

ACRS Submission on Draft Government Policy Statement on Land Transport



About the Australasian College of Road Safety

The Australasian College of Road Safety was established in 1988 and is the region's peak organisation for road safety professionals and members of the public who are focused on saving lives and serious injuries on our roads.

The College Patron is His Excellency General the Honourable David John Hurley AC DSC (Retd), Governor-General of the Commonwealth of Australia.

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Introduction

The Australasian College of Road Safety is the region's peak membership association for road safety with a vision of eliminating death and serious injury on the road. Our members include experts from all areas of road safety including policy makers, health and transport professionals, academics, community organisations, researchers, federal, state and local government agencies, private companies and members of the public. The purpose of the College is to support our members in their efforts to eliminate serious road trauma through knowledge sharing, professional development, networking and advocacy. Our objectives include the promotion of road safety as a critical organisational objective within government, business and the community; the promotion and advocacy of policies and practices that support harm elimination; the improvement of relative safety outcomes for vulnerable demographic and user groups within the community; the promotion of post-crash policies and practices; and the promotion of a collegiate climate amongst all those with responsibilities for and working in road safety.

The College believes that we should prevent all fatal and serious injuries on our roads; the road traffic system must be made safe for all road users; system designers should aim to prevent human error and mitigate its consequences; life and health are not exchangeable for other benefits in society; and that all College policy positions must be evidence based.

Draft Land Transport Policy

According to the consultation website, the draft document *"builds on the strategic priorities of GPS 2021, including supporting improved transport choices, improving safety, improving freight connections and reducing the impact of transport on our environment. It proposes a strengthened focus on maintaining assets and services and enhancing resilience, recognising recent flood and weather-related recovery efforts"*.

ACRS response to the Consultation Draft

a) Prioritisation of safety

The ACRS is very concerned about the apparent reduction in emphasis and priority of safety in the draft GPS 2024 compared with GPS 2021. Safety is not mentioned in the Ministerial Foreword, nor the Statement of Ministerial Intentions. This may unfortunately be interpreted as suggesting that safety is not considered important, despite the increasing number of deaths in New Zealand(1). Road safety is one of 6 listed strategic priorities, with the description "The primary focus of this priority is to make transport substantially safer for all". The ACRS does not support this diminution of the safety priority and recommends that the GPS 2021 wording be retained "Developing a transport system where no-one is killed or seriously injured", including the Road to Zero activity class. If the LTP2023 is to have a new description for the road safety priority, it must be stronger and more active than the proposed wording. "A transport system where all investment aligns with Safe System principles" may be suitable.

Safety must be maintained as a primary priority for the transport system, with the long-term aspirational goal of Vision Zero. Accepting anything less will decrease the innovation and performance required to address and prevent road trauma. Substantial system improvements have been started since the introduction of Road to Zero, and it is key to maintain this momentum into the next phase.

The description of the strategic priority of safety (p25) notes that “The Government has committed to a target of reducing deaths and serious injuries on our roads by 40 per cent by 2030. This will be delivered through five focus areas: infrastructure improvement and speed management, vehicle safety, work-related vehicle safety, road user choices and system management”. ACRS supports the retention of the 2030 targets. However, the role and responsibility assigned to the GPS 2024 in achieving this is restricted to “further embedding our road safety principles into infrastructure planning, design, operations, maintenance and investment decision-making”. The ACRS recommends this be strengthened to recognise the role of the GPS 2024 in each of the 5 focus areas.

b) Other strategic priorities

Maintaining and operating the system

ACRS strongly supports the government’s increased emphasis on maintaining and operating the system and on ‘building back better’ when completing the renewals programme. It is important to build in safety and resilience improvements rather than simply ‘like for like’. Funding maintenance and renewals at a sustainable rate to improve the condition of the road network will be crucial and there are significant cost savings and benefits that can be achieved when aligning renewals with safety or other mode shift initiatives. This includes identifying opportunities to make low-cost, sensible interventions like upgrading drainage, culverts and retaining walls across local roads and state highways. Targeted maintenance programmes to improve skid resistance have been found to have a benefit cost ratio of at least 2.5 in New Zealand(2).

Reducing emissions

ACRS recommends explicitly including transport related air pollution as a wider transport related harm which could be improved through reducing VKT and other actions included within this priority. (HAPINZ 3.0)

Sustainable urban and regional development

To support the achievement of well-functioning urban environments, and higher density development along well-connected transport corridors, ACRS recommends the inclusion of safe facilities around public transport to encourage uptake including pedestrian crossings, lighting and CCTV. We also recommend including a deaths and serious injuries metric for vulnerable road users in line with the overall 40% reduction target.

Continuing to encourage people back to public transport is critical for ensuring we meet safety and emission reduction outcomes.

