

Living Streets Aotearoa



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Submission to Ministry of Transport on Road to Zero – the New Zealand Road Safety Strategy

Living Streets Aotearoa welcomes the opportunity to comment on the Road to Zero – NZ Road Safety Strategy. Living Streets Aotearoa has been actively involved in the working groups that contributed to this strategy, it's therefore disappointing to see pedestrian safety being compromised in the Accessible Streets rule change package.

General

Living Streets Aotearoa supports the intent of this strategy to reduce road trauma. We don't believe this strategy goes far enough into a new way of seeing our roads to deliver a future that we can all embrace or to achieve its objectives.

We support learning from the work that has already been done overseas on Vision Zero. We would like to see NZ move rapidly to adopt a paradigm that moves beyond the Vision Zero focus on fatalities, safety and traffic calming, to one that looks forward to mode shift to more safe and healthier modes, and reduces road danger overall so that we improve liveability of the places people live. The focus is then on what we want rather than fixing what we don't want, as in this strategy.

The Road to Zero strategy particularly lacks a focus on mode shift or to reduce road danger overall. Shift to safer modes of travel should be a key tool in reducing road trauma. This would see increased support for more walking and safer pedestrian infrastructure as well as better, more accessible public transport in more places. We see from this document that NZTA is developing a strategy for mode shift and question why this has not been included in this strategy as it was raised during the workshops.

We support the strong focus on evidence-based actions which we expect in all government policy. A strong evidence base should flow through to all actions proposed. For instance, the reasons that NZ has such a high rate of injury compared to other countries is still not clearly explained in this strategy. The information states that the Safer Journeys approach was not implemented as intended, why not?

We support the proposals to “embed road safety in transport design, regulation, planning and funding.” We agree “a good road safety strategy is about putting the needs of people, rather than vehicles, at the heart of decision making.” We

understand that roads include footpaths, as the pedestrian priority element of the transport system.

The Government Policy Statement for Land Transport has four key aspects of: safety, access, environment and value. It would be useful to identify how this strategy meets each of those aspects.

On page 39 there seems to be some confusion on the definition of a vulnerable footpath user or pedestrian. The suggestion that the Accessible Streets package is all about changing the definition of footpaths also needs correcting. The NZ Pedestrian Planning and Design Guide has a definition that should be used of a 'vulnerable pedestrian':

a pedestrian at greater risk than others of being involved in a crash, or more susceptible to serious injury. It includes older people, impaired people and children.

The strategy definition should be corrected to reflect the NZ legal definition and not reinvented here.

The Strategy moves away from providing expensive 'Roads of National Significance' to a more balanced focus on safer roads where there is a high crash rate, but there is nothing in this Strategy that prevents a return to the former approach.

A four week consultation period is too short for such an important change in approach to be properly considered by a wider audience. We would expect that we are involved in a timely way in other transport policy and rule changes.

Vision and leadership

"a New Zealand where no one is killed or seriously injured in road crashes. This means that no death or serious injury while travelling on our roads is acceptable"

We welcome a vision to guide leaders and decision-makers, which has been missing from the safer system approach to date. Political will is one of the key factors of a successful road safety strategy, as shown by the New York example and lessons learned in Vision Zero.

Living Streets would like to see this vision include reducing all harm from crashes. There is no reason to only prevent serious harm, and this is consistent with a focus on crash prevention overall.

The National Road Safety governance group is a key to keeping the focus on safety and Living Streets would welcome the opportunity to be part of that group.

Target

Living Streets supports a 40% reduction in deaths and serious injury by 2030. Lack of a target has been a missing element in the NZ safer system approach.

We support this target being applied to all deaths and serious injuries across all road users, especially a focus on reducing crashes involving pedestrians. This report notes forty-one pedestrians died on our roads in one year and about 10 times that are seriously injured. Many serious pedestrian injuries are not reported as part of the

transport system to the Police (but known from hospital admissions data). An increasing rate of pedestrian injury has been seen in overseas jurisdictions as the vehicle user injury rate declines. 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.

