

Ministry of Transport's *Road to Zero: Road Safety Strategy 2020-2030*

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Introduction

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Ministry of Transport's Road to Zero: Road Safety Strategy 2020-2030.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.

General support

3. NMH commends the Ministry of Transport on this bold document and endorses its vision of "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." The total social cost of motor vehicle crashes in 2017 is estimated at \$4.8 billion¹. Whilst this figure factors in loss of life and life quality, medical, legal and property damage costs, it doesn't factor in the mental health costs to those personally affected by the crash either the victims and their friends and family or including those frontline emergency services workers. It is important to have a tangible strategy that works towards significantly reducing the number of road crashes.
4. NMH supports the proposed target of a 40% reduction in deaths and serious injuries. This approach will bring New Zealand closer to meeting the vision of the strategy.
5. NMH strongly supports the seven proposed guiding principles:
 - a. We plan for people's mistakes
 - b. We design for human vulnerability
 - c. We strengthen all parts of the road transport system
 - d. We have a shared responsibility for improving road safety
 - e. Our actions are grounded in evidence and evaluated
 - f. Our road safety actions support health, wellbeing and liveable places
 - g. We make safety a critical decision-making priority.
6. The principles above clearly show a commitment to improving the whole roading system so it makes all users safer. NMH is pleased to see that this consultation document acknowledges that the built environment is a key determinant of health

¹ <https://www.transport.govt.nz/mot-resources/road-safety-resources/roadcrashstatistics/social-cost-of-road-crashes-and-injuries/>

and improvements to roads and pavements can result in creating more liveable spaces.

Focus Area 1: Infrastructure improvements and speed management:

7. *Safety improvements:* NMH is pleased to see that \$1.3 billion has been allocated to the Safe Networks Programme which makes high risk roads safer. NMH supports the installation of median barriers, rumble strips, improved skid resistance and safe level crossings. NMH notes that roundabouts have been proposed for high risk intersections. Whilst roundabouts do have fewer casualty crashes than signalised intersections, the injury rate for cyclists at roundabouts are typically higher than at other intersection types². Many cyclists do not feel comfortable cycling on roundabouts therefore consideration must be given to installing cycle-friendly roundabouts³ in order to make roundabouts safer for more vulnerable road users.
8. *Speed Management:* As acknowledged in the Consultation documents, the current process for making speed management changes is long and complex therefore Councils have not been able to instigate changes quickly. This has been true for SH60 in Tasman when a large number of residents demanded the speed limit was reduced immediately following a series of fatal accidents however current processes meant that the process to reduce the speed limits was protracted. Changes to speed limit management are welcomed.
9. *Review of infrastructure standards and guidelines:* NMH supports the proposed programme of work to align urban street design with international best practice and is pleased to see that this guidance will be integrated into the Government Policy Statement on Land Transport.
10. *Enhance safety and accessibility of footpaths, bike lanes and cycleways:* NMH welcomes the proposed Accessible Streets packages aimed to enhance safety and accessibility of footpaths. Further to this, NMH recommends that consideration is given to refining the give way rules between vehicles and pedestrians. The current rules only specify rules in relation to pedestrian crossings, school crossing, driveways and share space zones. There are no rules in relation to left or right turning vehicles resulting in vehicles receiving priority over pedestrians in virtually all contexts except for the fore-mentioned rules. NMH recommends that additional rules are put in place that protects pedestrians from left or right turning vehicles such as the Australia

² <https://www.nzta.govt.nz/walking-cycling-and-public-transport/cycling/cycling-standards-and-guidance/cycling-network-guidance/designing-a-cycle-facility/intersections-and-crossings/roundabouts/>

³ <https://www.nzta.govt.nz/walking-cycling-and-public-transport/cycling/cycling-standards-and-guidance/cycling-network-guidance/designing-a-cycle-facility/intersections-and-crossings/roundabouts/cycle-friendly-roundabout/>

Road Rules. This is especially important as the numbers of footpath users increases, that consideration is given to minimising conflict between pedestrians and cars.

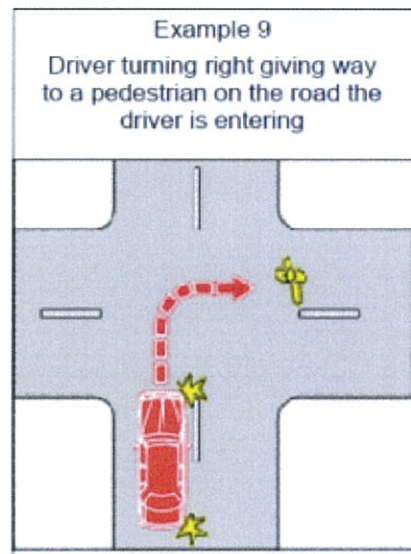
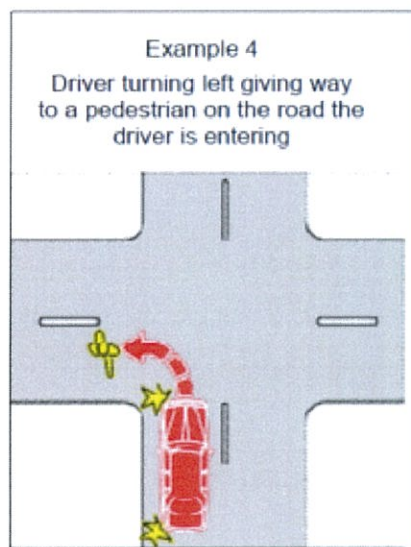


