



Road Safety Strategy

A submission from Local Government New Zealand

August 2019

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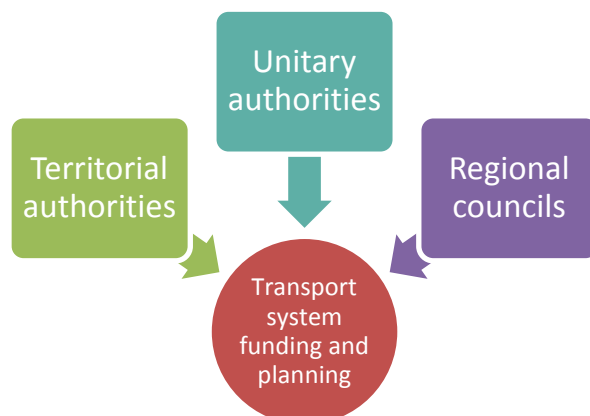
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We are. LGNZ.

Local Government New Zealand (LGNZ) is the national organisation of local authorities in New Zealand and all 78 councils are members. We represent the national interests of councils and lead best practice in the local government sector. LGNZ provides advocacy and policy services, business support, advice and training to our members to assist them to build successful communities throughout New Zealand. Our purpose is to deliver our sector's Vision: "Local democracy powering community and national success."

In response to the request for comment on the draft Road Safety Strategy, LGNZ has prepared answers to the questions posed below in this submission. However, LGNZ views it as necessary to set the context in which these answers are given, specifically the part that respective types of councils play in the delivery of transport services and infrastructure.

Territorial authorities, unitary councils and regional councils all play an important part in delivery, funding and planning of the transport system. Critically, each role is distinct and suited to the institutional strengths and characteristics of each local government tier. However, they must work as a whole to ensure successful transport outcomes. This is because collectively councils are responsible for the system outcomes, namely developing, maintaining and operating a large network of local roads and delivering public transport infrastructure and services. They also have an important role in achieving integrated transport planning¹. It is LGNZ's strong view that for the Road Safety Strategy to succeed it must respect the existing institutional settings and long-established relationships that underpin the transport sector.



In particular, LGNZ would note the responsibilities of district and territorial councils. These include local roads, footpaths and street lighting as well as local planning, road safety works and parking services, and active participation in land transport planning and the National Land Transport Programme funding process (see diagram below).

These actions are informed by input from New Zealand's diverse communities, and LGNZ would urge the Government to maintain this decision-making process to maintain democratic accountability when it comes to major transport decisions. Too often, particularly when it comes to safety considerations, the criteria that informs investment decisions has failed to factor in local preference for safer roads in favour of other considerations such as reductions in journey times. Many vital and necessary safety upgrades to local roads have not been made, at the real cost of lives lost.

¹ <https://www.nzta.govt.nz/planning-and-investment/planning/our-role-in-planning/the-role-of-local-government/the-role-of-territorial-authorities/>

For example, Opotiki District Council spent five years partnering with NZTA in the identification and planning for a road safety programme that required \$33 million of safety improvements to parts of the local state highway network. The council was advised this year that the funding was now not available due to reprioritisations, and as a consequence there have been further deaths on well-known local black spots.

Diagram 2: Shows the responsibilities of TLA's



Context

The combined annual operating expenditure (opex) of the local government sector into transport and roading infrastructure for the year-end 30 June 2018 was \$2,929,080,000. This represents 28 per cent of total local government opex. It is the largest investment area across activities. Local councils are responsible for 88 per cent (83,000km) of New Zealand's roading network, of which 20 per cent of the network is urban and 80 per cent is rural.

The investments are guided by several pieces of legislation, including the Resource Management Act 1991, the Land Transport Management Act 2003, and the Local Government Act 2002. The funding and planning system is highly complex and vulnerable to any changes made by central government or at the local government level. Regional, district and city councils set out how they will undertake their functions in a range of planning documents. These include long-term plans, regional and district plans, infrastructure strategies, policy statements and growth strategies. These documents also identify the transport aspirations of local communities². For the system to function properly NZTA is required to engage with local authorities in the development and delivery of ten strategies and plans.

