



Summary of Submissions



INTRODUCTION

The *Road to Zero* consultation document outlined proposals for a new road safety strategy for New Zealand and some first actions. The strategy replaces *Safer Journeys*, the previous road safety strategy.

The consultation document sought feedback on a proposed new vision statement, guiding decision-making principles, a target for 2030, five focus areas for the next decade, initial actions, and a framework for monitoring progress.

The consultation document was released on 17 July 2019. The period for public submissions ran from 17 July 2019 to 14 August 2019, a period of four weeks.

Feedback received during the public consultation process informed the 2020-2030 road safety strategy and initial action plan, which you can find here: www.transport.govt.nz/zero.

ACKNOWLEDGEMENTS

We would like to take this opportunity to thank those who have contributed to the process to develop the road safety strategy and action plan.

We have heard from thousands of New Zealanders over the last two years.

Hundreds of New Zealanders have written to the Associate Minister of Transport, Minister Genter, or to the Ministry of Transport contributing their views on priorities for the strategy. They expressed their perceptions including of how safe they feel on the transport network, what they see and how they feel when they cycle or walk to work, use a pedestrian crossing as a disabled person, ride their motorcycle in the weekend or drive during their summer break. People also provided their ideas for improving road safety.

More than 100 people contributed to a reference group process in late 2018. They included road safety experts, government officials, and representatives of membership organisations, charities and community groups. In April 2019, the Ministry of Transport visited 14 towns and cities across New Zealand to meet with local government officials, and other road safety specialists to discuss the proposed approach during the development of the draft strategy and action plan. We also engaged with hundreds of people, from all walks of life, through workshops and presentations at local, regional and national hui and conferences.

We have partnered with a range of government agencies to ensure we develop a new strategy and action plan that the New Zealand Government has confidence in and can deliver.

During July and August 2019, over 1,300 New Zealanders, including representatives of local government, businesses and membership organisations, then provided their submissions through the public consultation process.

We very much appreciate all of the experiences, ideas, personal anecdotes and expertise provided through these processes, which have been key in informing the strategy and initial action plan that has now been released. Thank you.

PURPOSE OF THIS DOCUMENT

This report summarises the submissions made on the *Road to Zero* consultation document and the prominent themes that emerged from the consultation process. It is not intended to serve as a record of all feedback received.

In some cases, selected quotes from submissions have been included in this report. They have been selected for their value in illustrating issues raised by submitters, or because they articulate issues in a way that is difficult to paraphrase without losing the original meaning. Their inclusion in this document does not imply that they carry additional weight over and above submissions that have not been cited specifically. We have anonymised individuals, as well as organisations that have requested that their names be withheld.

We received a total of 1,369 written submissions. Our primary consultation tool was an online survey. We received 1,093 submissions through this.

We also invited children and young people to provide their thoughts on road safety through a targeted students' survey. We received responses from 185 children and young people between the ages of 8 and 18, and the key themes from this survey are summarised in Part 4 of this report.

In addition, we received more than 40 responses to a version of the survey from people with learning disabilities, facilitated by People First NZ at meetings in cities, towns and rural areas across the country. These are summarised in Part 5 of this report.

Finally, 51 submissions were received outside of the primary survey tool, mostly through correspondence with the Associate Minister of Transport, Minister Genter.

Note that submissions received through the students' survey, the survey facilitated by People First NZ and submissions received outside of the primary survey tool have not been included in the breakdown of submissions as set out in this document. However, they have all been assessed and analysed in the same way as submissions received through the primary tool, and have informed the advice provided to Government on the final strategy and action plan.

REPORT STRUCTURE

This report consists of six parts:

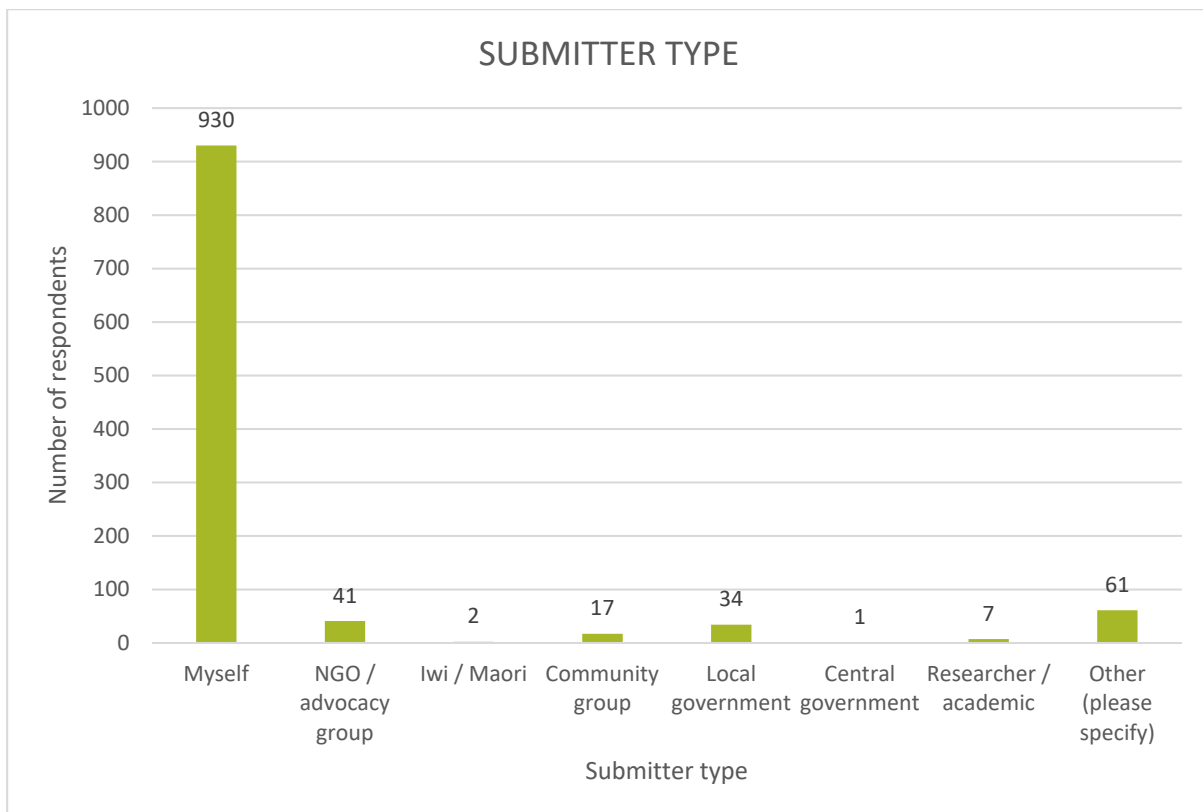
- ***Part 1: Overview of submissions***
Sets out the number of submissions received and from which groups
- ***Part 2: Summary of key themes***
Contains a high-level summary of the key themes from submissions
- ***Part 3: Further detail by section***
Contains more detailed information on responses received for the consultation questions, collated by section
- ***Part 4: Summary of responses from the students' survey***
Contains a summary of the key themes received from children and young people through a separate students' survey
- ***Part 5: Disability perspectives***
Contains a summary of key themes received from disabled people, including from a separate survey coordinated through People First NZ
- ***Part 6: Key changes made following consultation***
Provides a summary of changes incorporated into the final strategy and action plan following consultation

PART 1: OVERVIEW OF SUBMISSIONS

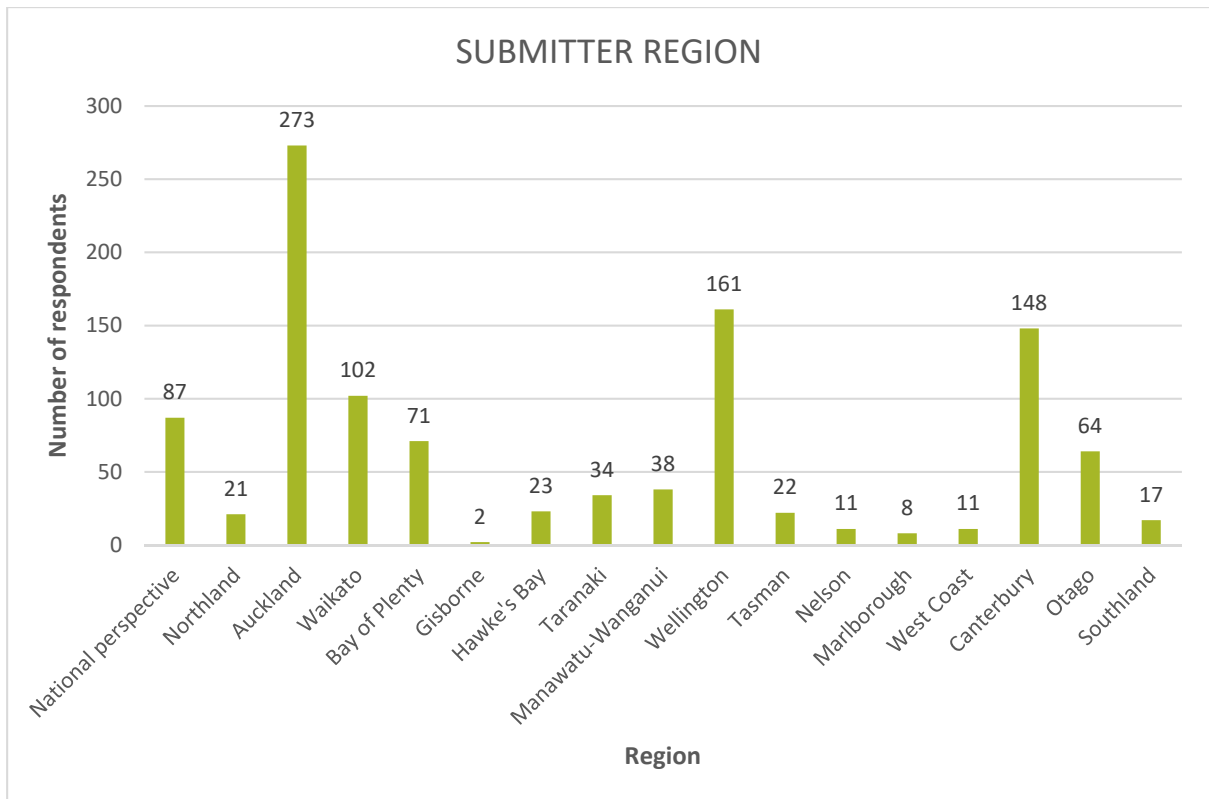
A total of 1,093 completed submissions were received on the Road to Zero consultation document through the primary survey tool.

We asked respondents who they were submitting on behalf of. They told us:

- individuals (930)
- non-government organisations (NGOs) or advocacy groups (41)
- iwi/Māori (2)
- community groups (17)
- local government (34)
- central government (1)
- researchers and academics (7)
- other submitters (including businesses, district health boards and schools) (61)



More submitters reported that they lived in (or travelled the most in) Auckland than any other region, although all regions were represented overall. Eighty-seven submitters said that they were providing a national perspective.



Urban and rural perspectives

Just over 20 percent of submitters (232) considered their perspectives to be urban, while five percent (62) considered their perspectives to be rural. The majority (73 percent, or 799 in total) considered their perspectives to be both.

The main difference between urban and rural submitters was that urban submitters were more likely to indicate that the proposed 2030 target was not high enough, while rural submitters were more likely to indicate that the proposed 2030 target was about right.

Another key difference was around priority actions – the top three priorities for urban submitters were:

- ‘enhance the safety and accessibility of footpaths, bike lanes and cycleways’
- ‘invest in safety treatments and infrastructure improvements’ and
- ‘introduce a new approach to tackling unsafe speeds’.

In contrast, the top three priorities for rural submitters were:

- ‘invest in safety treatments and infrastructure improvements’
- ‘enhance drug driver testing’ and
- ‘prioritise road policing’.

Māori perspectives

Seventy-six submitters indicated that their submission represented a Māori perspective. These included organisations (e.g. Auckland Transport, Road Transport Forum NZ and Whakatane District

Council) and community and advocacy groups (e.g. NZ VIEW, Candor Network and Safekids Aotearoa) as well as individuals. Two submissions were received from people who indicated that they were submitting on behalf of iwi/Māori.

The range of views (and levels of support for key components of the proposed strategy) from submitters who indicated that they represented a Māori perspective was similar to those expressed by submitters who did not represent a Māori perspective.

One individual submitter noted the need for Māori guiding principles and outcomes to be embedded in the new strategy. Similarly, Auckland Transport considered that the Treaty of Waitangi and Te Ao Māori underpins the strategy and recommended that this be clearly articulated in the strategy and strengthened by specific actions for improved Māori road safety outcomes.

A key issue highlighted by a submitter who was submitting on behalf of iwi/Māori was the need to consider the impacts of climate change, and to put the protection of our environment and ecosystems first in all decision making, particularly by encouraging the use of public transport and active modes of travel.

PART 2: SUMMARY OF KEY THEMES

The online survey tool provided submitters with an opportunity to provide comments through free text comment boxes. Although a wide range of views were expressed through the submissions, some key themes emerged. These are summarised below and discussed in more detail in the following sections of this report.

OVERARCHING THEMES

A number of topics or areas of concern were consistently and commonly raised in comment sections of the survey tool. These include:

Driver behaviour. Many submitters expressed a strong belief that if driver skills and attitudes improved, New Zealand would have a much lower rate of road trauma. Consistent with this, they suggested the Government should prioritise driver education, licensing and training. Many considered that addressing road user behaviour should be a top priority for the strategy, and that interventions focussed on improving what they regard as New Zealand's 'poor driving culture' would have the greatest impact on road safety outcomes. The need for more effective enforcement and penalties was also a strong theme. Many submitters called for greater Police presence on New Zealand roads, higher penalties (e.g. for cell phone use), and increased levels of enforcement of the road rules.

Mode shift and mode neutrality. We also received strong feedback that submitters would like to see a clearer link between mode shift (i.e. people switching from cars to other transport means) and its impact on road safety shown more intentionally in the new road safety strategy. Submitters highlighted the importance of supporting mode shift through the strategy's principles and focus areas, and suggested new actions to reduce the number of motor vehicles on the road (including shifting freight movements to rail), to promote active travel and the use of modes that are evidentially safer (e.g. public transport) and to achieve other benefits (e.g. health benefits and reductions in climate change-related emissions). In addition, many submitters thought we could be more mode neutral throughout the document, with less focus on cars.

Vulnerable users and disabled people. Linked to the above theme, many submitters also called for more attention to be paid in the strategy to the mobility needs of disabled people. Submitters also highlighted the need to take into account the specific vulnerabilities of particular groups, including children, pedestrians, cyclists and motorcyclists, and economically disadvantaged communities.

Funding and implementation. Many submitters (in particular organisations, including councils) urged the importance of ensuring there is appropriate funding and resources, as well as effective coordination and leadership, to achieve the intent of the vision and the proposed target for reducing deaths and serious injuries by 2030.

Impacts of new technologies. Finally, we received feedback from submitters that the strategy should be more explicit about the impact (both positive and negative) that new and emerging technologies may have on road safety outcomes over the next decade.

VISION

A large majority of submitters (almost 85 percent) were broadly in support of the proposed vision, with most organisational submitters indicating strong support. Those in support considered that New Zealand's levels of road trauma are too high, and that the outcome sought through the proposed vision is the only ethically acceptable outcome. Some individuals shared deeply personal stories of how they had lost loved ones due to road crashes.

A number of submitters thought that the vision focusses too narrowly on prevention of deaths and serious injuries and does not adequately consider wider factors such as accessibility, or the ability to travel on the roads in a safe and stress-free manner. Some submitters noted that these factors were especially important for disabled people and vulnerable road users.

Those who were opposed to the vision consisted largely of individuals. The overwhelming majority of submitters in this category considered that the vision is unrealistic, and that stopping all crashes from resulting in death or serious injury is an impossible goal.

TARGET FOR 2030

There was widespread support for including a specific target in the new road safety strategy, with a number of submitters saying that lack of a target had hampered the success of the previous *Safer Journeys* strategy.

The 15 percent of submitters who thought the target was too high offered a range of reasons for their view. Common reasons included scepticism that the proposed interventions would lead to a 40 percent reduction in road deaths or that adequate funding to support the strategy would be made available in New Zealand.

Thirty-four percent of submitters (including several organisations) wanted a more ambitious target. Some of these submitters argued that a 50 percent target (for example) would have more emotional resonance, could inspire communities to take more action toward the vision, and would bring New Zealand in line with international best practice. Other submitters called for a shorter timeframe for achieving a 40 percent reduction.

Approximately 42 percent of submitters thought the target was about right. Those who thought the target was about right generally regarded the target as a reasonable one. Some submitters acknowledged the need to balance two potentially competing aims: galvanising action through an ambitious target and setting a target that is realistic and achievable.

PRINCIPLES

There was broad support for all of the proposed principles, with at least 80 percent of submitters indicating support for each of them. Key themes from submitters who commented on the principles are set out below.

We plan for people's mistakes. Those who supported this principle suggested that good design and a holistic system management approach could help mitigate the effects of mistakes. However, a number

of respondents argued that the principle should not be used to excuse deliberate risk taking or to eliminate personal responsibility.

We design for human vulnerability. A number of individuals and organisations talked about the need to take into account the specific vulnerabilities of particular groups, including children, pedestrians, cyclists and motorcyclists, economically disadvantaged communities and disabled people.

We strengthen all parts of the road transport system. Many submitters sought an explicit acknowledgment of a hierarchy of responsibility, suggesting that certain users bear more responsibility than others. Others suggested that the strategy should clarify the different responsibilities that those in the road safety system should shoulder.

We have a shared responsibility for improving road safety. A number of respondents cautioned that shared responsibility should not mean excusing poor choices by road users. Some also suggested that it may be difficult to convince the public of the benefits of a shared responsibility approach when some road users engage in deliberate risk-taking behaviour.

Our actions are grounded in evidence and evaluated. Organisations were often particularly supportive of this principle, calling for more and better data to be made available to policy makers and regulators. Despite overwhelming support, there were some (even amongst those who strongly supported the principle), who warned against decision makers using the quest for evidence as a refuge from taking decisions.

Our road safety actions support health, wellbeing and liveable places. A number of submitters, particularly those representing local government and other organisations, highlighted the need to align this principle with planning guidance. There was a call from some submitters representing rural communities to ensure that the principle is applied to rural as well as urban environments.

We make safety a critical decision-making priority. There was a range of views among those who supported the principle when it came to the degree to which safety should be prioritised. Some submitters suggested that safety should override other considerations. Others said that safety should be a critical decision-making priority, but that other considerations, including efficiency, were also important.

FOCUS AREA 1: INFRASTRUCTURE AND SPEED

Over 75 percent of submitters were broadly in support of this focus area. Most organisational submitters expressed support for this focus area, although some (particularly councils) raised concerns about the lack of detail in the consultation document on anticipated funding or investment to support these changes. The majority of submitters who expressed support were supportive of both infrastructure safety improvements and speed management.

A key difference between those who expressed partial support and those who expressed strong support was the degree of enthusiasm for speed-related changes. Those strongly in support were more likely to endorse the use of speed management as a key tool for both driving substantial reductions in deaths and serious injuries and creating more liveable and accessible environments. Other submitters were more circumspect in their support. Many of these submitters agreed that while

there are some areas where speed limits are too high and require review, there should not be a blanket approach to lowering speeds (especially on main arterial routes).

Those who were opposed to the focus area consisted of a range of submitter types. The majority of those who were opposed to this focus area supported infrastructure changes (though it was sometimes unclear whether they were indicating support for safety treatments such as median barriers, or broader road improvements (such as widening roads and fixing potholes). Many submitters who were opposed expressed strong opposition to speed reductions (particularly on open roads/state highways and in rural areas).

FOCUS AREA 2: VEHICLE SAFETY

Over 85 percent of submitters were broadly in support of this focus area. The most common theme from those who strongly supported this focus area was a desire for more urgent action on vehicle standards. There were also several submitters who thought the vehicle safety focus area was car-dominant and could be expanded to take account of other modes, and the broader health, environmental and wellbeing impacts of vehicles.

The most common theme from those who opposed this focus area was a concern about costs and impacts on consumers. Other common themes centred around potential unintended consequences of increased reliance on vehicle safety technology. In particular, submitters expressed concern that safer (and therefore more automated) cars could lead to an increased number of crashes due to drivers not needing to pay as much attention. Other submitters considered that the vehicle fleet will improve and shift on its own as technology advances, and therefore intervention by the Government is not warranted.

FOCUS AREA 3: WORK-RELATED ROAD SAFETY

Almost 90 percent of submitters were broadly in support of this focus area. Organisational submitters, including local government, district health boards, non-government organisations (NGOs) and community groups, were overwhelmingly in support of this focus area. Some submitters highlighted the significant role businesses, as well as local and central government, could play in improving the safety and sustainability of the overall vehicle fleet.

A number of individual submitters also said that a greater focus on road safety in the workplace should not come at the cost of discouraging staff from travel modes perceived as “unsafe”, such as cycling or walking to work. Others noted that there was an opportunity for employers to encourage mode shift or commuting via different modes, particularly in cities and town centres. Many submitters (including both individuals and organisations) also raised significant concerns about fatigue and long driving hours for commercial drivers (sometimes driven by pressures from employers to perform to tight targets or unreasonable timeframes).

