

Submission by

Hamilton City Council

ROAD TO ZERO - CONSULTATION ON THE 2020-2030 ROAD SAFETY STRATEGY (CONSULTATION DOCUMENT)

16 August 2019

1.0 INTRODUCTION

- 1.1 Hamilton City Council (HCC) welcomes the opportunity to make a submission to the Ministry of Transport's consultation document 'Road to Zero - Consultation on the 2020-2030 Road Safety Strategy'.

2.0 KEY THEMES AND OPPORTUNITIES TO STRENGTHEN THE STRATEGY

- 2.1 The following provides an overview of the key themes of HCC's submission and some opportunities where we believe the strategy can be strengthened.
- 2.2 **HCC strongly supports the Government in the move towards a Vision Zero approach to road safety.**
- 2.3 HCC adopted Vision Zero in June 2017. Strong leadership at a national level makes it easier for Hamilton, the Waikato Region and other regions to progress on transport safety issues, to save more lives sooner, and reduce costs while doing so.
- 2.4 Vision Zero is a proven approach being applied by many jurisdictions globally, is customer-focused and human centred, and telling this story at a national level will help build trust across New Zealand communities that people's safety is at the heart of what we do.
- 2.5 **HCC strongly supports a focus on leadership, capability and capacity** to deliver a Vision Zero approach. Insufficient leadership and priority for road safety in policy and decision-making was identified through the 2015 independent review of Safer Journeys as a key factor that prevented the full delivery of a safe system. Success in this area will require strong leadership by the Ministry of Transport (MOT) to ensure key partners including the NZ Transport Agency, the NZ Police and local authorities are held accountable to national targets and maintain operational focus on keeping people safe.
- 2.6 **The national target needs to be more ambitious.** Many authorities are publicly committed to a higher level of reduction in road trauma - including Waikato Regional Council, Auckland Transport and HCC. Ambitious targets are a key driver used within Vision Zero strategies around the world to create urgency and drive innovation.
- 2.7 **There is a need for a stronger focus for urban road safety and the role that local authorities play in delivering road safety.** Urban transport safety needs to be given a strong mandate to support the efforts of HCC and those of other metros to eliminate death and serious injury (DSI) for all transport modes.
- 2.8 Urban road safety involves managing multi-modal, complex combinations in busy places and therefore require a different approach to that of rural road safety. Almost half of all New Zealand

DSIs are urban (48% for 2014 -2018).

- 2.9 There is a lack of discussion about the role of land use planning and the mode shift to public transport plays in reducing exposure to risk. As public transport is the safest mode, quality service and access to stations and stops will increase the number of low-risk trips. Both land use planning and public transport reduce exposure for everyone by reducing VKT on the network.
- 2.10 Inclusion of health, well-being and liveable places as a principle does not adequately link to urban road safety. Increasing safe and sustainable trips as a high-level measure links climate change goals to vision zero goals for an integrated policy approach to all harms from transport - thus achieving the well-beings.
- 2.11 To address previous and current gaps the **Road to Zero Strategy needs to make sure that funding is readily available when it is needed, and decision-making is timely**. Changes to funding levels and processes will be required to ensure that there is enough to cover planned safety work. There is also a need to ensure that the safety priority is supported in practice through funding processes (BCR, trading off safety benefits etc.).
- 2.12 Systems and processes need to be reviewed to expedite decision-making where possible, including ensuring consistent decision-making from leaders within approving agencies. This will allow for a plan to be implemented, which will result in actual road safety outcomes physically on the road network, leading to a reduction in harm on our roads. This is a priority as it was identified as one of the key weaknesses of Safer Journeys. This should apply to all transport network programmes, not just road safety.

This focus will be key to achieving Principle 7: We make safety a critical decision-making priority.

- 2.13 **Building competency and capacity in the transport sector** will be critical to implementing the changes that will be needed (including those already outlined) to achieve the Vision of this strategy. Developing competency and capacity is a long-term investment that will take time to achieve and therefore is something that needs to be included in the initial action plan. As noted in the consultation document, the evaluation of Safer Journeys found that there was insufficient leadership and sector capacity necessary for successful implementation. This was further supported by the work undertaken by the Reference Groups.
- 2.14 **Strong Actions Plans to achieve the step-change needed**. The intermediate actions included in the consultation document are great for keeping things moving while we move from the Safer Journeys Strategy to the Road to Zero strategy. They are all worthy of being completed and contributing to the vision – BUT they will not achieve the step-change that will be needed to achieve the new ‘challenging but achievable’ target. Urgent work following the adoption of the strategy will be needed to get in place the next action plan within the first 6 months of 2020 to ensure that all of the parties with a role to play in the safe system are able to work through funding processes and get actions underway.