Principles

Living Streets supports the principles, indeed it would be hard not to. We would like to see an additional principle, that safety on the road for one user group is not to the detriment of safety for other user groups. We strongly support the need for an evidence base demonstrating safety before any action is taken. This principle would have prevented the permitting of e-scooters on footpaths in 2018. We have re-ordered the principles by priority:

- 00 Safety is not compromised for a road user group by actions taken to benefit another road user group.
- 05 Our actions are grounded in evidence and evaluated
- 06 Our road safety actions support health, wellbeing and liveable places
- 03 We strengthen all parts of the road transport system
- 01 We plan for people's mistakes
- 02 We design for human vulnerability
- 04 We have a shared responsibility for improving road safety
- 07 We make safety a critical decision-making priority

Focus areas:

01 Improve the safety of our cities and regions through infrastructure improvements and speed management

Living Streets supports safer speeds on all roads and welcomes the move to make rural roads safer.

It's disappointing that no general lowered speed limits are considered for urban areas (where 84% of the NZ population lives). We support safer speeds around schools and note many towns and cities have already introduced lower speeds around schools. A general reduction in urban speeds would be an approach well supported by evidence, and promote health, wellbeing and liveability in a way that many other policies will not. A general reduction in speed would mean a safer route all the way to school for children and not just around school gates.

It is concerning that this safety strategy is promoting vehicle use of footpaths as if it is a safety measure. There is no evidence that allowing vehicles on footpaths improves safety of pedestrians or for the vehicle user. Footpaths are designed for pedestrians and in New Zealand that is what pedestrians must use. Unlike vehicle users, there is no choice.

The Accessible Streets rule change package that supports cycling on footpaths and the continued use of footpaths by scooters and other micromobility, shows that the principle of grounding actions in evidence has already been ignored. There should be no change to footpaths being primarily for pedestrians, unless it can be demonstrated an improvement in pedestrian safety will occur. At the same time there clearly needs to be much greater enforcement of the current Road Rules.

Living Streets would like to see the NZ Pedestrian Planning and Design Guide used in practise as this has not often occurred to date. There is no need for an update until it has been widely used and unless its use will be enforced.

02 Significantly improve the safety performance of the vehicle fleet

Safer vehicle design must play a key part in improving performance. We need to stop importing vehicles that don't meet a 5 star safety rating, or purchasing rubbish trucks that have blind spots, or fire engines that don't fit our streets. SUVs have been shown to have a significantly increased chance of harm to pedestrians in crashes, as does our current bus designs. The strategy should include an action to improve heavy vehicle designs used in urban areas, in particular bus design appears particularly damaging for pedestrians, and emergency vehicles seem to be purchased oversize for city streets which has an impact on how the road is managed. Heavy trucks should be required to have proximity sensors if they operate in urban areas.

Government funding should not support these types of unsafe, not fit-for-purpose designs. Providing safer vehicles needs to be a lot bolder than in these proposals.

04 Encourage safer choices and safer behaviour on roads

A focus on mode shift to safer modes should be addressed in this focus area. A programme of encouraging walking and making pedestrian infrastructure safer is urgently needed. Better support for public transport in more places is also needed to achieve mode shift, as is safer urban speeds, and proper cycle infrastructure on faster roads.

The report shows that 50% of crashes could be avoided if vehicle users were more skilled yet there is no action to improve this. Better education and enforcement of the Road Rules should therefore be a priority and this would flow through to all road users in every place. Supporting young people to get a drivers license is one way to improve awareness of Road Rules but this should be extended to ensure that all school children learn the Road Rules. This will mean scooter and cycle users are as aware of the rules as motor-vehicle users. We would like to see the Road Rules better understood by vehicle users so they do not use footpaths as extensions of the roadway, they know how to drive safely at pedestrian crossings, and they know the impact of their speed choices.

Enforcement of all Rules relating to footpaths and pedestrian crossings is also needed and is mostly lacking in urban areas.

It is disappointing that the safety issues of scooters and other micro-mobility vehicles on footpaths has not been directly addressed. Living Streets and other groups have expressed concern at the use of these vehicles on footpaths. There is a lack of data on the impact on pedestrians of these new vehicles and government needs to address this data lack. The current regulation of these new types of vehicle is inadequate.

The Accessible Streets rule package is stated to improve safety for footpath users and encourage active transport. However there is no evidence how the proposals will improve pedestrian safety by allowing vehicles onto footpaths. There is no evidence that any of the proposals will support more walking. Scooters and other motorised micro-mobility are not active travel, there are doubts about their carbon footprint, and the mode shift seems to be mainly from healthy, free walking.