The most common concern raised by those opposed was the potential adverse impact and additional costs on businesses. These submitters said they were already subject to substantial health and safety requirements and had limited control over their employees’ actions outside of the workplace. Another common concern was potential duplication of roles within central government and overregulation (in particular a potential overlap with the Health and Safety at Work Act). Many submitters who were

opposed to this area thought that responsibility for road safety should not be borne by employers but by the individual themselves (or by Government).

FOCUS AREA 4: ROAD USER CHOICES

There was near universal support (almost 95 percent) for this focus area. People felt strongly about this focus area, with many submitters strongly recommending prioritising it over other focus areas. Those that broadly supported this focus area largely directed their comments on two matters:

- (1) driver education, training, licensing and driver culture, and
- (2) enforcement and penalties.

Driver education, training, licensing and driver culture was a strong theme. Submitters considered that drivers should be a focus in the road safety strategy, and further education and a shift in driving culture was needed. Submitters called for subsidised driver training in some cases and for the current driver licensing system to be reviewed. Other submitters raised concerns about overseas drivers.

The other key area of comment was enforcement and penalty focussed. Those who provided views on enforcement and penalties tended to comment on them in tandem. Submitters called for dedicated road policing, increased Police presence across the network and increased enforcement of the road code (including more minor offences). People also raised concerns around the levels of enforcement and penalties around impaired driving and cell phone use.

The small proportion of submitters that did not support this focus area considered that the focus previously on this area had not delivered the desired result, and that the focus should be on fixing or improving road infrastructure rather than on drivers. Others did not support the focus area as they considered that it neglected driver education.

FOCUS AREA 5: SYSTEM MANAGEMENT

Over 87 percent of submitters were broadly in support of this focus area. Submitters representing local government, along with many sector organisations and NGOs, were overwhelmingly supportive of the focus area.

There was broad agreement that strong leadership is critical to success, including ensuring that elements of the system work together more effectively. Although there was a call for stronger central leadership on road safety, a number of submitters also advocated for communities to be empowered to develop local solutions. Local government submitters often noted the importance of a joined-up approach to road safety, calling for a strengthening of coordination mechanisms and for assistance with building capacity at the local level. Some submitters called for the Government to work in greater partnership with non-governmental organisations. They suggested that the Government leverage their membership networks to help foster public support for road safety.

A number of submitters called for a strong communication plan to support the new strategy and to expand ownership of road safety issues. Some said it would be vital to try and change attitudes towards road safety (not just target road user behaviour). There was general support for an evidence-

based approach to road safety, a call for more and higher-quality data to be collected and published, and a request from local government in particular for more assistance with data analysis.

While local government was largely very supportive of *Road to Zero*, many of these submitters used the System Management focus area as an opportunity to raise concerns about the funding of the new strategy. Those who commented on post-crash response said they supported its inclusion in the strategy.

PRIORITY ACTIONS

The three top priorities for submitters were:

- ‘invest in safety treatments and infrastructure improvements’
- ‘enhance the safety and accessibility of footpaths, bike lanes and cycleways’ and
- ‘introduce a new approach to tackling unsafe speeds’.

These actions were very closely followed by: ‘prioritise road policing’; and ‘enhance drug driver testing’.

There were strong calls for a greater focus on drivers (either through education, training or cultural change), with urgent action sought on targeting cell phone use while driving. There were also strong calls for a more mode-neutral list of actions, which focussed on transport modes other than private vehicles. Submitters also expressed a desire to target ‘mode shift’ in the priority actions, with many submitters seeing increased use of public transport and active modes (e.g. walking and cycling) as a key contributor to road safety outcomes.

We also asked submitters if they had any suggestions about other actions we could consider for future action plans. The most commonly mentioned suggestions (roughly 75 percent) fell into four broad categories:

- actions relating to driver training, education, licensing and cultural change;
- actions relating to enforcement and penalties;
- actions to incentivise mode shift; and
- actions to address road safety outcomes for vulnerable road users.

OUTCOMES MEASURES

We received a total of 434 written comments on the proposed outcomes measures. A majority of responses focussed on the proposed measures to track progress towards the 2030 target. These submissions provided suggestions on how to refine the draft measures, or put forth ideas for additional measures (e.g. particularly in relation to vulnerable road users, travel speed, enforcement and workplace safety).

Some submitters provided comments on how the Government should report on progress. Most submitters considered an annual update to be sufficient. A few submitters, however, asked for a more frequent update. Many of these submitters also commented on the importance of reporting publicly on progress as a way of increasing transparency and accountability.

A small proportion of submitters commented on the need to have reliable data collected on a regular and ongoing basis to enable long-term tracking and evidence-based decision making. Some submitters commented on the benefits of collecting and reporting data in a way that allows comparisons by areas and population groups, or geographical breakdowns.

PART 3: FURTHER DETAIL BY SECTION

VISION

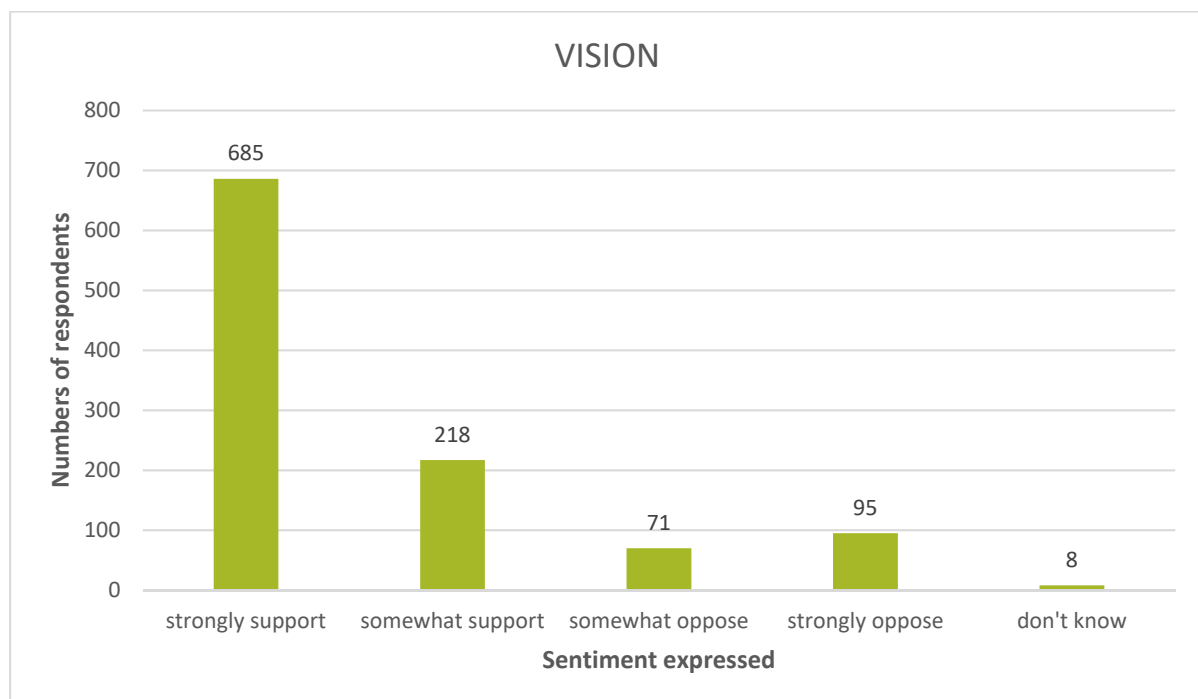
The consultation document set out a proposed vision: 'a New Zealand where no one is killed or seriously injured in road crashes'.

Submitters were asked:

- To what extent do you support the proposed vision?
- What was the reason for your rating?
- Do you have any other comments on the proposed vision?

Response

We received 1,077 submissions on the proposed vision. Of these, almost 85 percent were broadly in support, approximately 15 percent were broadly opposed, and less than one percent did not express an opinion. We received 792 written comments about the proposed vision.



Views of those in support

The majority of submitters who broadly supported the vision considered that New Zealand's levels of road trauma are too high, and that the outcome sought through the proposed vision is the only ethically acceptable outcome. Some individuals shared deeply personal stories of how they had lost loved ones due to road crashes, their fears when friends or family members were on the road or behind the wheel, or of bearing witness to the impacts of road trauma in the course of their work.

“I would love there to be no road deaths, I lost my father in a car crash that wasn't his doing and the pain you carry around is something you want no one else to feel.” (Individual submitter)

“Few people are directly affected by the trauma of a death or serious injury caused by a road crash. I work in this area so meet people who are impacted by such tragedies. If more people really understood just how terrible the consequences are of crashes, the loss, the long term struggles for those who are recovering from injury, the support for visions like this would I believe be universal.” (Individual submitter)

Most organisational submitters (including councils and district health boards) indicated a strong support for the vision. Many organisations (e.g. Marlborough District Council and Holden New Zealand) also noted the alignment between the proposed vision and their own (or parent) organisation's strategic goals. Some organisations stressed the importance of ensuring there is appropriate funding/resources, coordination and leadership to achieve the vision's intent.

“While the NZAA strongly supports an ambitious approach to improving road safety, including putting safety as a leading priority, we would like to see considerably more detail on the funding and resources that are being dedicated to safety, to ensure that there is real and meaningful progress. Without a noticeable increase in funds, the risk is that there is no arrest in the current trend will result from the road to zero approach, and it will simply be seen as a new ‘tag line’.” (NZ Automobile Association)

One submitter noted that a key challenge of setting a ‘Vision Zero’-based vision would be convincing people who regard it as an unrealistic target rather than an aspirational vision statement or a set of principles. The submitter recommended that the strategy be accompanied by a campaign to help people better understand the Vision Zero approach.

The key difference between those who were somewhat in support compared to those who were strongly in support was a concern about the achievability of a zero end goal, even if they indicated their support for the vision's intent and acknowledged the importance of having an aspirational vision to work towards.

A number of submitters thought that the vision focusses too narrowly on prevention of deaths and serious injuries, and does not adequately consider wider factors such as accessibility, or being able to travel on the roads in a safe and stress-free manner. Some submitters noted that these factors are particularly important for disabled people and vulnerable road users (e.g. cyclists and pedestrians).

“Road to Zero shows MOT focus on road crashes, whereas Vision Zero for Tamaki Makaurau [Auckland] 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.” (Auckland Transport)

Views of those who were opposed

Those who were opposed to the vision consisted largely of individuals. The overwhelming majority of submitters in this category considered that the vision was not realistic, and that stopping all crashes from resulting in death or serious injury is an impossible goal.

“A noble ambition but wildly optimistic and largely unachievable” (Individual submitter)

Some submitters considered that it would be better to set a stretch target for minimising deaths and serious injuries, one that is specific, measurable, achievable, realistic and targeted (i.e. a ‘SMART’ goal) – e.g. *“The lowest harm rate for road crashes (per capita) in Australasia.”* Others disagreed with the focus areas or actions proposed to achieve the vision. For example, some submitters thought that Government might choose to introduce blanket speed limit reductions in order to achieve the vision. Many submitters expressed a view that if driver skills and attitudes improved, New Zealand would have a much lower rate of road trauma, and the Government should therefore prioritise driver education and training, and enforcement of road rules.

Suggestions for improvement

Some submitters considered that the vision should be reframed in the positive e.g. *“Where people are 100% safe on our roads”* or *“A New Zealand where everyone survives use of roads”*.

TARGET FOR 2030

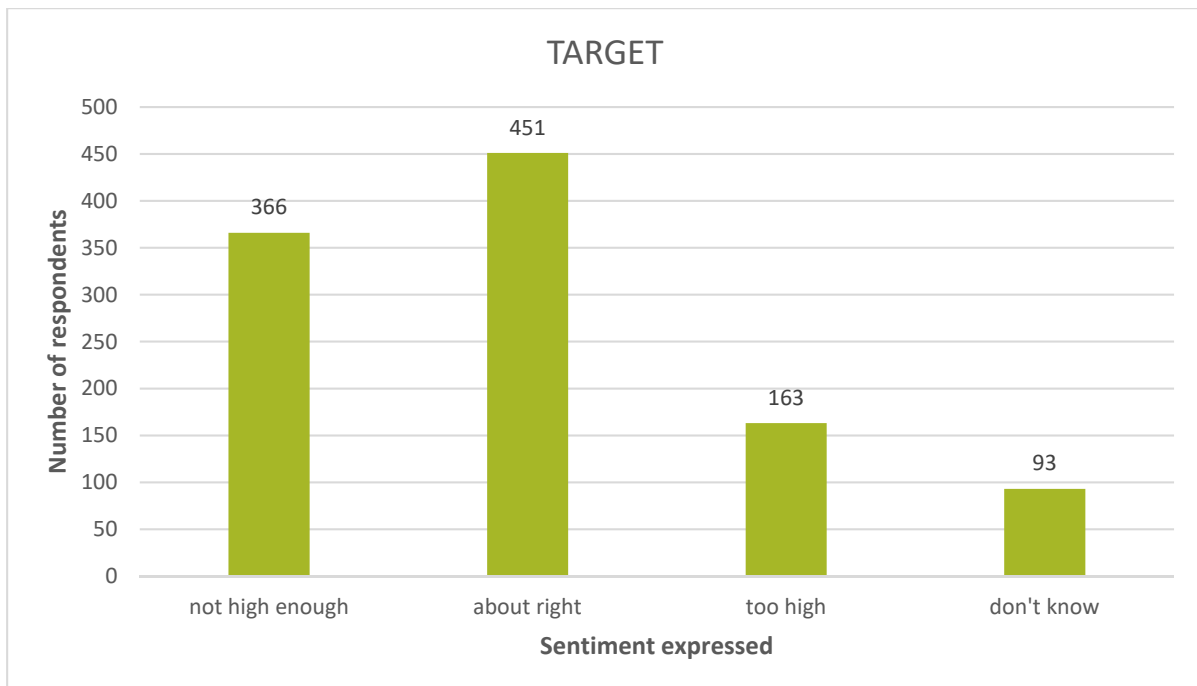
The consultation document set out a proposed target for 2030: a 40 percent reduction in deaths and serious injuries on our roads (compared to 2018 levels).

Submitters were asked:

- To what extent do you support the proposed target?
- What was the reason for your rating?
- Do you have any other comments on the proposed target?

Response

We received 1,073 submissions on the proposed 2030 target. Of these, 42 percent said the target sounded about right, 15 percent thought it was too high, 34 percent thought it was too low, and 9 percent did not express an opinion. We received 743 written comments about the proposed target.



There was widespread support for including a specific target in the new road safety strategy, with a number of submitters saying that the lack of a target had hampered the success of *Safer Journeys*.

A small number of submitters queried the distinction between a Vision Zero approach and a 40 percent target. Some said they were confused by the two different goals and suggested that the target for the new 10-year road safety strategy should necessarily be zero deaths.

Some submitters, particularly those representing local government and other organisations, said they wanted more information about the modelling that had informed the 40 percent target.

“The Group commends the leadership shown by the Government in setting a target of a 40% reduction as a practical way of incentivising the change that is needed to set Vision Zero in motion. As Road to Zero does not comment in any detail on the analysis which underlies the target, it is impossible to know whether the target is too high or not high enough.” (South Island Regional Transport Committee Chairs Group)

Views of those in support

Submitters generally regard the target as a reasonable one, with a number acknowledging the need to balance two potentially competing aims: galvanising action through an ambitious target and setting a target that is realistic and achievable.

“While the 40% reduction target is ambitious, we trust the modelling is accurate and this target is achievable in the 2030 time frame. To set a target that is grossly out of reach will be detrimental to public confidence.” (A regional council)

“Whilst we support this target, we would have liked to see something somewhat more ambitious and in line with UN targets of a 50% reduction in deaths. That said we understand that the 40% target has been based on modelling, and support a target that is achievable by 2030.” (Brake)

A number of those who supported the proposed target said that meeting it would depend on the mix of interventions deployed and the level of investment committed to road safety. Some submitters called for a greater focus on user behaviour, on enforcement or on infrastructure upgrades (or a combination of them). Others wanted to see lower default speeds. A minority of submitters thought it would be achieved relatively easily given likely advances in vehicle safety technology.

Views of those who thought the target too high

Those submitters who thought the target was too high offered a range of reasons for their view. A number said that the proposed interventions would not lead to a 40 percent reduction in road deaths.

“Good to aim high but I don’t think the measures you propose on their own will see that figure being achieved.” (Individual submitter)

This was echoed by those who doubted that adequate funding to support the strategy would be made available, particularly in comparison to the amount spent on road safety in those Vision Zero jurisdictions that have been most successful in reducing the number of deaths and serious injuries on their roads.

“Delivering this will require commitment and investment from the Government at a vastly greater scale than has ever happened before. ... The strategy does not give any indication that this scale of investment in infrastructure is likely, yet these are the types of measures that will be needed to reach the stated targets.” (NZ Automobile Association)

A number of the submitters who thought the target was too high said they wanted to see bolder initiatives to reduce the numbers of people killed on the roads. Some wanted more focus on user behaviour and enforcement, with others advocating for more investment in infrastructure investments and widespread reductions in speed.

A small number of respondents said that New Zealand's road safety record has improved considerably over the past 30 years, and that given the predicted population growth it was unrealistic to expect the number of people killed on the roads to fall significantly in the future.

"Don't believe it is realistic or achievable. Net population is increasing and the number of vehicles on the road are increasing, yet you expect there to be 40% less than today." (Individual submitter)

Views of those who thought the target was not high enough

Many submitters wanted a more ambitious target. Some of these called for a shorter timeframe for achieving a 40 percent reduction. Others, including Transportation Group NZ and Bike Auckland, sought interim targets to ensure that those responsible for achieving it maintain their focus. A number compared road safety with the approaches to safety in others sectors, including the airline industry. Others cited ethical concerns about the tolerance of road deaths as an acceptable cost of getting around. Many suggested that a more ambitious target would lead to step changes in approaches to road safety, with some arguing that a higher target would produce better results even if the target was not met.

"I think there is a good argument for a more ambitious target. This would provide a strong sense of leadership and urgency." (Individual submitter)

"I understand the target is trying to be realistic, and that it will save hundreds of lives, so I definitely support it. But we should be planning towards zero deaths and serious injuries. There should also be interim targets, over a regular basis, to ensure there is continued focus on reaching this larger target." (Individual submitter)

A number of organisations supported a more ambitious target. Of these some, including EROAD and TRAFINZ, called for a 50 percent target. They argued that this would have more emotional resonance, could inspire communities to take more action toward the vision, and would bring New Zealand in line with international best practice.

"Greater Wellington Regional Council supports a target, but we encourage Government to be more aspirational."

PRINCIPLES

The consultation document outlined seven proposed decision-making principles:

- (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.*

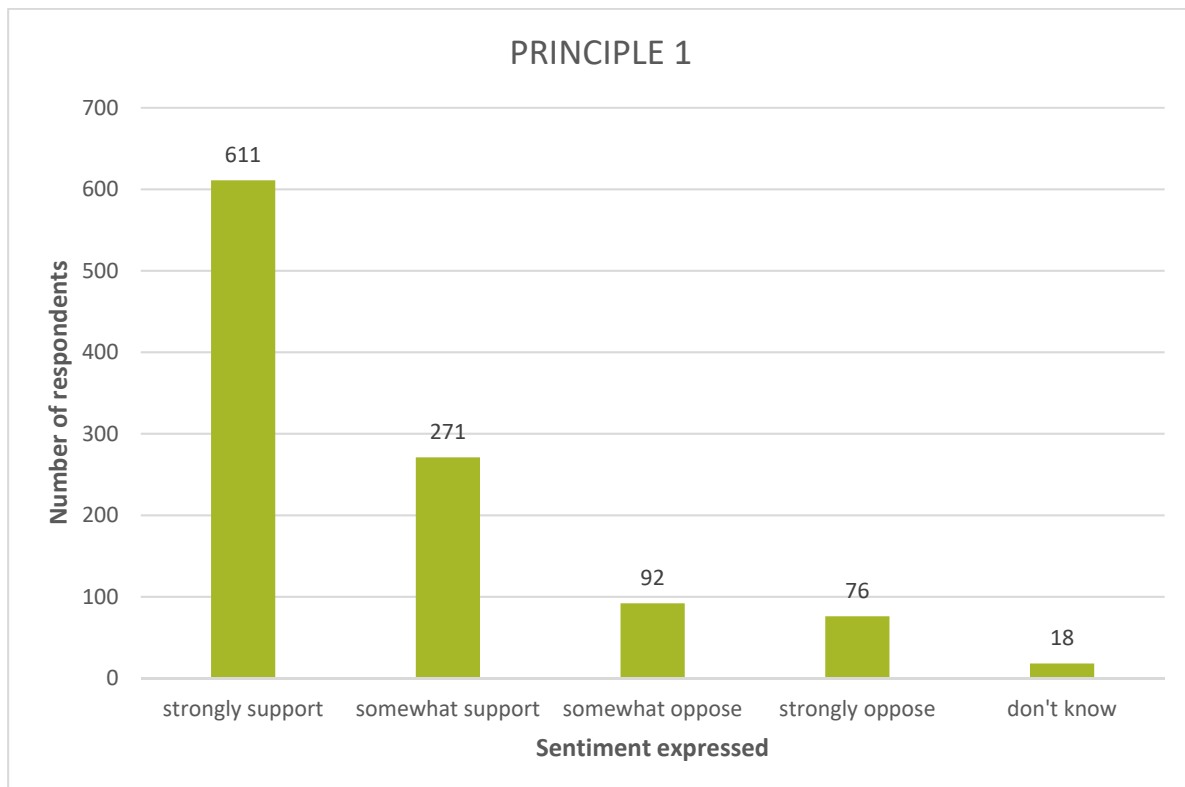
Submitters were asked:

- To what extent do you support each principle?
- What was the reason for your ratings?
- Do you have any other comments on the proposed principles?

