Transportation Group NZ	TRANSPORTATION GROUP NEW ZEALAND

FINAL SUBMISSION – ROAD SAFETY STRATEGY

14 August 2019

INTRODUCTION

This submission is made on behalf of the Transportation Group NZ (TG). The National Committee members have compiled this submission and sought feedback from TG members.

TRANSPORTATION GROUP NZ

Transportation Group NZ is a Technical Interest Group of Engineering New Zealand with approximately 1,200 members in total (approximately half being engineers). Membership is made up of transportation, traffic engineering, and planning professionals working in central government, local government, academia and the private sector.

With an organisation of this size, it is invariably difficult to gain consensus on all matters within a submission. This submission has been developed initially by the National Committee, and then feedback sought on that draft from the wider membership. As much as possible we have focused on areas where our members have some expertise in the matters being discussed, rather than being general opinions. In presenting our final view, we acknowledge that there have been a few dissenting views to some of the matters presented.

BACKGROUND

The DRAFT Road to Zero - Road Safety Strategy outlines proposals for a new road safety strategy for New Zealand, to replace Safer Journeys, the current road safety strategy which expires at the end of this year. It also sets out a preliminary set of actions under the new strategy.

The TG has a high level of interest in this strategy as our day to day work involves road safety, albeit at various levels and stages of projects. We have been very concerned to see the decline in road safety performance in New Zealand over the past five years, particularly when other countries have continued to make positive strides. We have always strived for better road safety outcomes and welcome a revised strategy to help achieve this.

In general, we applaud the overall content of this draft road safety strategy, particularly for its ambitious goals and evidence-based approach. As always, the devil is in the detail and in the willingness of the Government and its road safety partners to make the necessary "hard calls" to implement some of the proposed measures. As an industry group with a wide range of expertise across road safety, we are more than happy to assist the Government in any way we can with the finalisation, implementation and promulgation of this Strategy.

CONSULTATION QUESTIONS - our answer in red text

To what extent do you support the proposed vision?
Strongly support
- What was the reason for your rating? *It follows world's best practice and it is ethically sound to strive to reduce crashes, deaths and serious injuries.*

- Do you have any further comments about the proposed vision? *We appreciate that a "Vision Zero"-style objective is hard for many people to comprehend and there is the danger that people will not support it (through their actions) if they believe it is unrealistic to achieve. This needs to be tackled on a number of different fronts, e.g.:*

- *A comparison with workplace safety goals of "Towards Zero Harm"; few people would support a target of having "some" people die while doing their job.*

- *A comparison with the success of air travel safety. From routinely having over 1000 deaths a year in the 1970s and 1980s, 2017 was notable for being the first year since records began where no-one died in commercial passenger jet crashes worldwide. While acknowledging that there were still some commercial cargo and small plane fatalities in 2017 (and some passenger deaths have occurred in 2018-19), the key point is that it is possible to achieve substantial reductions in casualties within a sector with sufficient attention to safety matters.*

- *The existing total casualty counts need to be broken down into smaller categories where a target of zero might seem more feasible. For example, in 2018 there were seven fatalities overall in Hamilton City; there were five cycle fatalities nationally; there were three pedestrian fatalities in Christchurch. By focusing on specific subsets of the data, more manageable problems can be considered and addressed, e.g. "how do we get those three pedestrian deaths in Christchurch down to zero?" (notwithstanding the fact that disaggregation to very small numbers increases the likelihood of random instances of zero deaths).*

To what extent do you support the proposed target for 2030?
Support, but the target isn't ambitious enough
- What was the reason for your rating? *We need to be catching up with the best road safety countries in the world and that will require more dramatic action.*
- Do you have any further comments about the proposed target?

  We believe the target should be more ambitious, e.g. in Auckland they are looking at a 60% reduction by 2027 through ATAP; other roading authorities are also targeting high reductions. Also, the number of fatal/serious casualties was already heading towards the new target by 2020 before the recent increases, suggesting that greater gains are possible. Research by Elvik (1993)[1] and Wong et al (2006)[2] show that jurisdictions with stronger road safety targets (even if they are not fully met) typically do better than those with less ambitious ones (which typically do better than those jurisdictions without any targets). This research also supports the use of intermediate measures within the 10-year strategy period to help focus on more shorter-term steps required to help achieve the longer-term targets.

