

8 August 2019

Road Safety Strategy Team
Ministry of Transport
Wellington

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Christchurch City Council Submission on the Road to Zero Road Safety Strategy 2020-2030

Introduction

1. Christchurch City Council (the Council) thanks the Ministry of Transport for the opportunity to provide comment on the Road to Zero Road Safety Strategy 2020-2030.
2. As a local road controlling authority, Christchurch City Council is fully committed to improving road safety and undertakes actions, such as behaviour change campaigns, speed management and infrastructure improvements to reduce deaths and serious injuries on our roads. We have a local road safety programme that focusses on safe system principles for the improvement of intersections, routes, prioritising low cost safety interventions - and improving safety for vulnerable road users. In the past 2 years, we have undertaken 20 speed limit reviews based on the Speed Management Guide that has resulted in over 60 safe and appropriate speed limits being set. We are also working towards encouraging road user choices that lead to an increased uptake in travel by public transport which, as the Strategy shows, is an inherently safer means of travel in terms of exposure to risk.
3. Overseas experience suggests that very strong, focussed partnerships to deliver safety outcomes across Central Government, Local Government, Police Forces and other emergency services, are key to improved performance. We would encourage the Ministry of Transport to consider the merits of a much stronger call to partnership action in funding, delivery, and enforcement, if this new strategy is to succeed.
4. Submission

Key points

Council supports:

- the Road to Zero Vision, and the interim goal of 40% reduction in deaths and serious injuries on our roads by 2030,
- the proposed principles, but believe that they should be re-emphasized and prioritised based on evidence from the previous strategy's effectiveness, and
- the commitment to ongoing monitoring, but request clarification on the ability to modify strategy and principles if they are demonstrably ineffective.

Council requests the Ministry strongly consider:

- separating infrastructure improvements and speed management as key action areas, in line with the Safer Journeys strategy,

- ensuring that appropriate funding is available to achieve the strategy vision in line with the principles,
- development of action plans in partnership with Road Controlling Authorities that should include more specific targets in line with this 40% reduction that individual actions can be assessed against,
- clarifying, and amending as required, the consultative requirement for adjusting speed limits to align with a safe and appropriate speed,
- appropriate legislative and funding changes to enable Road Controlling Authorities to work with the police to more effectively enforce speed and other traffic infringements through the use of cameras,
- the benefits from Public Transport in achieving safety outcomes through the reduction of traffic volumes on our roads, and
- the need for greater leadership in road safety from Central Government.

Discussion on the specific sections of the Strategy

Vision and target

We strongly support the proposed Road to Zero vision.

We also support the strong target of a 40% reduction in deaths and serious injuries (DSI's) by 2030. We believe that this is an ambitious, stretching, but realistic goal that should be achievable, with the right action plan, priorities, interventions, accountability and strong leadership, as set out below.

Principles

The seven proposed guiding principles we believe could be better ordered to reflect their priority in guiding the strategic directions for road safety. Some of the principles could be considered more fundamental in shaping strategic considerations (4, 5 and 6), whilst others appear to relate more to investment decision-making processes (3 and 7). We believe that the strong role of partnerships in reducing DSI's is an omission from the guiding principles. Presenting the guiding principles in a prioritised order would demonstrate the necessary confidence that the evidence base behind this new strategy has been analysed to best develop a long term strategy from which prioritised actions can be established. The strategy needs to outline clear insight and direction over the biggest wins and provide information about effective ways of prioritising actions.

Focus areas

Given the evidence base for road safety interventions, the focus areas could also be prioritised more clearly. Infrastructure provision and speed management are fundamental cornerstones to the delivery of road safety. These were helpfully separated in the previous Safer Journeys Strategy and in other international guiding documents, such as World Health Organisation (WHO) report "Save Lives - a road safety technical package". It is not clear why these two key aspects are combined in this proposed strategy, but we would recommend these being separated.

Action Plan

Funding

We would reiterate that Christchurch City Council's response to the safety elements of the 2018/2019 Government Policy Statement on Land Transport (GPS) remain valid and emphasize the March 2017 feedback to that document regarding the following; "Council encourages the Ministry of Transport (MOT) to draw closer links between safety and value for money. Examining

the macro costs of the transport network would likely see the social and public health costs stand out as a negative externality of transport investment. When investing in safety, these costs can also be reduced by managing demand and providing transport choices as well as by improving infrastructure”.

With current changes at the New Zealand Transport Agency (NZTA), Council are not seeing demonstrated the alignment between the objectives of the GPS and funding support. This lack of alignment and the time required to achieve decisions through the NZTA processes is impeding the ability of local authorities to make progress in achieving the objectives of casualty reduction. Similarly, lack of alignment between MoT’s Road to Zero Strategy and NZTA’s funding support could impact on road controlling authorities’ abilities to achieve safety improvements on local roads.

Targets

The NZTA’s Safe Network Programme aims to address the road safety targets, with a focus on high speed / high volume State Highway environments. This results in a package of interventions that do not suit an urban environment or provide effective safety benefits for vulnerable road users.