Response

There was broad support for all of the proposed principles, with at least 80 percent of submitters indicating broad support for each principle.

Principle 1: We plan for people's mistakes



We received 1,068 submissions for Principle 1. A large majority of submitters (over 82 percent) supported this principle. We received 680 written comments about this principle. Those who supported it most strongly cited concern about vulnerable users (including those in less-safe vehicles) and the need to accept that humans make mistakes. They suggested that good design and a holistic approach to managing the road safety system could help mitigate the effects of mistakes.

“While we can, and should, do all we can to improve road user behaviour, we humans are inevitably going to make mistakes for a whole host of reasons, and unless we focus more widely on the system we will never make a significant dent in death and serious injury on our roads. Therefore we must plan for people’s mistakes.” (TRAFINZ)

A number of respondents argued that the principle should not be used to excuse deliberate risk taking or to eliminate personal responsibility (summed up by the responses *“this will enforce the ‘she’ll be alright’ attitude”* and *“if you expect less of people they will ‘plan’ on giving less”*). This was a concern for a number of respondents to this question, whether they supported the principle or opposed it.

A large minority of individual submitters advocated a greater focus on driver education and enforcement as a way of minimising the number of mistakes that people make on the roads. This was echoed by some organisations, particularly those involved in driver training and licensing support programmes, but also a number of submitters representing local government.

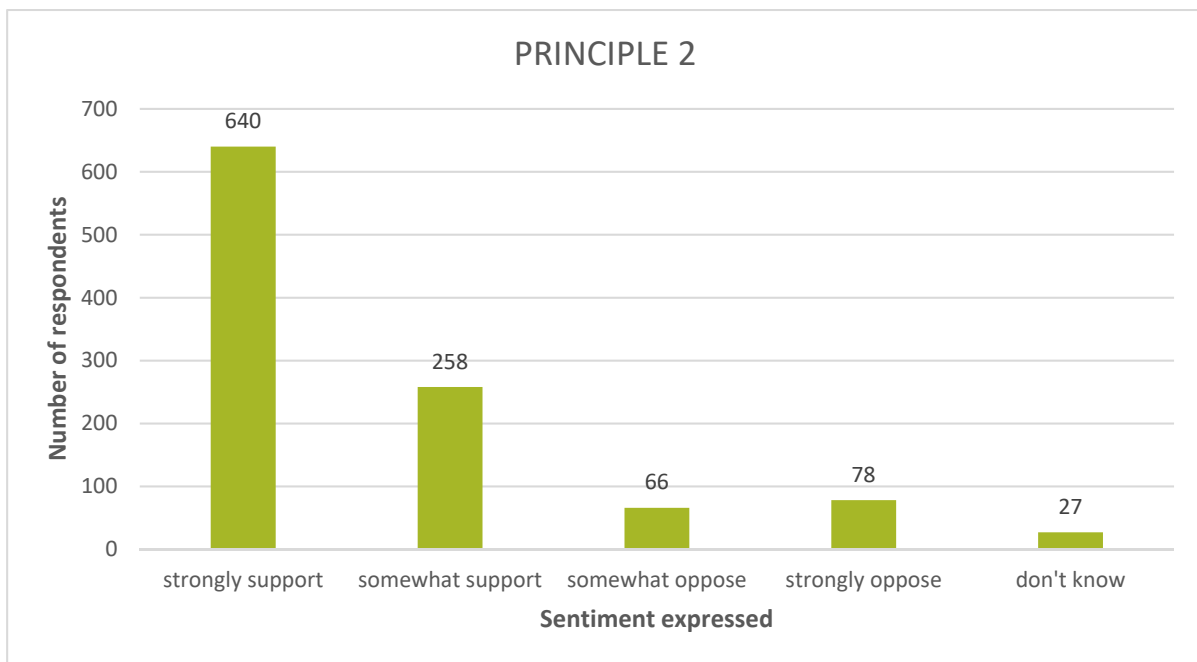
“While the human element to driving will, from time to time, result in genuine mistakes being made, we believe a sound road safety strategy must also include an emphasis on driver education across all road users.” (An organisation)

“Focusing only on an acceptance that people make mistakes risks designing interventions that do not address all potential causes. In our view this is not a sound basis for a comprehensive road safety strategy because it downplays, for example, the role of enforcement and penalties in discouraging behaviours that have the potential to kill or injure innocent parties.” (Whakatane District Council)

Some respondents were keen to distinguish between mistakes and deliberate risk-taking behaviour such as driving while impaired or using mobile phones.

“A more realistic perspective may be that the underlying causes of road crashes exist on spectrum of culpability ranging from ‘genuine mistakes’ through ‘carelessness’ and ‘negligence’ to ‘taking risks’ and ‘deliberately breaking the law’.” (An organisation)

Principle 2: We design for human vulnerability



We received 1,069 submissions on Principle 2. A large majority of respondents supported Principle 2, with 84 percent saying that they supported or strongly supported it. We received 565 written comments about this principle.

Many submitters talked about the need to take into account the specific vulnerabilities of particular groups, including children, pedestrians, cyclists and motorcyclists, economically disadvantaged communities and disabled people. They said that the strategy should acknowledge more explicitly that some users are more vulnerable than others.

“We have spent nearly a century planning spaces for metal boxes to move faster and more efficiently. It is time to give other vulnerable road users equal weighting in the considerations. I support this principle where the vulnerability of pedestrians, cyclists, horse riders and others are considered part of the mix, and not as a displaced side-effect.” (Individual submitter)

“We note the importance of designing a land transport system for people of all ages and abilities. Vulnerable road users, pedestrians and cyclists should be at the heart planning.” (Upper Hutt City Council)

“It’s so easy when one is surrounded by the bulk of a car to forget that pedestrians and cyclists have nothing to protect them - just flesh and bone, right there. It’s so easy when one is able and fit to forget that all of us are or will be at some stage vulnerable and impaired - needing accommodations to help us get around safely and easily.” (Individual submitter)

Some submitters suggested that improving standards of vehicle safety would help keep road users safer. It was suggested that in classifying vehicle safety, as much attention should be paid to those outside the vehicle as to those inside it. In particular, safety ratings should take into account sight lines and blind spots. Other submitters, however, argued that poorer people would find it harder to buy

safer, more expensive cars and called for more effort to be made to provide communities with safer ways to access work and school.

“There are very real challenges in this area when it comes to safe vehicles. Due to our low average incomes many people cannot afford vehicles that they will survive crashes in.” (Cycling Action Network Share the Road Campaign)

A number of submitters said that the number of vulnerable users will increase over the next decade due to an aging population and the increasing popularity of micromobility devices. They said that more should be done now to prepare for this development.

“We would also support stronger recognition and support for all vulnerable road users and the fact that there is an expectation that there will be more of these types of road users using our transport networks in the future i.e. people walking, cycling, scootering, using various mobility aids or other modes of transport which are not able to provide ‘the wrap around protection’ that a vehicle provides.” (Hamilton City Council)

Some respondents expressed concern about how the principle might be implemented in practice, with many of those who opposed it believing that it would be too focused on reducing speeds rather than making improvements to infrastructure (engineering up).

Some of these submitters, along with some of those who supported the principle, suggested that improved road infrastructure and greater use of safety-related technology in vehicles would be more effective ways to account for human vulnerability. Others wanted to see more emphasis on improving driver skills to reduce the likelihood of crashes.

“Of course it is good to try to reduce impact, but work on training, driving skills.” (Individual submitter)

“The roads in general do not contribute to crashes, bad driving is what causes crashes.” (Individual submitter).

“People are vulnerable at very low speeds indeed (even 40 kph) so slowing the population is not practical nor enforceable. We need to design for better people. Better actions by all drivers will make a safe place regardless of enforcement.” (Individual submitter)

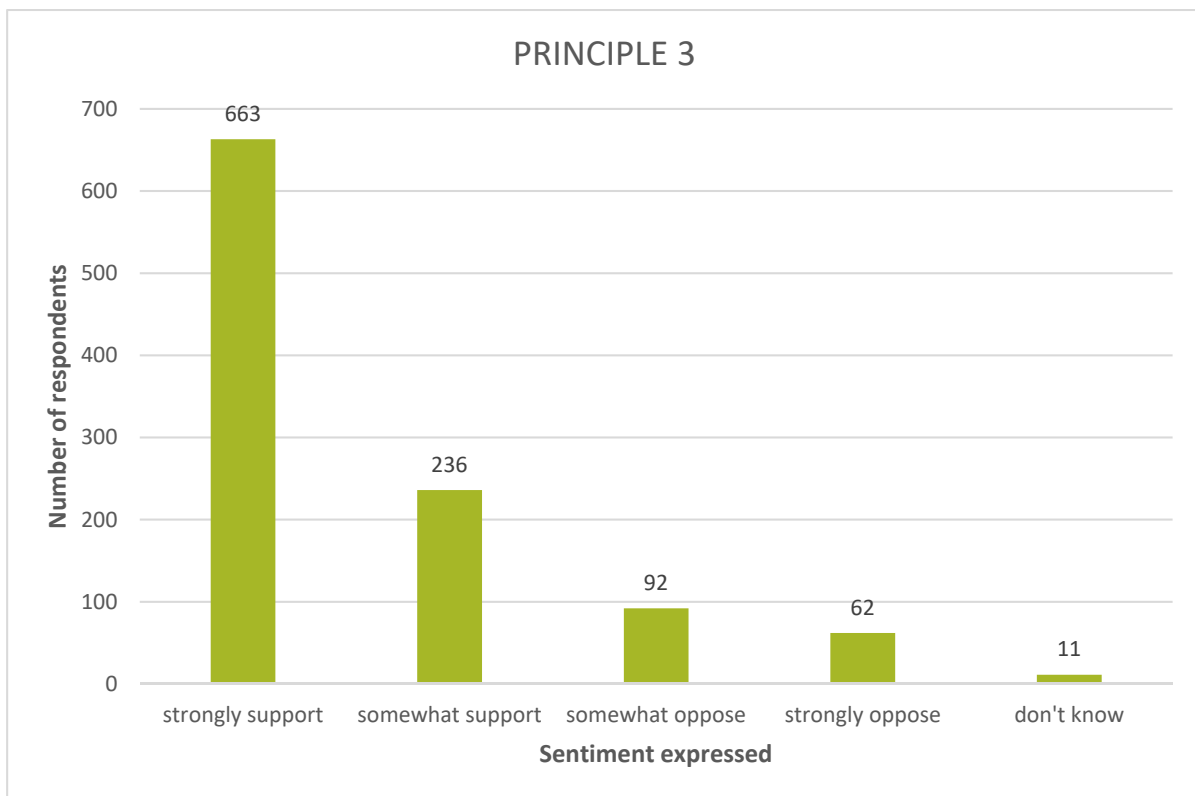
Some submitters also called for more action to reduce the amount of vehicle kilometres travelled by motor vehicles, saying that this would increase safety outcomes.

A small minority of those who opposed the principle were concerned that the Government is attempting to limit people’s choices and assume risk management for individuals.

“People choose their own level of risk.” (Individual submitter)

“Pedestrians need to learn to beware of road users & to keep themselves safe, it’s not the responsibility of the vehicle operator.” (Individual submitter)

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



We received 1,064 submissions on Principle 3. More than 84 percent of respondents somewhat or strongly supported the principle. We received 672 written comments on this principle.

There was support for additional focus on vulnerable users, including disabled people, pedestrians and cyclists. A number of submitters expressed concern about the impact on safety of allowing a range of users, including pedestrians, cyclists and users of e-scooters and mobility scooters, to use footpaths. A number of submitters, including Greater Wellington Regional Council, Christchurch City Council and Auckland Transport, wanted the road safety strategy to acknowledge more explicitly the safety benefits of mode shift (to both public transport and active modes). Some submitters extended this request to call for a reduction in the volume of freight transported on the road network.

Some submitters, including Waikato Regional Council, Taranaki Regional Council and the Transport Special Interest Group, suggested new wording for the principle, amending “road transport system” to, for example, “land transport system” to emphasise the Government’s mode-neutral approach.

A large minority of submitters expressed support for active travel and more attention being paid to the mobility needs of vulnerable users.

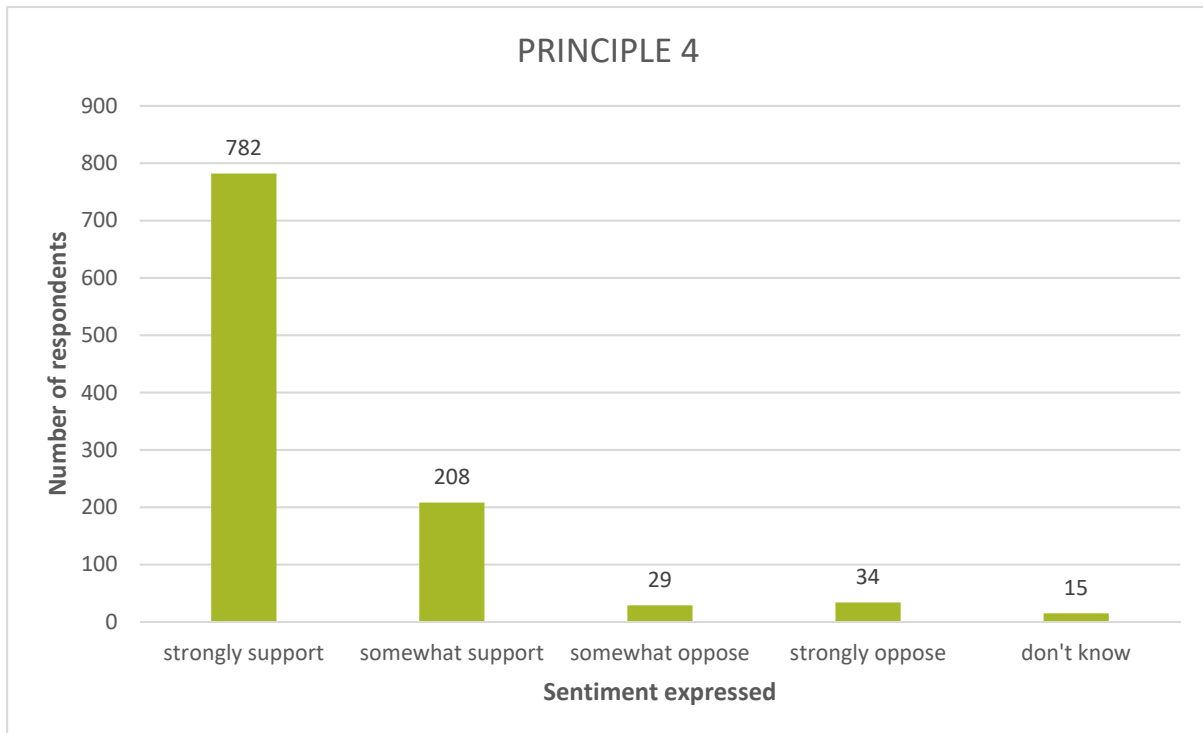
“Seventy years of society investing according to car and truck interested parties has seen gargantuan underinvestment in public transport, bike riding and pedestrians. Elevate the spending on those modes faster and in greater amounts, not equally. Otherwise, you will simply continue to induce demand from drivers to up their VKT [vehicle kilometres travelled]. A step change is required to provide choice.” (Individual submitter)

“Strengthening all parts of the road transport system – to achieve modal shift and equity for pedestrians who have impairments – it is essential to understand and install infrastructure that improves safety and accessibility for all pedestrians.” (The Blind Foundation)

A number of submitters were sceptical of the ability of drivers and vulnerable users to share roads safely, with some arguing that roads are for motor vehicles. There was support for improving road quality and infrastructure interventions such as median barriers and roundabouts but some concern, including from the NZ Automobile Association, that a lack of funding would stymie engineering upgrades. Those who opposed the inclusion of the principle often expressed concern that it would primarily be used to justify reducing speed.

Some submitters said that interventions aimed at improving the safety of users of some modes should not make travel less safe for users of other modes (citing, for example, the risk that installing median barriers will make it harder for drivers of motor vehicles to pass cyclists safely on narrow roads). A number of submitters, often from organisations that represent active and vulnerable road users, called for this concept to be added to the list of principles.

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



We received 1,068 submissions on Principle 4, with more than 90 percent of respondents supporting it. We received 596 written comments on this principle.

Many of those who made a comment said they would like to see an explicit acknowledgment of a hierarchy of responsibility, suggesting that certain users bear more responsibility than others (adults more than children, drivers of bigger vehicles more than those using active modes, for example).

“We support shared responsibility, but feel the strategy should acknowledge that responsibility lies more heavily with some people than others. Road and system designers have more responsibility than a person simply walking along a footpath. Vehicle drivers have more responsibility than vulnerable road users such as pedestrians and cyclists, as they are driving large, heavy vehicles travelling at speed that can cause injury and death. Adults have a higher responsibility than children, who deserve the protection of the system to allow them freedom while they are developing their ability to assess risk and speed.” (Individual submitter)

Others suggested that the strategy should clarify the different responsibilities that those in the road safety system should shoulder: government agencies have a responsibility to provide sufficient funding and leadership; planners and road builders to provide safe infrastructure; and road users to use the transport system safely. A number of submitters, including the Motor Trade Association, International Road Assessment Programme (iRAP) and Northland Regional Council Regional Transport Committee, said that responsibility must be accompanied by accountability.

The principle in *Road to Zero* makes reference to those organisations in the system that “design, build, maintain and regulate roads and vehicles”. Some submitters said that there should also be explicit mention of the role of those who enforce road safety rules.

A number of submitters representing organisations said they would like to see greater partnership working (between central government agencies and local government, and between government and membership organisations, community groups and business) to ensure that a wider range of views are taken into account in the decision-making process.

“Invite the key stakeholders in the community to the leadership table. If road safety is everyone’s responsibility, a wider cross-section of stakeholders should be invited to the system management table.” (The Driving Change Collective)

Local government submitters in particular said they would like to see the role of regions highlighted in the strategy.

“To achieve progress towards the identified national vision, central government agencies must partner seamlessly with local government and critical non-governmental partners to make the changes required.” (Waikato Regional Transport Committee)

“[A] collective approach will significantly improve the strategy’s chances of success. This must be a coordinated approach, involving all key stakeholders, engineering, education, enforcement, community health agencies, government policy and personal responsibility.” (Timaru District Council)

The issue of partnership working was a particular concern for groups representing disabled people, who said that their members’ mobility needs are often overlooked. Some submitters wanted communities to be given more ownership of local road safety issues to ensure public buy-in, suggesting it should be made easier, for example, for individuals and communities to report bad driving or road hazards.

There was some concern, even among supporters, that the principle might enable individual players within the road safety system to shirk responsibility.

“In practice ‘Everyone is responsible’ statements generally result in a situation where ‘no one is responsible’. There is a need for government to step up more at this point and take greater responsibility for creating safer systems for land transport users. ... Communities should not be told to simply ‘take responsibility for’ risky driving behaviours, because they may not have the resources, capacity or knowledge to know how to do so. They will require government support to do this effectively.” (Healthy Future Mobility research team at the University of Auckland)

This fear was echoed by a number of respondents who said that shared responsibility should not mean excusing poor choices by road users. Some also suggested that it may be difficult to convince the public of the benefits of a shared responsibility approach when some road users engage in deliberate risk-taking behaviour.