Government commitments

The section on Government commitments (p30) notes that “In addition to the Strategic Investment Programme, the Minister expects that, where appropriate, the development of the NLTP should be informed by...the Road to Zero Safety Strategy” (along with seven other programmes, plans and strategies). ACRS recommends that the wording of this section be strengthened to ensure that the Road to Zero Safety Strategy will inform the National Land Transport Policy.

The Road to Zero Safety Strategy was an Activity Class of its own in the GPS2021. The ACRS strongly recommends that this be retained, rather than being subsumed within the state highway and local road improvement and safety activity classes, to ensure that it has prioritisation and dedicated funding. Safety

aligned projects that deliver on achieving Road to Zero targets need their own activity class and should not have to compete for funding with other transport projects.

c) Investment in land transport

Investment delivered through the National Land Transport Fund

ACRS supports the hypothecation of traffic infringement fee revenue to the National Land Transport Fund to support safety investments through the Road to Zero programme. Alongside this, the work on reviewing road safety related fines and penalties should be accelerated, to ensure that they are linked to the risk of the behaviour. However, given that the Road to Zero programme is proposed to be split across two activity classes, further definition may be required on what actions are considered within scope. Because road policing and automated enforcement are within the safety activity class, there is the potential for hypothecation funding policing activities and being seen as a 'revenue raising' activity.

Safety Activity Class

The removal of the Road to Zero Activity Class lowers the tangible commitment to road safety and decreases the funding available. Without dedicated funding, safety risks having to compete with other actions in the Safety Activity Class and the State Highway Improvements and Local Roads Improvements Activity Classes. ACRS strongly recommends that previous funding levels and the Road to Zero Activity Class be maintained. Without this, the targeted 40% reduction in deaths and serious injuries by 2030 are at serious risk of not being achieved. While targeted safety interventions are still eligible for funding, the concern is that given funding and prioritisation pressures on the state highway/local road improvements activity classes, there is potential for limitations to be placed on the scale of targeted safety interventions delivered.

Activity Class expenditure upper and lower limits

Modelling indicates that infrastructure and speed management initiatives contribute just under half of the overall 40% targeted reduction in deaths and serious injuries by 2030. An estimated \$1.5 billion may be needed for each three-year National Land Transport Policy to deliver these safety infrastructure and speed management initiatives at the scale necessary to deliver these safety outcomes. However, the budget for State Highway Improvement activity is lower than the previous GPS, meaning that there is likely to be insufficient funding for state highway infrastructure and speed management. Local Road Improvements funding has increased, but overall the funding is insufficient to replace the funding lost from the previous \$10b Road to Zero activity class.

A distinct and critical component of road safety concerns is enforcement. Road safety partners have been working with NZ Police to increase traffic enforcement and reduce high-risk and illegal behaviour. This work has seen commendable recent gains in police activity. If funding for the safety activity class falls towards the lower end of the band, police resourcing may be compromised, and recent gains lost.

Community consultations have led to high expectations from schools and local boards for the delivery of Regional Speed Management Plans. ACRS strongly supports the implementation of these plans and believes that they should include a focus on delivery of low-speed neighbourhood plans. Funding must be maintained to enable implementation, which may be at risk with the infrastructure component of safety being moved to local roads improvements.

Conclusion and Recommendations

ACRS supports the drafting of a new Land Transport Policy but is concerned about the apparent demotion of safety within this current consultation draft. We recommend:

- that the GPS 2021 wording be retained “Developing a transport system where no-one is killed or seriously injured”;
- the Road to Zero activity class and accompanying funding levels be retained;
- the wording around the target of reducing deaths and serious injuries by 40% by 2030 be strengthened to recognise the role of the GPS 2024 in each of the 5 focus areas;
- explicitly including transport related air pollution as a wider transport related harm which could be improved through reducing VKT and other actions included within the reducing emissions priority;
- the inclusion of safe facilities around public transport to encourage uptake including pedestrian crossings, lighting and CCTV; and
- the wording of the Government commitments section be strengthened to ensure that the Road to Zero Safety Strategy will inform the National Land Transport Policy’.

ACRS appreciates this opportunity to comment on the draft Land Transport Policy and contribute to improving road safety in New Zealand. Please contact us should you require any further information.



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References

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2. Jooste FJ, van der Wel P. Understanding the safety impacts and opportunities of state highways resurfacing and renewals. Report by Lonrix for NZ Transport Agency. <https://www.nzta.govt.nz/assets/resources/understanding-the-safety-impacts-and-opportunities-of-state-highway-resurfacing-and-renewals/Understanding-the-safety-impacts-and-opportunities-of-state-highway-resurfacing-and-renewals-full-report.pdf>: NZ Transport Agency; 2020.