3.0 SPECIFIC COMMENTS IN RESPONSE TO QUESTIONS ASKED IN THE CONSULTATION DOCUMENT

3.1 To what extent do you support this proposed vision?

3.1.1 HCC strongly supports.

3.2 What was the reason for your rating? Do you have any other comments?

3.2.1 HCC adopted Vision Zero in June 2017.

3.2.2 This aligns with the Waikato Regional Land Transport Plan’s safety objective *“Land transport in the Waikato region is a Safe System, working towards zero deaths and serious injuries”*, and the Waikato Regional Road Safety Strategy (WRRSS) vision of *“Working together towards zero deaths and serious injuries on Waikato’s roads”*.

3.2.3 HCC is very supportive of the vision being adopted at a national level to achieve a consistent focus across the country for national, regional and local organisations who have a role to play in its

achievement.

3.3 **What do you think of the target?**

3.3.1 The target is not high enough.

3.4 **If you want to write some notes about this target, you can do it here:**

3.4.1 Having a target is strongly supported.

3.4.2 The consultation document indicates that this is a challenging but achievable target based on modelling of a substantial programme of road safety improvements over the next 10 years - but provides no detail of this modelling work.

3.4.3 The 40% target may be ambitious under existing constraints, regulation, funding and resourcing but we note that the Waikato Regional Road Safety Strategy 2017-21 has set ambitious targets of a 50% reduction in fatalities by 2040.

3.4.4 The Waikato Road Safety Strategy set interim targets of 50% reduction in road related fatalities and 25% serious injuries by 2040 compared to a 2004-2008 baseline. When this was reviewed in 2016 it was considered that based on the decreasing trend since that time more ambitious targets could be set. However, the subsequent upswing in fatalities brings this into question, given that road trauma increases reflect the government policies, practices and governance of the past decade alongside economic activity, population growth and changes in technology and social norms.

3.4.5 As road fatalities have increased markedly since 2012, and previous ground gained has been lost, a 40% reduction against 2018 DSIs would take fatality levels back to those of approximately 2008. So essentially in 10 years, no progress would have been made, except to halt the upward swing of recent years, which of course has immense value.

3.4.6 Considering the improved processes, system management, increased focus and funding, improved technology and tools that can be applied to this issue indicated in this strategy, and the government announcements that safety is their top transport priority, HCC believes that a more ambitious target should be proposed.

3.4.7 The consultation document provides very little indication of the role that local government can and do play in road safety. It would be useful to understand the level of investment and work that is being anticipated to be delivered by local authorities in the modelling so that we can plan for this accordingly – especially moving into the development of our 10-Year Plans.

3.5 **PROPOSED PRINCIPLES**

(1) We plan for people's mistakes

3.6 **To what extent do you support this principle?**

3.6.1 HCC strongly supports.

3.7 **Do you have further comments on this principle?**

3.7.1 We support the ongoing recognition and inclusion of Safe System principles which are human oriented and are in alignment with a generative safety culture and with the safety management practices of the aviation, shipping, rail transport and occupational health sectors.

3.7.2 In planning for people's mistakes, we need to recognise that as transport modes diversify, that non-dedicated space will become more contested and there is a need to protect the 'innocent' road users that are vulnerable to other's mistakes. Protection is best done by both changing the behaviour of those that are failing to be safe, along with ensuring the regulation and design of the infrastructure in shared spaces on or around roads is sufficient to protect road users from each other.

(2) We design our roads for human bodies

3.8 **To what extent do you support this principle?**

- 3.9 HCC strongly supports.
- 3.10 **Do you have further comments on this principle?**
- 3.11 HCC supports the ongoing recognition and inclusion of Safe System principles which are human oriented and are in alignment with a generative safety culture and with the safety management practices of the aviation, shipping, rail transport and occupational health sectors.
- 3.12 We would also support stronger recognition and support for all vulnerable road users and the fact that there is an expectation that there will be more of these types of road users using our transport networks in the future i.e. people walking, cycling, scootering, using various mobility aids or other modes of transport which are not able to provide 'the wrap around protection' that a vehicle provides.

