

2 October 2009

Safer Journeys
Ministry of Transport
PO Box 3175
WELLINGTON 6140

Dear Sir/Madam

'SAFER JOURNEYS' ROAD SAFETY STRATEGY DISCUSSION DOCUMENT

1.0 INTRODUCTION

- 1.1 Hamilton City Council (HCC) welcomes the opportunity to make a submission to the Ministry of Transport's 'Safer Journeys' Road Safety Strategy Discussion Document (referred to throughout this submission as Safer Journeys).
- 1.2 The debate around road safety comes at a critical time. Many organisations (including HCC) are of the view that the current Road Safety Strategy 2010 has failed to deliver in most of its focus areas - particularly around the Strategy's goals of having no more than 300 road deaths and 4,500 hospitalisations a year by 2010. Introduction of the Strategy in October 2003 has not resulted in a commensurate reduction in road fatalities and injuries over the past six years.
- 1.3 HCC appreciates the approach that the Ministry of Transport (MoT) has taken regarding the release of the comprehensive Safer Journeys discussion document, which outlines, debates and questions a range of critical issues around road safety.
- 1.4 However, given the significance around road safety issues facing the country, HCC is of the view that after considering submissions to Safer Journeys, that the MoT should then develop a **draft** Road Safety Strategy to 2020 that is open for a further round of submissions prior to finalising the Strategy. While this would delay release of the final Strategy from December 2009 to early 2010, HCC is of the view that this additional step would provide for more robust and focused discussion around priority areas for road safety resultant from submissions received to the Safer Journeys discussion document.
- 1.5 **Road Fatalities in the Waikato and Hamilton**
 - 1.5.1 As the MoT will be aware, each year the Waikato accounts for the highest number of road deaths across all regions in New Zealand. Of the 244 road deaths for the country recorded in 2008, 52 (21.3%) occurred on Waikato roads. The 2009 figures for the Waikato are already higher, with 59 road deaths so far this year.

- 1.5.2 The Waikato also accounts for the highest social cost from road fatalities and injuries i.e. \$578 million in 2007¹ (15.5% of the national total of \$3.74 billion). The social cost of road crash trauma is significant and far reaching throughout society - the bottom line is that road fatality and injuries result in the likes of families' lives being destroyed and depriving the workforce of skilled workers. The resource drain and costs imposed on the justice and health sectors alone are also significant - resources and costs that could be much better spent on other more pressing areas.
- 1.5.3 In terms of Hamilton's context, the number of injury crashes in Hamilton has been rising over the last five years; however nationally the number of deaths each year on New Zealand's roads has been decreasing since 1996.
- 1.5.4 In 2008, there was one death, 58 serious casualties and 407 minor casualties on Hamilton's roads. There were 882 reported non-injury crashes, and the total social cost of crashes in 2008 was \$84 million. Although Hamilton's severity rate of crashes is decreasing, the urban crash rate and rate of casualties is higher than New Zealand's as a whole.
- 1.5.5 HCC, along with its regional transport partners is committed to reducing road trauma in Hamilton and in the Waikato.

1.6 Hamilton's Access Hamilton Strategy and Current Areas of Concern

- 1.6.1 Hamilton's Access Hamilton Strategy identifies a vision for transport development and commits the city to integrated transport and land use planning. Access Hamilton has been developed in partnership by a working group of key agencies. This collaboration will deliver an affordable, coordinated approach to transport and ensure Hamilton's integrated transport planning leads best practice. The working group and key partners include key staff from HCC, the New Zealand Transport Agency, Environment Waikato and the Police.
- 1.6.2 The Transport Safety Action Plan is one of seven action plans that coordinate and prioritise the various activities developed to implement the Access Hamilton Strategy. The purpose of this action plan is to guide the delivery of road safety in Hamilton from now until it is reviewed in three years time.
- 1.6.3 The aspiration of the Transport Safety Action Plan is for "*no-one to be killed or seriously injured on Hamilton's transport network*". The action plan includes targets reviewed each year that reflect Hamilton's current transport issues. In line with the Draft Regional Road Safety Strategy for the Waikato Region 2009-2012, the action plan considers transport safety from a 'Safe System Approach'.
- 1.6.4 Hamilton's current areas of concern for transport safety are shown in the following diagram.

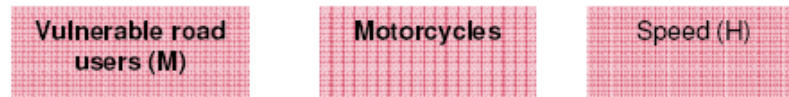
¹ New Zealand Transport Statistics (Transport Monitoring Indicator Framework). Ministry of Transport (July 2009).