“While we strongly support this principle, we believe the wording should be stronger, along the lines of ‘We are all accountable for making our roads safer’. We also foresee challenges in how this is sold to the NZ public, particularly where recidivist risky behaviour is involved, such as drink- or drugged-driving. Many tactics have been tried to reach these groups, often with limited success. A new approach is needed. There is another group of road users that considers themselves to be good drivers, able to exceed the speed limit or take some risks because they

believe they know how to handle the vehicle and the roads. Many of these people consider road safety to be another's problem and that they will not cause crashes. Changing this mindset will also be challenging." (Hawke's Bay Regional Transport Committee)

"Shared responsibility should specifically include the need to shift behaviours and attitudes."
(EROAD)

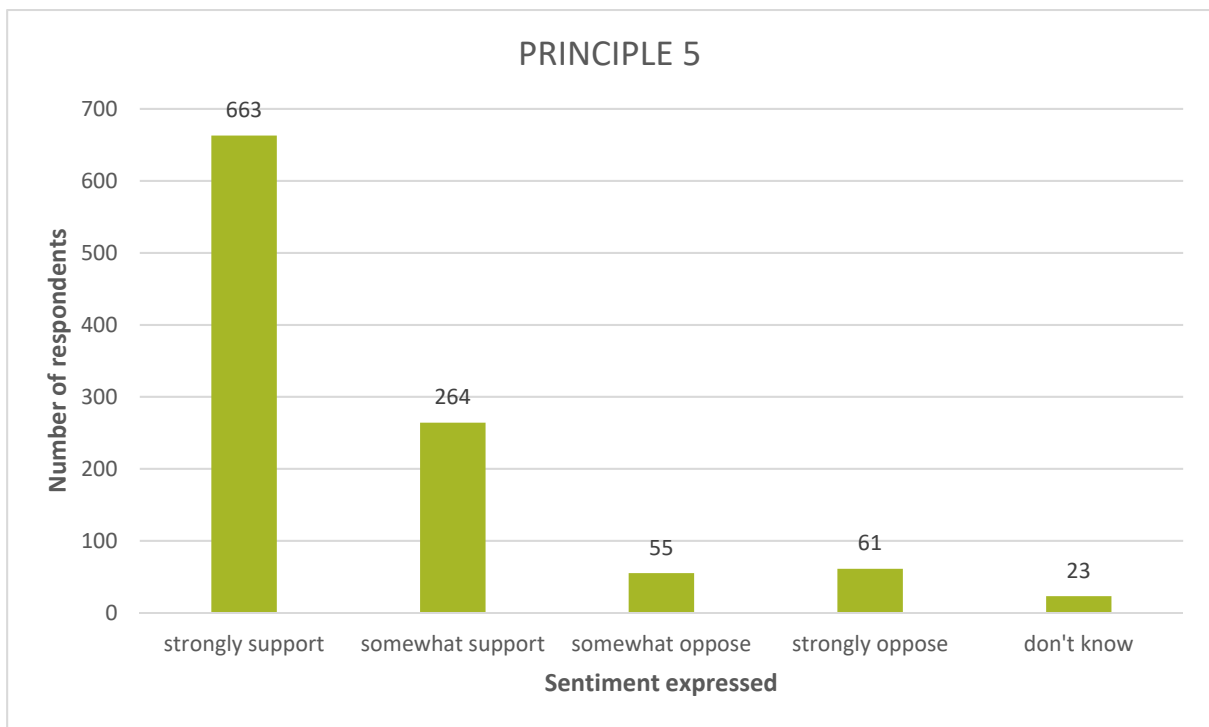
Some of those who opposed or were less supportive of the principle were concerned that it would remove individuals' sense of personal responsibility.

"You need to teach drivers, pedestrians and children to think about what they're doing, and point out the consequences of their actions. People need to be made accountable for their decisions." (Individual submitter)

"Greater personal responsibility will go further and cost less than better infrastructure."
(Individual submitter)

A small number of submitters recommended that New Zealand introduce mandatory insurance, with higher premiums for young and inexperienced drivers using more powerful cars, to reflect the higher risk that they present to the system.

Principle 5: Our actions are grounded in evidence and evaluated



We received 1,066 submissions on Principle 5. A large majority of respondents (86 percent) supported Principle 5. We received 648 written comments on this principle.

Despite overwhelming support, submitters articulated a range of views. There were some, even those who strongly supported the principle, who warned against decision makers using the quest for evidence, particularly New Zealand-specific evidence, as a refuge from taking decisions.

“I support evidence and evaluation, but let’s not delay taking actions that are already proven to reduce risk, such as setting safe speeds, or using tactical approaches in urban areas to improve safety.” (Individual submitter)

Many submitters suggested that New Zealand make use of existing evidence from other jurisdictions. They were not united, however, on the types of interventions they would like to see. Some cited countries with policies that particularly support active modes, while others referenced countries that have focused on constructing highways to support higher motor vehicle speeds.

A minority of individual submitters expressed cynicism about whether the data and evidence would simply be used by decision makers to provide justification for what they regard as preferred policies (particularly relating to speed reductions). Others were concerned politics would see evidence ignored or misused.

“This is critically important and the evidence must override the politics (we would underline that if we could).” (Generation Zero)

There was also some concern that data can hide the truer transport picture, particularly when it comes to the mobility needs of disabled people and other vulnerable users. Grey Power, for example, said that there is an over-reliance on reported incidents, which fail to capture minor incidents and near

misses, which can have a profound effect on perceptions on safety and the willingness of vulnerable users to venture on to the roads. This sentiment was reflected by a number of other submitters.

“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).” (Auckland Transport)

“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.” (Kāpiti Coast District Council)

Organisations were often particularly supportive of Principle 5, calling for more and better data to be made available to policy makers and regulators.

“There is currently insufficient information on which to determine evidence-based policy and regulatory interventions to lower the road toll.” (Vehicle Testing New Zealand)

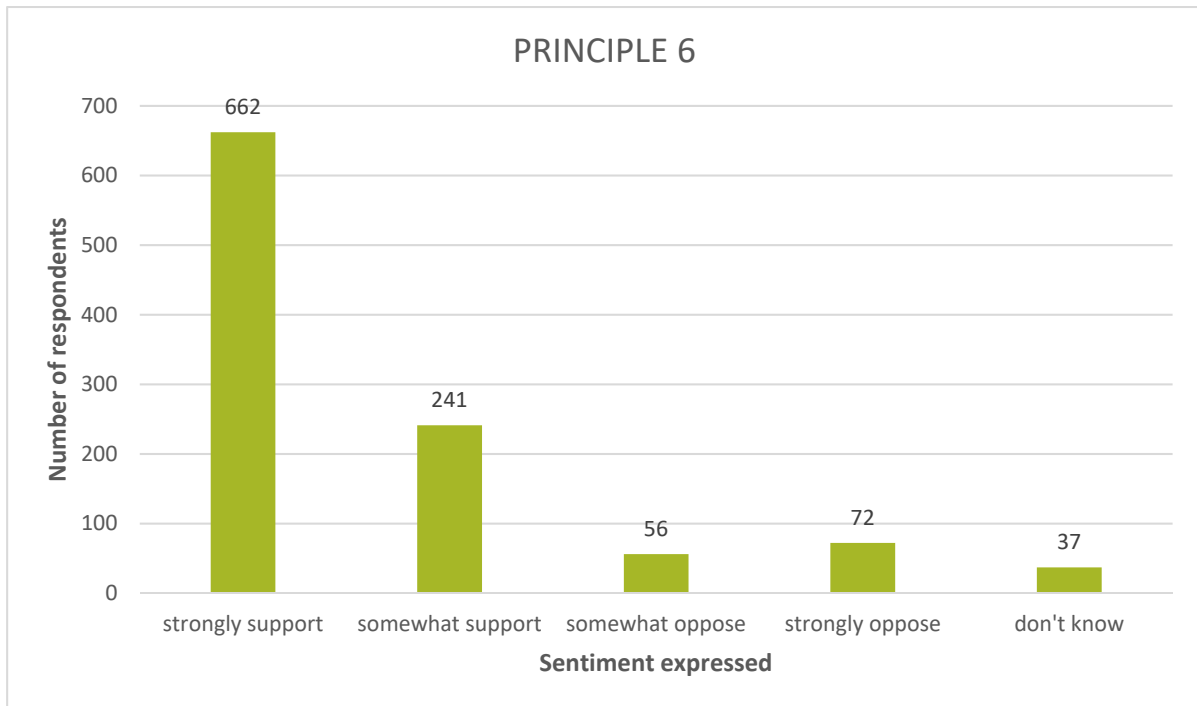
Submitters from local government frequently emphasised the importance of accessing high-quality data, sometimes requesting assistance from central agencies to collate and analyse it and for central government to coordinate the gathering and sharing of data to ensure it is consistent and comparable.

“While Council strongly supports evidence-based decision-making, local authorities (particularly smaller councils) require greater support accessing and utilising quality data. It can be difficult for councils to translate the huge amount of data into meaningful interventions and advice for decision-makers.” (Timaru District Council)

Although supportive of the principle that actions are grounded in evidence, some organisations also discussed the importance of being able to trial innovative safety interventions, even where evidence may be lacking.

“[T]here may be a range of excellent interventions for which there is insufficient data currently to enable inclusion in a completely evidence-driven strategy – even though anecdotally they are seen as adding benefit.” (Waikato Regional Council)

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



We received 1,068 submissions on Principle 6. More than 84 percent of respondents supported it. We received 573 written comments on this principle.

Some submitters wished to see this principle reflected as a higher priority than the others. Many of those who strongly supported it suggested that road safety has for too long been focused on the safety of vehicle occupants, that changing urban design has the potential to encourage mode shift, and that an emphasis on liveable places supports the Government’s focus on wellbeing.

“More liveable places contribute to changes in the ways people choose to travel, often resulting in increased numbers of active/sustainable travel trips/options which has a positive effect on road safety and individual health.” (Dunedin City Council)

A number of submitters, particularly those representing local government and other organisations, highlighted the need to align this principle with planning guidance.

“TRAFINZ has long advocated for this kind of integrated approach between transport and urban planning” (TRAFINZ)

“It would be great to see this principle translated into a Transport Domain Plan priority.” (Individual submitter)

“From our experience some of the requirements [in the NZS4404 code of subdivision] 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.” (Kāpiti Coast District Council)

There was a call from some submitters representing rural communities to ensure that the principle is applied to rural as well as urban environments.

“The text supporting this principle focuses exclusively on infrastructure and the built environment in urban and residential areas. We submit that the same thinking must also be applied to the countless small settlements, peri-urban areas and rural roadsides where the same interactions are occurring albeit on a smaller scale. In rural areas, roadsides are often the only way for people to connect or get from A to B.” (Whakatane District Council)

There was some challenge to the focus on liveability. WSP Opus, for example, said that the strategy implies that capacity increases are out and that place making is the only objective. It argued that the safety performance of many congested corridors is poor and that overload on local streets is reducing safety.

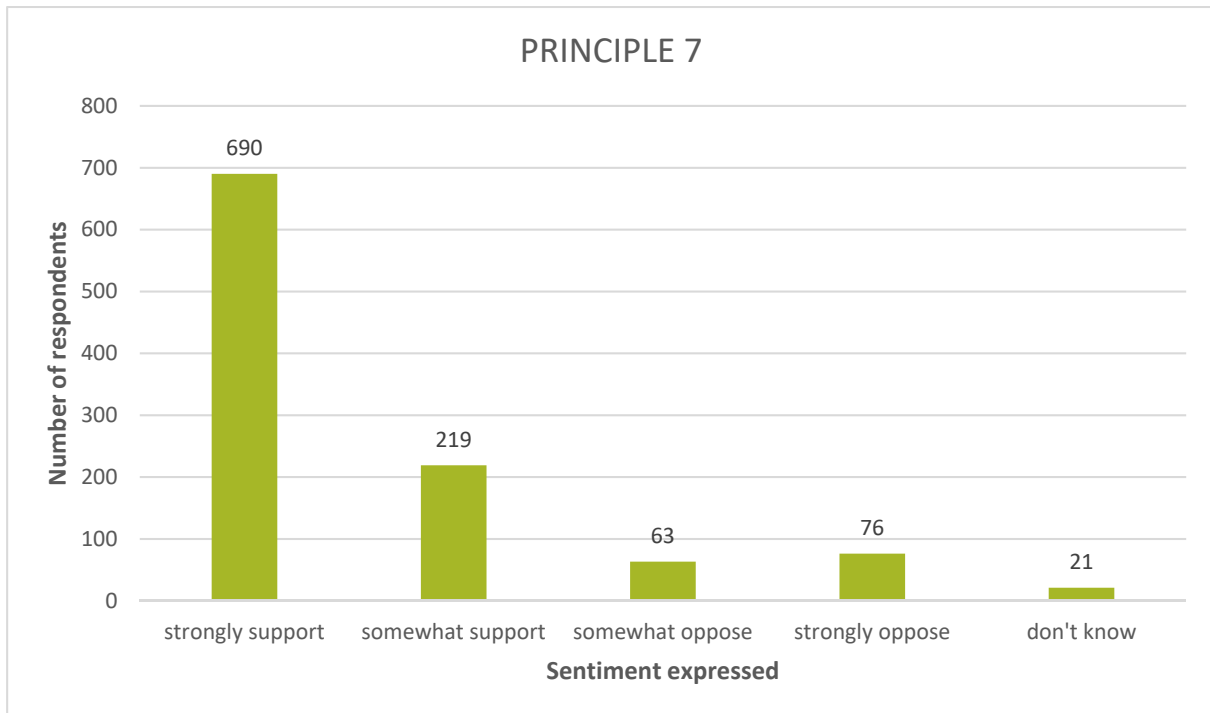
“We believe there needs to be a balance between movement and place with the acceptance that in some cases additional capacity may well improve safety for the wider community.”

Those that opposed the inclusion of the principle were concerned that it was anti-car and unrealistic. A significant minority (predominantly individual submitters) queried the language used to describe the principle. Many of these people argued that the primary purpose of roads is to get people or goods from one place to another, with a number suggesting that children should not be playing on or near roads.

“Roads are for transport. Parks are for recreation. Cafes and malls are for other activities.”
(Individual submitter)

“Roads are used for getting from A to B. Children shouldn't be playing on or near the road. Parents need to be made accountable for caring for their children.” (Individual submitter)

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



We received 1,069 submissions on Principle 7. A large majority (85 percent) of submitters supported this principle. We received 580 written comments, with a number of submitters saying that it should be given the highest priority.

“Yes! This is the only acceptable, ethical response. Efficiency is not that important compared to lives. We accept this in the work place (now - in earlier times people argued for an acceptable workplace death-rate as the cost of doing business). It should also be true in getting to work.” (Individual submitter)

“It should not be permissible to trade off peoples’ lives and wellbeing against travel efficiency or time savings.” (Individual submitter)

There were, however, a range of views among those who supported the principle when it came to the degree to which safety should be prioritised. Some submitters suggested that safety should override other considerations. Others said that safety should be a critical decision-making priority, but that other considerations, including efficiency, were also important.

“This is a commendable principle that everyone wants, and in a perfect world, would be achievable. Our world, unfortunately, is not perfect and we will continue to have constraints in both funding and the ability to construct required improvements immediately ... [I]t will still, however, be necessary to retain some form of cost benefit calculation to determine priority, as you will simply run out of money and other, possibly more serious, safety issues may not be addressed.” (Individual submitter)

“Importantly we agree that this should not come at the exclusion of considerations around cost and efficiency.” (Local Government NZ)

Other submitters, including a number of those submitting on behalf of organisations, wanted other outcomes, including health, wellbeing and environmental outcomes, to be elevated in the decision-making process alongside safety. These submitters said that priorities should be assessed for multiple impacts and co-benefits.

“Safety should be a higher priority in the way decisions are made but we believe that this does not go far enough. Safety, Health and Wellbeing should all be key priorities in the way decisions are made. The importance of sustainability should not be overlooked as a key contributor to those priorities.” (Fleetcoach)

Some discussed the practical implications of the principle, saying that it was important that local communities have a role in setting their own priorities.

“Should road-safety be a priority over improving environmental outcomes, economic advantages, social connectivity, or health benefits? These wellbeings will have different meanings and priorities across different geographic, social and cultural communities?” (Timaru District Council)

A number of submitters, particularly those representing local government, said that the principle would require changes to funding formulae and the Investment Decision-Making Framework, as well as being reflected in the Government Policy Statement on land transport.

Those respondents who opposed the principle were often particularly concerned that it downplays efficiency considerations.

“Safety is not and should not be the be-all and end-all of every decision. The decision to restrict people’s activities has real costs and those costs should be compared against quantifiable safety benefits. The decision to invest in engineering improvements has real costs and those costs should also be compared against quantifiable safety benefits.” (Individual submitter)

Those who were sceptical about the principle often argued that safety and efficiency were equally important. Some said that individual road users should assume more responsibility for keeping themselves and others safe, with a number calling for more focus on reducing the number of mistakes they make on the roads through additional driving training.

“Safety is important. Again, this is a thinly veiled attempt to lower speed limits instead of focusing on bad drivers and holding them to account.” (Individual submitter)

FOCUS AREA 1: INFRASTRUCTURE AND SPEED

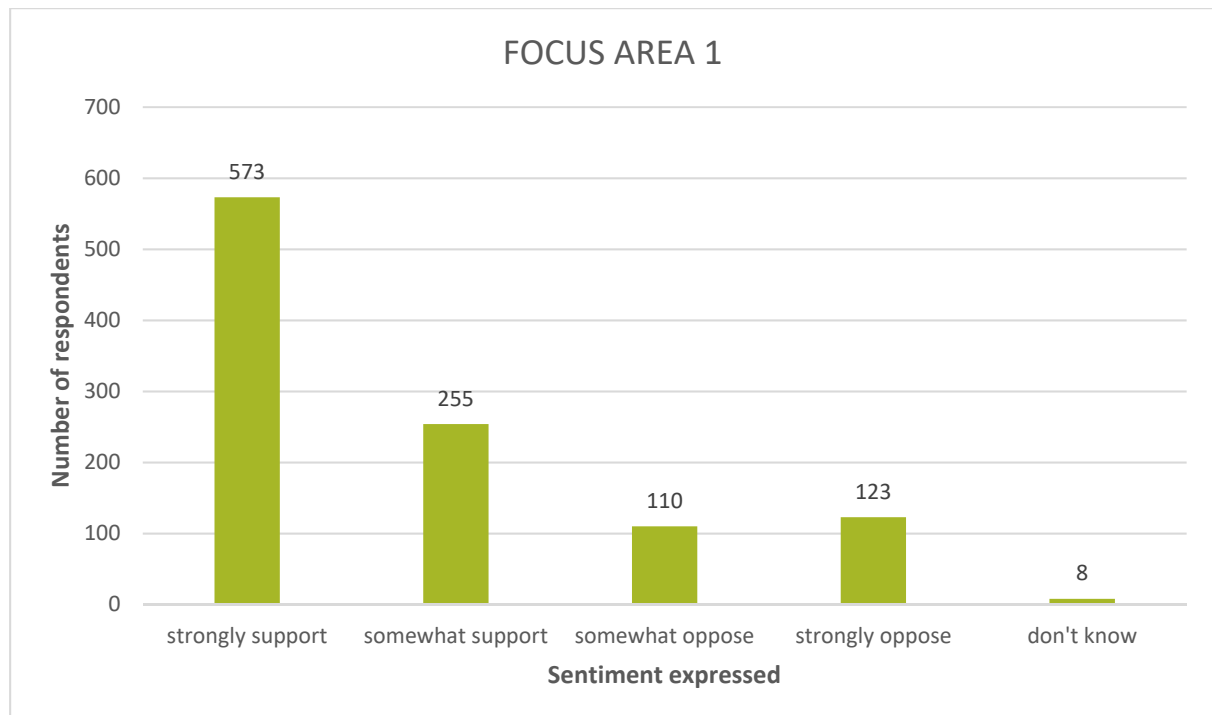
The consultation document proposed five focus areas for the next decade. The first focus area is: infrastructure improvements and speed management.

Submitters were asked:

- To what extent do you support this focus area?
- What was the reason for your rating?
- Do you have any other comments on this focus area?

Response

We received 1,069 submissions on the first focus area. Of these, over 75 percent were broadly in support, around 20 percent were broadly opposed, and less than one percent did not express an opinion. We received 755 comments about this focus area.



Views of those in support

Most organisational submitters expressed support for this focus area, although some (particularly councils) raised concerns about the lack of detail in the consultation document on anticipated funding or investment to support these changes.

The majority of submitters who expressed support were supportive of both infrastructure safety improvements and speed management. However, a key difference between those who expressed partial versus strong support was the degree of support expressed for speed-related changes.

Those strongly in support were more likely to back using speed management as a key tool for both driving substantial reductions in deaths and serious injuries, as well as creating more liveable, and accessible environments. Some submitters expressed a view that reducing speeds is quicker, less costly and more effective in the shorter term than other interventions (e.g. infrastructure improvements) and should therefore be prioritised.

“Infrastructure will cost a lot and take many decades. Speed is a more immediately available tool.” (Individual submitter)

“NZ definitely drives too fast. I made a submission opposing one of Wellington's 30km/h suburban zones, but since its installation I've been marvelling at the reduction in stress and wondering why we tolerate 50km/h urban speeds at all.” (Individual submitter)

A number of individuals and NGOs/community groups also called for this focus area to take into account the needs of disabled and other vulnerable road users, and that infrastructure should be designed with these users in mind.

“[I] use an electric wheelchair to access the shops, the doctor and out for meals and to meet friends. That is every part of my life. I find crossing the road at the lights is terrifying – because there is no enough time to cross, I get stuck, every time. Where I cross at the lights, drivers often toot at me and people shout rudely. I have nearly been run over on a number of occasions. This often happens to friends and some have been run over and had to be in hospital for a long time. The kerbs ... on the footpaths are all different – but none are any good. Some are too steep for my wheelchair, some are too rough, in many places there are no kerb ramps ... once I was nearly run over, I am always frightened. The roads need to be safer for wheelchair users and pedestrians ... so the kerbs and footpaths are safe for everyone.” (Individual submitter)

“The Blind Foundation would like to see more commitment and comment as to how the pedestrian environment will be improved to provide a safe and accessible transport option for those who are blind and have low vision. ... Injuries to pedestrians on the footpaths can be avoided through designing the infrastructure with the most vulnerable being prioritised. Designing safe accessible footpaths for those who have impairments benefits everyone by providing opportunities for everyone to walk safely and encourages participation in this active mode.” (Blind Foundation)

Other submitters were more circumspect in their support. Many of these submitters agreed that there are some areas where speed limits are too high and required review, but cautioned against taking a blanket approach to lowering speeds (especially on main arterial routes).