(3) We strengthen all parts of the road transport system

- 3.13 **To what extent do you support this principle?**
- 3.14 HCC strongly supports.
- 3.15 **Do you have further comments on this principle?**
- 3.16 HCC supports the ongoing recognition and inclusion of Safe System principles which are human oriented and are in alignment with a generative safety culture and with the safety management practices of the aviation, shipping, rail transport and occupational health sectors.
- 3.17 To strengthen all parts of the road transport system - roads and roadsides, speeds, vehicles, and road use we need strong recognition of all parties involved in the system. The consultation document provides very little recognition of the role that local government and other agencies (e.g. District Health Boards, emergency services, education and justice agencies) contribute to achieving road safety.
- Supporting Local Government to undertake an increasing role in the development and delivery of the Road to Zero strategy will be key to achieving the desired (and hopefully extended) targets.
- 3.18 Initiatives that support additional investment and stronger Government leadership and greater focus to be put on the capacity and capability of agencies to deliver a more robust strategy will be crucial to ensuring all parts of the system are able to be effectively and efficiently strengthened.
- 3.19 Ensuring that the NZ Police – Road Policing activities are able to be delivered in an effective and efficient manner is also crucial moving forward. The ability to utilise technology to release staff time to the important face to face activities which do have a direct impact on road user behavior needs to be a priority. Changes to legislation to enable point to point speed enforcement is an example of work that has been underway for a while now and is still not in place to ensure that the high speed high quality roads are able to be managed without large impacts on NZ Police resourcing.

(4) We have a shared responsibility for improving road safety

- 3.20 **To what extent do you support this principle?**
- 3.21 HCC strongly supports.
- 3.22 **Do you have further comments on this principle?**
- 3.23 HCC supports the ongoing recognition and inclusion of Safe System principles which are human oriented and are in alignment with a generative safety culture and with the safety management practices of the aviation, shipping, rail transport and occupational health sectors.
- 3.24 There is a need to investigate and understand how we can engage with and educate all the various parties that are involved in the system. The Safer Journeys Strategy did not deliver on this principle and it is key to ensuring that the people who design (including developers, planners, architects), build and manage the road transport system, as well as the individuals and communities who use it, understand the part they play in making our roads safe.

- 3.25 There needs to be focused and persistent Safe System education to practitioners with influence on any aspects that will impact on road safety outcomes.

(5) We do the things that will make a difference

3.26 To what extent do you support this principle?

3.27 HCC strongly supports.

3.28 Do you have further comments on this principle?

3.29 HCC agrees that there is a need for consistent and accessible data, monitoring, and reporting and access to research and analysis on transport as a Safe System to ensure interventions are evidence driven - but there is a need to be able to break outside of this where it makes sense i.e. where there are intangibles and non-quantifiable outcomes or where it will just take too much time to be able to accurately determine the impact e.g. we know that a more active community will have health benefits. These health benefits may not be able to be quantified for 50+ years in the case of getting children using active modes to get to school.

3.30 Part of the issue with being completely evidence driven is that the range of parameters for which there is good evidence is biased towards engineering interventions, and there may be a range of excellent interventions for which there is insufficient data currently to enable inclusion in a completely evidence-driven strategy - even though anecdotally they are seen as adding benefit. Education and behaviour change are particularly lacking in good recent research and analysis.

3.31 There is also a need to balance the amount of effort (including time and money spent on analysis) when compared to the cost of the intervention/activity and benefits from getting the work done.

3.32 'Paralysis by analysis' is a real risk.

(6) Our actions improve people's health, wellbeing and our places

3.33 To what extent do you support this principle?

3.34 HCC strongly supports.

3.35 Do you have further comments on this principle?

3.36 This fits well with the recent legislative changes to re-introduce the Community Well-beings. It also reflects the wider benefits of achieving Vision Zero i.e. an increased number of people using active modes because they are safe and convenient modes of travel.

3.37 New Zealand currently has a car dominated urban form, dispersed development and inappropriate speeds that contribute to vehicles taking priority in residential and community areas creating severance. There is a lack of infrastructure for safe, comfortable and connected active transport and connections to public transport.

3.38 A much stronger focus on moving people and not vehicles is needed i.e. much stronger support and incentives for safe, connected, active and public transport options. It is hoped that this principle and strategic objective will lead to the building of active healthy communities walking and cycling to catch public transport.

3.39 This approach also has economic benefits as pedestrian-friendly environments promote greater dwell times in retail centres i.e. people spend more time and therefore more money so it's good for business.