Most recently, the complexity and vulnerabilities of the system have been exposed. The NZTA governance and management changes conducted over the past twelve months alongside the substantive changes to the Government Policy Statement for 2018 have destabilised the system³. Both have contributed to a breakdown in the delivery of desired transport outcomes and resulted in project delays⁴ and added costs to the local government sector.

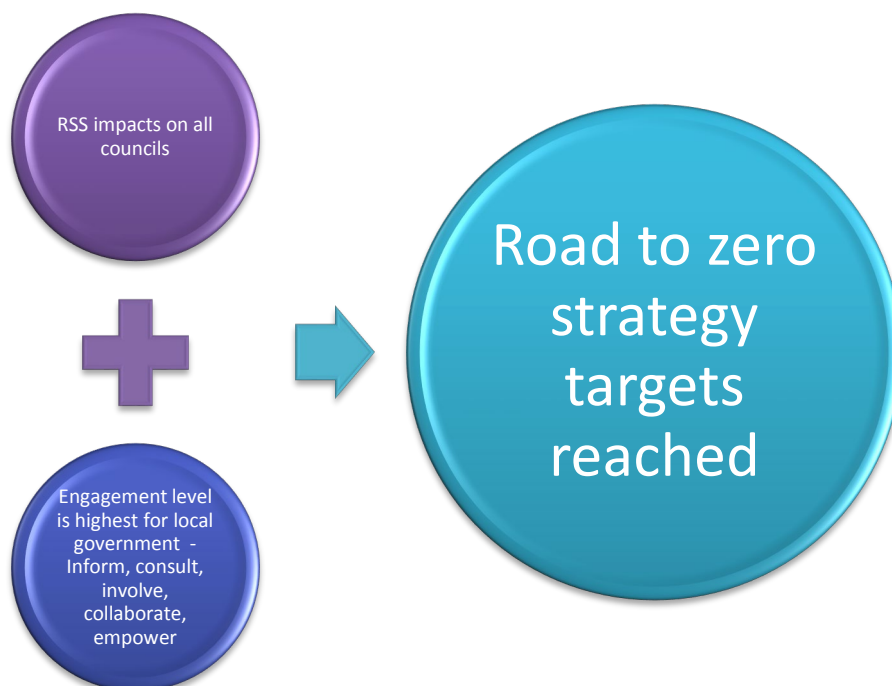
² <https://www.nzta.govt.nz/planning-and-investment/planning/our-role-in-planning/the-role-of-local-government/local-government-strategies-and-plans/>

³ <https://www.stuff.co.nz/business/107846210/road-transport-association-supports-safety-review-and-call-for-tougher-enforcement>

⁴ https://www.nzherald.co.nz/bay-of-plenty-times/news/article.cfm?c_id=1503343&objectid=12212177

A shift away from local relationships and empowering local decision-making by NZTA has been a major contributing factor to this breakdown. This issue was discussed and acknowledged by the Prime Minister and Cabinet at the Central Government Local Government Forum meeting in May 2019 alongside other policy issues.

The Prime Minister and Cabinet have committed resources to improve the relationship, which is good timing for the aspirational Road to Zero vision. They have launched a guide for central government engagement with local government in May 2019⁵. Importantly, The Road Safety Strategy meets all five of the criteria for engagement (refer diagram below) set out in the guide on page eight. The delivery of the strategy will require the setting of engagement goals to ensure the highest levels of inclusion and engagement such as information sharing, consultation, involvement, collaboration and empowerment with the local government sector over the life of the strategy. The outcome will be achievement of the targets set out in the strategy.



LGNZ advocates that for the Road Safety Strategy to be a success for New Zealand there needs to be a greater acknowledgement and recognition of the complex relationship between central and local government at the system level. The strategy needs to articulate how the new guidance will be applied to ensure the success of the strategy. Sections are needed in the narrative on the complexity of the relationship and required actions at various levels to improve central government engagement practices with local government.

Localism principle

LGNZ broadly supports the development of the Road to Zero Road Safety Strategy, specifically the focus areas of infrastructure improvements, speed management, safety of the vehicle fleet, health and safety focus, behavioural changes and system management. However, the actions that underpin the delivery of the improvements in these areas need to consider efficiencies and include a cost benefit analysis approach.

