for improved Māori road safety outcomes including:

    o   Participation and representation of Mana Whenua as kaitiaki in decision-making and leadership of the strategy and its implementation;

    o   Support and invest in Māori led approaches or interventions to whānau, hapū, iwi and hapori Māori;

    o   A system change to decision-making criteria to ensure targeted investment for improving outcomes for Māori;

    o   Issues of equity, access and wellbeing of Māori to be addressed in the strategy.

7. To address previous and current gaps **the RTZ strategy needs to make sure that funding is readily available when it is needed**, and that there is enough to cover planned safety work. Also ensure that the safety priority is supported in practice through funding processes (e.g. revise the existing Benefit-Cost approaches that trade off safety for vehicle efficiency).

    o   Funding systems and processes need to be reviewed to expedite Vision Zero decision making where possible and ensure consistent decision making from leaders within approving agencies. This will enable more immediate construction of physical infrastructure on the road network, leading to a faster reduction in road trauma. A funding system review is a priority for RTZ as it was identified as one of the key weaknesses of Safer Journeys. This review should apply to safety outcomes for all transport programmes not just road safety.

    o   Urban network safety investments will at times legitimately increase travel times for vehicles which means safety projects could struggle to achieve Benefit:Cost Ratios (BCRs) in a funding system designed to reduce travel time for vehicles. Reducing vehicle speeds provides a number of safety, health and social benefits and can also save money.

Detail of submission

Note on formatting – the tables below align with the online submission form with a rating and comments box for each segment.

The VZfTM strategy comments refer to the draft Tamaki Makaurau Road Safety Governance Group Strategy, "*Vison Zero for Tamaki Makaurau*: *a transport strategy and action plan to 2030*" – being prepared by AT and partners, Auckland Council, NZ Police, NZTA, MOT, ACC, ARPH (Public Health) and MinEdu. (note key parts of the draft VZfTM strategy text are included for comparison - blue shaded rows)

This submission includes recommended actions from independent report: Auckland Transport: Road Safety Business Improvement Review (BIR), 2018[1]. The Board of Auckland Transport were concerned about the deteriorating road safety performance in Auckland and in November 2017 commissioned an urgent Business Improvement Review on road safety in Auckland, resulting in a number of actions for AT to advocate to central government.

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[1] https://at.govt.nz/media/1976968/road-safety-business-improvement-review-report-finaldocx.pdf

Section 2 and 3	Comments	Rating
Vision	"Our proposed vison is: A New Zealand where no one is killed or seriously injured in road crashes. This means that no death or serious injury is acceptable. " **Support with note that it could be stronger and more mode neutral:** 1. MOT have given no end date for reaching zero, where Auckland have suggested 2050 is a possible timeframe to aspire to. While a specific year is perhaps not important, in combination with a comfortable target this may affect the sense of urgency and limit expectation for a dedicated and innovative approach. The International Transport Forum states that stretch targets ultimately may not be achieved but may achieve more improvement than if a lower, more conservative target was set. This is due to higher targets which value safety also drive innovation and aspiration to go some steps further than current best practice. [2] 2. *Road to Zero* shows MOT focus on road crashes, whereas *Vison Zero for Tamaki Makaurau* is shifting towards wider transport safety view – with the aim of a mode neutral approach to injury. This enables mode-shift to public transport (the safest option) to be clearly seen as a safety benefit. It also will lead to more consistent data for comparing the safety of all the modes Aucklanders have to choose from. We would like MOT to support this approach within *Road to Zero*	**Strongly support**
Target	40% reduction in death and serious injuries by 2030 (from 2018 baseline) **Support with comment that it could be stronger, e.g. 50%** **Comment**: 1. Auckland targets are more ambitious: e.g. ATAP: 60% in 10 years from 813 in 2017 baseline to 325 in 2027, and draft VZfTM strategy: "Approximately 65% reduction from a 2016-2018 annual average baseline of 716 deaths and serious injuries [in Auckland]." This has been modelled as achievable in the Road Safety Programme Business Case for the next 10 years. 2. Much of Auckland's risk is on urban arterials. Solving this aspect alone would help us reach most of this target. While this is not easy, especially with constant growth in population and the need for streets as places and even faster growth in vehicle numbers, we acknowledge that MOT is working with a much larger network, with many kilometres of difficult high speed and high-risk road environments so a different target for 2030 is to be expected. However, a 50% target would be more in line with international goals such as the UN sustainable development goals, and Sweden's initial step change in road safety thinking.	**Strongly support**

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[2] Page 64 of 2016 Zero Road Deaths and Serious Injuries: Leading a Paradigm Shift to a Safe System, by International Transport Forum (ITF) https://read.oecd-ilibrary.org/transport/zero-road-deaths-and-serious-injuries_9789282108055-en#page63