(7) We make safety a critical decision-making priority

3.40 To what extent do you support this principle?

3.41 HCC strongly supports.

3.42 Do you have further comments on this principle?

3.43 HCC supports this principle and note that there is need to have clear mechanisms to enact this in a systematic way, which are not clear in the consultation document.

- 3.44 To embed this into decision-making practices, changes will be required in the Land Transport Management Act, relevant regulatory devices, investment methodologies and investment assessment framework, training and education for practitioners, Activity Management Plans and funding instruments such as Regional Land Transport Plans, the National Land Transport Plan and Fund, and the Government Position Statement on Transport, and the Local Government Act Bylaw setting processes etc.
- 3.45 Where is the statutory change to require safety as the key consideration for councils through investment programmes and RLTPs?
- 3.46 This will also need to be embedded into other key central government agency mandates, supporting legislation and management and operational procedures to achieve a ‘Whole of Government Approach’.
- 3.47 **Do you have any other comments about any of our principles?**
- 3.48 It is recognised that the principals are not necessarily in any particular order. However, given that the first four principles build largely upon those contained in Safer Journeys, it is suggested that principles 5, 6 and 7 should be promoted as being the first three principles in order to raise their profile.

3.49 **FOCUS AREAS**

(1) Safer roads and footpaths, and safer speeds

- 3.50 **To what extent do you support this focus area?**
- 3.51 HCC strongly supports.
- 3.52 **Do you have further comments on this focus area?**
- 3.53 Increased investment levels will be necessary to support the achievement of the targets set out in Road to Zero consultation document. This will be particularly critical in providing choice of transport mode, particularly for vulnerable road users and for those with a disability.
- 3.54 Posted speed limits are considered one of the most significant factors in determining a driver’s choice of speed. Speed choice is affected by factors such as purpose of trip and travel time, roadway design, forms of traffic regulation etc. Speed enforcement is the mediator between speed limit and speed choice.
- 3.55 Evidence from overseas jurisdictions making good progress against road trauma emphasise the need to improve and make more forgiving all (road) transport infrastructure and to generally lower speeds to safe and appropriate levels for the location, purpose and traffic volumes. This is particularly critical for active modes and ensuring environments are accessible for all mobility needs.
- 3.56 The Speed Management Guide and Mega Maps have already completed the hard work – determining the safe and appropriate speeds for our road network. Streamlining the speed limit setting process is the next key to unlock the benefits. Many Road Controlling Authorities have not changed any speed limits since the updated Speed Limit Setting Rule came out in 2017.
- 3.57 HCC recommend a move away from the bylaw process. This process and the associated Local Government Act consultation requirements that apply to most road controlling authorities make it very time consuming and an onerous process to change speed limits via bylaw change.
- 3.58 We also question the level of repeated consultation required. Given that the speed management guide/rule drive robust technical processes for identifying the appropriate speed limits and there is a desire to achieve national consistency of outcomes, there is very limited scope for ‘consultation’ to actually change the outcomes of specific speed limit changes. It is appropriate for councils/RCA to consult widely on their strategic approach to speed management, to take onboard the concerns and requests for changes/improvements from the community and to engage and educate on the benefits of speed management. However, we would like to see a reduction the consultation on the detail of specific speed limits changes.

3.59 HCC has successfully developed a Speed Management Plan which sets out the long-term aspirations for speed management in the city, including safe and appropriate speeds. We undertook a high degree of engagement and consultation in the development of this plan. HCC does not believe that there is an ongoing need to have a high level of consultation when we implement the speed limit changes. We are happy to continue to engage and education on speed management at the higher level and to consult on specific engineering measures that we propose to implement to support the change in speed limit.

(2) Vehicle safety

3.60 **To what extent do you support this focus area?**

3.61 HCC strongly supports.

3.62 **Do you have further comments on this focus area?**

3.63 We can't wait for the technology to improve as this will be a 'slow burn' - there is a need to act immediately.

3.64 HCC supports lifting minimum standards and retrofitting safety technology, scrapping unsafe vehicles and increasing their removal from the fleet, and the need to keep up with technology in the WOF, COF and regulatory system.

3.65 We agree that the public needs to be educated about safety and the need to build public demand for safer vehicles. However, the existing methods such as RightCar and Used Car Safety Rating programme are largely invisible. There will need to be regulation to make it happen.

3.66 While there is little that can be influenced directly by local authorities in this area, as managers of a vehicle fleet, HCC (along with many other large organisations) should have clearer guidance/direction on the role that we play as purchasers of new vehicles and therefore the second-hand vehicles that are introduced into the fleet. Purchases should all be 5 Star as a minimum requirement.