⁵ https://www.lgnz.co.nz/assets/Uploads/9df337b770/Guide-for-central-government-engagement-with-local-government_compressed.pdf

It is local people that are best placed to decide on how these trade-offs are to be balanced, since it is they who directly bear the effects. As noted above, we strongly urge the Government to maintain community say in major transport investments by making territorial authorities responsible for speed setting decisions due to their proximity to people. This is in line with LGNZ's core principle of localism, and we actively propose and support policies that give citizens the ability to be directly involved in the decision-making process⁶. One size fits all thinking needs to be replaced with evidence-based decision-making. This would include cost benefit analysis being applied to the setting of targets within the strategy.

To make this work we need to move away from the centralised model of policy making to one that is inclusive and engages the community in the design and decision-making process. We advocate that for this strategy to be successful, central government must embrace this principle alongside the recently released guidance on engagement as a key pillar in delivering on the strategy vision.

⁶ <https://localism.nz/proposal/10-reasons-to-give-localism-a-chance/>

Question responses

LGNZ has collaborated with Trafanz and the Regional Council Transport Special Interest Group (TSIG) in the preparation of responses to the questions. We feel that the way some of the questions have been structured is unhelpful for example. To ask us if the target of 40 per cent reduction in road deaths and serious injuries is something we agree with, without involving affected councils in the setting of this target means we cannot provide a meaningful answer. The target setting and a discussion with the local government sector about what is practical and how it is going to be achieved should be part of the first years' work.

	Question	LGNZ Position	Notes
1	Our proposed vision for road safety is: “a New Zealand where no one is killed or seriously injured in road crashes”. To what extent do you support the proposed vision?	Strongly support the intention	Choose between: <ul style="list-style-type: none"> • Strongly oppose • Somewhat oppose • Somewhat support • Strongly support • Don't know
	What was the reason for your rating? Do you have any other comments on the proposed vision?	<p>LGNZ and its members agree that too many people are dying on New Zealand’s roads, and the increase of the road death and serious injury trend is of deep concern.</p> <p>Of concern is that the vision and the strategy does not consider what the costs are to achieve a zero target, which is necessary to make informed policy decisions. We seek for these to be developed further. Achieving a zero target would require massive funding several times of what is available along with substantive structural changes. We therefore support a cost benefits analysis approach to target setting.</p> <p>Solving the issue in New Zealand also requires central and local government collaboration at a level we have not seen before. There needs to be a step by step change at all levels which includes a culture change in government agencies. A special partnership is needed with local government on focus areas 1 and 5.</p>	

2	As a step towards achieving this vision, we propose a target of a 40 per cent reduction in deaths and serious injuries by 2030. What do you think about this target?	LGNZ believes it is good to set a target. This provides all parties with something to work towards. That said, the 40 per cent level does seem somewhat arbitrary, therefore would answer 'don't know' as a means of resolving this. We believe that a supplementary target be set within the bounds of what is possible in the system as it stands for comparison and evaluation purposes. Please also note that Waikato and Auckland have set reduction targets of 50%.	Choose between: <ul style="list-style-type: none"> • That target is too high • That target seems about right • That target is not high enough • Don't know
	What was the reason for your response? Do you have any other comments on our proposed target?	We do not fully understand the evidence (inputs and assumptions) supporting the target and would like it explained in detail to our sector. Questions we would like answered relate to what is achievable within the bounds of the current system (capacity and capability), to inform the level of investment needed to meet the 40 per cent target. This will inform whether the target is appropriate (too high, too low, or about right). It is worth emphasising that LGNZ supports stretch targets, but these should not be unrealistic to the point they are unachievable.	

Principles

Clear guiding principles provide a shared understanding of how we will work, and the values that will guide our actions and decision-making. Our proposed seven guiding principles for our road safety strategy are:

- We plan for people's mistakes.
- We design for human vulnerability.
- We strengthen all parts of the road transport system.
- We have a shared responsibility for improving road safety.
- Our actions are grounded in evidence and evaluated.
- Our road safety actions support health, wellbeing and liveable places.
- We make safety a critical decision-making priority.