Section 4	Comments	Rating
Principles to guide decision making and investment	"Clear guiding principles provide a shared understanding of how we will work, and the values that will guide our actions and decision-making." "Our proposed seven guiding principles for our road safety strategy are: **1** We plan for people's mistakes **2** We design for human vulnerability **3** We strengthen all parts of the road transport system **4** We have a shared responsibility for improving road safety **5** Our actions are grounded in evidence and evaluated **6** Our road safety actions support health, wellbeing and liveable places **7** We make safety a critical decision-making priority" **Support the list of principles and MOT for exhibiting their own responsibility as the lead agency for transport across New Zealand.** MOT have an overview of the whole system, and as the lead agency for transport have a wide ability to review and predict system failure and take steps to prevent it. Note: Both MOT and VZfTM draft strategies include the first four guiding principles as safe system principles, but MOT is more explicit that these should guide decisions, process and the safety priority within these, while VZfTM puts more emphasis on people and leaders such as the responsibility of system designers and placing the ethical principle first. **Comment**: In terms of process, we support the participation and representation of Mana Whenua in decision-making and investment **Recommend** that safety needs to be critical for all transport programmes, not just road safety programmes. I.e. all projects with a transport aspect should look to maximise safe mobility.	Strongly support
	From the Vision Zero for Tāmaki Makaurau draft strategy: The 4 principles of a safe system / vision zero, condensed into 3 points plus explicit ethical position 1. **Ethics:** People shouldn't die or be seriously injured in transport journeys. 2. **Responsibility**: *System designers are ultimately responsible* for the safety level in the entire system - systems, design, maintenance and use. Users need to show respect, good judgement and follow the rules. If injury still occurs because of lack of knowledge, acceptance or ability - then system designers must take further action to prevent people being killed or seriously injured. 3. **People centred:** System designers must accept that people make *mistakes* and people are *vulnerable*. 4. **System response**: We need to look at the *whole system* and develop combinations of solutions and all work together to ensure safe outcomes.	
Principle 1 We plan for	**Support** but would prefer a mode-neutral view. All road users are equally prone to human error. The greater speed and mass of some road users makes the consequences more severe for themselves and others, but these users. as human beings. are not inherently more or less prone to mistakes (with exceptions for children and others who cannot increase their levels of perception).	Strongly support

Section 4	Comments	Rating
people's mistakes	Studies have shown that most serious crashes and half of fatal crashes include some human error as part of multiple failures across the safe system 'pillars'. In urban areas with high numbers of people on foot, bike, public transport, as well as drivers all interacting, anyone can make a mistake and the system needs greater consideration of vulnerability and survivable speeds in these locations. **Recommend** the strategy incorporate strong statement to support multimodal urban safety, **Recommend** running a multi-modal/mode-neutral lens over all the proposed principles.	
Principle 2 We design for human vulnerability	**Support** AT considers that New Zealand's current transport standards and guidelines are not fit-for-purpose. They do not cater for safety and access for all modes, help establish self-explaining roads through design, or facilitate the creation of safe and liveable urban areas. Interactions between various standards and guidelines (e.g. urban design and accessibility standards) are also challenging, notably for less-abled pedestrians. **Recommend** a comprehensive review of existing transport standards and guidelines to enable Vision Zero design principles that would also greatly improve safety in urban areas and deliver health and environmental co-benefits. **Recommend** that the transport standards and guidelines review make it easier to trial innovative safety treatments. **Support with comment** that VZfTM use the IRTAD 2018 Speed & Crash-risk Research[3] recommended survivable impact speeds which are recognised internationally and still hold a 10% risk of fatality i.e. 30km/hr for pedestrians and cyclists and motorcyclists and 70km/hr for head-on crashes We note that the IRTAD report stating the proposed RTZ speeds are *'reasonable'* refers to a study that looks at pedestrians being struck by passenger cars only, ignoring the presence of buses and trucks in the urban network. None of the survivable speed curves are perfect, but CAS and studies looking at pedestrian crashes in detail show that serious injuries still occur at 40-30km/hr and below. The Austroads Safe System Assessment Framework (SSAF) and compendium of the Safe System approach refer to survivable impact speed curves where 30km/hr still contains a 10% risk of fatality for a pedestrian. 50km/hr still contains 10% risk of fatality for drivers in a side impact, and similarly 70km/hr still contains a risk of fatality for a head-on crash, with serious injuries at a higher risk again. **Recommend** the more conservative survivable speed of 30km/hr for pedestrians and other road users unprotected by a vehicle shell as this is more likely to eliminate deaths and reduce serious injuries. In addition, it is worth noting that ANCAP vehicle safety ratings are tested at lower speeds than 70km/hr for head-on collisions to receive a 5-star safety rating. R**ecommend** that MOT incorporate a more conservative list of survivable impact speeds of: • 30km/hr for pedestrians • 50km/hr for side impact with vehicles • 70km/hr for head-on impacts with vehicles We recognise that the proposed survivable impact speeds better reflect the Speed Management Guide (SMG), and **note with concern** that there is a gap between	Strongly support

[3] Speed & Crash Risk Research Report, IRTAD/OECD, 2018

Section 4	Comments	Rating
	outcomes of the SMG, the Speed Limit Setting Rule and outcomes of Vision Zero, whereby the function of the road/ numbers of vehicles allow for less safe speeds to be chosen where exposure is highest.	

Recommend that Safe and Appropriate Speeds (SAAS) in the SMG are reviewed to better align with Vision Zero outcomes, particularly with more sensitivity to vulnerable road users for high risk urban arterials.

Recommend that the resulting indicator measures also use these lower survivable impact speeds as benchmarks, rather than the 40 and 60km/hr limits proposed.

International evidence that supports the more conservative threshold for survivable impact speeds includes:

- Kröyer, H. R. G. (2015). Is 30 km/h a 'safe' speed? Injury severity of pedestrians struck by a vehicle and the relation to travel speed and age. International Association of Traffic and Safety Sciences Research., 39, 42-50 (https://www.sciencedirect.com/science/article/pii/S0386111214000235)

- Woolley, J., Stokes, C., Turner, B., & Jurewicz, C. (2018). Towards Safe System Infrastructure: A Compendium of Current Knowledge. Austroads.