Hamilton's Areas of Concern for Transport Safety

High concern



Medium concern



Areas for continued focus



2.0 SAFER JOURNEYS - PROPOSED STRATEGY, VISION AND POLICY APPROACH

2.1 Proposed Strategy

- 2.1.1 As discussed in the introduction to this submission, HCC is of the view that after considering submissions to Safer Journeys, the MoT should then develop a **draft** Road Safety Strategy to 2020 that is open for a further round of submissions prior to finalising the Strategy. HCC is of the view that this additional step would provide for more robust and focused discussion around priority areas for road safety resultant from submissions received to the Safer Journeys discussion document.
- 2.1.2 As it currently stands, the Safer Journeys discussion document does not have a strong strategy element and focuses on detail and implementation. While it promotes good debate and offers a comprehensive range of suggested initiatives, it does not advocate for a strong direction or integration with other related legislation, strategies and plans.
- 2.1.3 For instance, will the final Strategy take into account (and be in alignment with) the projects and programmes currently being considered for the 20-year National Infrastructure Plan to be released in 2010 (and vice versa)? The programmed development stages of the Waikato Expressway between Auckland and Cambridge will significantly reduce the number of fatal and serious injury crashes.
- 2.1.4 It is also difficult to prioritise the suggested initiatives, as they are very wide ranging, are often interdependent, and their relative importance will depend on the submitter's context. For example, initiatives that are important to Hamilton as a predominantly urban area will likely differ from those that are important to a rural area. It is critical that the initiatives selected for implementation provide a balance between improving outcomes at a national level and providing for action at a local level.

- 2.1.5 It is important to note that HCC's views on the suggested initiatives concentrate on those that are important in terms of Hamilton's context and focus predominantly on the current road safety concerns highlighted in the Access Hamilton Road Safety Action Plan.

Key Points:

- That the MoT develop a **draft** Road Safety Strategy to 2020 that is open for a further round of submissions prior to finalising the Strategy.
- That the MoT ensure that the final Road Safety Strategy to 2020 takes into account and is in alignment with the content and direction of other related national, regional and local strategies.
- It is critical that the initiatives selected for implementation provide a balance between improving outcomes at a national level and providing for action at a local level.

2.2 Proposed Vision

- 2.2.1 HCC is supportive of having an inspirational and challenging vision that resonates with all New Zealanders. However, the vision proposed in Safer Journeys (page 6) is currently unspecific around timeframes, does not contain targets and overall does not strongly advocate for change.
- 2.2.2 HCC encourages the MoT to strengthen the vision proposed in Safer Journeys to aim for zero road fatalities and serious injuries in the longer term, supported with steady progress through interim strategies and targets in the short to medium term. HCC recognises that this is ambitious; however, an ambitious vision can be a powerful stimulus to developing new approaches to preventing loss of life and serious injury on the roads.
- 2.2.3 Safer Journeys points out that having no vision for road safety is a weakness. However, HCC is of the view that having no targets or milestones to assess progress towards the vision is also a weakness.
- 2.2.4 It is acknowledged that targets may create a perception that the government is comfortable with a certain level of fatalities and serious road trauma. In practice though, targets provide a means of accountability for all parties in the sector and a clearer indication of the level of investment expected to deliver on the Strategy's vision. Targets can also serve as a way of assessing the effectiveness of initiatives over time.
- 2.2.5 In addition to the inclusion of targets in the final Strategy, HCC is also of the view that the MoT needs to undertake regular monitoring and reporting (at least on an annual basis) of road safety initiatives and programmes in order to gauge their effectiveness. This information can then be used to make adjustments that will enable better resource allocation and more efficient and effective delivery of initiatives and programmes.

Key Points:

- That the MoT strengthen the vision proposed in Safer Journeys to aim for zero road fatalities and serious injuries in the longer term, supported with steady progress through interim strategies and targets in the short to medium term.
- That in addition to the inclusion of targets in the final Strategy, the MoT also undertake regular monitoring and reporting (on at least an annual basis) of road safety initiatives and programmes in order to gauge their effectiveness. Adjustments can then be made that will enable better resource allocation and more efficient and effective delivery of initiatives and programmes.

