

12 August 2019

Email: roadsafetystrategy@transport.govt.nz

Dear Minister Genter

ROAD TO ZERO – DRAFT ROAD SAFETY STRATEGY 2020-2030

Thank you for the opportunity to submit on the draft Road to Zero Road Safety Strategy 2020-2030.

As a local authority, Kapiti Coast District Council has an on-going role in providing a safe and effective local transport network of roads, footpaths and cycleways to support our local residents, businesses and visitors alike.

As an employer and large fleet operator, the health and safety of our staff are also paramount, especially those using vehicles, be it daily or occasional use. As such, we welcome and support the direction and ambition of the Road to Zero Road Safety Strategy, which looks to build on and achieve new levels of safety across New Zealand's road network.

While we support the overall approach, our main concerns relate to the lack of detail or understanding of where and how different aspects of the Strategy will be delivered and in particular, the financial expectations and impacts this may have associated with it with regards to infrastructure upgrades, education and enforcement to implement this Strategy.

Local government already struggles to meet its requirements for the operation of local transport networks under an increasing financial burden. Where the Strategy intends to continue existing mechanisms, it would help delivery if Government could make it easier to access on-going funding to support implementation. Additionally, introducing new areas of work will require increasing central government's contribution or subsidy to enable these works.

Given these constraints, we would like to have continued involvement in the future action plans as they evolve.

Please find attached more detailed feedback on the consultation questions relating to the proposed Strategy's vision, target and focus areas.

We look forward to working together with you and other agencies as the Strategy is finalised and implemented.



Yours sincerely

K. Gurunathan JP, MA
MAYOR, KAPITI COAST DISTRICT



MINISTRY OF TRANSPORT: ONLINE SUBMISSION FORM

ONLINE SUBMISSION PROVIDED BY Kāpiti Coast District Council

CONSULTATION QUESTIONS (FROM THE EXECUTIVE SUMMARY)

THE QUESTIONS HIGHLIGHTED IN THIS BOX WERE ANSWERED ONLINE AT WWW.TRANSPORT.GOV.T.NZ/ZERO

SECTION 1 VISION

Q1 Our proposed vision for road safety is 'a New Zealand where no one is killed or seriously injured in road crashes'. To what extent do you support the proposed vision?

Strongly oppose	Somewhat oppose	Somewhat support	Strongly support	Don't know
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Q What was the reason for your rating?

We share your concerns that the current numbers and increasing rate of deaths and serious injuries are far too high and we must do something to change that.

Q Do you have any further comments about the proposed vision?

We are in support of the Road to Zero vision, with no deaths and serious injuries on our roads. This will bring New Zealand in line with other developed countries such as Europe and Britain which have 'vision zero' as their road safety vision.

Q 2 As a step towards achieving this vision, we propose a target of a 40 percent reduction in deaths and serious injuries by 2030. To what extent do you support the proposed target for 2030?

That target is too high That target seems about right That target is not high enough Don't know

☐ ☒ ☐ ☐

Q What was the reason for your rating?

This is a good start as it is realistic and achievable.

Q Do you have any further comments about the proposed target?

Suggest adding the following underlined words: 'we propose a target of at least a 40% reduction in deaths and serious injuries by 2030, so that rather than viewing 40% as an end point there is an invitation to exceed this target.

SECTION 2: PRINCIPLES TO WHAT EXTENT DO YOU SUPPORT THE PROPOSED DECISION-MAKING PRINCIPLES?

Q3 Principle 1: We plan for people's mistakes.

We accept that people will make mistakes and take risks but that these mistakes should not result in people dying or suffering serious injuries on our roads.

Our first principle is: 'We plan for people's mistakes'. **To what extent do you support this principle?**

Strongly oppose Somewhat oppose Somewhat support Strongly support Don't know

☐ ☐ ☐ ☒ ☐

Q Do you have any further comments about this principle?

We agree with the principle and our understanding is 'we' includes all parties:

- System coordinators
- System designers
- Enforcement: to reinforce road rules that are designed to keep road user's safe
- Road users (through driver training of how to avoid mistakes or at least minimise the harm)
- Driver instructors and educators

In our view significant coordination will be required to deliver this principle and while we believe that this is implicit in the strategy's focus areas and immediate actions, as a road control authority we want guidance and clarity as to what this means for us – what do forgiving roads look like for the range of road environments we have throughout New Zealand, how we can retrofit existing roads, what priorities, any upskilling needed, what timescale and importantly who pays for this? Central Government? Local Government? Councils have long term plans and we need to ensure Councils are capable of delivering any requirements required by the road safety strategy actions both in terms of financial resources, staffing and capability/training.