  Further work should be undertaken to spell out in the strategy how it is expected that the proposed casualty reductions will be achieved (and what evidence those assumed reductions are based on), i.e. broken down by the various measures proposed and the crashes that will be affected. This will help to confirm the validity of the proposed target (or flag that further measures may need to be implemented to achieve it) and also provide for the specification of sub-targets for different road or crash types.

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[1] Elvik R. (1993). Quantified Road Safety Targets: A Useful Tool for Policy Making. *Accident Analysis & Prevention*, Vo.25, Issue 5, pp.569-583

[2] Wong S.C. *et al* (2006). Association between setting quantified road safety targets and road fatality reduction. *Accident Analysis & Prevention*, Vol.38, Issue 5, pp.997-1005.

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We recommend more reference to multimodal urban roads, e.g. in Auckland the majority of DSIs occur on multimodal urban roads, mainly arterial roads (50 km/h). Such environments are typically complex, multi-faceted corridors where traditional engineering-centric approaches may not be sufficient.

To what extent do you support the proposed decision-making principles?

Principle 1 – We plan for people's mistakes
Strongly support
- Do you have any further comments about this principle? *Based on a lot of current public discourse around road user education and training, this continues to be a challenge to explain. While not dismissing the role of user training, creating a protective road environment that does not kill people who make (often minor) mistakes is fundamental for moving towards zero casualties. We note that achieving such a safe system environment on our roads will take considerable time through infrastructure (the current Safe Networks programme is still only a fraction of the nation's roads); this suggests that even more investment in road safety infrastructure is required, together with extensive speed management.*

Principle 2 – We design for human vulnerability
Strongly support
- Do you have any further comments about this principle? *We strongly support much greater use of speed management across the country to help achieve this aim, together with the ongoing improvements in vehicle protection systems and roadway barriers.*

Principle 3 – We strengthen all parts of the road transport system
Strongly support
- Do you have any further comments about this principle? *We recommend that this approach be taken into greater consideration as part of traditional road review processes like safety audits; the Austroads Safe System Assessment Framework provides a good starting point to build on. We also note that strengthening other parts of the wider transport system (e.g. long-distance passenger rail and coastal shipping) can also play an important role in road safety, by providing travellers and shippers with different options to move around the country that reduce the potential road safety risks imposed by their current travel modes. Further investment in the rail-road interface is also critical, e.g. removal and grade-separation of high-use urban level crossings.*

Principle 4 – We have a shared responsibility for improving road safety
Strongly support
- Do you have any further comments about this principle? *People are often wary of admitting their fault or failing in contributing to a serious crash, due to personal or professional repercussions. Although difficult for individual cases, we strongly endorse greater use of more transparent "no blame" inquiries into major road safety issues, in a similar vein to the Transport Accident Investigation Commission's inquiries. This Strategy also continues a bias towards organisational responsibility (rather than individual responsibility) to 'fix' road safety; while there is certainly much*

that our public agencies can still improve on, further work is needed to determine how to shift cultural and attitudinal approaches to road safety by the public at large.

Principle 5 – Our actions are grounded in evidence and evaluated
Strongly support
- Do you have any further comments about this principle? *We support greater investment in suitable road safety research. As well as fundamental "first principles" safety research, this support should also extend to making it easier for roading authorities to trial and assess potential safety innovations based on successful overseas measures. The Evidence Base Strategy being developed by the Transport Ministry provides a good starting point.*

Principle 6 – Our road safety actions support health, wellbeing and liveable places
Strongly support
- Do you have any further comments about this principle? *We are very encouraged by the strong inclusion of health and wellbeing concepts throughout this Strategy. Environments that support appropriate lower speeds and greater use of active modes not only improve their safety outcomes but also improve many other health and liveability metrics as well. The acknowledgement that road safety is an important part of workplace health and safety performance is also overdue.*

Principle 7 – We make safety a critical decision-making priority
Strongly support
- Do you have any further comments about this principle? *The One Network Road Classification system and other "place/movement" classification systems being used should help to identify where metrics such as travel efficiency need to be considered (or not). National investment and funding guidance need to reflect these differences in analysis, depending on the nature and function of each road corridor.*

Do you have any final comments about our principles?
> *We support the reference to UN convention which recognises the rights of persons with disabilities.*

To what extent do you support the focus areas?

Focus Area 1 – Infrastructure and speed
Strongly support
- What was the reason for your rating?