2.3 Proposed Policy Approach - The Safe System

- 2.3.1 HCC supports the Safe System Approach to road safety. However, HCC is concerned that the diagram (page 7) and approach described in the Safer Journeys discussion document are not aligned with current international best practice.
- 2.3.2 The ultimate goal of a Safe System Approach is to prevent any road user being subject to impacts sufficient enough to cause fatal or serious injury when inevitable errors of judgement result in crashes. It places road users at the centre of the diagram and sees them as the weakest link in the transport chain.
- 2.3.3 Placing the road user at the centre of the Safe System Approach is reinforced through the fact that the predominant cause of crashes is a result of 'poor observation'. As noted in a recent New Zealand Automobile Association report², *"Crash causes coded in the Crash Analysis System are entered by Police from crash forms at the scene. Although the form makes ticking speed and alcohol easy, in fact the most commonly coded cause is 'poor observation'. Almost half of all injury crashes were coded to 'poor observation' in 2008."*
- 2.3.4 HCC is of the view that a consistent representation of the Safe System Approach that aligns with international best practice and places road users at the centre of the diagram is required.

Key Points:

- That the MoT promotes a consistent representation of the Safe System Approach in the final Strategy that aligns with international best practice and places road users at the centre of the diagram.

3.0 AREAS OF HIGH CONCERN**3.1 Reducing the Impact of Alcohol/Drug Impaired Driving**

- 3.1.1 The impact that alcohol has on road safety is also a high priority for Hamilton. The number of alcohol-related injury crashes has been rising in the city. Between 2004 - 2008 there were 172 alcohol-related injury crashes on

² 'Saving Ourselves' - A Discussion Paper on Issues for the 2020 New Zealand Land Transport Strategy. New Zealand Automobile Association (September 2009).

Hamilton's local roads and 36 on state highways. In 2008, alcohol was a factor in 13% of injury crashes in Hamilton.

3.1.2 Submission to 'Alcohol in Our Lives'

HCC is currently developing a submission to the Law Commission on the recently released issues paper entitled 'Alcohol in Our Lives - An Issues Paper on the Reform of New Zealand's Liquor Laws'. The issues and concerns raised in this discussion paper are strongly tied to the issues around alcohol discussed in Safer Journeys. HCC assumes that the MoT is working with the Law Commission on issues and solutions that could be beneficial for both the final Road Safety Strategy and the final revised Sale of Liquor Act.

3.1.3 Drug Driving

Driving while affected by drugs (either illicit or prescription drugs) is becoming an increasing problem both overseas and in New Zealand. Research undertaken by the Australian state of Victoria found that **in 2005 illicit drugs were a factor in more fatal crashes than alcohol** i.e. drug driving (where one or more illicit drugs are present) is a factor in approximately 40% of driver deaths on Victoria's roads each year.

3.1.4 While there appears to be no substantive studies that identify the full extent of the drug driving problem in New Zealand (particularly in comparison to studies around the effects of alcohol on driving), it is likely that this country's proportion is similar to that of the Australian state of Victoria. HCC is of the view that the MoT needs to undertake further research so as to gain a better understanding of the role that both illicit and prescription drugs have on road safety.

3.1.5 HCC is also aware that various states in Australia are undertaking random drug testing of drivers using saliva sampling. These tests detect five of the main drugs in use: amphetamines (such as ecstasy), cocaine, opiates, cannabis and methadone. Those found positive are then referred for drug treatment. It is suggested that similar tests could be introduced into the New Zealand system.

3.1.6 Measures that the Victoria 2008-2017 Road Safety Strategy (which is based on the Safe System Approach) has incorporated to reduce the incidence of drug driving include:

- More targeted enforcement through roadside drug testing programmes.
- Educating motorists to better understand the illicit drug driving/crash risk relationship, and the high risk of detection.
- Undertaking research to increase understanding of the role of both illicit and prescription drugs on road safety.
- Following discussions with the emergency hospital sector, ensuring the routine blood sampling of all drivers who are injured in crashes, but not killed.
- Exploring the introduction of a drug interlock program to separate driving from drug use (this is similar to the alcohol interlock program currently being used in Victoria).

3.1.7 HCC encourages the MoT to adopt similar measures being used by the Australian state of Victoria to combat illicit and prescription drug driving, and

that these measures be included in New Zealand's final road safety strategy for the next 10 years (including the introduction of random roadside drug testing for the presence of illegal drugs as technology allows).