Q 4. Principle 2: We design for human vulnerability

There are physical limits to the amount of force our bodies can take before we are injured in a crash and we will design our road system to acknowledge this.

Our second principle is: 'We design for human vulnerability'. To what extent do you support this principle?

Strongly oppose	Somewhat oppose	Somewhat support	Strongly support	Don't know
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Q Do you have any further comments about this principle?

Agree please see our comment for principle 2 in the last paragraph.

Q 5. Principle 3: We strengthen all parts of the road transport system

We will improve the safety of all parts of the system – roads and roadsides, speeds, vehicles, and road use – so that if one part fails, other parts will still protect the people involved. We will make roads and streets safer for more vulnerable road users such as pedestrians, cyclists, motorcyclists and scooter riders.

Our third principle is: 'We strengthen all parts of the road transport system'. To what extent do you support this principle?

Strongly oppose	Somewhat oppose	Somewhat support	Strongly support	Don't know
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Q Do you have any further comments about this principle?

Agree with this principle and note one of the specific aims is to make roads safer for vulnerable road users. Improving safety (and accessibility) for vulnerable road users is important to us, in particular as vulnerable road users accounted for over 50% of deaths and serious injury crashes on Kāpiti's local road network from 2014 to 2018.

Kāpiti has an ageing population and the need to cater proportionately for safety needs of this change in demographics need to be recognised in any safety strategy. A specific example of this in our district is around the increased use of mobility scooters and the safety risks associated with the use of this form of transport.

Q 6. Principle 4: We have a shared responsibility for improving road safety

The people who design, build and manage the road transport system, as well as the individuals and communities who use it, all have a part to play in making our roads safe.

Our fourth principle is: 'We have a shared responsibility for improving road safety'. To what extent do you support this principle?

Strongly oppose	Somewhat oppose	Somewhat support	Strongly support	Don't know
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Q Do you have any further comments about this principle?

Agree with this principle, we believe coordination and communication between the parties (refer to Q1) is critical. We welcome the strategy's intention to increase road Policing, and would hope this includes community presence, education (including school safety) as well as enforcement and look forward to working more closely with them. The principle refers to collective responsibility and we would like to understand what this will mean in practice.

Q 7. Principle 5: Our actions are grounded in evidence and evaluated

We will strengthen our road safety research so that we can base our decisions on the best evidence available. We will evaluate the changes we make so that we see what works, what doesn't work and what needs to be altered.

Our fifth principle is: 'Our actions are grounded in evidence and evaluated'.

To what extent do you support this principle?

Strongly oppose	Somewhat oppose	Somewhat support	Strongly support	Don't know
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Q Do you have any further comments about this principle?

Agree. This principle, including having the flexibility to adjust the actions according to what is working or not, is critical to the success of the road to zero vision and target.

We further consider the evidence base needs to be relevant to the range of conditions within NZ and its wide range of social, physical and climatic variances.

We note there is a lot of emphasis on pedestrian safety in the consultation document; However in establishing evidence based actions and evaluation measures we are aware pedestrian and cyclist injuries are often under reported with respect to motor vehicle injuries; so would like this inequity taken into account in any monitoring and evaluation.

Q 8. Principle 6: Our road safety actions support health, wellbeing and liveable places

Our roads are not just used for getting from A to B. In urban areas in particular, they are often places where people meet, shop and where children play. We will acknowledge this in our decision-making process to support healthier and more liveable places.

Our sixth principle is: 'Our road safety actions support health, wellbeing and liveable places'.

To what extent do you support this principle?

Strongly oppose	Somewhat oppose	Somewhat support	Strongly support	Don't know
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Q Do you have any further comments about this principle?

Agree; however, this needs careful thought especially in terms of what good looks like and:

- how it can be achieved using existing or upgraded infrastructure
- how 'good' can be achieved in new sub-divisions which are regulated, for example, via NZS4404 code of subdivision and our District Plan. From our experience some of the requirements are not aligned with this principle, for example: a footpath has a benefit for providing a place for pedestrians especially elderly and disabled/vision impaired to walk protected from vehicles yet NZS4404 allows 'shared' use roads with no footpaths for up to 20 lots (or a footpath only on one side) so we can end up providing inferior infrastructure.

Q 9. Principle 7: We make safety a critical decision-making priority

We will treat safety as a higher priority in the way we make decisions. This does not mean that other objectives, such as efficiency, are no longer important, but that they should not be achieved at the cost of safety.

Our seventh principle is: 'We make safety a critical decision-making priority'.