- Australia and New Zealand Roads Capability Analysis 2017-2027 (2018), Hart ,A Hart & Logie. Austroads

- 20's Plenty for Us – representing some of the largest 40 urban authorities in the United Kingdom, Briefing sheets, Rod King MBE (http://www.20splenty.org/)
  20'S PLENTY FOR LONDON - NOV 17 UPDATE
  GLOBAL CONSENSUS THAT 20MPH IS BEST PRACTICE
  WOMEN GAIN CONFIDENCE, EXERCISE, TIME & FREEDOM FROM 20MPH
  20MPH LIMITS HELP THE INVISIBLY DISABLED GAIN SOCIAL EQUALITY

- Pilkington, Paul, Bornioli, Anna, Bray, Issy, Bird, Emma, "Public health evaluation of the 20mph speed limit policy in Bristol, UK", 2019 (https://injuryprevention.bmj.com/content/injuryprev/early/2019/07/25/injuryprev-2019-043305.full.pdf) - *The analysis highlights a general reduction in injuries and suggests evidence of a city-level reduction in fatalities of 63%.*

- Has the Christchurch Central City 30km/h zone worked?, Koorey, G., Transport Knowledge Conference, November 2018. (https://viastrada.nz/pub/2018/chch-30k-zone)

- Go slow: an umbrella review of the effects of 20 mph zones and limits on health and health inequalities, Jo Cairns, Jon Warren, Kayleigh Garthwaite, Graeme Greig, Clare Bambra, *Journal of Public Health*, Volume 37, Issue 3, September 2015, Pages 515–520 (https://doi.org/10.1093/pubmed/fdu067)

- Safe Speed: promoting safe walking and cycling by reducing traffic speed, Garrard, J., Safe Speed interest group – The Heart Foundation, the City of Port Phillip and the City of Yarra, November 2008
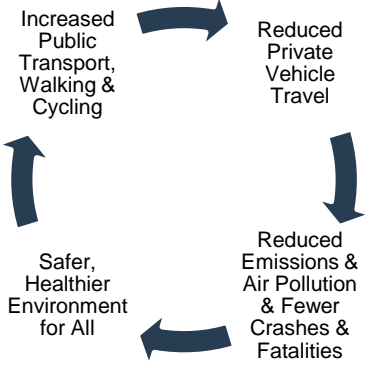
Section 4	Comments	Rating
	(http://www.victoriawalks.org.au/Assets/Files/Safe%20Speed%20Report%20Dec%20202008.pdf)	
Principle 3 We strengthen all parts of the road transport system	**Support** **Request** that this should incorporate a multi-modal view of transport safety, not just the 4 pillars, but also the option to choose safer modes, and the possibility of better integrated transport and land use planning reducing the need for trips and hence both reducing the exposure levels to un-survivable forces on the road network. **Support** the inclusion of post-crash care and technology as further aspects beyond the original four pillars of speed, road environment, vehicle and user behaviour.	Strongly support
Principle 4 We have a shared responsibility for improving road safety	**Support** Refer to the responsibility principle text from VZfTM strategy above which takes the Swedish approach that system designers bear ultimate responsibility, both before and after a crash occurs **Suggest** considering how the Resource Management Act might help vison zero goals be achieved in new developments.	Strongly support
Principle 5 Our actions are grounded in evidence and evaluated	**Support** **Recommend** more consistent and comparable data collection across modes for a whole transport system approach to reducing and eventually eliminating death and serious injury. Existing national standards and guidelines use evidence of a lack of pedestrian injuries as a reason not to take action to improve safety in priority locations for communities (i.e. locations where crashes don't occur because the conditions are so hostile that people do not use a specific transport mode or route, particularly for walking or cycling). We wish to ensure that the review of national standards and guidelines allow decisive action to be taken for improving walking and cycle safety in situations where alternative forms of evidence can be provided. Investment to improve multi-modal safety in an urban environment is currently skewed by NZ Police Traffic Crash Reports (TCR's) which are very vehicle focused, under-report Distraction/Fatigue, and have an inherent bias towards blaming vulnerable road users. **Request** revising TCR's and Serious Crash Reporting processes to more accurately capture a wider Systems approach to safety issues in an urban context.	Strongly support
Principle 6 Our road safety actions	**Support** **Note** that Section 1 - case for change mentions other work on PT walking and cycling 'beyond' this strategy	Strongly support

Section 4	Comments	Rating
support health, wellbeing and liveable places	• **R**ecommend more on the role of land use planning and public transport integration to reduce exposure to un-survivable crash forces, implementing this as a step before applying the safe system principles to reduce likelihood and severity of crash risk. • **R**ecommend this principle is linked more clearly to urban road safety, such as using place functions, land use and population as a guide to latent trips by walking and current exposure, and density of conflicts which in turn reflect the type of interventions required (e.g. slow speed zones). This is particularly relevant in growth and redevelopment areas. • Survivable speeds of 30km/hr around urban schools are a key detail under this principle. • **Recommend** that the strategy recognise and invest in holistic Māori approaches/ interventions for improved Māori road safety outcomes for whānau, hapū, iwi and hapori Māori. We have taken a whānau-centric approach to design and delivery that is supported through Māori collective structures for improved outcomes. • **R**ecommend that a specific action be developed to consider Māori road safety outcomes including access and equity and Māori wellbeing. Our experience shows that Māori road safety outcomes are complex including socio-economic issues such as licensing costs and access to licensed drivers and registered vehicles which makes behavioural change challenging. Rangatahi require licences for employment and we welcome related proposals for road safety in the workplace. • **Recommend** a combined safe and sustainable policy for urban transport to support both short and long-term goals to reduce transport harm. From a wider viewpoint of transport harm, the ICCC has just recommended accelerated electrification[4] of transport in New Zealand including increased uptake of low emission modes to reach our climate change targets. Globally there is less than a decade before CO_2 emissions must peak and fall, with immediate action necessary to avoid significant harm in future decades[5]. • **Suggest** using the international Safe & Sustainable transport diagram[6] below in RTZ to emphasis the linkage between increased PT, Active Travel and reduced transport harms	