    We agree with tackling infrastructure and operating speeds at the same time. However, speed management can also be a very useful interim safety measure until it is possible to improve some corridors to be capable of safer higher speeds. It is also very important to acknowledge the role of re-engineering our roads so that they are "self-explaining" and support more intuitively the most appropriate travel speeds, otherwise enhanced enforcement is likely to be needed to achieve better compliance.

    However, effective road safety and speed management work can be costly, and often beyond the budgets of many local authorities. To that end, the NZ Transport Agency

should seriously consider the ongoing use of higher subsidy rates when funding safety-related works.

We agree with not accepting road marking as means of safe infrastructure for people on bikes anymore (except in relatively limited low volume/speed environments) and therefore reviewing design standards is supported.

- Do you have any further comments about the focus areas?

We are somewhat perplexed at the relatively slow pace of change to implement lower speed limits on many roads where the environment is already clearly self-explaining (particularly on the State Highway network, where the safety benefit is the greatest). Given the significant immediate safety benefits demonstrated following virtually every instance of introducing lower speeds in New Zealand and worldwide (even without the creation of self-explaining road environments), this is one of the quickest ways to help achieve your road safety targets. These changes should not all have to wait until the release of (another) national speed management programme. We particularly feel that the NZ Transport Agency should be taking a strong lead in delivering safer speeds extensively across its highway network, so that local councils can have certainty about how their local road speed plans fit in and ensure consistency across the network.

We strongly agree with integrating urban and land-use planning, particularly in Auckland; growth typically increases demand for travel. Third-party developers are building new roads and should be more accountable to create safe and liveable and more self-contained neighbourhoods where demand for motor vehicle travel is reduced.

Although there are some positive-sounding words around infrastructure investment for active modes (walking and cycling) and mention of an "Accessible Streets" legislation package, there is little detail within the strategy regarding this. We note that many of the 35 recommendations made by the 2014 Cycle Safety Panel have not been addressed yet (or only partially), and so this Road Safety Strategy should continue progress monitoring of these recommendations.

Focus Area 2 – Vehicle safety
Strongly support
- What was the reason for your rating? Do you have any further comments about the focus areas?
The strategy does not adequately address the age and star ratings of the existing vehicle fleet. We recommend incentivising the removal of unsafe vehicles from the national fleet as an immediate action. We also recommend more emphasis on safer truck design (e.g. eliminating blind spots through electronic blind spot warning systems, side under-run bars, and additional side mirrors). This is a particular issue with drivers not seeing people on bicycles.

At present, our current vehicle rating system ("RightCar") only focuses on ANCAP information, when it could easily also feature information from other NCAPs like Europe and Japan. The used car safety rating of a car is not always a reliable guide to the safety of some models. We suggest that consumers are provided access to information from other NCAPs and that NZTA investigate the apparently anomalous used car safety ratings for some models quoted on RightCar.

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Focus Area 3 – Work related road safety
Strongly support

- What was the reason for your rating? Do you have any further comments about the focus areas?
  As a highly regulated part of society, it should be easier to address road safety concerns in the workplace than via individual personal travel. The Government has the ability to introduce various "sticks and carrots" to help achieve this, e.g. changes to ACC levies, required workplace health & safety plans for those whose work involves travel on roads. Better monitoring of logged hours (e.g. by remote vehicle tracking) would also help to improve workplace practices and to reduce driver fatigue and other safety issues.

Focus Area 4 – Road user choices
Strongly support

- What was the reason for your rating? Do you have any further comments about the focus areas?
  It should be noted that loss of driver's licence (through cumulative demerits) appears to be a greater concern to many than payment of fines. Stricter enforcement and use of demerits (with negligible fines to cover administration costs) may be more palatable politically, while also negating much of the "revenue gathering" stigma currently attached to infringement tickets. Notwithstanding that, we also consider it appropriate for government to emphasise that the aim is for no fines (or demerits) to be issued because they have been successfully used as a road safety tool to discourage unsafe behaviours.

Focus Area 5 – System management
Strongly support

- What was the reason for your rating? Do you have any further comments about the focus areas?

  This is the factor that links together the other focus areas. If we do not treat road safety as a system, we will continue to identify components of the system that are "responsible" for crashes. Statements attributing crashes to factors such as "the road" or "speed" are not constructive; if the road wasn't there and road users were not moving, crashes could not occur; therefore, the "road" and "speed" are always factors. The reason crashes occur is because of the interaction of the components of the system; therefore, from a strategy perspective, the system must be managed and the components appropriately integrated to maximise reductions in death and serious injury as we work towards the Vision Zero outcome.