To what extent do you support this principle?

Strongly oppose	Somewhat oppose	Somewhat support	Strongly support	Don't know
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Q Do you have any further comments about this principle?

Agree – safety needs to underpin the entire transport system.

Q 10. Do you have any final comments about our principles?

These are good and ambitious principles but we do need to be careful that we do not 'bite off more than we can chew' and spend the next 10 years getting prepared to carry out the required actions. Funding needs to be available for the inevitable costly infrastructure, services or programmes that will be required.

FOCUS AREAS

Our target will be achieved through action in five key areas:

- Improve the safety of our cities and regions through infrastructure improvements and speed management
- Significantly improve the safety performance of the vehicle fleet
- Treat road safety as a critical health and safety at work issue
- Encourage safer choices and safer behaviour on roads
- Drive action through effective system management.

You will now be asked to rate and provide comment on these five proposed focus areas. You will then be asked about priority actions on the next page.

Q 11. Focus Area 1: Infrastructure and Speed

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 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.

Our first focus area is: 'Improve the safety of our cities and regions through infrastructure improvements and speed management.'

To what extent do you support this focus area?

Strongly oppose	Somewhat oppose	Somewhat support	Strongly support	Don't know
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Q What was your reason for this rating? Do you have any further comments about this focus area?

Agree with this focus;

We welcome a simpler and more coordinated/regional approach for setting speed limits. We appreciate the new tools (Megamaps) NZTA has developed for identifying safe speeds and high risk roads within the network, these do need to be sense tested by the road control authority, and we would like the data sources and safety metrics therein kept up to date. We would also like the various asset and safety databases to be coordinated to assist with safety and asset management measures.

We notice the indicators for this action include the proportion of urban schools with 30-40km/h speed limits:

- For many of our schools this will mean a 30 or 40 km/h variable school zone speed limits– we would like clarity for example having different speed limits around different schools could be confusing to road users, would it not be better to have either a 30 or 40 variable school zone; Is the intention for all schools to have such a speed limit? If so how will the area be identified?
- Most of our schools have active school warning signs, that cannot be converted to display speed limits so replacing these signs would be a significant cost to council.

In addition to implementing safe speeds, road user awareness is needed as to the different speed environments.

Other infrastructure safety measures such as rumble strips

Agree with infrastructure improvements – but we need to have good guidance on what works for the different road environments. For example, rumble strips are good for vehicles but not so good for cyclists and under certain circumstances can be hazardous; treating isolating high-risk sites and routes can be beneficial, but we need to be careful that we don't just shift the problem further down the road. Roundabouts can be great for safety but they often require expensive land purchase.

Q 12. Focus Area 2: Vehicle safety

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.

Our second focus area is: 'Significantly improve the safety performance of the vehicle fleet'.

To what extent do you support this focus area?

Strongly oppose	Somewhat oppose	Somewhat support	Strongly support	Don't know
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Q What was your reason for this rating? Do you have any further comments about this focus area?

Agree.

We note the focus area also allows for safety improvements that can be retrofitted to existing vehicles, this is important from an affordability point of view i.e. the expense of buying new safe cars means it will be some time before the vehicle fleet within New Zealand is replaced.

Q 13. Focus Area 3: Work-related road safety

Employers have a responsibility to ensure that work-related road travel is safe for their staff and the public. 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.

Our third focus area is: 'Ensure that businesses and other organisations treat road safety as a critical health and safety issue'.

To what extent do you support this focus area?

Strongly oppose	Somewhat oppose	Somewhat support	Strongly support	Don't know
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Q What was your reason for this rating? Do you have any further comments about this focus area?

The statistic that 25% of deaths involve someone driving for work is a strong reason to focus on work related road safety. Kāpiti Coast District Council like many other work places has a structured and operating health and safety systems and processes so leveraging off these is sensible.

While the focus on work related safety is on driving; our workplace is also involved with working on the road and as such compliance with codes such as the NZTA Code of Temporary Traffic Management Code is also important in keeping these staff safe.

Q 14. Focus Area 4: Road user choices

Everyone has a responsibility to act with care and consideration on our roads. We need to continue to shift public attitudes and behaviour through road safety education and promotion, ensure that our training and licensing systems equip people with the skills required to be safe, alert and compliant, and deliver effective enforcement targeted towards risk.

Our fourth focus area is: 'Encourage safer choices and safer behaviour on our roads.'

Strongly oppose	Somewhat oppose	Somewhat support	Strongly support	Don't know
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Q What was your reason for this rating? Do you have any further comments about this focus area?

Agree with this focus area.