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[4] Interim Climate Change committee (ICCC) of New Zealand Electricity Enquiry report 2019 https://www.iccc.mfe.govt.nz/what-we-do/energy/electricity-inquiry-final-report/
[5] https://www.ipcc.ch/sr15/ IPCC report on global warming of 1.5 degrees
[6] Sustainable & Safe: A Vision and Guidance for Zero Road Deaths, World Resources Institute & Global Road Safety Facility, 2018

Section 4	Comments	Rating
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Principle 7 We make safety a critical decision-making priority	**Support** Especially with review of funding and other processes to ease delivery of safety interventions. **Recommend** decision-making criteria to ensure targeted investment for addressing Māori transport safety outcomes. **Suggest** that a commitment be made to work with Mana Whenua and Mataawaka to ensure that there is true and appropriate partnership approach for representation of Māori at all levels of leadership and decision making on transport safety. AT would like to see stronger mandate for solving urban road safety issues from MOT. **Suggest** that this may be through a specific 'Urban' seat on the National Road Safety Committee or equivalent.	Strongly support

Section 5	Comments	Rating
Focus areas	**1** Infrastructure improvements and speed management **2** Vehicle safety **3** Work-related road safety **4** Road user choices **5** System management **Comment**: Generally **support**, but note the focus is heavily on vehicle users and not in urban areas, in both the headings and detail text. Would prefer to see more emphasis on the urban road safety problem and vulnerable road users, particularly under focus area 1 and 5. Would like to see public transport safety included in all focus areas. Focus area 4 has particularly strong emphasis on extreme behaviour that counters the 1st decision making principle of the previous section. • **Recommend** creating a new focus area for urban transport safety to cover the gaps noted. This could link up the principles of liveable places with infrastructure and safe urban speeds to give emphasis to safe multi-modal streets, network planning and operation, particularly around schools, town centres, stations, but also urban high-risk areas and conflict types. • **Recommend** strengthening the supporting data in each focus areas for a stronger strategic story overall. In particular, clarifying the different ways of thinking about speed across the focus areas – as a legal limit, normal	Support

Section 5	Comments	Rating
	operation, extreme behaviour or the design of a self-explaining speed environment	
Focus Area One	**"Improve the safety of our cities and regions through infrastructure improvements and speed management.** Our roads and streets reflect our natural landscape and changing communities: our roads are winding, hilly and often narrow, and our streets can be full of people, and bustling retail areas. Not all risks are visible, and often our roads and streets are not self-explaining. This means the wrong speed can result in an unforeseen tragedy. Improving our road infrastructure and setting and enforcing safe speed limits are some of the most powerful ways we can create a road system that is forgiving of human mistakes." • Further investment in safety treatments and infrastructure improvements • A new approach to tackling unsafe speeds • Review infrastructure standards and guidelines • Enhance safety and accessibility of footpaths, • bike lanes and cycleways **Comment**: **Support** safe and survivable speeds, and primary treatments for a vision zero approach to road infrastructure (such as more roundabouts for intersection safety, flexible barriers, separated cycle lanes, raised pedestrian crossings, and self-explaining road environments for both urban and rural roads) **Support** the review of guidelines and standards to reflect and embed Vision Zero approach in planning and design, operations and maintenance. **Recommend**: AT would like to see more emphasis on solving urban road safety issues, and an overview of solutions and interventions for multi-modal, complex movements and activity in busy places. These require a different approach to that of rural road safety. Almost half of all New Zealand DSI are urban (48% for 2014 -2018). In Auckland 72% of DSI are urban, mostly on 50km/hr multimodal arterials. • More support for active modes safety through infrastructure and nuanced speed management is requested. Each mode has its own safety context and solutions, but there is also a holistic approach that includes speed management, transport planning and urban design. • Pedestrians make up 19% of DSI in Auckland from 2014-18, this increases to one quarter of the DSI on 50km/hr roads. Cyclists were 8% of the total rising to 12% on 50km/hr roads, and motorcyclists were 19% rising slightly to 20%. The safety of vulnerable road users requires survivable speeds, or separation (which is usually not possible at intersections). • Support **safe pedestrian crossings which are key to safe walking routes,** either on raised tables or with narrow kerbs to slow traffic to survivable impact speeds. Recommend system review to include strong support for the installation of safe crossings on walking routes,	Strongly support

Section 5	Comments	Rating
	based on a broader data set e.g. Data on population, pedestrian scale destinations (e.g. a bus stop) and trip purpose indicate potential behaviour that is more relevant than current 'pedestrian factors' that imply crossing the road is inexplicable and random.	