Key Points:

- HCC supports reducing the legal adult blood alcohol concentration (BAC) limit to 50mg per 100ml (BAC 0.05), and considers this to be the single most important initiative around alcohol that will reduce the impacts of drink driving.
- HCC supports the introduction of a zero blood alcohol limit for certain drivers e.g. drivers under 20 years, adults without a full license, and commercial drivers.
- Addressing recidivism (repeat drink drivers) through a zero blood alcohol limit for recidivists and move towards mandatory alcohol interlocks is also supported.
- HCC **does not** support the introduction of infringement penalties for offences between BAC 0.05 and BAC 0.079 if the legal blood alcohol limit is lowered to BAC 0.05. This approach is seen to detract from the message that the legal limit is now lower and may effectively result in 'legitimising' having a BAC that is over the legal limit.
- HCC also supports programmes that inform the New Zealand public about the impact of alcohol on driving e.g. use of television campaigns.
- Driving while affected by drugs (either illicit or prescription drugs) is becoming an increasing problem both overseas and in New Zealand. Research undertaken by the Australian state of Victoria **found that in 2005 illicit drugs were a factor in more fatal crashes than alcohol**. HCC is of the view that the MoT needs to undertake further research of the role that both illicit and prescription drugs have on road safety.
- HCC encourages the MoT to adopt measures similar to those being used by the Australian state of Victoria (as identified in Sections 3.1.6 and 3.1.7 of this submission) to combat illicit drug driving in New Zealand's final road safety strategy for the next 10 years (including the introduction of random roadside drug testing for the presence of illegal drugs).

3.2 Increasing the Safety of Young Drivers

- 3.2.1 As noted in Safer Journeys, *"Young New Zealanders aged 15-24 years are 14.5% of New Zealand's population and 16% of all licensed drivers. Yet in 2008 they were involved in around 37% of all fatal crashes and 37% of all serious injury crashes."*
- 3.2.2 HCC supports raising the minimum driving age from 15 to 17 years of age. New Zealand's minimum driving age of 15 years is currently one of the lowest of the OECD countries, and it is well documented that the highest crash risk occurs in the 15-17 year age group. Given this situation HCC also supports extending the learner period from six to 12 months (as outlined on page 17 of Safer Journeys). As part of this, it is suggested that advanced driver training courses form a mandatory part of this additional learner period.

- 3.2.3 It is estimated that uninsured motorists cost insurance companies up to \$85 million a year. The existing situation means that those who currently pay to be insured for third party damage are in effect subsidising the quarter or more of vehicles not insured through their premiums.
- 3.2.4 On average third party insurance costs around \$100 a year for drivers with good track record (although premiums are likely to be higher for young drivers or those driving modified cars).
- 3.2.5 Australia currently operates a compulsory third party insurance system. This is an integral part of the vehicle registration process and appears to operate very successfully.
- 3.2.6 HCC supports the recent moves by government to introduce compulsory third party insurance in New Zealand and would like to see this linked through to the motor vehicle registration system.
- 3.2.7 HCC is aware that access to high powered vehicles is a factor in a number of crashes involving young drivers.
- 3.2.8 While HCC sees merit in introducing vehicle restrictions (e.g. power, turbocharged/supercharged vehicles) for young drivers, it has concerns over the practicality of enforcing of such provisions.

Key Points:

- HCC supports raising the minimum driving age from 15 to 17 years of age, as well as extending the learner period by six months (including the mandatory inclusion of advanced driver training courses as part of this additional learner period).
- HCC supports the introduction of compulsory third party insurance in New Zealand that is linked through to the motor vehicle registration system.
- While HCC sees merit in introducing various vehicle restrictions (e.g. power, turbocharged/supercharged vehicles) for young drivers, it has concerns over the practicality of enforcing such provisions.

3.3 Safer Roads and Roadsides

- 3.3.1 Hamilton's highest concern in this area is intersections. The five worst urban intersections in Hamilton have crash rates up to three times what would be expected for typical similar sites. The proportion of rural crashes that occurred at intersections on Hamilton's rural roads is significantly higher than for New Zealand or Hamilton's peer group.
- 3.3.2 The two most common factors are failure to give way/stop and poor observation. The most common crash type at intersections is when a driver turns right and is hit by a vehicle approaching from the right.
- 3.3.3 An objective of the Access Hamilton Transport Safety Action Plan is to reduce the number of crashes at intersections in Hamilton city to less than or equal to the intersection crash rate of Hamilton's peer group.

Key Points:

- HCC is supportive of all of the suggested initiatives in pages 20-23 of the Safer Journeys discussion document.
- The most important initiative to Hamilton is a targeted programme for high-risk urban intersections (including engineering treatments, changing the give way rules for turning traffic, and changing the give way rules for pedestrians).
- HCC is also supportive of the initiative to develop and support new approaches to safety on mixed-use arterial roads. It is noted that Safer Journeys points out that if there is enough support for this initiative, then a package of interventions will be put together to assist local authorities.