“SWDC agrees with the focus area but consideration is need for greater investment against benefits and affordability. Speed management does not mean blanket speed reduction. This Council has in the past engineered up to allow speeds to increase to gain efficiency.” (South Wairarapa District Council)

Some submitters considered that the best solution was to improve road conditions and infrastructure to support current speed limits. Others recommended targeting other factors, particularly driver

behaviour, rather than investing the majority of effort on speed management or infrastructure improvements.

A number of submitters also raised implementation concerns – in particular citing the need for speed limits to be appropriately enforced, or emphasising the need to combine speed management with appropriate road design.

“...it doesn’t matter if you put 30km/h on a lollipop sign, no one is going to follow it if you make the road wide ... and make the lights very easy and tempting to speed through”. (Individual submitter)

Of those in support of the speed proposals, many supported lower speed limits. A number of submitters wanted this focus to be in urban areas or around schools.

Views of those who were opposed

The majority of those who were opposed to this focus area and who provided written comments said they supported infrastructure changes (though it was sometimes unclear whether they were indicating support for safety treatments such as median barriers, or road improvements such as widening roads and fixing potholes).

Many submitters expressed strong opposition to speed reductions (particularly on open roads/state highways and rural areas). Some submitters expressed concerns about the potential negative impacts of lower speeds – in particular, a view that lower speeds could increase driver frustration and reckless behaviours, resulting in an increased risk of crashes. Others were opposed because of concerns about time delays. However, very few submitters expressed explicit opposition to lowering speeds around schools (at least at peak times).

“Speed limit reduction in an urban area and city centres is acceptable. However changing the speed limits on any state highway will drastically lengthen travel times.” (Individual submitter)

Many submitters who were strongly opposed to speed-related changes primarily attributed poor road safety outcomes to factors other than speed (e.g. reckless or inadequately trained drivers, and inadequately maintained roads). These submitters thought that the focus should therefore be on addressing driver behaviour, or upgrading road infrastructure (e.g. repairing potholes, fixing road surfaces, building two-lane state highways). They said that speed management should be the last resort. Some submitters called for higher speed limits in some areas, especially if roads were upgraded.

“Cutting speeds is a band-aid for failure in other areas. Well educated drivers drive to the conditions and cut speed as necessary. Concentrate on driver training and on improving country roads rather than just making people drive more slowly.” (Individual submitter)

“Targeting speed limits as the culprit is the lazy way of handling a situation that has taken years to get to this point. Instead of creating safer roads, let’s slow everyone down! This makes an already frustrating experience even worse.” (Individual submitter)

Suggestions for improvement

A number of individuals and organisations suggested separating out infrastructure improvements and speed management as two different focus areas. Some of these submitters, including Timaru District Council and Environment Southland, expressed concerns that speed management could be used to compensate for insufficient infrastructure investment. Waimakariri District Council noted that the safe system approach separates out the four pillars of Speed, Safe Roads and Roadsides, Safe Vehicles and Safe Road Users, and there was a risk that treating them unequally could result in an unbalanced system.

Whakatane District Council recommended rewording the objective of the focus area to *“improve the safety of our transport networks through infrastructure improvements and speed management”*. This is because it considered that that cities and regions should not be separate since both areas need improvements.

FOCUS AREA 2: VEHICLE SAFETY

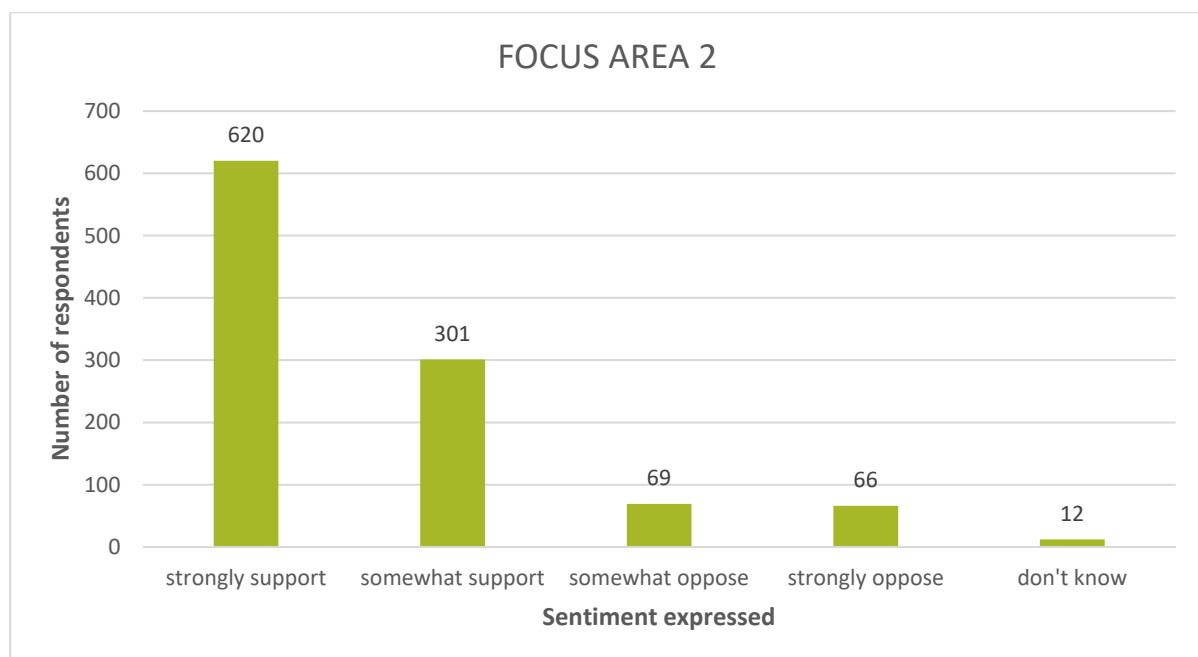
The consultation document proposed five focus areas for the next decade. The second focus area is: vehicle safety.

Submitters were asked:

- To what extent do you support this focus area?
- What was the reason for your rating?
- Do you have any other comments on this focus area?

Response

We received 1,068 submissions on the second focus area. Of these, over 85 percent were broadly in support, over 10 percent were broadly opposed, and around one percent did not express an opinion. Individual submissions represented the majority (86 percent) of the respondents to this question. We received 724 written comments for this focus area.



Views of those in support

Submitters who supported this focus area generally felt that this was an element of the safe system approach that would benefit from increased attention, and one that could be a significant contribution to the intent of the new strategy.

“In terms of the ... the Safe System, we consider the ‘safer vehicles’ pillar is one area that has not had enough focus in New Zealand under the last Safer Journeys strategy. The NZAA believes there is more that can be done to improve the safety of the vehicle fleet, which in turn will help achieve the ambitious target...” (NZ Automobile Association)

The most common theme from those who strongly support this focus area was a desire for more urgent action on vehicle standards. Many submissions noted that a considerable number of the vehicles (not just cars) travelling on New Zealand's roads are relatively old (compared to those in other developed countries) and have poor safety ratings. Submitters said that the supply of cheap used vehicles may enable greater access to a car, but also impacts on the overall safety of the fleet.

Many submitters (including Greater Wellington Regional Council, Canterbury District Health Board and Living Streets Aotearoa) suggested that clear direction and quick action is required to ensure that safer vehicles enter the New Zealand market and/or unsafe vehicles are rapidly removed from the in-service fleet.

Many of those who supported this focus area also suggested additional changes that could be made to the strategy to make this focus area more ambitious. Examples cited included: an opportunity to utilise vehicle technology to support a safe system (e.g. alcohol interlock devices and speed limiters); a need to train drivers to use newer vehicle technologies with greater confidence (as without this the benefits available to avoid crashes or minimise their impact would not be fully utilised); and a desire to see greater action taken against drivers of cars that lack a warrant of fitness or which are poorly maintained.

“The consultation document is silent on the issue of the many unwarranted cars travelling on our roads. This is prevalent in the Hawke’s Bay, with 24% of cars involved in fatal or serious crashes in Hawke’s Bay between March 2016 and March 2019 having no current WOF. The statistics provided by NZTA do not clarify to what extent the car being unwarranted contributed to the crash or to injuries and deaths, but the fact that these vehicles feature so prominently is cause for concern and merits consideration in the strategy.” (Hawke’s Bay Regional Transport Committee)

There were also a number of submitters (including a group representing disabled people and South Island Regional Transport Group Chairs Group) who thought the vehicle safety focus area was car-dominant and could be expanded to take account of other modes, and the broader health and wellbeing impacts of vehicles.

“Please define safety with regard for people outside as well as inside vehicles – given the greater risk posed to pedestrians, cyclists, motorcyclists and mobility users, vehicle designs should prioritise features such as mandatory underrun protection and better black spot visibility designs for trucks, pedestrian impact crumple zones for cars, etc. Please also include safety factors such as pollution, noise, and greenhouse gas emissions, which have a cumulative and long-term deleterious effect on public health and wellbeing.” (Individual submitter)

Submitters also noted that safety features and safer vehicle purchases could also apply to public transport suppliers and to owners and operators of large and small passenger service vehicles.

Many submitters were concerned about the potential financial impacts on consumers from increasing the safety of the vehicle fleet. These submitters often cited the lack of alternative transport options for some people and the potential equity impacts that any increase in vehicle prices would have. Some discussed the lack of public transport options in their area, some mentioned that they do not feel safe using active modes, and others noted that cars are often the most time-efficient option.

“This could have unintended consequences and a disproportionate well-being effect on our community given our deprivation levels are third only to Northland and the East Coast, the effect of a policy change such as this will cause further deprivation in our district. There are already many who cannot afford a vehicle, let alone a newer, safer vehicle. Many of our road environments – particularly the state highways – do not support safe active travel, and such a policy change may only serve to displace risk. Given our community is underserved by public transport or safe active travel connections, people have no viable transport alternative other than private vehicle. Further work is required to understand the socio-economic/wellbeing implications of further reducing the transport options available to our community who are already transport disadvantaged compared to many other parts of the country. Not only do they have fewer options available to them, but their roads are inherently more dangerous.” (Horowhenua District Council)

“While we support improvements to the vehicle fleet we believe our most vulnerable families and whānau frequently have less ability to make safer choices. Safety often comes at a cost that many cannot afford. We don’t want changes to vehicle safety requirements to disadvantage our most vulnerable people.” (Royal New Zealand Plunket Trust)

Many submitters (including Hastings District Council, Canterbury District Health Board and Dunedin City Council) suggested that the Government subsidise vehicles with more safety features or provide other incentives (such as a buy-back scheme) to remove older vehicles from the fleet. Submitters noted such schemes would provide both an incentive to invest in safer vehicles and help mitigate inequity concerns.

Child restraints were also mentioned by a small number of submitters, with reference to access to child restraints and enforcement of child restraint use.

“Additionally, consideration needs to be given not only to the vehicle itself but to child restraints within the vehicle. More work is needed to ensure that all children have access to appropriate seating in all vehicles. We recommend including child restraints as part of this focus area to improve vehicle safety.” (Royal New Zealand Plunket Trust)

Views of those who were opposed

The strongest theme from those who opposed this focus area was concern about costs and impacts on consumers.

“This will increase vehicle costs, and make it hard for people struggling financially to afford a car. If it means older vehicles get penalised financially for not being modern enough then that is not fair.” (Individual submitter)

Other common themes centred around potential unintended consequences of increased reliance on vehicle safety technology. In particular, submitters expressed concern that safer (and therefore more automated) cars could lead to an increased number of crashes due to drivers not needing to pay as much attention.

“Safer vehicles don't "help drivers avoid crashes"! The driver is the only one controlling the vehicle! Teach the driver!” (Individual submitter)

Other submitters considered that the safety of the vehicle fleet will improve naturally as technology advances, and therefore intervention by the Government is not warranted.

“The safety performance of our vehicle fleet is improving without anyone doing anything, as older cars are scrapped. The cars that have poor safety are driven and owned by the poorer sections of society. Do you wish to make their lives even tougher, financially? Eventually, many of such journeys might be made by self-driving cars that are used on-demand, rather than owned. That will also help.” (Individual submitter)

Additional comments

Other suggestions related to this focus area included a call for more public education on vehicle safety so that members of the public have a clear understanding of the safety of the vehicles they drive or intend to purchase. Other submitters sought greater clarification as to whether this focus area is intended to read as ‘scrap all older cars’.

FOCUS AREA 3: WORK-RELATED ROAD SAFETY

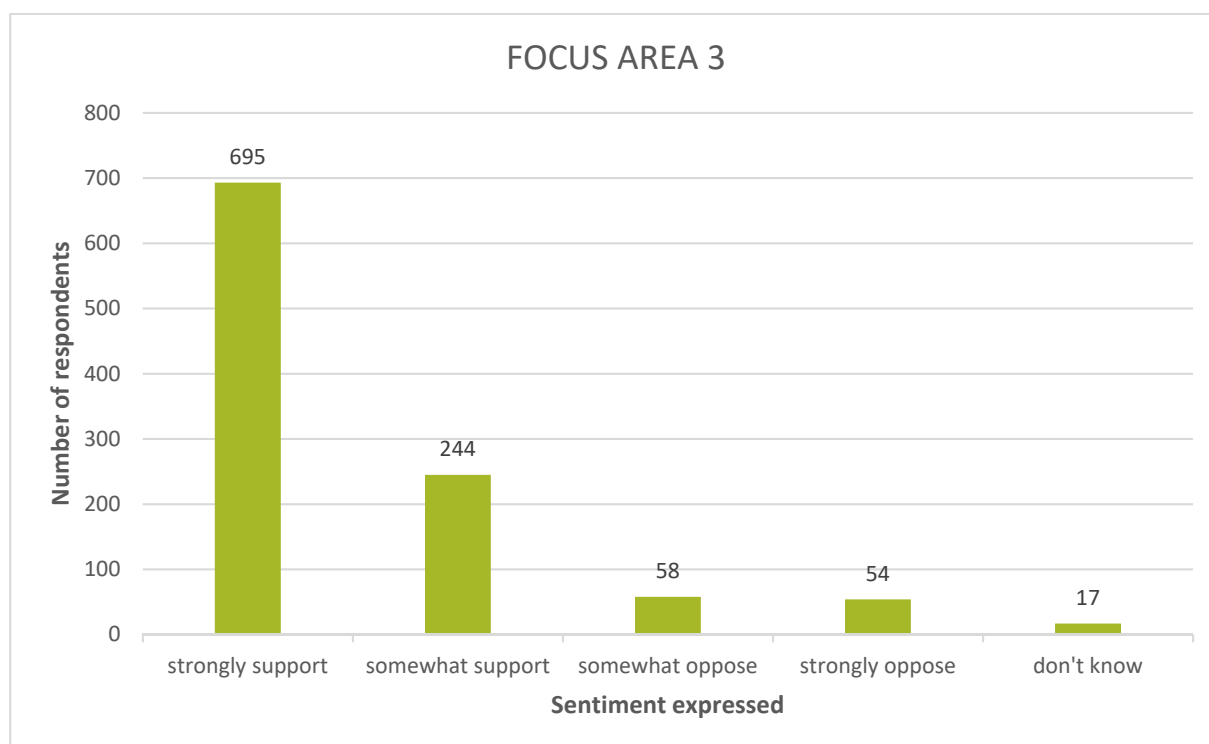
The consultation document proposed five focus areas for the next decade. The third focus area is: work-related road safety.

Submitters were asked:

- To what extent do you support this focus area?
- What was the reason for your rating?
- Do you have any other comments on this focus area?

Response

We received 1,068 submissions on the third focus area. Of these, nearly 90 percent were broadly in support and around 10 percent were broadly opposed. Just over one percent did not express an opinion. We received 606 written comments on this focus area.



Views of those in support

Organisational submitters (including local government, district health boards, NGOs and community groups) were overwhelmingly in support of this focus area. For example, Greater Wellington Regional Council, Upper Hutt City Council and Masterton District Council all noted:

"[We support] the work-related road safety focus, particularly the important role central and local government can play in improving road safety outcomes for their employees. We support central government's development of a package of initiatives to ensure that organisations are aware of work related road safety risk."

Those who made comments on this focus area generally considered that supporting work-related road safety is critical, and that consideration of road safety risks needs to be elevated among organisations and businesses (building on the requirements of the Health and Safety at Work Act). Some submitters highlighted the significant role that businesses, and local and central government, could play in improving the safety and sustainability of the overall vehicle fleet.

“HCC particularly supports the need to address the whole supply chain – this is a real systemic fix. When businesses (including local government) take on responsibility in this area, it could change the face of the transport and freight industry, attract people to that industry, and reduce many of the negative aspects which currently fall on them.” (Hamilton City Council)

Dunedin City Council suggested that businesses should be encouraged and incentivised to replace unsafe vehicles with safer and more sustainable vehicles including bikes and e-bikes. A number of businesses noted that they were already focussing on road safety as a key part of their business plans and recognised its importance in the context of their staff’s health and safety at work.

A number of individual submitters stressed that a greater focus on road safety in the workplace should not come at the cost of discouraging staff from travel modes perceived as “unsafe”, such as cycling or walking to work. Others noted that there is an opportunity for employers to encourage mode shift or commuting via different modes, particularly in cities and town centres.

Some organisations and community groups (including Royal NZ Plunket Trust, Got Drive Community Trust and Gear Up) thought that this focus area could include greater incentives (tax breaks, other encouragement) for employers to train workers to become safer drivers, both in class one and heavy vehicles.

Many submitters (including both individuals and organisations) also raised significant concerns about fatigue and long driving hours for commercial drivers (sometimes driven by pressures from employers to perform to tight targets or unreasonable timeframes). This issue was particularly highlighted with respect to heavy vehicles/the trucking industry, although a few submitters also noted that employees in other industries (e.g. healthcare) also faced similar risks travelling to and from work while fatigued from shift work.

Many submitters who raised these concerns considered that employers should have a greater duty to ensure that their staff have adequate rest breaks and take steps to manage stress and fatigue. They indicated support for strengthening regulation of commercial transport as an immediate action. A number of submitters also suggested that there are untapped opportunities to move freight onto rail.

“There is a least a 30% shortage in the number of commercial drivers available to the transport sector in New Zealand currently. This is leading to poor corporate decision-making around work scheduling, fatigue and overlooking known risks to driver safety, and specifically, the risks posed by OSA; where we know from our own testing of thousands of commercial drivers in large transport companies across New Zealand that 31% of those drivers suffer from moderate to severe OSA and are likely to have microsleeps whilst driving.” (Fit for Duty Ltd)

A few submitters considered that action in this area should be followed up with sufficient enforcement and clear legal responsibilities

“At the moment we take [health and safety] really seriously because it has real liability consequences, but on road safety there are no consequences for the ‘system owners’.”
(TRAFFINZ)

Views of those who were opposed

The most common concern raised by submitters was the potential adverse impact and additional costs on businesses, who were already subject to substantial health and safety requirements and had limited control over their employees’ actions outside of the workplace. Another common concern was potential duplication of roles within central Government and overregulation (in particular a potential overlap with the Health and Safety at Work Act).

“I do not support duplication of roles across multiple government departments. I believe WorkSafe to be best placed to deal with this, and that it readily sits within their mandate. I do not see it useful to dilute their role or create confusion for workplaces or organisations by this becoming a focus of another department.” (Individual submitter)

Many submitters who were opposed to this area thought that responsibility for road safety should not be borne by employers but by the individual themselves (or by Government).

Suggestions for improvement

Timaru District Council considered that the road safety strategy should recognise that work-related driving extends far beyond freight and passenger services, and should therefore encompass a number of other industries. In particular, they noted:

“... a huge number of employees are driving as a requirement of their jobs if not necessarily as the sole purpose of their job. It is essential that industries such as the trades, agricultural services such as shearing and animal health, forestry, sales, and emergency services, are included in programmes addressing work-related road safety. Commercial activities using light vehicles should be subject to similar requirements for heavy transport drivers. Work place driving attitudes need to change particularly with experienced commercial drivers and a safety culture needs to be embedded in organisations to enable the change.”