- **Recommend** introduction of a **better framework** to manage the safety of people in the growing urban environment of fast personal mobility devices, including updating the **Road User Rules** and revised **Standards & Guidelines** to facilitate safe urban infrastructure for these growing mode choices.

Recommend including support for public transport priority projects for safer mode choices. DSI has been shown to decrease in cities with effective rapid transit by EMBARQ[7] and research for NZTA supports the insertion of PT into road safety strategy[8]. Comparable injury data across all modes will help, including being able to measure safe and sustainable journeys by linking active mode injuries on trips to public transport.

Note that safe public transport journeys rely on people feeling safe while walking or cycling to the PT stop or station. The surrounding network, whether new or existing, needs to support safe travel for the 'first and last mile' to get the full benefits of an integrated urban network.

Recommend transport programmes under Vision Zero reflect the need for safe and accessible links between modes.

Rural DSI is significant for Māori in Auckland e.g. in Rodney.

Recommend this over-representation among rural Maori be acknowledged especially through safe speeds and improved road design near rural marae.

Speed management

Support streamlining the speed limit setting process. Key issues for Speed Management are in the bylaw process. AT hasn't changed any speed limits since the updated Speed Limit Setting Rule came out in 2017.

- **Suggest** we do not use the bylaw process, this process and the associated Local Government Act consultation requirements that apply to most road controlling authorities make it very time consuming and onerous process to change speed limits via bylaw change.

- **Question** the level of consultation required. Given that the speed management guide/rule drive quite deterministic technical processes for identifying the appropriate speed limits and there is a desire to achieve national consistency of outcomes there is very limited scope for "consultation" to actually change the outcomes of specific speed changes. It is appropriate for councils/RCAS to consult widely on their strategic approach to speed management, but could we reduce the engagement on the detail of specific speed changes down to an inform only level?

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[7] EMBARQ, 2014, "Traffic Safety on Bus priority Systems, https://www.wrirosscities.org/sites/default/files/Traffic-Safety-Bus-Priority-Corridors-BRT-EMBARQ-World-Resources-Institute.pdf

[8] NZTA research report 581, "The role public transport can play in Safer Journeys and, to advance the Safe System approach, 2015.

Section 5	Comments	Rating
	The existing roading investment paradigm encourages NZTA to fund greater travel speeds on open roads for vehicles and often the justification for investment has been to make higher travel speeds safer. Adopting Vision Zero under current investment levels makes continuing this approach unaffordable because it will be expensive to increasingly try to separate vehicles or vehicles and people through transformative infrastructure changes. Additionally, this type of infrastructure is often brutal in an urban context and incongruent with liveable urban design.	

Request that the National Road Safety Committee change the existing roading investment paradigm by adopting the introduction of lower and survivable speeds area-wide as an immediate and effective low-cost measure for reduced road trauma. To improve the 87% of roads that do not have appropriate speed limits

Request that speed limit setting legislation require RCA's to lower the speed limit to the appropriate level if the default speed is not safe in the first instance, until infrastructure investment can allow for a higher speed in a safe environment. This would create an environment in which life and injury-saving changes would happen faster.

Request that MOT make a simple yet powerful move towards vision zero by changing the default speed limit for:

- Rural undivided roads to 80km/hr to immediately make a difference to rural DSI and allow resources to be shifted towards urban safety. RCAs could still apply higher km/hr speeds if they are safe, e.g. with median barriers but for the majority of rural NZ roads 100km/hr is not safe.

- Urban school zones default to 30km/hr as a clear safety concern in the community, and a step towards safe urban streets for all.

BIR Actions for Infrastructure and speed

- **Request** that the Safe System Assessment Framework (SSAF) or similar is used for all national roads (i.e. NZTA to apply it as well RCAs), and for all transport projects generally. Auckland Transport recognises that the current Austroads framework is not complete for assessing urban safety risks and is working on developing this tool for better results in urban areas and vulnerable road users.

- **Request** that no particular speed limits in Auckland are raised unless the safety case is clear, or many lower safe speeds are introduced at the same time.

- **Support** use of safety cameras (see comments under 'system improvements')

| **Focus**

Area

Two | **Significantly improve the safety performance of the vehicle fleet.**
The design and safety features of our vehicles matter. Safer vehicles not only help drivers avoid crashes, but also protect occupants and other road users when crashes do happen. A focus of this strategy will be on improving the safety of vehicles entering New Zealand, ensuring that existing vehicles are as | Strongly support |

Section 5	Comments	Rating

	safe as they can be (including through retrofitting new technologies where appropriate), and building public demand for safer vehicles.
	
	    • Raise safety standards for vehicles entering the fleet
	    • Promote the availability of vehicle safety Information
	    • Implement mandatory ABS for motorcycles
	
	Comment: Good to see actions that business can take to improve the safety of the fleet.
	
	• R**ecommend** safety features and safer vehicle purchases also apply to public transport suppliers, large and small passenger service vehicle owners and operators.
	
	• R**ecommend** consideration of safety of micro-mobility vehicles/devices that will likely increase and diversity with new technology and innovation
	
	• **Recommend** increased emphasis on vehicle design that offers protection to vulnerable road users in an urban mobility context.
	
	BIR actions **Vehicles**
	
	• **Support** raising the safety standards for vehicles entering the fleet. Suggest MOT promote newer safer vehicles, especially light commercial vehicles and suggest MOT restrict used cars over 7 years old, with consideration for equity of access. Minimum ANCAP rating for imported vehicles, including electric vehicles.
	