You will now be asked to rate and provide comment on these proposed principles.			
3	<p>Principle 1: We plan for people's mistakes.</p> <p>We accept that people will make mistakes and take risks but these mistakes should not result in people dying or suffering serious injuries on our roads.</p> <p>To what extent do you support this principle?</p>	<p>Strongly support – however need to accept that there will always be a segment of society that makes mistakes, and a smaller subset who will ignore rules and break the law. The principle needs to be refined to reflect different road users based on ability and mode choice.</p>	<p>Choose between:</p> <ul style="list-style-type: none"> • Strongly oppose • Somewhat oppose • Somewhat support • Strongly support • Don't know
	Do you have any further comments about this principle?		
4	<p>Principle 2: We design for human vulnerability.</p> <p>There are physical limits to the amount of force our bodies can take before we are injured in a crash and we will design our road system to acknowledge this.</p> <p>To what extent do you support this principle?</p>	<p>Strongly support.</p>	<p>Choose between:</p> <ul style="list-style-type: none"> • Strongly oppose • Somewhat oppose • Somewhat support • Strongly support • Don't know
	Do you have any further comments about this principle?	<p>We support the notion that for a reduction in deaths and serious injuries roads and roadsides, vehicles and speeds, and crash response should be designed around human vulnerability. This means that when a crash happens it should not kill or maim those involved.</p>	
5	<p>Principle 3: We strengthen all parts of the road transport system.</p> <p>We will improve the safety of all parts of the system – roads and roadsides, speeds, vehicles, and road use, so that if one part fails, other parts will still protect the people involved. We will make roads and streets safer for more vulnerable road users such as pedestrians, cyclists, motorcyclists and scooter riders.</p> <p>To what extent do you support this principle?</p>	<p>Strongly support – Consistent with Safer journeys. We would include driver education and greater enforcement in this list. It is arguable that laxity in this area contributes to risky driving behaviours.</p>	<p>Choose between:</p> <ul style="list-style-type: none"> • Strongly oppose • Somewhat oppose • Somewhat support • Strongly support • Don't know
	Do you have any further comments about this principle?	<p>Could be amended to strengthening “the land transport system”. “All” is simply not realistic from an affordability point of view.</p>	

6	<p>Principle 4: We have a shared responsibility for improving road safety.</p> <p>The people who design, build and manage the road transport system, as well as the individuals and communities who use it, all have a part to play in making our roads safe.</p> <p>To what extent do you support this principle?</p>	Strongly support.	<p>Choose between:</p> <ul style="list-style-type: none"> • Strongly oppose • Somewhat oppose • Somewhat support • Strongly support • Don't know
	Do you have any further comments about this principle?	This is consistent with Safer Journeys approach. MoT and NZTA need to acknowledge local government as an equal and critical partner in the delivery of the strategy. Much greater reference to them is needed in Road to Zero to identify and acknowledge their role as the delivery agents for the strategy. We support greater recognition of systems designers in the strategy. We support greater coordination and planning across system owners.	
7	<p>Principle 5: Our actions are grounded in evidence and evaluated.</p> <p>We will strengthen our road safety research so that we can base our decisions on the best evidence available. We will evaluate the changes we make so that we see what works, what doesn't work and what needs to be altered.</p> <p>To what extent do you support this principle?</p>	Strongly support.	<p>Choose between:</p> <ul style="list-style-type: none"> • Strongly oppose • Somewhat oppose • Somewhat support • Strongly support • Don't know
	Do you have any further comments about this principle?	<p>The strategy should explain what will change to improve the cost efficiency of data collection, analysis and reporting within the system. And reference how this will improve the decision making process for local councils.</p> <p>There needs to be a strong and robust collaborative process established between MoT, NZTA (CAS), NZ Police, ACC LGNZ, the RCA Forum, TSIG and Trafinz to ensure that the data and research is coordinated packaged and communicated locally in a way that achieves improved decision-making. A key focus needs to be cost efficiency and information sharing. This is particularly important for achievement of outcomes associated with focus area 1.</p>	