3.4 Safer Speeds

- 3.4.1 HCC has a number of initiatives in place that target a reduction in speed related crashes. A new 40km/h speed precinct came into effect on 1 March 2009, around the Waikato Hospital and Hamilton West Primary School. This is an expansion to the already successful 40km/h school speed zones project launched in February 2008, which is now in place around 18 Hamilton primary and intermediate schools.
- 3.4.2 The impetus behind the new traffic calming initiatives is to provide a safer road environment around Hamilton schools and residential areas, reinforce driver expectations as to the likely presence of children in the area and encourage safe, active travel to school. In particular HCC is seeking to discourage inappropriate speeds within the vicinity of primary and intermediate schools, parks, and places where there is a high presence of people walking or cycling on the street in a given area.
- 3.4.3 Although it is HCC's desire to implement 40km/h variable speed zones around every school in the city, this is difficult to achieve given the current Speed Rules.
- 3.4.4 HCC also has in place an annual traffic calming and minor safety programme to reduce speeds and volumes of 'rat-running' traffic on local roads. Speed trailers and other speed indicating devices are used throughout the city; and support is also provided for back to school initiatives focusing on safe speed around schools. It would assist local authorities if LTNZ provided a greater Financial Assistance Rate to support these relatively low cost but effective measures.

Key Points:

- HCC is supportive of all of the suggested initiatives outlined in pages 24-27 of the Safer Journeys discussion document.
- In particular, HCC supports an increase in the adoption of lower speed limits in urban areas, an initiative already well underway in Hamilton. HCC also supports reviewing speed limits on mixed-use urban arterials.
- HCC supports having higher demerit points, but does not support lowering fines. Rather, fines should remain the same.
- HCC encourages the MoT to consider reviewing the existing NZTA Speed Rules to make it easier for local authorities who wish to implement 40km/h

speed zones around schools.

- It would assist local authorities if LTNZ provided greater Financial Assistance Rates to support relatively low cost but effective safety initiatives such as 40km/h speed zones, speed trailers and other speed indicating devices.

Increasing the Safety of Motorcycling

- 3.4.5 A recent New Zealand Automobile Association³ paper notes that of the 2,303 fatal and serious moped and motorcycle crashes between 2003 and 2008, 2,000 were classed by Police to have been caused by the motorcycle or moped and half of these only involved one vehicle.
- 3.4.6 The most common type of motorcycle crash in Hamilton is when a vehicle fails to give way and the motorcyclist hits the vehicle. This is most often due to poor observation. Most motorcycle crashes occur at intersections.
- 3.4.7 Motorcyclist injuries do not feature highly in the overall crash statistics in Hamilton, representing only 10% of all injuries. However, they make up 15% of fatal and serious injuries.

Key Points:

- HCC supports all of the suggested initiatives outlined in pages 28-30 of the Safer Journeys discussion document, with an emphasis on the first four:
 - Improve rider training and licensing (for example, linking rider training and licensing with motorcycle purchases).
 - Introduce a specific programme of treatments for motorcycle black spots.
 - Require all new motorcycles to have anti-lock brake systems by 2015.
 - Promote high visibility and protective clothing.
- In terms of the motorcycle crashes in Hamilton (the primary cause being poor observation) the promotion of high visibility and protective clothing in particular may help to reduce the incidence of crashes.
- In addition to the suggested initiatives, HCC also supports initiatives such as the change to the Road User Rule from 1 November 2009, to include a requirement for motorcyclists and moped riders to operate headlights during daylight hours. This initiative, along with the promotion of high visibility and protective clothing, will also assist in ensuring that motorcyclists and moped riders are more visible to other road users.

4.0 AREAS OF MEDIUM CONCERN

4.1 Improving the Safety of the Light Vehicle Fleet

- 4.1.1 Research from the State of Victoria in Australia indicates that if all motorists upgraded their vehicles to be the safest in their class, road trauma would immediately decrease by around one third.

³ Saving Ourselves - a Discussion Paper on Issues for the 2020 New Zealand Land Transport Safety Strategy (September 2009).