The Road Transport Forum expressed some concerns about the immediate actions proposed in this area around commercial regulation: *“...what is suggested lacks detail and fails to recognise how the supply chain operates. We are concerned the industry will be held accountable for the lack of accountability in parts of the supply chain that are beyond the operators’ scope of influence.”* It also suggested that *“the provision of the chain of responsibility must be updated to bring the supply chain into some order of capability for drivers’ rest and work time compliance.”*

FOCUS AREA 4: ROAD USER CHOICES

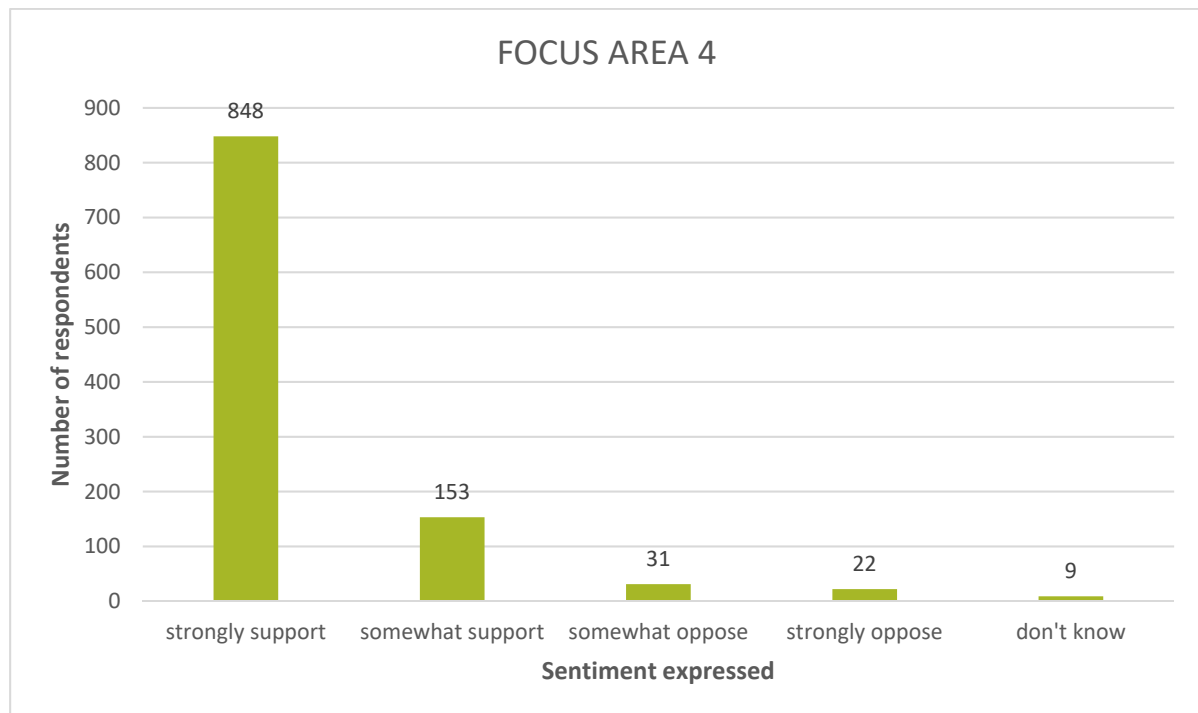
The consultation document proposed five focus areas for the next decade. The fourth focus area is: road user choices.

Submitters were asked:

- To what extent do you support this focus area?
- What was the reason for your rating?
- Do you have any other comments on this focus area?

Response

We received 1,063 submissions on the fourth focus area. Of these, almost 95 percent were broadly in support, five percent were broadly opposed, and less than one percent did not express an opinion. We received 684 written comments on this focus area.



Views of those in support

This focus area elicited strong views, with many submitters recommending prioritising it over other focus areas.

“We believe this should be the number 1 focus area. The wording should also be reconsidered to hold more weight and emphasis of what exactly will be focused on. As mentioned earlier, a complete overhaul of the driver training and licencing framework, supported with significant investment is needed to reduce the occurrence of mistakes and risk taking. The first focus should be on root causes, and behaviour change should be a high priority. We support a greater emphasis on enforcement and stronger penalties to discourage unsafe driving

behaviour, but this also needs to be coupled with education and behaviour improvements. As noted earlier, this focus area needs more emphasis in the principles underpinning the strategy.” (Whakatane District Council)

Those who broadly supported this focus area focussed their comments largely on two matters: (1) driver education, training, licensing and driver culture, and (2) enforcement and penalties.

“...The strategy’s statement that “even if everyone obeyed the road rules all the time, it would only reduce road deaths by 50%”, shows just how many lives could be saved by focusing on ensuring better compliance from drivers. The NZAA suggests that as part of the Road to Zero strategy, there needs to be education to inform the public why it focusses on the other pillars of the safe system – and why not investing in skill and behaviour will deliver better value for money in terms of meeting the strategy target. While the NZAA strongly supports this focus area and the immediate actions that it proposes, we believe there is the need to do significantly more in this space.” (NZ Automobile Association)

“Our Support Workers see many lives devastated by the errors of other road users’ choices – the choice to not wear a seatbelt, to consume alcohol and/or drugs, to be distracted, to speed, to drive illegally such outside the limits of a restricted licence or while disqualified. These victims, and/or their families, are forced to live with the fact that the offender made a choice that changed their lives in an instant. Deaths and injuries from these crashes are not accidents, and our experience is that crashes where there is an element of human volition are particularly difficult for those impacted. Victim Support strongly encourages greater emphasis on improving road user choices, including policy, penalties, education and enforcement relating to speed, seatbelt use, use of phones, alcohol and drugs, and licensing.” (Victim Support)

Driver education, training, licensing and driver culture

Driver education, training, licensing and driver culture was also a strong theme. Many submitters used these terms interchangeably, while others used one or more as umbrella terms. For some, one or more of these terms was used to refer to advanced driver training for those already holding a driver licence. For others, the term was focussed on the process to obtain a licence (through each stage of the licensing process). Sometimes submitters referred to driver education more broadly – including media campaigns, school-based learning, or other mechanisms for maintaining lifelong driver skills and training.

Common views from submitters who provided comments on driver education, training, licensing and driver culture included:

- Drivers should be a focus in the road safety strategy – there is a missed opportunity to focus on drivers, and compliance by drivers is an issue in New Zealand.
- There is a lack of “driver respect” in New Zealand (with submitters using words such as “arrogant”, “impatient” and “hoon” to illustrate their point). Submitters considered that driving is regarded as “a right rather than a privilege”, and that there is a lack of respect shown by drivers for other road users.
- Education around “the basics” is needed (particularly around staying left, indicating and giving way).

- Everyone should have access to formal driver training and to licensing facilities, no matter where they live or their income level. Some submitters suggested subsidised driver training be provided where there are income barriers.
- The driver licensing system needs reviewing, with some submitters expressing concerns around the rigour of the test, some suggesting that formal driving education should be compulsory, and others seeking re-testing of all drivers at regular intervals (e.g. every five years).
- Drivers need exposure and experience to new safety features in vehicles in order for those features to be effective.

“There is rarely any graciousness on the road...try to instil through education to care for the other road user.” (Individual submitter)

“Most crashes still involve some form of driver error, and all road users still have a responsibility for their own and others’ safety. An effective licensing and training system is vital. Raising awareness through education and advertising is important, and effective enforcement is essential to take risky drivers off our roads and to deter others from taking risks. Brake feels driver licensing and training isn’t referenced enough in this section. We know this is an area many people feel is important and needs some improvement. We believe some work in this space may be happening separately to this strategy? If that’s the case it would still be beneficial to reference that work here, so people have an understanding that licensing and training is also a key part of the road safety programme. Brake supports prioritising roads policing, reviewing penalties, enhanced drug testing and improved motorcycle safety.” (Brake)

Enforcement and penalties

The other key focus of comments related to enforcement and penalties. Those that provided views on enforcement and penalties tended to comment on them in tandem. Common views included:

- Police presence and enforcement on the roads is a key component of a safe transport system. Submitters called for dedicated road policing, increased Police presence across the network and increased enforcement of the road code (including more minor offences). People also raised concerns around the levels of enforcement around impaired driving and cell phone use.
- A review of penalties is needed, with many submitters calling for a substantive increase in penalties for cell phone use. Some submitters recommended a higher fine, or demerit points, to deter cell phone use while driving.
- Greater incentives are needed to encourage compliance with road rules (including driving at a safe speed, not crossing the centre line, not speeding through road works, and wearing a seat belt).
- New technologies could be used more to support enforcement (including point-to-point safety cameras, red light cameras and cell phone cameras). Submitters also called for additional cameras across the network
- Slow drivers are as hazardous as fast ones, and more should be done to deter drivers from driving too slowly.

“We support increasing road policing and reviewing penalties for driving offences. We’d like to see higher demerit point penalties for known widespread / harmful offences such as distracted driving using phones. This particular offence would also need improved methods of

detection for penalties to be effective. Dangerous drivers are often allowed to continue driving because they 'need' to be able to drive. We would like to see tougher penalties and sentencing guidelines that recognise driving is a privilege, not a right.” (Cycle Wellington)

... Way more enforcement is required to actually incentivise driving to the speed limit, safe following distance, etc. That is, bigger fines and more demerit points. More speed cameras and police are needed. Look at what Australia does.” (Individual submitter)

Other comments

Some submitters expressed concern about the lack of driver testing before individuals are allowed to drive on New Zealand roads, and a lack of knowledge and education about New Zealand’s road rules.

There were also some calls for compulsory third party insurance to be required in New Zealand.

Other submitters also considered that there was a need for greater funding for locally-led partnership approaches to deliver driver training and education. Auckland Transport noted that whānau, hapū, iwi and hapori Māori play an important role in leading and delivering transport safety programmes to their communities (including those related to licensing and speed management) and recommended that this be emphasised in the strategy.

Some submitters also expressed concerns about the interface between road safety outcomes and the Government’s intent to consider decriminalising cannabis.

Views of those who were opposed

The small proportion of submitters that did not support this focus area considered that the focus previously on this area had not delivered the desired result, and that the focus should be on fixing or improving road infrastructure rather than on drivers. Others did not support the focus area as drafted as they considered that it neglected driver education.

Additional comments

We also received the following suggestions (not covered above):

- Language around “dangerous behaviour” in the strategy may cause people to “conclude that most road harms are caused by a small subset of road users, and disregard the call for more general cultural shift” (EROAD).
- This focus area should be emphasised more in the principles underpinning the strategy.
- The strategy should include more information about how technology will be utilised to support this focus area (including alcohol interlock devices, in-car fatigue/behaviour monitoring, and speed limiters).

FOCUS AREA 5: SYSTEM MANAGEMENT

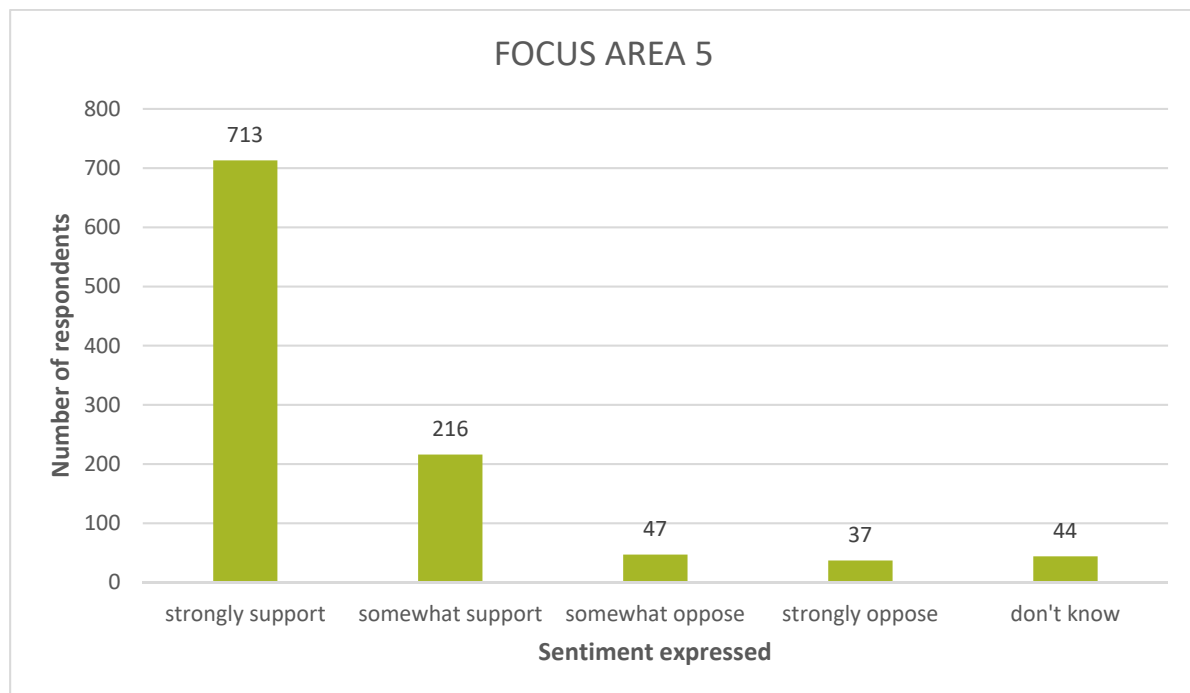
The consultation document proposed five focus areas for the next decade. The fifth focus area is: system management.

Submitters were asked:

- To what extent do you support this focus area?
- What was the reason for your rating?
- Do you have any other comments on this focus area?

Response

We received 1,057 submissions on the fifth focus area. Of these, more than 87 percent were broadly in support, almost eight percent were broadly opposed, and four percent did not express an opinion. We received 533 written comments on this focus area.



A number of submitters (predominantly individuals) who commented on this question discussed international best practice in relation to road infrastructure, enforcement and standards of driving, rather than international best practice in relation to the management of the road safety system. Of these, a small number questioned whether New Zealand could afford to implement the highest international standards of infrastructure.

There was a fairly equal split between those individual submitters who suggested that New Zealand should take and apply best practice overseas, and those who argued that New Zealand is unique (in terms of geography, population density and management systems, among other things) and should develop its own approach to road safety.

“We don't need international best practice. We need to understand that NZ is unique.”
(Individual submitter)

“It is clear that New Zealand hasn't learnt from overseas in regard to roads - we shouldn't be reinventing the wheel.” (Individual submitter)

Views of those in support

Many individual submitters supported strengthening the way that the road safety system is managed at all levels.

“Absolutely. The ‘accident’ that led to my brother being killed by a truck was the result of multiple failures in road design, errant road markings, flawed cycle safety mantra, an absence of safety technology and just plain carelessness.” (Individual submitter)

Submitters representing local government, along with many sector organisations and NGOs, were overwhelmingly supportive of the focus area, saying that strong leadership from central government, effective coordination between agencies and between central government agencies and the regions, and robust accountability mechanisms were essential for a good road safety system.

A number of submitters argued that system management failings had limited the impact of the *Safer Journeys* strategy and urged a stronger focus on the way that the new strategy is implemented.

Key themes and suggestions from submissions made on behalf of organisations are outlined below.

Leadership and coordination

This was broad agreement that strong leadership is critical to success, including in ensuring that elements of the system work together more effectively. Some submitters said that while the concept of government agencies working together is not new, what will be important is applying the approach successfully in practice. Some submitters, including the Motor Industry Association, recommended the Ministry of Transport plays a stronger coordination role through the National Road Safety Committee to ensure a collective approach to road safety.

A number of local government submitters called for strong and informed leadership from central government, with leaders who make the case for change and are committed to bringing communities along with them.

“Leadership is more than setting a strong strategy. It is about ongoing support and a role that front[s] publically.” (Christchurch City Council).

Transportation Group NZ said it was concerned that there did not seem to be a central voice on road safety, with media communications coming from a variety of sources, including the Police, the New Zealand Transport Agency (NZTA) and independent commentators. It suggested the Government give the Ministry of Transport the role of providing pro-active and consistent messages regarding road safety initiatives and responses to safety-related issues.

Timaru District Council recommended the establishment of a road safety agency to drive the principles and focus areas of the new strategy and to ensure national consistency.

Some submitters had specific suggestions for strengthening the operation of the National Road Safety Committee (NRSC). These included:

- that the Committee's minutes be released publically
- that road safety-related key performance indicators be included for Chief Executives represented on the Committee
- that the Committee be given a function similar to the Parliamentary Commission for the Environment to ensure it has more political support and involvement
- calls for Committee membership to be widened (with suggestions including representation of Fire and Emergency New Zealand, the disability sector, an urban road safety representative, a Māori representative and the involvement or representation of a victim of road safety trauma).

A number of local government submitters said they would like to see local government representation on the Road Safety Partnership, which currently brings together representatives from the Ministry of Transport, NZTA and NZ Police.

Although there was a call for stronger central leadership on road safety, a number of submitters advocated ensuring that communities are encouraged to develop local solutions. Some submitters wanted greater acknowledgement of the role of Regional Transport Committees in the system (including in speed management).

Local government submitters often talked about the importance of a joined-up approach to road safety, calling for a strengthening of coordination mechanisms and for assistance with capacity building at the local level. Local Government NZ suggested that funding be made available to facilitate engagement with all territorial local authorities in New Zealand within the first year, as a way of ensuring that communities buy into the strategy and explore innovative implementation initiatives. A number of advocacy groups called for community groups and businesses to be given a greater role in road safety decision making processes.

Engagement

A number of submitters called for a stronger communication strategy to support the new strategy and to expand ownership of road safety issues.

"Without public buy-in, how are any of the goals achievable?" (Waitaki District Council)

"Road to Zero assumes a step change in attitudes without explaining how community buy in will be achieved." (Canterbury Regional Transport Committee)

"A shortcoming of the Safer Journeys Strategy was its failure to engage both industry stakeholders and the public on the safe system approach. This public dialogue is needed at a local level, engaging directly with communities in their own backyard and within their communities, to increase a sense of ownership and commitment to achieving the Road to Zero vision." (Waimakariri District Council)

A number of submitters said it would be vital to try and change attitudes towards road safety (as well as target road user behaviour *per se*). *"Without a significant shift in the public's social perspectives*

and individual sensitivities toward road trauma, any change may only be marginal.” (Road Transport Forum).

Some submitters called for the Government work in greater partnership with non-governmental organisations to leverage their membership networks. Brake, which took part in the reference group process that helped shape the development of *Road to Zero*, said that it would value a continuation of that dialogue to support the strategy and action plan.

“Many of the stakeholders involved in those groups are able to engage with specific sectors, or the public more generally, and assist with communicating the strategy, actions, and importance of the measures to be implemented. However, for many of us resources are stretched, and we all need to be supported through effective leadership and support at Government level, and access to data/evidence to help us effectively communicate with communities.” (Brake)

Some submitters, including Waikato Regional Transport Committee and Auckland Transport, said Māori engagement would be critical to improve the poor safety outcomes that affect Māori disproportionately.

Funding

Many local government submitters raised concerns about the funding of the new strategy.

“[Our] resources are severely limited in terms of implementing (Road to Zero’s) safety objectives. As a Territorial Local Authority, it is crucial to have a clear indication from the Government on funding in order to implement the strategy locally.” (Queenstown Lakes District Council)

“To address previous and current gaps the Road to Zero Strategy needs to make sure that funding is readily available when it is needed, and decision making is timely. Changes to funding levels and processes will be required to ensure that there is enough to cover planned safety work. There is also a need to ensure that the safety priority is supported in practice through funding processes (BCR, trading off safety benefits etc.).” (Hamilton City Council)

“It is important to note that many of the rural regions such as Northland have a very limited funding base for the local share requirements and are therefore limited in what they can deliver.” (Northland Transportation Alliance)

One submitter suggested that ACC help to address funding shortfalls, given that financing infrastructure (such as median barriers) is predicted to reduce the number of deaths and serious injuries on the roads.

The Combined Otago Southland Regional Transport Committees recommended that NZTA give greater weight to prioritisation of safety within Regional Land Transport Plans when making decisions under the Investment Decision-Making Framework. It said that this would ensure that critical regional infrastructure and service projects are supported, including critical safety projects. Other submitters said that a well-maintained (and funded) transport network provides the best way to improve road safety.

“Let’s not lose sight of the basics i.e. improve seal widths and fixing defects like pot holes, edge break and improving signage/delineation etc.” (Selwyn District Council).

TRAFINZ said it had long advocated for the inclusion of a specific road safety engineering activity class in the National Land Transport Programme to avoid trade-off of safety for other objectives and to drive behaviour within the NZTA. It also recommended that the Funding Assistance Rate be raised to 75 percent for safety programmes, both to send a clear message about the importance to safety and to incentivise investment by road controlling authorities. Other local government submitters, including Timaru District Council, advocated adopting new funding models to provide investment incentives to road controlling authorities based on their achievement of road safety targets.

Data and evidence

A number of the comments made by submitters in this area mirrored comments made in relation to Principle 5 (*Our actions are grounded in evidence and evaluated*). These include general support for an evidence-based approach to road safety, a call for more and higher-quality data to be collected and published, and a request for more assistance with data analysis.

“VIA recommends significant resources be dedicated to improving data, data collection, and data storage. The ability to build and utilise a system-based approach will be dependent upon how well this is done.” (Imported Motor Vehicle Industry Association)

Some submitters, including Waimakariri District Council and Selwyn District Council, called for more data to be collected on minor and near-miss crashes to provide evidence for where a safety issue may exist. Living Streets Aotearoa also requested more investigations into crashes, particularly those involving trucks and heavy vehicles.

“Road crashes are currently investigated re prosecution, blame or cause by bodies designed to pursue those aspects. They are not investigated to learn the wider lessons, as rail, maritime and air crashes are.” (Living Streets Aotearoa)

Auckland Transport recommended ongoing comparison of injury and fatality data in order to provide a comprehensive picture of the issue across agencies, including the Police, hospitals and ACC. It, along with the NZ Automobile Association, also called for the Ministry of Transport to revive its national measure of attitudes to road safety rules and enforcement and to measure intermediate outcomes such as seatbelt wearing to assist road controlling authorities with tracking safe behaviours year on year.