		We support the use of technology-based solutions for data collection and evaluation.	
8	<p>Principle 6: Our road safety actions support health, wellbeing and liveable places.</p> <p>Our roads are not just used for getting from A to B. In urban areas in particular, they are often places where people meet, shop and where children play. We will acknowledge this in our decision-making process to support healthier and more liveable places.</p> <p>To what extent do you support this principle?</p>	Strongly support	<p>Choose between:</p> <ul style="list-style-type: none"> • Strongly oppose • Somewhat oppose • Somewhat support • Strongly support • Don't know
	Do you have any further comments about this principle?	That this principle is made to be local in its emphasis. We would suggest that it is changed to say "The Road safety actions will have central government funding to help encourage and enable a local council response that meets the needs of local community health, well-being and liveable places". LGNZ supports integrated approach between transport and urban planning.	
9	<p>Principle 7: We make safety a critical decision-making priority.</p> <p>We will treat safety as a higher priority in the way we make decisions. This does not mean that other objectives, such as efficiency, are no longer important, but that they should not be achieved at the cost of safety.</p> <p>To what extent do you support this principle?</p>	LGNZ: Strongly support.	<p>Choose between:</p> <ul style="list-style-type: none"> • Strongly oppose • Somewhat oppose • Somewhat support • Strongly support • Don't know
	Do you have any further comments about this principle?	<p>Importantly we agree that this should not come at the exclusion of considerations around cost and efficiency.</p> <p>LGNZ supports Road safety being given a high priority in NZTA's</p>	

		decision-making framework (IDMF) to ensure the most deserving road safety transport investments flow into the National Land Transport Programme (NLTP). In addition, the Government Policy Statement on Transport (GPS) should give strong direction on road safety.	
10	Do you have any final comments about our principles?	<p>It is important that the principals reflect the fact that local council and community leadership will need to be a pre-requisite across New Zealand for the strategy to achieve its goals⁷. Therefore, the principles of “Inclusion” and “collaboration” are critical ones that need to be emphasised in the policy process.</p> <p>We would like to see the partnership and engagement principles included from the guide for central government engagement with local government launched and endorsed by Prime Minister and Cabinet in May 2019.</p>	
		<p>It should be acknowledged in the strategy that the Road Safety Strategy meets all five engagement criteria in the guide⁸. In addition, that all government officials will adhere to the guidance when progressing the strategy.</p> <p>Included for delivery on focus area 1.</p>	

Focus areas

Our target will be achieved through action in five key areas:

- Improve the safety of our cities and regions through infrastructure improvements and speed management.
- Significantly improve the safety performance of the vehicle fleet.
- Treat road safety as a critical health and safety at work issue.
- Encourage safer choices and safer behaviour on roads.
- Drive action through effective system management.

⁷ Guide for central government engagement with local government, 2019,p.g 4

⁸ Guide for central government engagement with local government, 2019, pg 8

You will now be asked to rate and provide comment on these five proposed focus areas. You will then be asked about priority actions on the next page.			
11	<p>Focus Area 1: Improve the safety of our cities and regions through infrastructure improvements and speed management.</p> <p>Our roads and streets reflect our natural landscape and changing communities: our roads are winding, hilly and often narrow, and our streets can be full of people, and bustling retail areas. Not all risks are visible, and the wrong speed can result in an unforeseen tragedy. Improving our road infrastructure and setting and enforcing safe speed limits are some of the most powerful ways we can create a road system that is forgiving of human mistakes.</p> <p>To what extent do you support this focus area?</p>	Strongly agree.	<p>Choose between:</p> <ul style="list-style-type: none"> • Strongly oppose • Somewhat oppose • Somewhat support • Strongly support • Don't know
	<p>What was your reason for this rating? Do you have any further comments about this focus area?</p>	<p>That an engagement goal is included to empower local government to deliver on this focus area⁹. This would include a commitment to place final decision-making, accountabilities and funding in the hands of local government. Central government officials would work with individual local councils to resolve and implement changes considered appropriate at the local TLA level. This will include a commitment to calculate, agree and devolve required tax funding to support councils to meet the infrastructure and goals of the strategy in focus area 1.</p> <p>LGNZ advocates for improved engagement practices in the development of the Tackling Unsafe Speeds Programme¹⁰. We would like a commitment in the strategy for greater collaboration and empowerment of local councils in the design finalisation, funding model and delivery of this programme. We support greater clarity and simplification around consultation requirements when local councils are reviewing and setting new speed limits.</p> <p>LGNZ supports separating the infrastructure improvements and</p>	

⁹ Guide for central government engagement with local government, 2019, pg 9

¹⁰ Interview with TSIG Road Safety Strategy working group chair, 2019, 1.40pm, 29/7/2019 affirms that only targeted engagement with Waikato, Auckland and Canterbury in development of the advice to cabinet on issues and solutions. Agreed this was not enough and that RCA's and TLA's need to be better engaged.