- 4.1.2 Given the significant impact that safer vehicles can make to people's safety on the roads (and therefore to the Safe Systems approach to road safety), HCC supports ongoing initiatives by government to work with the motor vehicle industry on accelerating the introduction of advanced vehicle safety technologies in new vehicles being imported into New Zealand.
- 4.1.3 Support is also encouraged regarding introduction of initiatives that will increase the safety of imported used vehicles. For example, introduction of the New Zealand Frontal Impact Standard in 2002 limited the import of used vehicles that could be certified for use on New Zealand roads to those manufactured after 1996. However, while this initially reduced the average age of imported vehicles by limiting them to vehicles that were six years old or less, this effect appears to have diminished each year - importers continue to source vehicles from just after 1996 as they are generally cheaper than newer vehicles. As a result, the average age of the vehicle fleet seems to be increasing each year, which means that the country is not benefiting from other technology gains in safety or fuel consumption that have been occurring at the same time as emissions standards have been improved.
- 4.1.4 However, it is envisaged that this trend will not continue. The introduction in January 2008 of the Land Transport Vehicle Exhaust Emissions Rule 2007 requires that a vehicle being certified for entry into service in New Zealand for the first time must have been manufactured in accordance with an approved emission standard. Its aim is to establish an exhaust emissions baseline for motor vehicles entering the country - this will bring New Zealand in line with Japanese and European standards. The Rule provides clear guidance to the new car industry that New Zealand will adopt new standards as they are adopted internationally. It also introduces a testing regime to ensure that emissions from used vehicle imports have remained within stated limits.
- 4.1.5 In effect this Rule should result in a gradual reduction in the age of imported vehicles. The revised Rule is intended to clearly establish minimum standards for used vehicles.
- 4.1.6 HCC supports the ongoing introduction of such initiatives by government that will gradually lead to an update of the country's vehicle fleet. A more modern vehicle fleet will in turn result in an increase in key safety features such as side curtain air bags and electronic stability control (ESC). The latter feature in particular has been proven to significantly reduce the likelihood of crashes occurring as well as reducing the severity of outcomes when crashes do occur. A study by the University of Michigan Transportation Research Institute⁴ (the most comprehensive study of its kind to date) looked at the effect of ESC in relation to fatal and non-fatal crashes, weather conditions, gender and age.
- 4.1.7 The study showed that ECS can cut in half the odds of fatal single-vehicle SUV crashes (rollovers and other loss-of-control-type crashes) and reduce the odds of fatal single-vehicle crashes for passenger cars by 30%. Corresponding percentage reductions for non-fatal, loss-of-control crashes are 70% for SUVs and 55% for passenger cars. No significant differences due to ESC were found between males and females, but middle-aged drivers of passenger cars and older drivers of SUVs tended to benefit most from the presence of ESC.

⁴ The Effectiveness of Electronic Stability Control on Motor Vehicle Crash Prevention. University of Michigan Transportation Research Institute (UMTRI). Paul Green and John Woodrooffe (April 2006).

- 4.1.8 The study's authors also note that "*Electronic stability control is probably the most significant automotive safety technology since the seat belt...It provides benefits in various driving conditions, specifically in cases of oversteering and understeering. It also provides safety benefits in bad weather conditions by preventing vehicles from skidding or sliding on wet, snowy or icy roads.*"
- 4.1.9 The safety benefits offered through vehicles having ESC are clearly immense. As such, HCC encourages the government to ensure that regulations are in place so that vehicles (in particular the light vehicle fleet) imported into New Zealand are required to be equipped with ESC and other key safety technology. HCC supports the suggestion in Safer Journeys (page 33) that a phase in period for this to occur could be around 2011-2015.
- 4.1.10 HCC is also of the view that government should be showing leadership in this area through, for example, government departments replacing fleet vehicles with those that have key safety features such as ESC and side curtain air bags.
- 4.1.11 HCC also supports the Safer Journeys suggestion that WOF inspections be expanded to include checking of key vehicle safety technology such as ESC. Support is also given to the various approaches outlined in Safer Journeys around increasing consumer awareness of the benefits of buying safer vehicles (such as promoting more information through the likes of the 'RightCar' website www.rightcar.govt.nz and working with the insurance industry to lower premiums for safer vehicles).
- 4.1.12 A major benefit of upgrading the country's vehicle fleet is the resultant increase in vehicle operating efficiency and the corresponding reduction in exhaust emissions, which in turn has positive effects on the natural environment (including climate change) and people's health.
- 4.1.13 The report *Health and Air Pollution in New Zealand* released in July 2007⁵ shows that air pollution is associated with around 1,100 cases of premature mortality throughout the country i.e. people dying earlier than they would have if they had not been exposed to air pollution. Of this figure, 500 New Zealanders (45.5%) are dying prematurely every year as a result of vehicle emissions, particularly the emissions from older diesel vehicles. This number increased by 25.3% from 399 in 2002 to 500 people in 2007.
- 4.1.14 Other illnesses caused by air pollution include:
- Around 1,500 extra cases of bronchitis and related illnesses.
 - 700 extra hospital admissions for respiratory and cardiac illnesses.
 - 1.9 million restricted activity days (days on which people cannot do the things they might otherwise have done if air pollution was not present).
- 4.1.15 Although the majority of health effects are associated with particulate pollution (PM₁₀), there are also effects associated with other pollutants such as nitrogen dioxide, carbon monoxide and volatile organic compounds.

