

14 August 2019

Ministry of Transport  
PO Box 3175  
Wellington 6140

**Submission to the 2020 - 2030 Road Safety Strategy**

Thank you for the opportunity for Auckland Regional Public Health Service (ARPHS) to provide a submission on the Ministry of Transport's consultation on the 2020 – 2030 Road Safety Strategy.

The following submission represents the views of ARPHS and does not necessarily reflect the views of the three District Health Boards it serves. Please refer to Appendix 1 for more information on ARPHS.

Yours sincerely



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## Overview and Recommendations

1. Thank you for the opportunity for Auckland Regional Public Health Service (ARPHS) to provide a submission on the Ministry of Transport's (MoT) consultation on the 2020 – 2030 Road Safety Strategy.
2. ARPHS fully supports the Ministry in implementing a "Road to Zero" approach to improve road safety in New Zealand; and thereby reduce deaths and serious injury.<sup>1</sup> Road safety is recognised as both a transport as well as a public health issue.
3. Auckland has high rates of pedestrian and cyclist injuries compared with many other cities in developed countries.<sup>2</sup> These deaths and serious injuries are largely preventable and impact disproportionately on children and young people, older people and people living in economically poorer areas.
4. In the Auckland region, road safety has already been prioritised through Auckland Council's "Auckland Plan" with further work in process through the development of a "Vision Zero for Tamaki Makaurau" transport safety strategy and action plan, led by Auckland Transport (AT) and overseen by the Tāmaki Makaurau Road Safety Governance Group.<sup>3,4</sup>
5. It is therefore encouraging to see that MoT shares a similar vision for road safety nationally and will provide the required leadership in this important area. As highlighted in the independent review of the MoT road safety strategy "Safer Journeys" in 2015, it is crucial for the MoT to take a leadership role in order to achieve sustained improvements in road safety.<sup>5</sup>
6. Our main recommendations with regards to the draft strategy are as follows:
  - Adopt a more ambitious target than the proposed 40% reduction in serious injuries and deaths by 2030 and set an end date for reaching zero;
  - Include an explicit focus on achieving equitable outcomes for Māori under principle six "Our road safety actions support health, wellbeing and liveable places";
  - Ensure that safety will be a critical decision-making priority, through reviewing project and programme prioritisation and funding models used by national and local transport agencies;
  - Ensure the inclusion of mana whenua representation in decision-making and investment;
  - Refocus the strategy from being primarily focused on private vehicle use to include other transport modes;
  - Ensure equitable access to transport options when the safety standards for imported vehicles are being regulated;

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<sup>1</sup> Ministry of Transport. Consultation on the 2020 – 2030 Road Safety Strategy. Available from: <https://www.transport.govt.nz/assets/Import/Uploads/Our-Work/Documents/e97c3b3d0d/Road-to-Zero-consultation-document-July2019.pdf> Accessed 30 July 2019.

<sup>2</sup> International Transport Forum. "Safer City Streets, A Global road safety benchmark, Working Document prepared to support 2nd meeting of the Safer City Streets network". ITF, 2017.

<sup>3</sup> Auckland Council. Auckland Plan 2050. June 2018.

<sup>4</sup> Vision Zero for Tāmaki Makaurau – A transport safety strategy and action plan to 2030.

<sup>5</sup> Small M, Howard E, Moore R. Safer Journeys Interim Evaluation. July 2015.

- Include indicator and performance measures for all transport modes.
7. The remainder of the submission addresses the specific consultation questions raised in the consultation document.

## Consultation questions

### To what extent do you support the proposed target for 2030?

8. ARPHS strongly supports the vision expressed in the consultation document, which is “a New Zealand where no one is killed or seriously injured in road crashes”. In order to achieve that, ARPHS supports the MoT setting an interim target. However, ARPHS suggests that the MoT is more ambitious with its interim target.
9. Research shows that stretch targets ultimately may not be achieved, but may achieve more improvement than if a lower, more conservative target was set. The International Transport Forum also concluded that higher targets, which value safety, drive innovation, and an aspiration to go further than is required, align with best practice.<sup>6</sup>
10. For the draft Auckland road safety strategy, a target between 60% and 65% reduction of deaths and serious injuries by 2030 is currently being considered. The MoT setting a more ambitious interim target nationally would support this local effort to achieve a vision zero.

**Recommendation:** Adopt a more ambitious target than the proposed 40% reduction in serious injuries and deaths by 2030, and set an end date for reaching zero.