		<p>speed management into two focus areas. As it was in Safer Journeys. LGNZ encourages investigation and understanding about the variations across the country to speed setting process including the issues as part of the Tackling Unsafe Speeds programme.</p> <p><i>LGNZ strongly believes any political decision to lower speed limits should weigh the benefits of safety improvements against the costs on commerce and community. In addition, that includes the costs and benefits of other options – particularly when three out of four road accidents are not related to speed limits.</i> ¹¹</p> <p>The strategy narrative¹² needs to emphasise the importance of this engagement with local government over the life of the strategy and how it intends to work in practice. It should also clearly explain what would be different to the current engagement practices.</p> <p>In particular, how central and local government will work better together to build on the success of the Safe Networks Programme and collaborate in the development and establishment of the new infrastructure package for safety treatments and infrastructure improvements¹³. We would also like to see an explanation of how the investment packages (median barriers, treatments such as roundabouts on high-risk intersections and investments associated with speed management on the highest risk areas of the network) will support achievement of the 40 per cent reduction in road deaths showing a breakdown with lower level targets.</p> <p>LGNZ would like a commitment for a greater partnership approach between local and central government agencies to the proposed review of infrastructure standards and guidelines.</p> <p>Accessibility Streets package: LGNZ has initiated in partnership with Auckland Council and Auckland Transport a micro-mobility workshop and symposium for September 2019. LGNZ would like the strategy to</p>	
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¹¹ Buckle up for speed limits, Insights newsletter, 7 June 2019

¹² Road to Zero, 2019, pg 34

¹³ Road to zero, 2019, pg 39

		acknowledge this partnership and support from MoT and NZTA as an example, collaborating in development of a regulatory response to an emerging transport safety issue.	
12	<p>Focus Area 2: Significantly improve the safety performance of the vehicle fleet.</p> <p>The design and safety features of our vehicles matter. Safer vehicles not only help drivers avoid crashes, but also protect occupants and other road users when crashes do happen.</p> <p>To what extent do you support this focus area?</p>	<p>LGNZ supports improving the safety performance of the vehicle fleet.</p> <p>Somewhat supports the star rating:</p> <p>LGNZ would like a commitment for greater awareness and understanding of the cost implications of the star rating and its anticipated contribution to lowering the road toll.</p> <p>LGNZ would like further investigation into the costs associated fleet upgrades. For large councils and businesses, this could be large.</p>	<p>Choose between:</p> <ul style="list-style-type: none"> • Strongly oppose • Somewhat oppose • Somewhat support • Strongly support • Don't know
	What was your reason for this rating? Do you have any further comments about this focus area?		
13	<p>Focus Area 3: Ensure that businesses and other organisations treat road safety as a critical health and safety issue.</p> <p>Employers have a responsibility to ensure that work-related road travel is safe for their staff and the public. About 25 per cent of the deaths on our roads involve someone driving for work, whether as a commercial driver or as a secondary part of their main role. Ensuring that road safety is treated as a critical health and safety at work issue has the potential to significantly reduce this harm.</p> <p>To what extent do you support this focus area?</p>	<p>Strongly support:</p> <p>LGNZ supports the introduction of initiatives to reduce work related safety risk but on the condition, that funding for the packages is provided to councils to administer and develop for the local communities.</p>	<p>Choose between:</p> <ul style="list-style-type: none"> • Strongly oppose • Somewhat oppose • Somewhat support • Strongly support • Don't know
	What was your reason for this rating? Do you have any further comments about this focus area?		
14	<p>Focus Area 4: Encourage safer choices and safer behaviour on our roads.</p> <p>Everyone has a responsibility to act with care and consideration on our roads. We need to continue to shift public attitudes and behaviour through road safety education and promotion, ensure that our training and licensing systems</p>	<p>Strongly support:</p> <p>LGNZ advocates for a greater partnership between NZ Police and local councils to undertake promotional campaigns that promote improved choice and improving driver behaviour. We also would like to see included in the strategy NZ Police working collaboratively with local</p>	<p>Choose between:</p> <ul style="list-style-type: none"> • Strongly oppose • Somewhat oppose • Somewhat support • Strongly support