05 Drive action through effective system management

This focus area should include appropriate investigation of all crashes. The recent coroner's verdict that a child should have been accompanied by an adult and that would have saved her life is in direct contrast to the safer system approach. How will crash investigations change? There needs to be a focus on the real impacts on pedestrians in particular, since they are the ones who are often not around to put their case.

We recommend that all deaths and serious injuries involving trucks and heavy vehicles are investigated to avoid a repeat (as happens with deaths involving all other modes of transport) by the Transport Accident Investigation Commission or a similar body. 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.

Measuring success

The Centennial Highway median barrier is used as a measure of success of the safer system approach. This example highlights the flaws in the safer system approach where safety of one mode is seen as a fix. Centennial Highway connects Pukerua Bay to Paekakariki along the coast and is unwalkable for most people. The footpath is less than 1 metre wide in many places, there is no barrier between pedestrians and 80 km hour speed motor-vehicles and yet there is a barrier to access the coast, and it is 'shared' with cyclists. It is not a safe place to walk, never mind a pleasant place so it does not support health, wellbeing or liveability. Examples of improvements need to be improvements for all road users not just motor-vehicles. This should be particularly applied to walking in rural areas.

There are no measures to show safety improvements for walking, public transport users or cyclists.

Overarching outcome measures

Include road user type in this measure. Improvements for road user safety must be across all user types.

Include for each road user type the proportion of trips taken by that mode. The strategy must ensure that healthy and sustainable mode share does not decrease

even if the safety measure improves. For an extreme example, there may be no pedestrian deaths because there are no longer any pedestrians using a road.

Infrastructure

- Include a measure of how much of the urban road network is a safe speed 30km hour.
- Include a measure of how many crashes occur on footpaths (gathered from all data sources)
- Include a measure of how many injuries occur on footpaths from slips, trips and falls.

Vehicles

- Include a measure of the proportion of the heavy vehicle fleet (including fire trucks, buses /trams) that have pedestrian friendly design (ie no blind spots, fit for the streets they operate in)

Road user choices

- Measure mode shift to safer and more sustainable modes – walking, public transport, cycling

System

Its hard to see how the measures proposed will be assessed.

- Include number of expert investigations into road crashes undertaken

Our top priorities

1 We urgently need to see an evidence base developed for pedestrians that measures actual impacts of existing infrastructure and use, and for all proposed changes, to ensure that safety is first but also walking amenity and access for all pedestrians is considered. This data is lacking currently.

No changes should be made to footpath regulation and use until this evidence base is developed. It is simply unacceptable for regulators to assume that the perceived safety of one group is prioritised ahead of other groups. We support the UNCRPD approach that safety and use of our transport system for disabled people must not decline, rather it should be urgently improved. This means that footpaths are improved, and that vehicles are not allowed to this safe pedestrian space.

Other actions for the future

We expect that as baseline information is gathered on pedestrians, including disabled pedestrians, in urban areas in particular, that more action is targeted towards improving the pedestrian urban environment.

We would like to see a standard developed for rural roads that supports rural people having the same rights to walk along their roads as other road users have to use rural roads. Currently walking on rural roads is seriously compromised. The need for the overarching outcome measures we have suggested is evident for rural walkers.

We support the 'immediate set of actions number 4', to enhance safety and accessibility of footpaths, bike lanes and cycleways, in so far as that means pedestrians retain a dedicated safe and pleasant place vehicle-free space to walk.

Rehashing the previous governments approach to pedestrians will simply not do.

About Living Streets

Living Streets Aotearoa is New Zealand's national walking and pedestrian organisation, providing a positive voice for people on foot and working to promote walking friendly planning and development around the country. Our vision is "More people choosing to walk more often and enjoying public places".

The objectives of Living Streets Aotearoa are:

- to promote walking as a healthy, environmentally-friendly and universal means of transport and recreation
- to promote the social and economic benefits of pedestrian-friendly communities
- to work for improved access and conditions for walkers, pedestrians and runners including walking surfaces, traffic flows, speed and safety
- to advocate for greater representation of pedestrian concerns in national, regional and urban land use and transport planning.

For more information, please see: www.livingstreets.org.nz

7 August 2019

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