⁵ Health and Air Pollution in New Zealand. G. Fisher (Endpoint); T. Kjellstrom (Health and Environment International Trust); S. Kingham (University of Canterbury); S. Hales (Wellington School of Medicine and Health Sciences); R. Shrestha (Australian National University). A research project funded by the Health Research Council of New Zealand, the Ministry for the Environment and the Ministry of Transport (June 2007).

- 4.1.16 The total economic cost of air pollution in New Zealand (from both premature death and adverse health impacts) is estimated to be \$1.14 billion per year. Of this figure, \$494.6 million (43.4%) is directly attributable to emissions from motor vehicles.

Key Points:

- Given the significant impact that safer vehicles can make to people's safety on the roads (and therefore to the Safe Systems approach to road safety), HCC supports ongoing initiatives by government to work with the motor vehicle industry on accelerating the introduction of advanced vehicle safety technologies in new vehicles being imported into New Zealand.
- HCC supports the ongoing introduction of initiatives by government (such as the Land Transport Vehicle Exhaust Emissions Rule 2007) that will gradually lead to an update of the country's vehicle fleet. A more modern vehicle fleet will in turn result in an increase in key safety features such as side curtain air bags and electronic stability control (ESC).
- The safety benefits offered through vehicles having ESC are clearly immense. As such, HCC encourages the government to ensure that regulations are in place so that vehicles (in particular the light vehicle fleet) imported into New Zealand are required to be equipped with ESC and other key safety technology. HCC supports the suggestion in Safer Journeys (page 33) that a phase in period for this to occur could be around 2011-2015.
- HCC is also of the view that government should be showing leadership in this area through, for example, government departments replacing fleet vehicles with those that have key safety features such as ESC and side curtain air bags
- Support is also given to the various approaches outlined in Safer Journeys around increasing consumer awareness of the benefits of buying safer vehicles (such as promoting more information through the likes of the 'RightCar' website www.rightcar.govt.nz and working with the insurance industry to lower premiums for safer vehicles).
- A major benefit of upgrading the country's vehicle fleet is the resultant increase in vehicle operating efficiency and the corresponding reduction in exhaust emissions, which in turn has positive effects on the natural environment (including climate change) and people's health (particularly given that 500 New Zealanders are dying prematurely every year as a result of vehicle emissions - particularly emissions from older diesel vehicles).

4.2 Safer Walking and Cycling

- 4.2.1 In Hamilton, pedestrians and cyclists do not feature highly in the overall number of crashes; however, they make up a significant proportion of fatalities. Most pedestrian crashes occur at mid-block locations (not intersections). Most cyclist crashes occur at intersections.
- 4.2.2 HCC would like to see further work on the NZTA Speed Rule to allow more flexibility for setting slower speed limits in urban situations, particularly where there are high numbers of vulnerable road users.

- 4.2.3 As discussed in Section 3.4 of this submission (Safer Speeds), it is HCC's desire to implement 40km/h variable speed zones around every school in the city, but this is difficult to achieve given the current Speed Rules.

Key Points:

HCC supports the suggested initiatives outlined in pages 35-37 of the Safer Journeys discussion document. In particular, the roll-out of strongly enforced variable speed limits around schools.

4.3 Improving the Safety of Heavy Vehicles

4.3.1 On 24 July 2009 HCC made a submission to the NZ Transport Agency on the draft Land Transport Rule: Vehicle Dimensions and Mass Amendment [(No 2) 2009] - Rule 41001/05. HCC expressed serious reservations in its submission about the MoT's claims around predictions of increased safety on New Zealand's roads through introduction of the draft amendment.

4.3.2 As the MoT will be aware, just on 20% of the nation's freight passes through the Waikato Region. This heavy usage of the road network corresponds to the region accounting for the highest number of road fatalities, as well as being the region with the highest number of fatalities involving heavy vehicles.

4.3.3 The following table shows the number of road fatalities involving trucks (irrespective of who was at fault) for the whole country and the Waikato Region. Clearly the proportion of road fatalities involving trucks is significantly higher for the Waikato Region when compared with the national figures. For example, in 2008 the proportion for New Zealand was 15.85% compared to 22.67% for the Waikato Region. The difference in proportions between New Zealand and Waikato Region was particularly marked in 1996 (13.95%), 1997 (11.45%), 2002 (10.18%) and 2007 (12.45%) - refer column on the far right of the following table.