	<p>equip people with the skills required to be safe, alert and compliant, and deliver effective enforcement targeted towards risk.</p> <p>To what extent do you support this focus area?</p>	<p>councils when undertaking enforcement activities.</p>	<ul style="list-style-type: none"> • Don't know
	<p>What was your reason for this rating? Do you have any further comments about this focus area?</p>		
15	<p>Focus Area 5: Develop a management system that reflects international best practice.</p> <p>Everyone who uses, designs, manages and maintains our roads, streets and footpaths has an important role to play. Leadership, co-ordination, engagement, and accountability will be critical if we are to achieve our road safety ambitions.</p> <p>To what extent do you support this focus area?</p>	<p>Strongly support:</p>	<p>Choose between:</p> <ul style="list-style-type: none"> • Strongly oppose • Somewhat oppose • Somewhat support • Strongly support • Don't know
	<p>What was your reason for this rating? Do you have any further comments about this focus area?</p>	<p>LGNZ would like the structure of local government more clearly recognised including its role in system management. This includes the wide variation across the sector.</p> <p>There are 78 local authorities comprising 11 regional councils and 67 territorial authorities (unitary authorities, city and district councils).</p> <p>Additionally, many territorial authorities also have one or more Community Boards. These boards are filled largely by election, though territorial authorities have the right to appoint a minority of the members, to help represent and advise council on community views.</p> <p>Local authorities vary considerably in size. At the previous Census of Population and Dwellings (March 2013) the largest regional council was Environment Canterbury (population 539,433) and the smallest was West Coast Regional (population 32,148). Territorial and unitary authorities ranged from 1,415,550 (Auckland) to 600 (Chatham Islands). The average population for territorial authorities was 63,313, but this was skewed by several very large councils. The</p>	

		<p>median population for territorial authorities was 30,096.</p> <p>Councils spent \$2,929,080,000 in operating expenditure for roading and transport, year-end June 2018. This will rise in future years.</p> <p>In addition to this investment in the Governance arrangements surrounding local government, investments totalled \$279,431,000. It is therefore important that the strategy acknowledges this leadership capability and capacity and utilises this for leading and delivering on the strategy.</p> <p>The strategy should also note the substantive variation surrounding the local government sector and apply appropriate measures when engaging on the road safety strategy development and implementation. Such as a local government engagement strategy and plan, that underpins the RSS.</p>	
16	Do you have any final comments about our focus areas?	<p>In order to support system leadership, support and coordination, establish a budget and funding commitment in partnership with local government to socialise and engage with all 67 TLA¹⁴ communities in the strategy in the first year to ensure that communities buy into and explore innovative implementation initiatives. This will also bring central and local government officials together to build a new safety focused central/local government network responsible for delivering on the strategy vision over time.</p>	

¹⁴ Territorial local authority

Action plan priorities

We have proposed a list of 14 priority actions under our five focus areas.

Please tick your top three priorities from the list below.

<input checked="" type="checkbox"/> Introduce a new approach to tackling unsafe speeds	<input type="checkbox"/> Strengthen the regulation of commercial transport services
<input checked="" type="checkbox"/> Invest in safety treatments and infrastructure improvements	<input type="checkbox"/> Enhance the safety and accessibility of footpaths, bike lanes and cycleway
<input type="checkbox"/> Review infrastructure standards and guidelines	<input type="checkbox"/> Prioritise road policing
<input type="checkbox"/> Raise safety standards for vehicles entering the fleet	<input checked="" type="checkbox"/> Enhance drug driver testing
<input type="checkbox"/> Promote the availability of vehicle safety information	<input type="checkbox"/> Support motorcycle safety
<input type="checkbox"/> Implement mandatory anti-lock braking systems for motorcycles	<input type="checkbox"/> Review financial penalties and remedies
<input type="checkbox"/> Support best practice for work-related travel	<input checked="" type="checkbox"/> Strengthen system leadership, support and co-ordination

Do you have any comments about these priority actions?