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

11. ARPHS is generally supportive of the proposed decision-making principles in the draft strategy. The principles build on the previous road strategy “Safer Journeys” and the recommendations from the evaluation.<sup>7</sup> From a public health perspective ARPHS is encouraged to see a specific focus on health, wellbeing and liveable places.
12. However, ARPHS considers this could be further strengthened by including specific outcomes for Māori. Research from the University of Auckland found traffic related deaths and hospitalisations were more common for Māori, Pacific children, and people residing in South Auckland, and rural areas.<sup>8</sup>

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<sup>6</sup> International Transport Forum. Zero Road Deaths and Serious Injuries: Leading a Paradigm Shift to Safe System. 2016.

<sup>7</sup> Small M, Howard E, Moore R. Safer Journeys Interim Evaluation. July 2015.

<sup>8</sup> Hosking J, Ameratunga S, Exeter D, Stewart J, Bell A. Ethnic, socioeconomic and geographical inequalities in road traffic injury rates in the Auckland region. Australian and New Zealand Journal of Public Health 37, no. 2 (2013): 162-7.

**Recommendation:** Include an explicit focus on achieving equitable outcomes for Māori under principle six “Our road safety actions support health, wellbeing and liveable places”.

13. ARPHS supports principle seven; “making safety a critical decision-making priority”. In order to achieve that, project and programme prioritisation and funding models need to be reviewed to ensure that safety becomes a critical decision-making priority.
14. With regards to decision-making it should also be noted that the Ministry should ensure that Māori, as mana whenua, are represented when decisions are being made with regard to prioritisation of programmes and projects and funding.

**Recommendation:** Ensure that safety will be a critical decision-making priority, through reviewing project prioritisation and funding models used by national and local transport agencies, and ensuring mana whenua representation in decision-making and investment.

### **To what extent do you support the focus areas?**

15. Overall ARPHS is supportive of the proposed focus areas. ARPHS would like to note though, that the focus is mainly on private vehicle users and could be strengthened in relation to the other transport modes relevant to New Zealand’s urban areas. Addressing road safety offers opportunities to support public transport projects for safer mode choices.

**Recommendation:** Refocus the strategy from being primarily focused on private vehicle use to include other transport modes such as public transport.

16. Reducing traffic speeds has proven to be a highly effective way of reducing traffic related deaths and injuries. There is a strong and exponential relationship between increasing speeds and crash risk, and between increasing speeds and serious injuries or death. The faster vehicles travel, the more frequent and severe road crashes become, and the greater the level of injury and death that ensues.<sup>9</sup>
17. With the development of a national Vision Zero strategy, there is an opportunity to rectify the current situation where road speeds are not set in a best practice way. Implementing a national road and streets framework whereby appropriate speeds are applied for each level of road service, would mean a significant improvement of the current scenario where 87% of NZ roads have a posted speed limit higher than the conditions would recommend. It would also facilitate all regions in implementing safer speeds and achieving Vision Zero targets by supporting the reduction of vehicle speeds to appropriate levels without unnecessary delay and consultation.

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<sup>9</sup> International Traffic Safety Data and Analysis Group. “Speed and Crash Risk: Research report”. Paris: International Transport Forum, 2018.

18. With regards to vehicle safety and the MoT's intention to raise the safety standards of vehicles entering the New Zealand fleet, it will be important to ensure there is no adverse impact on low income families who are dependent on the second car market, and that consideration will be given to providing equitable access to transport options for all, regardless of income.

**Recommendation:** Ensure equitable access to transport options when the safety standards for imported vehicles are being regulated.

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

19. The indicator and performance measures, are very much focused around vehicles. It would be beneficial if the MoT could include indicators and performance measures for all transport modes. Indicators could include:

- Kilometres of protected cycle facilities;
- Community perceptions on routes to school, town centres and public transport as safe environments for active modes;
- Increase in active mode and public transport journeys; and
- Proportion of busy town centres where travel speeds are 30km/h or lower.

**Recommendation:** Include indicator and performance measures for all transport modes.

## Conclusion

20. Thank you for considering ARPHS' submission to the 2020 - 2030 Road Safety Strategy.

## Appendix 1: Auckland Regional Public Health Service

Auckland Regional Public Health Service (ARPHS) provides public health services for the three district health boards (DHBs) in the Auckland region (Counties Manukau Health, Auckland and Waitemata District Health Boards).

ARPHS has a statutory obligation under the New Zealand Public Health and Disability Act 2000 to improve, promote and protect the health of people and communities in the Auckland region. The Medical Officer of Health has an enforcement and regulatory role under the Health Act 1956 and other legislative designations to protect the health of the community.

ARPHS' primary role is to improve population health. It actively seeks to influence any initiatives or proposals that may affect population health in the Auckland region to maximise their positive impact and minimise possible negative effects.

The Auckland region faces a number of public health challenges through changing demographics, increasingly diverse communities, increasing incidence of lifestyle-related health conditions such as obesity and type 2 diabetes, infrastructure requirements, the balancing of transport needs, and the reconciliation of urban design and urban intensification issues.