	• **Support** mandatory ABS breaking for motorcycles	

Focus
 	
Area
 	
Three
	Ensure that businesses and other organisations treat road safety as a critical health and safety issue.
	
	Employers have a moral and legal responsibility to ensure that work-related road travel is safe for their staff and the public. They also have the expertise, resources and influence to make a real difference to our road safety outcomes. About 25 percent of the deaths on our roads involve someone driving for work, whether as a commercial driver or as a secondary part of their main role. Ensuring that road safety is treated as a critical health and safety at work issue has the potential to significantly reduce this harm.
	
	    • Support best practice for work-related road safety
	    • Strengthen commercial transport regulation
	
	Comment: RTZ presumes all business travel is by vehicle. This is not the case in Auckland and other city centres, where travel via public transport and active modes is common.
	
	We r**ecommend** this focus area include discussion of business travel behaviour in urban areas. The Auckland Business Case for Walking study in the CBD estimates between 300 and 400 thousand walking trips in the city centre each day. Half of those trips are estimated to be by people working in the centre, with trips are spread across the working day. The CBD is also a high-risk area for pedestrians (Urban kiwiRAP VRU heatmap).
	
	Suggest seeking out research like this for a broader view of transport safety in relation to work travel. **Suggest** promoting safer vehicles for those in and
		Strongly support

	outside the vehicle, and safer behaviour in areas near and by vulnerable road users. Another aspect of workplace safety is construction industry, and how these activities impact on the safe use and management of transport facilities for all users through temporary traffic management (e.g. injuries lack of access for less agile pedestrians, and lack of cycle space) as well as safety for those working in the road. **Suggest** adding Temporary Traffic Management to this focus area. **Request** an increased Health & Safety focus on preventing harm to the wider public not just the driver/employee. Professional drivers (commercial, taxi, freight, trade & PT) make up the majority of travel on the urban network and there is a greater duty of care required among professional drivers to prevent road trauma. Creating some culpability for causing harm to others while driving for work purposes to reinforce road use legislation is potentially powerful. The benefit is that employment based training and behaviours generated by this approach in the employment context will overflow into recreation and private mobility as well. **Suggest** using the RTZ strategy to drive general health and safety, by extending the Health & Safety act or to drive greater accountability by RCAs and commercial workplaces for preventing road trauma. This could start with ensuring 'all reasonable steps' are taken to protect workers who drive and the general public who could be affected by them. **Recommend** a stronger regulatory and infringement framework to incentivise safe road user behaviour among professional drivers including speed, impairment, distraction, restraints etc.	
Focus **Area** **Four**	**Encourage safer choices and safer behaviour on our roads.** We make choices on our roads and streets every day. We choose whether to speed up or slow down at a yellow light, whether to take the call or let it go to voicemail, whether to pull over or keep driving when we're feeling tired. When it comes to driving or riding, most people think that other people are the problem – but we all have a responsibility for making safe choices. Over the next ten years, it will be critical that we continue to promote responsible behaviour and consideration of others on our roads and target deliberate violations if we are to achieve our vision. • Prioritise road policing • Review of financial penalties and remedies • Enhance drug driver testing • Support motorcycle safety **Comment**: **Support** additional enforcement and technology to assist safe behaviour **Support** greater use of safety cameras and introducing the point to point speed camera approach. (BIR) **Suggest** that Auckland could trial automated enforcement to support Tamaki Makaurau Police in their work on road safety enforcement. R**ecommend** review opportunities for non-Police operated cameras to be better utilised for automated enforcement, i.e. CCTV cameras.	Strongly support

Section 5	Comments	Rating
	Suggest implementing safety camera technology that can also capture motorcycle registration details for automated enforcement purposes.	
	Recommend review of the impact of the lowering of the BAC, has this achieved the expected outcomes and if not, what further needs to be done.	
	Strongly Support for review of penalties to better reflect risk arising from the behaviour in question. Including a lower tolerance for speeding infringements and demerit points to apply regardless of whether officer or camera detection (BIR) Including the way we respond to blood alcohol levels that are between the current and previous limit, to strengthen the new limit.	
	Support enhanced drug driver detection such as saliva testing (BIR)	
	Support ongoing enforcement of use of restraints. (BIR)	
	Suggest that greater penalties are considered for heavy vehicles due to the much greater risk. e.g. 50% higher penalties and a requirement of zero BAC levels for passenger service vehicle drivers. (BIR)	
	Suggest zero BAC levels for small passenger service vehicles like taxis also (BIR)	
	Suggest reducing the capacity to award a work-related licence for a drink driving offender (BIR)	
	Recommend mandatory alcohol interlocks for repeat and most serious offenders (BIR)	
	Support inclusion of driver licensing and training.	
	Suggest putting the comment around how a safe system helps people make successful safe choices early in the section (currently placed later under shifting public attitudes) and adding more encouragement/mandate for education for all modes, in particular school safety education for all modes. New migrants and tourists are also groups that can benefit from road safety education.	
	Whānau, hapū, iwi and hapori Māori play an important role in leading and delivering transport safety programmes to their communities including licensing and speed management. **Recommend** that this be emphasised in the strategy as a specific action point.	
	Support campaigns that align with enforcement and help sell the story of vision zero and how it works (e.g. reducing exposure to un-survivable impact forces) will be an important part of successfully delivering speed management.	
	Recommend providing a national resource to deliver transport safety education to schools, similar to the VicRoads/ TAC - Road to Zero: Road Safety Experience and Physics Challenge. This would allow all RCAs to access best practice resources to deliver behaviour change programmes to their communities, utilising the latest technology and behavioural science insights.	
	This section is heavily focused on extreme behaviour in contrast to principle 1 which is acknowledging half of fatal crashes and most serious injury crashes are a result of mistakes in an unforgiving system. Serious injuries are over 90% of all DSI and contribute most of the social cost. **Recommend** a more balanced view of behaviour and actions that support the 1st principle would be helpful from a consistent storytelling point of view.	
	Recommend that enforcement activities take care not to unintentionally increase existing at-risk inequities.	