Road Fatalities Involving Trucks - Comparison between Waikato and NZ1994-2008

Year	Total Waikato Road Toll	Waikato Road Toll Involving Trucks	Percentage Share (%)	New Zealand Road Toll	New Zealand Road Toll Involving Trucks	Percentage Share (%)	Percentage Share Difference between Waikato and NZ (%)
1994	108	23	21.30	580	113	19.48	1.81
1995	108	21	19.44	582	115	19.76	-0.32
1996	89	28	31.46	514	90	17.51	13.95
1997	108	31	28.70	539	93	17.25	11.45
1998	85	21	24.71	501	82	16.37	8.34
1999	97	28	28.87	509	115	22.59	6.27
2000	107	30	28.04	462	90	19.48	8.56
2001	93	20	21.51	455	88	19.34	2.16
2002	65	16	24.62	485	70	14.43	10.18
2003	81	18	22.22	461	72	15.62	6.60
2004	84	23	27.38	435	89	20.46	6.92
2005	98	30	30.61	405	93	22.96	7.65
2006	68	12	17.65	393	85	21.63	-3.98
2007	94	28	29.79	421	73	17.34	12.45
2008	75	17	22.67	366	58	15.85	6.82

Source: NZ Transport Authority

- 4.3.4 This issue is likely to compound with traffic volumes on the Waikato's roads predicted to grow at an average rate of 3% per annum over the next 10 years. Road freight in the Waikato is also projected to almost double between 2006 and 2031⁶. This means that the Waikato is forecast to have the highest growth in freight traffic generated from within the country's 14 regions. It is likely that this will then impact on the safety risks for Waikato roads.
- 4.3.5 While HCC acknowledges that the road freight sector has made a number of improvements towards increased vehicle safety, trucks still account for around 16% of all road deaths. Most of these deaths occur on main roads between urban centres - supporting the view better complementary use can be made of rail (as well as coastal shipping) i.e. Given that road freight accounts for 70% of all domestic freight movements, this modal shift of freight could make a significant impact in improving driving safety on New Zealand's roads.
- 4.3.6 It is also worth noting that any compromises to vehicle and road safety that may result in more crashes would soon negate any of the MoT's claimed benefits around increases in vehicle productivity and the nation's GDP by introduction of the draft amendment.
- 4.3.7 HCC supports the suggested initiatives to improve the safety of heavy vehicles outlined on pages 38-39 of Safer Journeys. As with private motor vehicles, increased introduction of electronic stability control technology into the heavy vehicle fleet is seen as having a significant impact on the safety of trucks on New Zealand's roads.

Key Points:

- As the MoT will be aware, just on 20% of the nation's freight passes through the Waikato Region. This heavy usage of the road network corresponds to the region accounting for the highest number of road fatalities, as well as being the region with the highest number of fatalities involving heavy vehicles.
- HCC's submission to the NZTA on the draft Land Transport Rule: Vehicle Dimensions and Mass Amendment [(No 2) 2009] - Rule 41001/05 expresses serious reservations about the MoT's claims around predictions of increased safety on New Zealand's roads through introduction of the draft amendment.
- HCC supports the suggested initiatives to improve the safety of heavy vehicles outlined on pages 38-39 of the Safer Journeys discussion document. As with private motor vehicles, increased introduction of electronic stability control technology into the heavy vehicle fleet is seen as having a significant impact on the safety of trucks on New Zealand's roads.

5.0 CONCLUDING COMMENTS

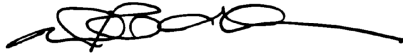
- 5.1 HCC trusts that the points made in this submission are helpful to the MoT when considering all submissions to the Safer Journeys Road Safety Strategy.
- 5.2 HCC understands that the MoT will not be holding formal hearings for submitters. However, given the importance of road safety issues, HCC is of the

⁶ The Ministry of Transport, Ministry of Economic Development and Land Transport New Zealand (now part of the New Zealand Transport Agency) - 'National Freight Demand Study' (September 2008).

view that submitters should be given the opportunity to be heard in support of their written submission.

- 5.3 If you require clarification or additional information on the points raised in this submission, please contact Sarah Ward (Strategy and Research Unit) in the first instance, phone 838 6605, email sarah.ward@hcc.govt.nz).

Yours faithfully

A handwritten signature in black ink, appearing to read 'Michael Redman', with a long horizontal flourish extending to the right.

Michael Redman
CHIEF EXECUTIVE