Road users need to have the knowledge through driver training to make good choices. Agree with the indicators which include alcohol and drug testing. We would also like to have the ability to target education to both national and local at-risk groups, for example for the period 2014-2018 younger drivers (20-24 years old) were over represented as 'at fault' or 'part at fault' drivers in serious and fatal crashes both within Kāpiti's local road network and also within New Zealand, so we would like to see initiatives targeted at this age group.

We further support increased road policing both in enforcement and in road safety education. Would like increased resources, coordination and liaison between Police and local authorities.

Q 15. Focus Area 5: System management

Everyone who uses, designs, manages and maintains our roads, streets and footpaths has an important role to play. Leadership, co-ordination, engagement, and accountability will therefore be critical if we are to achieve our road safety ambitions.

Our fifth focus area is: 'Develop a management system that reflects international best practice.'

To what extent do you support this focus area?

Strongly oppose	Somewhat oppose	Somewhat support	Strongly support	Don't know
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Q What was your reason for this rating? Do you have any further comments about this focus area?

Agree that system management is critical, we would like to see good coordinated leadership (both within and between various agencies), public understanding, and annual tracking of the outcomes and indicators of the strategy.

Q 16. Do you have any final comments about our focus areas?

Agree with the focus areas, the indicators, and the intent for actions to be evaluated and adjusted as need be. While the immediate actions are largely determined for local authorities in terms of expenditure; we are unclear as to the resourcing and funding implications to us for the 10 year period and would like to be involved with future action planning.

Q 17. Action Plan Priorities

We have proposed a list of 14 priority actions under our five focus areas.

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 cycle ways
- ☒ Prioritise road policing
- ☐ Enhance drug driver testing
- ☐ Support motorcycle safety
- ☐ Review financial penalties and remedies
- ☒ Strengthen system leadership, support and co-ordination

While we consider all priorities important as a road control authority we have selected the four priorities that are most relevant to us in terms of what we deliver. We are already doing some of these actions (investing in infrastructure and enhancing footpaths and cycle lanes). However, the extent to which we do this is limited by funding. Further guidelines and standards are important as they dictate what goes on the road, for this we look to external agencies to work with us to provide nationally consistent evidence based guidelines. Also critical is leadership support and coordination with agencies such as NZTA.

Q 18. Additional Actions

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

Not at this stage however we would like;

- To have our feedback considered in this action plan
- To be involved in the development of further actions.

Q 19. Measuring Success

The Road to Zero consultation document provides a draft outcomes framework, which provides a list of key measures that can help us track progress and performance indicators to help us meet our targets. This outcomes framework will help us monitor how the road safety system is performing, drive action and hold agencies publicly accountable for delivering the strategy. The framework will continue to evolve as we develop the final strategy.

Do you have comments about the way we intend to monitor our performance?

We agree with the approach given. We would also like to have the opportunity to see more detail as to how as a local authority we are to report on these measures. Also we would like to be involved in any future proposed performance monitoring measures before they are finalised.

Q 20. Additional Supporting Material

Providing your feedback through this online form makes it easier for us to read and analyse your input. If you would like to provide any additional supporting material, you can attach it here. Please note, this is not required.

- Letter to Minister Genter from K. Gurunathan Mayor, Kāpiti Coast District attached

Q 21. A little bit about you:

Name: Glen O'Connor – Access & Transport Manager

Organisation: Kāpiti Coast District Council

Email Address:

Q 22. Who are you submitting on behalf of?

Kāpiti Coast District Council

Q 23. What region do you live in, or most often travel in?

Wellington

Q 24. Do you consider your perspectives urban, rural or both?

Both

Q 25. Ongoing partnership with Māori will be a focus in our road safety efforts so we can build a shared understanding and road safety responses that appropriately meet the needs of tangata whenua in New Zealand.

☐ To help us build a better understanding of road safety issues for Māori, please check this box if this submission represents a Māori perspective

Q 26. USE AND PUBLIC RELEASE OF INFORMATION

The Ministry of Transport will publish a summary of submissions, which may include quotes from individual submitters. Do you want your submission to be anonymous and your name or organisation's name to be withheld from any information that the Ministry of Transport publishes? (Yes or No)

No

Q 27. Your submission is also subject to the Official Information Act 1982 (OIA). This means people will be able to obtain copies of submissions by making a request under the OIA.

☒ I understand that this submission will be classified as Official Information and may be subject to public release under the Official Information Act 1982 if requested.

Q 28. If you want us to keep some sections of your submission confidential, please let us know your reasons below. We will take your reasons into account and may consult with you when responding to requests under the OIA.

n/a