17	Additional actions. Do you have any suggestions about other actions we could consider for future action plans?	LGNZ:	
18	Measuring success. The Road to Zero consultation document provides a draft outcomes framework, which provides a list of key measures that can help us track progress and performance indicators to	LGNZ supports co-design on an outcomes framework for the Road Safety Strategy. There needs to be a stronger connection between the proposed outcomes and the areas of investment to track and measure	

	<p>help us meet our targets. This outcomes framework will help us monitor how the road safety system is performing, drive action and hold agencies publicly accountable for delivering the strategy. The framework will continue to evolve as we develop the final strategy.</p> <p>Do you have comments about the way we intend to monitor our performance?</p>	<p>effectiveness of interventions over the life of the strategy. We would encourage for both infrastructure, speed and systems management that a local and central government working group be established to develop a meaningful set of measures within the first twelve months. This could be integrated with the socialising and buy in process to support system leadership and coordination.</p> <p>That Government include red light running with other traffic offences that incur demerit points.</p> <p>That LGNZ supports NZTA’s initiative to review CoPTTM in light of the recent fatalities; and</p> <p>Encourages NZTA to work closely with RCA’s to ensure the CoPTTM review also covers local road Temporary Traffic Management.</p> <p>Mobility scooter safety</p> <p>Speed limits</p> <p>It is recommended that the approach taken in some Australian States, including Victoria be adopted. This states that mobility scooters: “must have a maximum capable speed of 10km per hour on level ground and a maximum unladen mass of 110kg”.</p> <p>Road usage</p> <p>It is recommended that New Zealand Police be resourced to enforce the law. Local and regional councils throughout the country, as well as NZTA, road safety action groups and other key agencies, have highlighted serious concerns about mobility scooters riding on the road when a footpath is available, as well as riding on the road as if they are a motor vehicle.</p> <p>Monitoring and registration</p> <p>It is recommended that legislation is changed to require all mobility scooters to be registered and display a licence plate, with minimal or no cost imposed, to ensure compliance. It is further recommended</p>	
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		that the legislation set a maximum power assisted speed and size for mobility scooters.	
19	Additional supporting material. Providing your feedback through this online form makes it easier for us to read and analyse your input. If you would like to provide any additional supporting material, you can attach it here. Please note, this is not required.		

A little bit about you

Name

Organisation (optional)

Email Address

Who are you submitting on behalf of?

Other (please specify)

What region do you live in, or most often travel in?

Wellington

Do you consider your perspectives urban, rural or both?

- Urban
- Rural
- Both

Ongoing partnership with Māori will be a focus in our road safety efforts so we can build a shared understanding and road safety responses that appropriately meet the needs of tangata whenua in New Zealand.

To help us build a better understanding of road safety issues for Māori, please check this box if this submission represents a Māori perspective.

Use and public release of information:

The Ministry of Transport will publish a summary of submissions, which may include quotes from individual submitters.

Do you want your submission to be anonymous and your name or organisation's name to be withheld from any information that the Ministry of Transport publishes?

- Yes
- No

Your submission is also subject to the Official Information Act 1982 (OIA). This means people will be able to obtain copies of submissions by making a request under the OIA.

I understand that this submission will be classified as Official Information and may be subject to public release under the Official Information Act 1982 if requested.

If you want us to keep some sections of your submission confidential, please let us know your reasons below. We will take your reasons into account and may consult with you when responding to requests under the OIA.

Conclusion

LGNZ and its members affirm that the Road to Zero strategy is contained within a cracked Transport system. At the core of that structural failure is a relationship breakdown between councils and MoT and NZTA.

LGNZ in its submission on the strategy has provided the Government with a pathway forward to strengthen the strategic partnership between local government and central government in the finalisation and implementation of the actions to deliver on the strategy. This would include the addition of a Localism definition within the strategy, inclusion of efficiency and cost benefit analysis to support funding allocations, narrative that clearly explains and acknowledges the role and functions of local councils in the transport system and a commitment to apply the engagement guidelines that have been signed off by the Prime Minister and Cabinet in May 2019. This commitment to applying the guidance is to be supported by appropriate budget and resource allocations where required.

LGNZ supports the Road Safety Strategy to lower New Zealand's death toll in a way that provides RCA's with a set of nationally consistent tools to choose from. Subject to community consultation to address the greatest road safety hazards in their area.