  We are concerned at the relative lack of public leadership currently existing in the road safety sector. At the moment, media and other public communications regarding road safety tend to be a random mixture of Police and NZTA spokespeople and external independent commentators. Going forward, the Government should consider a role in the Transport Ministry with the aim of providing pro-active and consistent messages regarding road safety initiatives and responses to safety-related issues.

  It is also important that road safety leadership and championing is present throughout the many organisations that have a safety role, and across the community as well. To that end, we strongly support greater development of capacity and capability in understanding road safety principles, through training and other professional

development for decision-makers, industry practitioners, workplace safety staff, community advocates, and many other people who have some effect on road safety outcomes.

What are your top priorities for the first action plan?

Please tick your top three priorities from the list below.

- ☑ Introduce a new approach to tackling unsafe speeds
- ☑ Invest in safety treatments and infrastructure improvements
- ☐ Review infrastructure standards and guidelines
- ☐ Raise safety standards for vehicles entering the fleet
- ☐ Promote the availability of vehicle safety information
- ☐ Implement mandatory anti-lock braking systems for motorcycles
- ☐ Support best practice for work-related travel
- ☐ Strengthen the regulation of commercial transport services
- ☑ Enhance the safety and accessibility of footpaths, bike lanes and cycleways
- ☐ Prioritise road policing
- ☐ Enhance drug driver testing
- ☐ Support motorcycle safety
- ☐ Review financial penalties and remedies
- ☐ Strengthen system leadership, support and co-ordination

- Do you have any further comments about these priority actions?

  We note that asking submitters to indicate their top three priorities is somewhat disingenuous when virtually all of these initiatives will be needed to contribute to improved safety outcomes. As an organisation whose members deal a lot with transport infrastructure and engineering, we naturally see the importance of improving provision in these areas. However, we also strongly support many of the other initiatives regarding safer vehicles, users and systems; for example, "prioritise road policing" was endorsed by multiple members.

  We believe updated driver's license testing should play a higher role and particularly including the awareness of vulnerable road users and how to behave around them when driving a vehicle. We also consider there is merit in reviewing whether it is appropriate to only test road users once within a 50+ year driving career; in this regard, if there are demonstrable road safety benefits it may be appropriate to include theory and/or practical testing as part of the existing 10-year licence renewal process, or at least consider greater use of re-testing for recidivist offenders.

  We support a review of financial and custodial penalties, as existing penalties seem not to provide enough incentives to change unsafe behaviour or recognise the unsafe actions of road users that have resulted in life changing injuries and/or loss of life.

Education / information should be a critical component of the priority actions. Unless we provide readily available, accessible, and accurate information regarding the reasons behind the Strategy and the Focus Areas, road users will not understand why various steps are being taken and will be less likely to support the changes.

Do you have any suggestions about other actions we could consider for future action plans?

We recommend more emphasis on safer truck design (e.g. eliminating blind spot through electronic blind spot warning system). This is a particular issue with drivers not seeing people on bicycles.

Regulatory changes to prioritise the needs of vulnerable road users (pedestrians, people on bikes, and other wheeled device users) is strongly supported.

Increases in local government funding to support safety on urban roads is necessary to achieve improvements in safety for pedestrians and people on bicycles.

We believe more emphasis should be on urban roads and multimodal transport modes and how to solve road safety in complex and dense areas as they require a different approach to rural road safety (and typically impact on different types of road users).

Mobile phones and other distractions appear to be a growing safety issue in New Zealand. More consideration needs to be given to whether current levels of user education and enforcement in these areas are sufficient. For example, there are commercially available systems for detecting drivers using cell phones while driving.

Raising safety standards for new and used vehicles entering the fleet will increase the rate at which we have safer vehicles on the network; these vehicles will improve safety not just for the occupants of those vehicles but for other road users. For example, vehicles that automatically limit the operating speed of the vehicle based on the speed limit will reduce the speed differential between vehicles. While safer vehicles will not necessarily reduce the potential for drivers to make mistakes, they will reduce the consequences of those mistakes.

Do you have comments about the way that we intend to monitor our performance?
New and improved monitoring methods are urgently needed for walking and cycling because we lack exposure detail (quantity and diversity of people walking and riding bicycles). There are no equivalent KiwiRAP star ratings for urban streets that are practically useful (e.g. for road crossings, cycleways and paths). The lack of objective monitoring for walking and cycling makes effective prioritisation difficult.

Thank you for your consideration. For more information please contact:

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