Post-crash response

Those who commented on post-crash response said they supported its inclusion in the strategy. Some submitters said that they wanted more detail about what is proposed.

Some submitters said they wanted it to be given greater priority, with a request from some local government submitters in rural areas for greater urgency to understand and improve services, including limited communications services. The Waikato Regional Transport Committee said it was the responsibility of the transport sector to work in partnership with health and emergency service providers to improve the delivery of post-crash response.

One district health board suggested that facilitating faster access to trauma units is unlikely to significantly reduce fatalities from severe injuries. Priority should instead be placed on infrastructure improvements that reduce the severity of crashes and injuries, and removing or separating heavy freight from dual carriageways. Another district health board wanted to see basic emergency care training for emergency responder personnel, and first aid training to be promoted to the public.

Hamilton City Council recommended that a Department of Emergency Services be established to coordinate and facilitate post-crash response, adding that the responsibility of road safety agencies does not stop at the point of injury but continues, in some form, until that patient has reached definitive care.

“Post-crash response needs to be embedded into transport policy, road safety strategies and action plans as well as improvements around travel and crash site information/accessibility needs (cellular networks and heli-landing pads for example). It also requires an increased focus into how the post-crash response is organised and funded. Currently a large component of this care is provided by volunteers via ambulance and Fire and Emergency Services. Road Policing is also expected to provide response to activities that are not ‘road related’.” (Hamilton City Council)

Views of those who were opposed

A minority of individual respondents were cynical about this focus area, suggesting that it reflected a culture of bureaucracy and red tape. They made comments such as: *“If this means form another Committee and increase overhead costs I do not support this Focus,”* and *“Seems a bit of a pipe dream, given the myriad of agencies involved.”*

Additional comments

Key suggestions from submitters include strengthening post-crash response, and providing more detail in the action plan about individual actions in this focus area.

INITIAL ACTIONS

The consultation document proposed 14 initial actions across the five focus areas. These were:

- 1. Invest in safety treatments and infrastructure improvements**
- 2. Introduce a new approach to tackling unsafe speeds**
- 3. Review infrastructure standards and guidelines**
- 4. Enhance safety and accessibility of footpaths, bike lanes and cycleways**
- 5. Raise safety standards for vehicles entering the fleet**
- 6. Promote the availability of vehicle safety information**
- 7. Implement mandatory ABS for motorcycles**
- 8. Support best practice for work-related travel**
- 9. Strengthen the regulation of commercial transport services**
- 10. Prioritise road policing**
- 11. Enhance drug driver testing**
- 12. Support motorcycle safety**
- 13. Review financial penalties and remedies**
- 14. Strengthen system leadership, support and co-ordination**

Submitters were asked:

- What are your top priorities for the first action plan?
- Do you have any further comments about these priority actions?
- Do you have any suggestions about other actions we could consider for future action plans?

Response

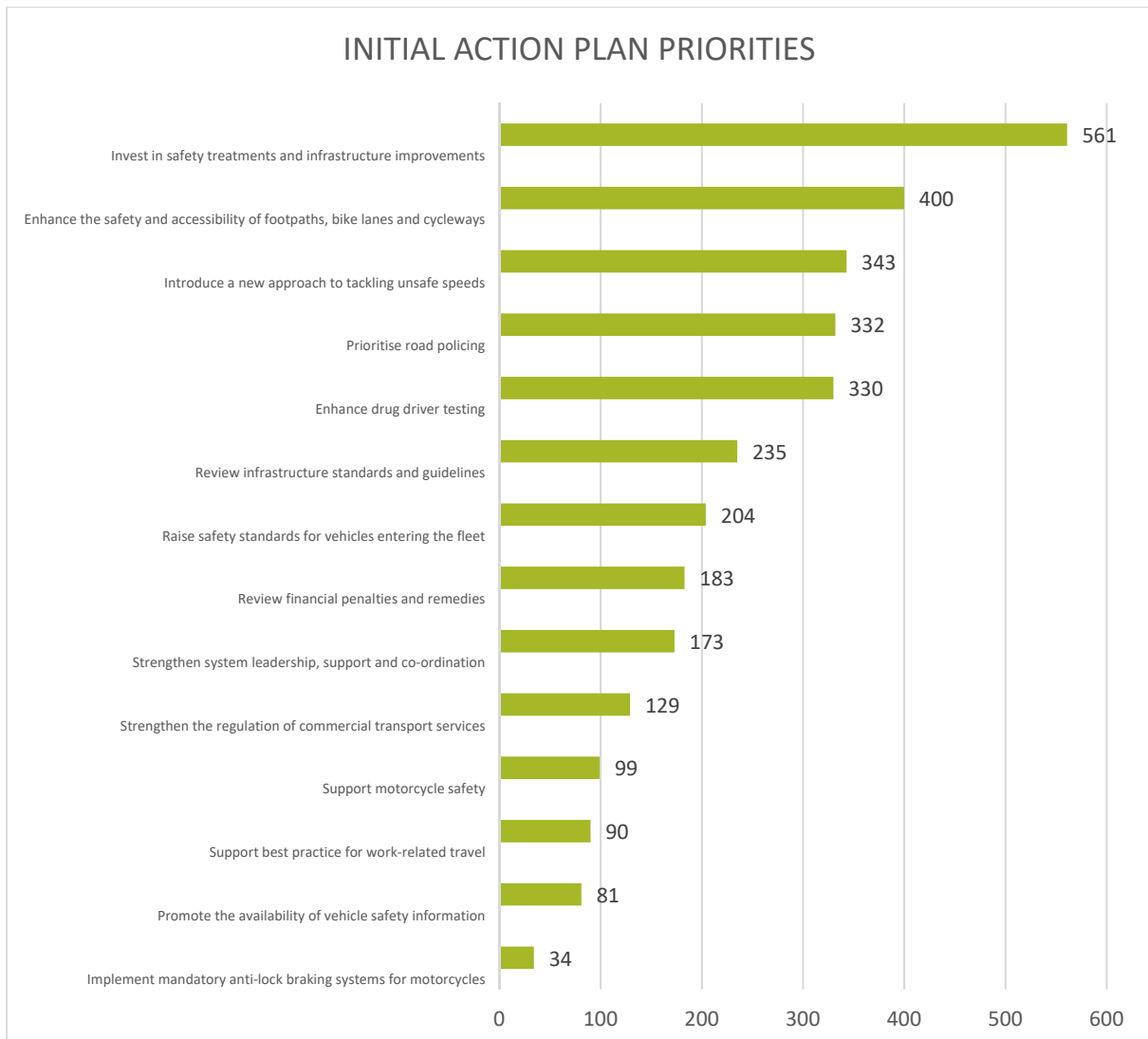
We received 1,072 submissions on the initial actions.

The three top priorities for submitters were:

- invest in safety treatments and infrastructure improvements
- enhance the safety and accessibility of footpaths, bike lanes and cycleways
- introduce a new approach to tackling unsafe speeds.

The next two priorities for submitters were ranked very closely behind:

- prioritise road policing
- enhance drug driver testing.



We received 521 comments on this section. The sentiment from submitters was generally very positive, with very few comments suggesting the list of actions did not at least capture most of the key priorities.

“I believe these actions will have immediate effect for lowering our road toll.” (Individual submitter)

Of those who commented on this this section, there were strong calls for:

- a greater focus on drivers (including through education, training or cultural change)
- a greater emphasis on ‘mode shift’ in the priority actions, with many submitters seeing increased use of public transport and active transport as a key contributor to road safety outcomes
- a more mode neutral list of actions (i.e. greater focus on modes other than private vehicles)
- higher penalties for cell phone use while driving.

Multiple submitters also asked that the motorcycle related actions (‘Support motorcycle safety’ and ‘Implement mandatory anti-lock braking systems for motorcycles’) be combined into one action.

There were also requests for system-level actions (e.g. ‘Strengthen system leadership, support and coordination’) to be presented as a distinct list from more specific actions.

Some submitters (both individual submitters and organisations) did not agree that we should have asked people to prioritise the action areas. Submitters either deemed all actions important, or noted that some actions were already underway and would be implemented regardless of whether they were rated highly in the consultation.

“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.” (Transportation Group NZ)

Suggestions for future actions

We asked submitters if they had any suggestions about other actions we could consider for future action plans. We received 607 comments from both individual and organisation submitters.

The most commonly mentioned suggestions (roughly 75 percent) fell into four broad categories:

- driver training, education, licensing and cultural change
- enforcement and penalties
- mode shift
- vulnerable users/active transport.

Driver training, education and cultural change

Those submitters who requested new actions under this banner typically sought:

- more or enhanced professional driver training and education, with some submitters suggesting this be focussed on school age children, with others suggesting all drivers should undertake professional training before gaining a licence
- driver licence re-testing, with some submitters focussing on this as a penalty for offenders, and others suggesting all of the driver population should undergo regular re-testing
- greater access to licence/testing facilities, especially in rural areas (multiple submitters said that a driver licence is a key enabler of employment in their area and also mentioned the risks of unlicensed drivers on the roads)
- action to change the culture around driving and safety, with several submitters urging campaigns and other methods to encourage people to drive with patience, courtesy and respect for others.

“Throughout various stages of a Drivers licensing journey there should be mandatory and subsidized Driver Training Programmes in all regions of NZ. All drivers who sit their license should be forced to undergo a basic version of this programme which would focus on the core skills required for today's conditions. Things like basics of vehicle knowledge, ABS (anti-lock braking system) emergency stops, nose- to- tail simulations all taken in a controlled and safe environment could be elements of this programme and give drivers the skills they need to drive on the road by themselves. Ongoing, every ten years Drivers should be forced to sit this programme again but a more advanced version which could recap previous knowledge and

teach more defensive techniques such as oversteer, understeer and what to do etc. These are all ideas that could be used to help bring up a generation of drivers who are better prepared to take on NZ's roads because they have the skills necessary to do so. They will have more confidence in their own driving ability and be able to make rational and informed decisions in emergency situations that could save their lives. We need to start looking more at the driver themselves rather than the other variables. At the end of the day, the driver is the one who is in control of the vehicle.” (Individual submitter)

“Education. Hard hitting adverts like overseas.” (Individual submitter)

Enforcement and penalties

Those submitters who requested new actions on enforcement and/or penalties typically sought:

- more dedicated road policing, more police on the roads, and greater enforcement of the more minor infringements (e.g. drivers not using their indicators and aggressive driving behaviour)
- higher penalties for cell phone use while driving (and/or the adoption of technologies to detect cell phone use while driving)
- stronger penalties for recidivist driving offenders, with some submitters suggesting demerit points are more impactful than fines, and others calling for removal of cars from offenders or mandating these drivers to undertake training before being permitted to drive again
- greater road side drug-testing (with significant concerns expressed about the number of people driving while drug-impaired).

“Regulate smart phone technology to reduce driver distraction. In the short term introduce extremely high penalties for drivers caught operating a dangerous vehicle in public while on their phone.” (Individual submitter)

“Significantly increase the number of Police in the Highway Patrol so that they become a fully resourced dedicated unit for road safety, rather than having other Police units providing part time road safety activities. This would enable the public to know who is undertaking traffic duties as well as providing a degree of separation between two completely different activities. It also will enhance the Police’s image, especially when they drive past a traffic infringement because they are [not], at that stage, in their traffic enforcement role. This unfairly stigmatises the Police through no fault of their own, but is a perception commonly held by the public, that road safety is not a Police priority.” (Individual submitter)

Mode shift

Many submitters indicated that they would like to see the link between mode shift (i.e. people using transport means other than cars) and road safety trauma reduction shown much more intentionally in the new road safety strategy.

In line with this, submitters also suggested new actions that could support mode shift, and thereby reduce the number of cars on the road, promote the use of modes that are evidentially safer (e.g. public transport) and achieve other benefits (e.g. health benefits and climate change benefits).

Suggested actions include:

- a focus on reducing the number of vehicle kilometres travelled, with some submitters suggesting greater use of demand management tools to lessen the number of trips people take, and time spent travelling
- actions to promote use of modes other than cars (free public transport was suggested, as was greater access to public transport and urban planning that takes greater account of the needs of cyclists and pedestrians)
- shifting freight from road to rail.

“Make it a priority to move more people towards healthier (and hopefully one day, safer for them as well as for other travellers!) travel modes, such as public transport, active transport, and micromobility (but bearing in mind that e-scooters and e-bikes need some careful regulation due to their high speeds and the general lack of skill of users). Reduce vehicular travel demand to reduce everyone’s exposure to risk on the roads, using levers such as congestion pricing. Prioritise safety improvements that give more independence and travel choice to those who cannot or do not drive and are currently not well-served by alternatives, including children, people with mobility challenges, and older people, to ensure full equity in our transport system. This will in turn free up road space for those who have to drive (e.g. the mobility-impaired, ambulances, etc).” (Individual submitter)

Vulnerable users/active transport

Closely connected to the above section, many comments centred around active modes and vulnerable road users (including older people, children and disabled people).

Submitters sought:

- consideration of all road users in decision-making processes, with many noting that active transport users and other vulnerable groups (particularly disabled people) are not given the same priority as other road users. Priority actions suggested include new standards and guidelines, representation of these user groups on key decision-making forums, and a culture shift that would see greater consideration of all users at all stages of transport decision-making processes
- infrastructure that prioritises the safety of pedestrians, cyclists and other active transport users
- actions focussed on the safety of micro-mobility users as an emerging technology/user group (including national safety standards, rules, and enforcement processes)
- action to support the safety of children (including lower speeds around schools, more walking and cycling infrastructure to support active transport options to travel to school, minimum passing distances around cyclists, and measures to support child restraint use in vehicles).

“Ensure all road users are planned for. 1 in 4 NZers identify as having a disability. the same principles of universal design and accessibility also benefit many other groups of road users and improve safety for all. this principle should underpin all of the above priorities. stakeholder groups with specialized knowledge of universal design and accessibility should be consulted with all planning and design for infrastructure. Meeting minimum standards should not be the aim, exceeding and setting new standards for the betterment of the entire community and all road users should be considered and implemented.” (Individual submitter)

The CDHB is pleased that the role of walking, cycling and public transport is acknowledged throughout the document however more emphasis should be placed on recognising that creating a roading network which prioritises the safety of these modes plays an increasingly vital role in creating safe and accessible cities. (Canterbury District Health Board)

Other

Many other suggestions for additional or future actions were also received. This include (but are not limited to):

- updating government back-office systems (ideally to integrate different data sets, including driver, vehicle, journey, pert, registration, load weight and route data)
- taking steps to improve safety at level crossings, and rail safety more generally
- increasing drink-driving testing /enforcement
- legally requiring all cars to travel with their lights on at all times
- requiring all drivers to have compulsory third party insurance
- introducing a different licensing regime for visiting drivers
- promoting safer truck design, such as electronic blind spot warning systems and underrun protection
- greater consideration of the potential for new technological solutions to both deliver significant improvements to road safety outcomes, as well as creating additional hazards.

OUTCOMES FRAMEWORK

The consultation document proposed a draft outcomes framework to help track progress towards the 2030 target.

Submitters were asked:

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

Response

We received a total of 434 comments on this section of the consultation document. Responses (and suggestions for improvement) are categorised into five main themes (below).

Measures

A majority of responses focussed on the proposed measures to track progress towards the 2030 target. These submissions provided suggestions on how to refine the draft measures, or put forth ideas for additional measures. Suggestions included:

- broadening the overarching outcome measures to cover not just deaths and serious injuries but also minor injuries, crashes that do not result in any injuries, and near misses
- indexing some of the measures to take into consideration changes in the wider context (e.g. converting the number of death and serious injury crashes into a per capita figure to account for changes in population size)
- changing the measures relating to speed reduction from '40 km/h or lower' to '30 km/h or lower'
- extending the set of measures on perceived likelihood of being caught when committing offences (e.g. using a mobile phone while driving, and running a red light).

Common suggestions for additional measures were focussed on the following:

- vulnerable road users (e.g. number of death and serious injuries crashes involving pedestrians and cyclists, perceived safety of walking and cycling, kilometres of safe/separated cycleways added and footpaths improved, number of intersections treated to improve safety for active modes, and number of children walking or cycling to school)
- travel speed (e.g. average free flow speeds and compliance with posted speed limits)
- enforcement (e.g. number of infringement offences by type of offences, and number of hours spent on enforcement)
- workplace safety (e.g. number of death and serious injuries crashes involving travel to or from a workplace where fatigue was a factor, and the safety rating of vehicle fleets owned by workplaces)
- co-benefits and unintended consequences of the strategy (e.g. mode share, sustainability, congestion, and journey times).

Some submissions identified gaps in the draft outcomes framework but did not suggest specific measures. Gaps noted by submitters include measures around police enforcement, quality of driving instructors and licensing officers, quality of drivers, and post-crash response.

Reporting regime

Some submitters provided comments on how the Government should report on progress.

In terms of frequency of reporting, most submitters considered an annual update to be sufficient. A few submitters, however, asked for a more frequent update (e.g. daily, weekly, monthly or quarterly).

Many of these submitters also commented on the importance of reporting publicly on progress as a way of increasing transparency and accountability. These submissions highlighted the importance of presenting the results in an easily digestible, accurate and meaningful way. This would help the public to understand the contributing factors to fatal crashes and reasons for investing in road safety; inform future decision-making to ensure continuous improvement; and hold agencies and organisations accountable on their progress.

“The key will be ensuring that the data gathered in widely available and that ongoing development is informed by the data.” (Individual submitter)

“Monitoring the performance of all agencies responsible for keeping people safe on roads in New Zealand is a crucial part of any road safety strategy... We agree that regular public monitoring and reporting of performance indicators will help evaluate which programmes are working and where changes need to be made.” (Royal Australasian College of Surgeons' New Zealand Trauma Committee)

Some submitters offered specific suggestions on how to improve the reporting regime, such as involving overseas experts in designing the framework, utilising an independent body to monitor and review progress, and making it a mandatory requirement to present an annual report to Parliament.

Data collection

A small proportion of submitters commented on the need to have reliable data collected on a regular and ongoing basis to enable long-term tracking and evidence-based decision-making. Some of these submitters provided specific comments on potential mechanisms for collecting data.

With regards to data sources, some submitters referred to surveys or databases that could be used to measure the indicators included in the draft outcomes framework. These include the Public Attitudes to Road Safety Survey and the Restraint Use Survey. Other submitters highlighted a need to look for new ways to generate data insights on road safety.

Some submitters commented on the benefits of collecting and reporting data in a way that allows comparisons by areas and population groups. Most of these comments (including from councils such as Taranaki Regional Council and Greater Wellington Regional Council) focussed on the need for geographical breakdowns, including by road controlling authority, regions, sub-regions, and Police Districts. A few submitters suggested collecting additional data on the road safety outcomes of disabled people.

Interim targets

Some submitters (including some councils e.g. Masterton District Council and Timaru District Council, as well as a number of individual submitters) considered that interim targets should be set between 2020 and 2030. However, no specific suggestions were offered in this section about what the interim target could look like.

Framework structure and complimentary monitoring and evaluation activities

A few submitters commented on the structure of the draft outcomes framework and the role of evaluation. Specifically, some submitters asked for more information on the structure of the outcomes framework, and sought clarification on the relevance of intervention-specific measures and their linkages to the overarching outcomes.

“... Establish a framework that links intermediate and final outcomes: for instance more CBTs (compulsory breath tests) leads to a greater perception of apprehension when drink driving (intermediate outcome), which impacts on drink drive related crashes and DSIs (deaths and serious injuries) (final outcome).” (IAM RoadSmart)

Other submitters highlighted the need to monitor and evaluate specific interventions, alongside the implementation of the proposed outcomes framework.

PART 4: DISABILITY PERSPECTIVES

OVERVIEW OF SUBMISSIONS

We heard from people with disabilities or impairments through a range of ways. We met with the Disabled Persons' Organisations Coalition (DPO Coalition) immediately prior to consultation and discussed a range of priority actions. In addition to the submissions received through the primary online survey (as summarised in earlier sections of this report), we also received over 40 responses to a version of the survey from people with learning disabilities. This was facilitated by People First New Zealand at its meetings in cities, towns and rural areas across the country.

COMMENTS ON ROAD SAFETY AND THE PROPOSED STRATEGY

General comments

An important theme that emerged through these conversations and submissions was the critical link between road safety and accessibility for vulnerable users and people with disabilities. Personal mobility is recognised as a right under the United Nations Convention of the Rights of Persons with Disabilities, and increasing the accessibility of transport services and the built environment for disabled people is a priority in New Zealand's Disability Action Plan.

People noted that the proposed 2030 target to reduce the number of deaths and serious injuries failed to recognise that some people are effectively shut out of the transport system due to feeling unsafe.

"You're measuring fatalities, but suppressed demand is a big issue for disabled people. We're safe but we're isolatingly safe. How do we measure the suppressed demand?" (Individual submitter)

There were strong calls to involve disabled people in decision making related to the transport system, and to ensure that the unique needs of disabled people are specifically acknowledged and planned for in the strategy.

Vision

Those who provided input almost all agreed or strongly agreed with the proposed vision.

Target

The majority agreed with the target, although many felt it was not high enough.