We therefore recommend that the Ministry of Transport and NZTA work together to support implementation of local authority safety programmes, through an improved understanding of the different network environments with a range of possible interventions, including focussing on vulnerable road users and options to further support delivery of effective road safety packages through the provision of local share funding.

The establishment of clear national casualty reduction targets, if disaggregated locally, would enable resulting performance of programmes to be accurately assessed as to their relevance and effectiveness in meeting those targets.

Consultative Requirements

This strategy could assist with setting consistent national standards around speed management. As a Road Controlling Authority our statutory obligation under Section 78 of the Local Government Act and in the Speed Limit Setting Rule (2017) requires us to consult over speed limit reductions that are justified by their projected safety benefits. Improved clarity over how and to what degree road controlling authorities are obliged to consult over programmes that are consistent with the new road safety strategy would speed implementation and reduce costs and resources. In this context, the Ministry and this strategy should have a key role in providing leadership and the reasoned justification, to enable lower speed limits and national consistency by working on reducing or removing the need for local consultation processes where the changes are based on national recommendations. The document states “A critical issue in New Zealand is that approximately 87% of our current speed limits are not appropriate for the conditions of our roads”, and national leadership is vital to enable efficient progress to address this fundamental problem. As this is the case, the current consultation obligations would impede our collective ability to address this issue in the first few years of the strategy.

Enforcement

The proposed strategy could be utilised to establish and enforce laws at national and local levels, working with partners through legislative change and application of emerging technology to ensure our partners the police have relevant powers to apply legislation to ensure speed management is enforced. Enforcement initiatives, the route to using enforcement technology and the acceptance of all parties on an enforcement strategy should be highlighted to ensure

the efficient roll out of enforcement tools, tools that are readily available. The international evidence that robust national speed (safety) camera deployment and signing strategies, often delivered by close partnerships between Government, local road controlling authorities and enforcement agencies, is beyond doubt. Therefore we would welcome a stronger commitment to the significant expansion of speed enforcement and red light running resources in the early years of strategy implementation. We believe this would greatly improve the chances of the 40% target being achieved.

Many Road Controlling Authorities see safety cameras as low cost solutions to road safety concerns and may be willing to invest in their installation, however, under the current model only the Police can enforce these and there are limitations with their backend processing capacity. Changes to the current model could vastly improve the opportunity to deploy more of these valuable road safety resources.

Public Transport and Safety

Safer Journeys and Road to Zero have limited reference to the key role that a strong public transport can play in enhancing road safety. The discussion misses an opportunity to connect travel demand management, road safety thinking and investment, whereby multiple individual journeys can be made with one professional driver reducing the risk of mistakes. Less car trips/individual vehicle manoeuvres reduces the exposure to risk within the roading network, particularly when buses and trains are inherently safe vehicles.

Leadership

It was identified throughout the term of Safer Journeys that there was insufficient leadership in road safety. This has also come through strongly in what you have heard from the industry. The void in leadership was often filled by misinformed opinion that continues to undermine road safety projects, in particular speed management, and has led to a lack of direction. The Strategy mentions that leadership is required but then indicates that it is looking for this to be the responsibility of all. Whilst we agree that road safety is the responsibility of all, we believe that Central Government needs to take a stronger role in leadership. Leadership is more than setting a strong strategy. It is about ongoing support, leadership and a role that fronts publically.

Monitoring

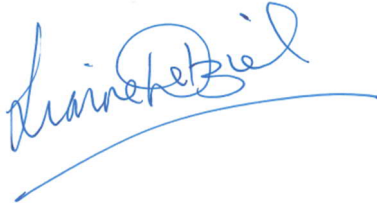
The 'Safer Journeys' strategy was not supported by a comprehensive monitoring framework to enable an effective way in which to adjust the strategy or actions when it became clear that the desired targets will not be met. A robust analysis of what went well with the previous strategy and what could have worked better is critical for achieving the outcomes desired in the draft Strategy. This would better shape new Strategy and highlight the key differences between the previous 'Safer Journeys' strategy and the new 'Road to Zero' vision.

Conclusion

Whilst generally supporting the draft Strategy, the Christchurch City Council would like to emphasize the need for commitment by the Ministry of Transport to drive the target reductions in deaths and serious injuries through legislative changes, fostering strong funding and delivery partnerships, and enabling local authorities to apply for packages of road safety (infrastructure, education and awareness) funding to support delivery. We also urge the Government to make a much stronger commitment to the early roll out of increased speed (safety) camera deployment across the nation's state highway and local road networks based on casualty data-led enforcement regimes, delivered as partnerships between Government, road controlling authorities and the New Zealand Police.

For any clarification on points within this submission please contact Steffan Thomas, Manager Transport Operations at steffan.thomas@ccc.govt.nz .

Yours faithfully

A handwritten signature in blue ink, appearing to read "Lianne Dalziel", with a long horizontal flourish underneath.

Lianne Dalziel
Mayor of Christchurch