Figure 5 – Clarification of Give-Way rules at 4-approach intersection, Australian Road Rules

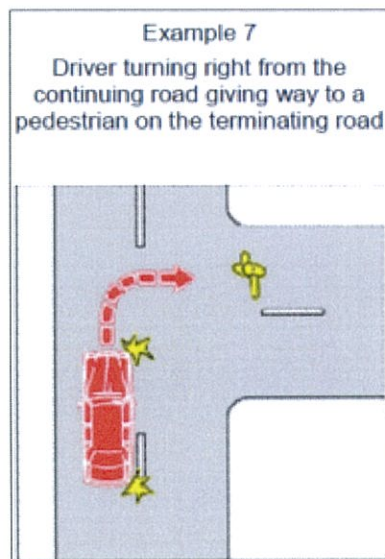
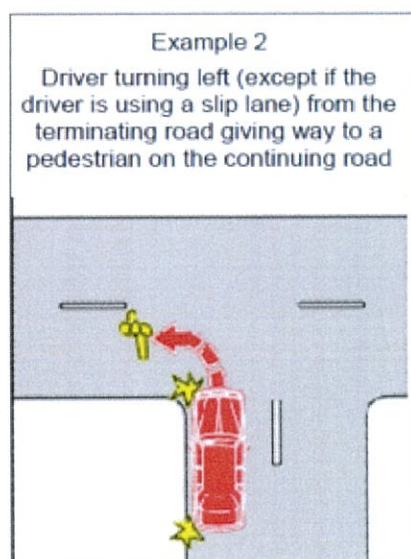


Figure 7 – Clarification of Give-Way rules at a 'T' intersection, Australian Road Rules

Focus Area 2: Vehicle safety.

11. NMH supports the immediate actions proposed in this section to raise the safety standards for vehicles entering the fleet, promote the availability of vehicle safety information and implement mandatory anti-lock braking systems (ABS) for motorcycles.

Focus Area 3: Work-related road safety

12. NMH supports the immediate actions proposed in this section to support best practice for work-related road safety and strengthen commercial transport regulation

Focus Area 4: Road user choices

13. NMH supports the immediate actions proposed in this section relating to prioritise road policing and motorcycle safety.
14. The health care system sees first-hand the human suffering and social cost crashes resulting from alcohol/drug impaired driving. NMH has submitted on the consultation on enhanced drug testing. NMH supports the objectives of the new framework in terms of deterring people from driving while impaired by drugs. The current options for roadside drug screening are not optimal. The roadside screening devices can only detect a limited range of substances, and are not 100% accurate, and expensive to use. When devices become more accurate, faster and cheaper to use, screening should be considered, but based on the current technology, NMH does not believe that the use of roadside drug screening devices is the best option.
15. NMH advocates that a zero blood alcohol limit is applied to those on restricted licence holders. Alcohol contributes to around 30% of New Zealand's fatal road crashes⁴ and even small amounts of alcohol affect judgement. Even at 50mg of alcohol, the predictable effects on a person's driving are reduced coordination, difficulty steering, and a reduced response to emergency driving situations⁵. Therefore those who are on learner or restricted licences should not be allowed to consume alcohol and drive. This is the approach that Australia has adopted.

Focus Area 5 System management

16. NMH supports immediate actions proposed in this section that strengthen system leadership, support and coordination in regards to emergency response. NMH also advocates for the inclusion of a public health representatives on Regional Land Transport Committees. As discussed in the consultation document, transport and the built environment is a determinant of health. Having a public health representative on Regional Land Transport Committees can give Councils an insight on the public health implications of transport decisions.

Measuring success

17. NMH supports the measures included in the document but notes there seems to be a lack of measures around liveability of streets and the number of pedestrians or cyclists on the roads. If streets are considered safe, then it is assumed that the

⁴ <https://www.transport.govt.nz/land/bloodalcoholganda/>

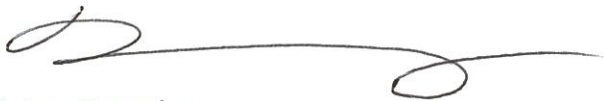
⁵ <https://at.govt.nz/driving-parking/road-safety/drink-driving/>

number of people using the roads as pedestrians or cyclists would increase. If measures are restricted to measuring of injuries or deaths then it does not necessarily reflect how the road is being used. Consideration could also be given to including indicators from the likes of the Healthy Street Indicators⁶ which measure people's experience of streets and measures things like whether streets feel safe and are they easy to cross.

Conclusion

18. NMH strongly supports Ministry of Transport's goal of improving safety on New Zealand roads and thanks the Ministry for the opportunity to comment on Road to Zero: Road Safety Strategy 2020-2030.

Yours sincerely

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke.

Peter Bramley

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⁶ <https://healthystreetscom.files.wordpress.com/2017/11/guide-to-the-healthy-streets-indicators.pdf>