Section 5	Comments	Rating
	The contributing factors graph for road user choices is unclear in what it means by 'speed' - is this referring to extreme behaviour, or inappropriate speed limits or high-speed environments? • **Suggestion**: Given speed is key to understanding vision zero and therefore part of at least 4 of the 5 focus areas (part of safe road design, legislation, normal and extreme behaviour in a safe system) perhaps the strategy could include some clarifying comment on how speed contributes to DSI and needs to be considered in all parts of the system, or provide a clearer view of the statistics? **Request** that Tamaki Makaurau Police have the resources they need to play their key role in road safety. (BIR) • Red light/ speed cameras and the required increased capacity for infringement processing • Seat belt enforcement/programmes, • random breath testing **Recommend** use of technology to deter illegal phone use (e.g. camera detection) (BIR), or other monitoring either inside or outside of the vehicle.	
Focus Area Five	**Develop a management system that reflects international best practice.** Road safety belongs to all of us. Everyone who uses, designs, manages and maintains our roads, streets and footpaths has an important role to play. Leadership, coordination, engagement and accountability will therefore be critical if we are to achieve our road safety ambitions. • Strengthen system leadership, support and coordination **Comment:** **Support** strong leadership and making the case for change. The National Road Safety Committee was the executive vehicle for putting pressure on politics to create a safe transport system in line with Safer Journeys objectives. The failure of Safer Journeys to save lives and prevent injuries can be interpreted as the NRSC enabling increasing road trauma over the last five years. The increased deaths and injuries are a direct result of a lack of high level leadership, even in the face of publicly transparent and rising road trauma. The draft Road to Zero Strategy remains connected to this same executive vehicle and there is a very real risk of it not succeeding unless there is significant reform or revitalisation of the NRSC with clear accountabilities to improved road trauma outcomes. **Suggest** the National Road Safety Committee be given a function similar to the Parliamentary Commission for the Environment for more political support and involvement. **Support** significant reinvigoration of the National Road Safety Committee including • CEO's directly accountable through DSI KPI's • someone to represent urban road safety issues. • Māori representation AT and our road safety partners **support** the proposed work to improve the larger system:	Strongly support

Section 5	Comments	Rating
	- coordination and intelligence sharing between agencies through the Road Safety Partnership - addressing data and research gaps through the new Transport Evidence Base strategy, including for urban road safety and vulnerable road users - new intervention modelling, and sharing local case studies - ongoing engagement activities to build public understanding and support for VZ approach to RS - develop a robust monitoring framework for the strategy and publicly report on progress. - Work with local govt including strengthening coordination mechanisms - Identifying and responding to key capability and capacity gaps - Transport health and emergency services continuing to work together to improve how we respond to road crash and treat crash victims and better understand the full impact of road safety on health, emergency services and rehabilitation services. **Māori partnership** - We have taken a Treaty of Waitangi and Te Ao Māori approach to improving Māori road safety outcomes through Te Ara Haepapa programme and have strong relationships with Mana Whenua. We **strongly support** the process of ongoing engagement and partnership with Mana Whenua as the strategy is developed and implemented and this be adopted as a practical action. - The Crown's commitment to the principles of partnership, participation and protection under the Treaty of Waitangi aligns with our approach. We consider that the Treaty of Waitangi and Te Ao Māori underpins the strategy and delivery of improved road and transport safety outcomes for Māori and **recommend** that this is clearly articulated in the strategy with deliverables. **Recommend** that the strategy will be strengthened by specific actions for improved Māori road safety outcomes. - Participation and representation of Mana Whenua as kaitiaki in decision-making and leadership of the strategy and its implementation; - Support and invest in Māori led approaches or interventions to whānau, hapū, iwi and hapori Māori; - A system change to decision-making criteria to ensure targeted investment based on need for improving outcomes for Māori; - Issues of equity, access and wellbeing of Māori be addressed in the strategy. - The Auckland Plan requires AT to address disparities in transport access particularly where this exacerbates existing inequities. Distribution of deaths and serious injuries geographically and across particular groups such as Māori is part of these compounding disparities that effect wellbeing and equity in Auckland.	