"Zero tolerance for unsafe roads and vehicles is what we feel is the right target. So 100%. No deaths or injuries." (Individual submitter)

There was a suggestion from a number of respondents that it was important that this target specifically includes footpath users, who are among the most vulnerable users.

"The pedestrian experience of the road is not reported and has not been specifically addressed in this strategy. A focus on all road users is needed. Applying the target to all road users is

important and should be linked to a target for increasing mode share of safer modes of transport. For walking this means that there are fewer injuries at the same time as walking mode share increases. Otherwise safety could improve for pedestrians because mode share has decreased, a likely outcome of allowing more vehicles on footpaths.” (Living Streets Aotearoa)

Action plan priorities

Priority actions listed by disabled people and representative groups were:

- improving the safety and accessibility of footpaths, bikepaths and cycleways
- investing in infrastructure improvements; reviewing infrastructure standards and guidelines
- strengthening the regulation of commercial transport services.

People also noted the lack of data on road safety relating to disabled people, and the increased risk of electric scooters and other silent vehicles for disabled and vision-impaired people.

“Despite the disadvantage and barriers disabled people face, there is currently a lack of quality data about disabled people’s experiences with transport and transport infrastructure. We need data down to a local level, preferably meshblock level, on the number of people with access needs.” (CCS Disability Action)

“Hybrid and electric vehicles – referred to as “quiet vehicles” – offer numerous economic, environmental and social benefits. The low level of noise is beneficial from an environmental and social perspective, but presents a significant safety problem for people who are blind or who have low vision.” (The Blind Foundation)

It was also noted that road safety and instruction information, including advertising campaigns and the Road Code, should be available in a range of accessible formats including NZ Sign Language and Easy Read.

Overall, there was a strong and compelling call for considering the importance of access for people with disabilities or impairments, and the role that road safety plays in enabling accessibility.

“Make footpaths safe for disabled people. Lots of times people using wheelchairs have to go on the road because they can’t get over the curb.” (Individual submitter)

“Disabled people, including those who rely on mobility aids such as wheelchairs, canes, crutches, or walkers as well as those with hearing and/or vision impairment and/or learning disability, can be especially vulnerable when it comes to using roads and streets, if the streetscape is not designed for their access needs; for instance, it may take longer for a person relying on a cane to cross the road, placing them at increased risk of injury. People with hearing and/or vision impairment as well as learning disability may miss important cues, if they are not accessible.” (CCS Disability Action)

“There’s inequity of access to a system that’s supposed to support everyone’s movement. Note who isn’t using the roads because of access, it’s not safe. [The strategy] needs an explicit statement to ensure the system is effective for people to go about the activities that they need to in their daily lives.” (Individual submitter)

PERCEPTIONS OF ROAD SAFETY

People with learning disabilities were also asked through the People First survey what made them feel safe or unsafe when travelling on the road and footpath.

Following the road rules and simple safety measures – drivers travelling at safe speeds, wearing a seat belt, looking both ways before crossing a road, separated bike lanes – were common themes, as were well-maintained and well-lit roads and footpaths, graded slopes off kerbs for wheelchairs, reliable bus and train services, and courtesy and care from other road users.

People noted the level of aggression they experience from other road users, cars and buses going too fast, drivers not stopping at pedestrian crossings, not having enough time to cross the road, and specifically the danger of electric scooters and other silent vehicles for disabled and vision impaired people.

“Aggressive drivers who yell out and threaten pedestrians.” (Individual submitter)

“... scooters parked in the middle of the footpath, going too fast, people are scared they will be knocked over, often they are very quiet and cause people to be startled.” (Individual submitter)

“Sometimes people with learning disabilities can have extra difficulty crossing roads or understanding what drivers are doing. Drivers need to know that everybody uses roads and footpaths and be respectful and careful.” (Individual submitter)

PART 5: SUMMARY OF RESPONSES FROM THE STUDENTS' SURVEY

Alongside the main submissions process, we also invited children and young people to provide their thoughts on road safety through a students' survey.

Respondents were asked the following questions:

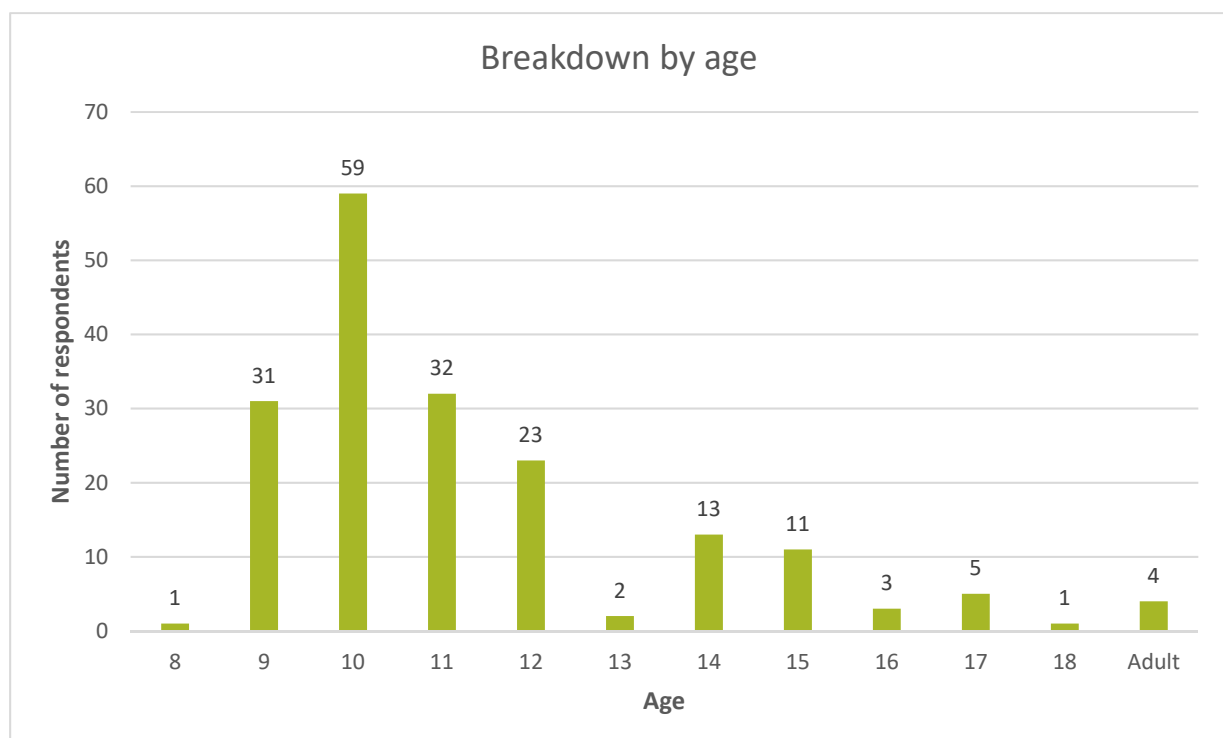
- How old are you?
- What region do you live in?
- How do you travel most often?
- What does being able to use the road safely mean to you?
- What sorts of things make you feel unsafe on the road?
- To what extent do you support the proposed vision?
- To what extent do you support the proposed target?
- What do you think we should do to make our roads safer?
- Do you have anything else you want to say about making our roads safer?

OVERVIEW OF SUBMISSIONS

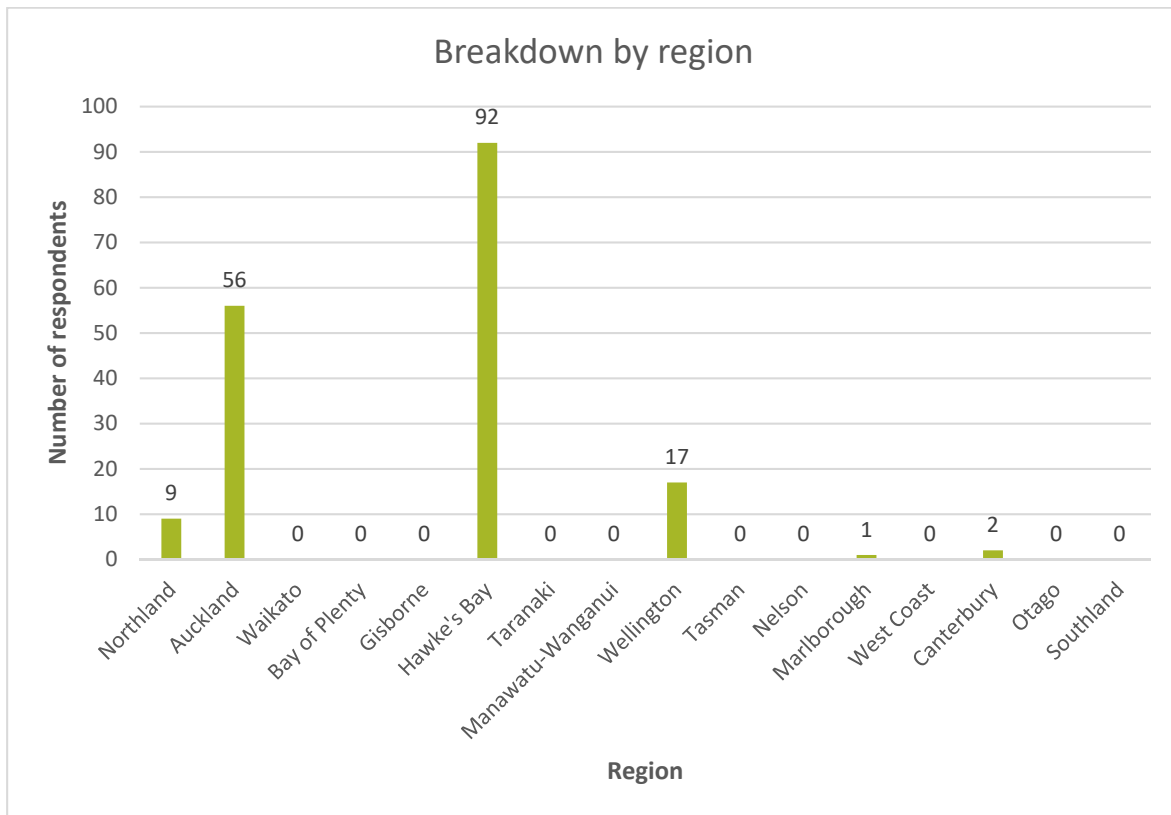
A total of 185 completed responses were received from children and young people aged between 8 and 18 through the students' survey.

Of these:

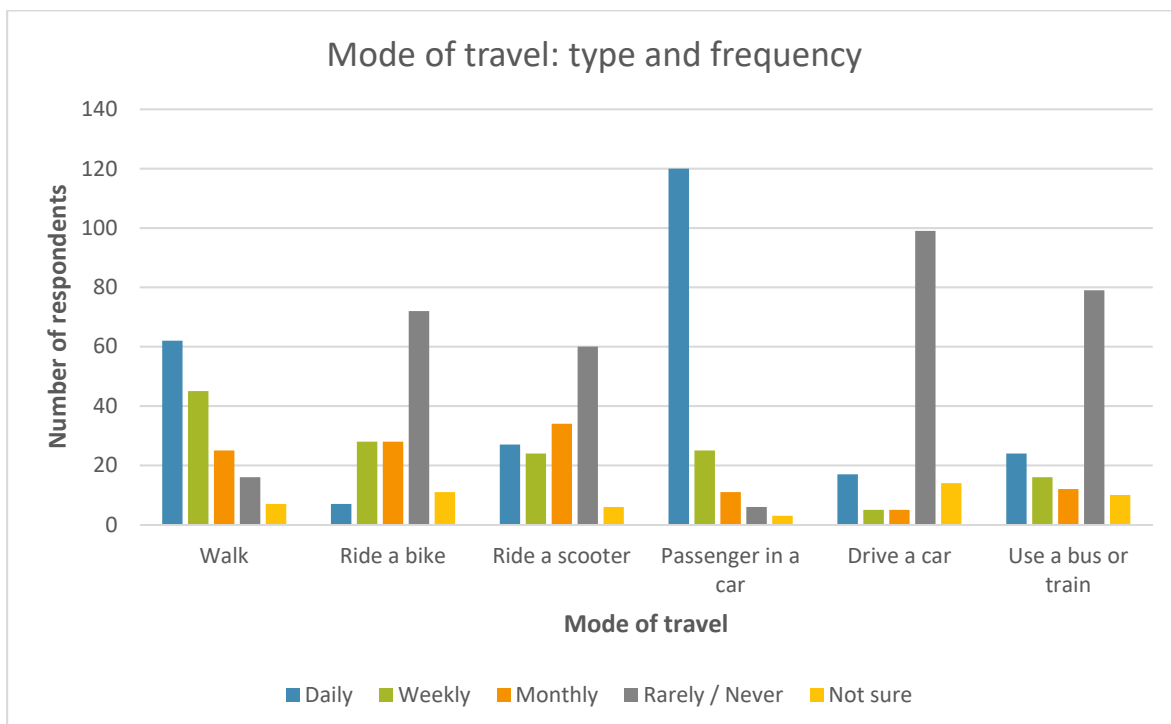
- 78 percent were between the ages of 9 and 12
- 13 percent were aged 14 or 15.



Students from the North Island were heavily over-represented in the survey. Of the 177 students who answered this question, just over half live in Hawke’s Bay, 31 percent live in Auckland, nine percent in Wellington and five percent live in Northland. The rest live in Canterbury or Marlborough.



Students said they were most likely to travel as passengers in a car or walk. Nearly half said they rarely or never travelled by bike.



COMMENTS ON THE PROPOSED STRATEGY

Vision

The majority of students surveyed were supportive of the vision, with 80 percent saying they agreed or strongly agreed with it. Nine percent were broadly opposed, and 11 percent said they did not know.

Target

Seventy percent of students who answered this question considered that the target was about right, while 11 percent considered the target to be too high, and 19 percent considered it to be too low.

Those who thought the target was too high said it *“is going to be hard to stop people to stop drinking and cars and getting drunk”*, and that it would be *“impossible”* to ensure that no one dies on the roads.

Those who thought it too low talked about the need to ensure that everyone stays safe on the roads.

“Forty percent is still not half of the people and there are a lot of people that got hurt and then if the percentage of the target gets put up a bit it would be fantastic.” (Student)

Action plan priorities

Students were asked to rank ways to make roads, cycleways and footpaths safer in order of preference. More than half said they would like to make footpaths, bike lanes and cycleways safer and easier to use.

Students were then asked to rank ways that people could be encouraged to use roads more safely. The most popular option by some margin was finding ways to help people drive at safe speeds. Students expressed a preference for finding ways that cars and motorbikes could be made safer in equal numbers. Students were also equally divided over their preferences for policies to make vehicles safer. Each of the options (make vehicles coming into New Zealand safer, make all motorbikes have better braking systems called ABS, find more ways to make motorcycling safer, and help people to find information about the safety of different vehicles) received similar levels of support.

When it came to choosing other ways of improving road safety, the most popular intervention was to look at how much people get fined if they're going too fast or being dangerous on the roads (47 percent), followed by better drug driving testing (45 percent), and giving police more money and people to focus on road safety (33 percent).

A free text question asking for additional road safety action ideas elicited a range of responses. Some students wanted to see more powers for police to fine drivers who use mobile phones or speed. Others wanted to see additional barriers to protect both vehicle occupants and pedestrians. Other suggestions included encouraging the use of more advanced in-vehicle safety technology and building more and better cycle lanes.

Perceptions of road safety

Students were asked to describe in their own words what made them feel safe when travelling on the road or footpath. A quarter said they felt most safe when travelling with other people. One in six cited competent drivers. A similar proportion talked about feeling safe when there were good footpaths or segregated bike paths.

“The pathways allow me to walk from the bus to school safely.” (Student)

One in eight said that using seat belts made them feel safe. One in 10 said that they felt safe when vehicles didn't travel too fast, and one in 12 said that they felt safe when there were not many vehicles around.

Students were also asked what made them feel unsafe when travelling on the road or footpath. More than one in five said that fast vehicles made them feel unsafe, whether as a passenger in a car or a pedestrian.

Almost the same number of students said that travelling alone made them feel unsafe. Typical responses were: *“when there is no one around to ask for help”* and *“when I don't know where to go”*.

More than one in six students cited incompetent drivers (e.g. *“the way some people drive and don't pay attention to the rules”*) as making them feel unsafe.

PART 6: KEY CHANGES FOLLOWING THE SUBMISSION PROCESS

Following the public consultation period, feedback was analysed and considered and advice provided to decision makers.

As a result of this, and other processes, a final strategy and action plan has been agreed and released. This section outlines some of the key changes made to the final strategy and action plan since the consultation process was undertaken. This does not intend to be an exhaustive list.

New action focussing on road user behaviour

The strongest feedback received throughout the submissions was a call for the Government to focus on driver behaviour (for example, through driver licensing, education, training or cultural change).

There is now more focus in the strategy emphasising the importance of responsible user behaviour, and highlighting ongoing initiatives in this area. Most substantively, there is a new action focussing on licensing ("*Increase access to driver licensing and training*"). This has three components: increasing access to driver licensing opportunities; encouraging drivers to progress through the graduated licensing system; and reviewing the licensing system to encourage progression, improve training and increase access. This action will contribute to both road safety and broader transport outcomes, and has wider social benefits. You can read more about this in the action plan.

Refinement of the *Review of Financial Penalties* action

The *Review of Financial Penalties and Remedies* action in the *Road to Zero* consultation document signalled that the Ministry of Transport is undertaking a regulatory review of financial penalties across the transport system. This work remains a key part of the Ministry of Transport's regulatory work programme.

In response to calls for stronger road safety enforcement and higher penalties for those who commit offences, this action has been refined to focus on the road safety components this work programme in the action plan. It also signals the Government's intention to review a number of key road safety penalties (for example, associated with cell phone use while driving) as a priority. This action has also been renamed *Review road safety penalties* to reflect this shift.

Acknowledgment of the transport concerns of specific groups of road users

Some submitters told us that the strategy did not adequately take into account the specific road safety concerns of particular groups of road users.

In response, we have amended the strategy to include demographic vignettes that outline key issues for different user groups and key demographics, including pedestrians, Māori and disabled people. We have also reflected the different needs of users where it was appropriate in the strategy and action plan.

Amendments to Principle One

In the consultation document, the first principle stated: “We plan for people’s mistakes”. Feedback suggested that the principle might imply people are not obliged to make good choices as road users. In response, this has been amended so that the principle now reads: “We promote good choices but plan for mistakes”.

Edits and clarification of existing text

A number of more minor changes have been made to the strategy and the initial action plan to clarify the intent of the policy. These include:

- additional text to highlight the link between the road safety strategy and the Ministry of Transport’s broader strategic assessment of access to transport (including an assessment of the barriers to accessible transport for vulnerable users as identified in the Government’s proposed new Disability Action Plan)
- additional text to highlight the link between mode shift (people switching car travel for travel by other means) and road safety. This is in response to feedback suggesting that the strategy did not adequately explain the potential road safety benefits of more people choosing to travel by foot, bicycle or public transport rather than travelling by car
- further detail on the modelling that supports the target of reducing deaths and serious injuries by 40 percent. This is designed to show how the target can be achieved if the right mix of interventions are applied
- further discussion on the financial implications of the new strategy and action plan – with high level indicative costings for the delivery of the 10 year strategy and action plan now included
- more information about the Government’s approach to overseas drivers. This is in response to feedback from some members of the public who told us that they believe that overseas drivers often have poor standards of driving and/or are responsible for many road crashes. The strategy now shows that overseas drivers crash at about the same rate as the general population and explains how the current Visiting Drivers Project helps overseas drivers to travel safely in New Zealand
- greater detail on components of the system management actions in the initial action plan. This reflects feedback from local government submitters who said they wanted more clarification about how central government agencies plan to work with local government partners to implement the strategy
- adding additional measures to the outcomes framework. This reflects calls for more measures to be added around vulnerable road users and enforcement and the further development by officials of the framework since the consultation process occurred. These measures include the number of crashes that result in deaths or serious injuries which involve a vulnerable road user; the number of ACC entitlement claims related to walking and cycling injuries; the perceived

safety of walking and cycling; the number of breath tests conducted; the number of Offender Management Plans in place for high risk drivers; the proportion of learner drivers who have progressed to restricted licences; and the proportion of restricted drivers who have progressed to full licences

- minor revisions of the text supporting each of the principles. These changes include acknowledging more explicitly the vulnerability of disabled people, emphasising the role of communities and families in building cultural change, acknowledging the role of local government and the regions in the delivery of the road safety strategy and action plan, and clarifying that the trialling of innovative road safety solutions should not be excluded by the principle that decisions should be based on good evidence
- a revision to the supporting text related to Principle Six (“Our actions support health, wellbeing and liveable places”). Some submitters reacted negatively to the description of the principle, which referred to children “playing in the street”. The description now refers to the road network as including “places where people meet, shop and connect to their communities”.

Feedback received that was out of scope of the consultation process

In some cases, the feedback we received from the public was out of scope for the road safety strategy and action plan.

Examples of this feedback includes:

- comments relating to specific operational road safety issues, such as concerns around construction materials or specific intersections/corridors of the network
- detailed suggestions about the implementation of the strategy and action plan, such as discussion on specific databases to support operational delivery.

All feedback received has been considered and retained and will inform future stages of the programme.

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