Section 5	Comments	Rating
	Capability **Support** any moves to help increase capability and capacity for RCAs to deliver vison zero / safe system outcomes. Suggest that Auckland could help by participating in trials in this process. **Recommend** MoT re-introduce past NZ best practice for national, regional and local road safety co-ordination as outlined in the 2006 TRL Review of International Road Safety Good Practice[9]. This world leading road safety co-ordination framework was developed by LTSA and delivered a substantial reduction in DSI in partnership with NZ Police, Local Govt and Communities. Things have moved on since this review in many areas, however the principles of maintaining a well-co-ordinated & resourced (vertical & horizontal) multi-agency road safety partnership approach remains very relevant to the successful roll out of a new Road Safety Strategy delivery. **Funding** (BIR actions) Auckland Transport has developed a Programme Business Cases (across the 2018-28 period[10]) which identifies a significant increase in the level of investment in safety programmes within the Auckland Region to align with the Government's direction of a Vision Zero approach to safety. In order to implement the level of change required both nationally and locally, it will be important for Central Government to increase the level of funding available through the **NLTP to commit to the safety initiatives being advanced for co-investment**. At this point, the Transport Agency has signalled funding constraints in the 2018-21 NLTP period which could impact on the delivery of the Auckland Transport safety programme, and therefore the DSI benefits. **Request:** • MOT address funding gaps: Invest in the infrastructure safety programme to address High Risk corridors and intersections backlog (within 15 years) • Inclusion of a road safety activity class in the NLTP to avoid the trade-off of safety at high risk locations • Change the Funding Approval Rate (FAR) to 75% for safety programmes and projects • Safety camera income to be used as a fund for regional road safety • Remove existing Benefit:Cost Ratio requirements for trading off safety benefits against travel time disbenefits in crash reduction projects. • Funding to restore adequate police enforcement to support the Vision Zero approach **Data** (BIR actions) **Support** much improved data, analysis, monitoring and review of outcomes for reducing road trauma and measuring risk.	

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[9] TRL 2006 Review of International Road Safety Good Practice https://trl.co.uk/reports/PPR248

[10]Interventions include the top 50% of high risk corridors and intersections, speed management for both urban and rural settings, (blanket approach and high-risk sites), vulnerable road users – specific interventions for each of pedestrians, cyclists, motorcyclists, safer communities, educational campaigns for speed and VRU, behaviour change initiatives for mode shift and increased enforcement, and other operational improvements. (10-year road safety programme - estimate of 70-80% reduction in DSI, designed to meet ATAP target of 60%)

Section 5	Comments	Rating
	Request that MOT bring back a national measure of attitudes to road safety rules and enforcement and intermediate outcomes like helmet wearing to assist RCAs with tracking safe behaviours year on year. (i.e. reinstate the Public Attitudes to Road Safety survey) **Suggest** that a wider transport safety approach look at standardising injury reporting across all modes or at least allow for a more consistent comparison with public transport injuries (H&S reporting) and CAS data, while also increasing accuracy of reporting for active transport mode injuries. For urban safety management, consider that public transport and mode shift is another 'pillar' or layer in the system. **Recommend** ongoing comparison of injury and fatality data for a comprehensive picture of the issue across agencies – police CAS, hospitals and ACC - R**ecommend** recording PT injuries (including on-board) for consistency - R**ecommend** sourcing drug and alcohol data from hospitals for crash casualties/patients for better record of these factor - R**ecommend** including 'purpose of trip' in injury databases, such as walking to the bus stop. e.g. add this to CAS reports. This will help measure the safety of complete journeys with public transport including first and last trip legs across multiple modes. R**ecommend** a wider view of the transport system and of transport harms now and into the future is incorporated into policy and programmes, including goals and measures for safe and sustainable transport to help meet zero carbon emission targets.	
	Vision Zero for Tāmaki Makaurau draft strategy Focus areas for Auckland: **Key Vision Zero actions** We have already started working towards safe transport for everyone. Currently, we have several activities all being delivered by different organisations. Our first step is to bring together all these activities and align our work across all partners. We expect this will make the largest contribution to our death and serious injury reduction targets. - Safe infrastructure and speed - Policing to prevent harm - Bus, train and ferry safety - Community engagement - Te Ara Haepapa - Post-crash care **Build capability** We need to build our skills and capacity, so we have the tools and ability to deliver the safety gains from future action plans and achieve our long-term goals. - Grow our people	

Section 5	Comments	Rating
	• Make plans and places for our future • Central government partnership • Workplace health and safety **Lead Conversations** Only with our communities will we be able to create a truly safe Tāmaki Makaurau. We will demonstrate what Vision Zero will look like and what it means for everyone. • Leadership and governance • Māori participation and representation in governance, decision making and leadership • Our Vision Zero story • Transport safety and equity **Research and Evaluation** Only with our communities will we be able to create a truly safe Tāmaki Makaurau. We will demonstrate what Vision Zero will look like and what it means for everyone. • We will produce an annual report on the strategy's performance, together with evaluation and research so we can make informed future decisions. • Action area for evaluation and research: • Performance and research	

Section 6	Comments	Rating
Indicator measures / Performance measures	AT would like to work with the MOT team to align measures where appropriate and share data collection as both have identified a need to fill significant data gaps including: • More active mode measures needed, including DSI for each mode • More vison zero survivable speed measures needed. AT do not support measures that incorporate non-survivable speeds (e.g. 40km/hr or 60km/hr) • Proportion of vehicle kilometres travelled (VKT) on roads that provide safe system primary and supporting treatments • **Suggest** Māori KPI's be developed as a partnership action • Urban multi-modal measure needed – e.g. numbers or % of safe and sustainable trips, and mode-shift. • Safe infrastructure for vulnerable road users (VRU) in urban areas to increase in the proportion of VRU trips that use safe routes (e.g. protected cycle facilities, raised pedestrian crossings) • **Suggest** safe and sustainable measures be developed for reaching long term goals for all transport harms, including low-emission transport (refer to new accelerated electrification goals)	Support

End of submission comments