(3) Work-related road safety

3.67 **To what extent do you support this focus area?**

3.68 HCC strongly supports.

3.69 **Do you have further comments on this focus area?**

3.70 HCC supports a work-related approach and Worksafe having a critical role in supporting road safety within organisations and the result of having businesses and other organisations to treat road safety as a critical health and safety issue.

3.71 In addressing the role of commerce and the supply-chain on freight movements, there is an opportunity to set up a partnership programme with the private sector to champion better safety outcomes and to provide that sector the opportunity to lead.

3.72 There is a need to consider wider than just freight activities - there are a large number of organisations that have staff driving for a large percentage of their working day. Fatigue is a known risk factor and contributes significantly to our road toll. However, this is not well understood or managed by those who are not required to comply with the Work Time Rule.

3.73 HCC particularly supports the need to address the whole supply chain - this is a real systemic fix. When businesses (including local government) take on responsibility in this area, it could change the face of the transport and freight industry, attract people to that industry, and reduce many of the negative aspects which currently fall on them.

(4) Road user choices

3.74 **To what extent do you support this focus area?**

3.75 HCC strongly supports.

- 3.76 **Do you have further comments on this focus area?**
- 3.77 Stronger regulation and enforcement is supported to catch up with leading overseas jurisdictions, as this has dropped off in recent years and has not kept up with changing social trends.
- 3.78 We note that although this focus area indicates the need to shift public attitudes, behaviour and understanding of road safety - the immediate actions largely reflect this from a punitive perspective.
- 3.79 A key action for this focus area will be 'how do we get hearts and minds commitment to this strategy'?
- 3.80 There seems to be a lack of awareness about the role and value of local Road Safety Coordinator skills development, education and behaviour change activities and the need to enable and support stronger community engagement in risk-targeted interventions through stronger partnerships.
- 3.81 The first step is to define groups at risk (the 'Who') then determine the psychological, social, environment, emotional and physical factors that lead to decision-making failure (the 'Why').
- 3.82 Next, design-focussed intervention strategies around changing perceptions and behaviours. This is significantly more complex than simply providing 'education' but is essential if the education is to be efficient and effective.
- 3.83 Shifting public perception is critical to making the conversation about safety real, relevant and giving political and organisational mandate to act. This needs a strong local partnership approach to align with national activities, and to extend the reach of national directives. Utilising all of the channels and the various organisations that have been involved in the development of the strategy to date is strongly supported. People choosing active transport need to have the option of using safe infrastructure or services to reduce their risk of injury.
- 3.84 Finally, further investigation into the value that additional and compulsory driver training is also requested. While this is focused at 'new drivers' in the first instance, consideration of regular reviews throughout a driver's lifetime is also suggested. Those returning to motorcycling after long periods of not riding should be a focus – building upon the Ride Forever programme.

(5) System management

- 3.85 **To what extent do you support this focus area?**
- 3.86 HCC strongly supports.
- 3.87 **Do you have further comments on this focus area?**
- 3.88 HCC agrees with the need to embed Safe System thinking, accountability and alignment - this was very poorly implemented with Safer Journeys. However, we see a need to embed Safe System thinking more broadly than those 'working in road safety', as a whole-of-system response is required i.e. central and local government, those in transport, land use planning, developers, and the commercial, agricultural, education and health sectors in particular.
- 3.89 The consultation document refers several times for the need to improve capacity and capability, but there is no immediate action proposed to address this issue. The NZ Transport Agency working with local government is good, but probably not enough as the Agency has its own capacity and capability issues and, in many cases, don't actually have the capability to deal with issues outside the state highway environment.
- 3.90 HCC also support strengthening the National Road Safety Committee and have advocated for this via submissions to the Waikato Regional Council and Trafanz. Monitoring and reporting to hold agencies to account for outcomes and making the agendas, minutes and activities available from the NRSC will all be key to ensure that this group are an effective mechanism for driving the Road to Zero Strategy. Consideration should also be given to widening the scope of this committee to include key partners such as Fire and Emergency and Health to reflect the role that post-crash response plays in achieving the Road to Zero.
- 3.91 We strongly recommend that this focus area is split into two and a **sixth focus area be created to**

focus on post-crash response.

- 3.92 While HCC is pleased to see this is picked up in system management, the detail and scope is unclear. We are concerned that it will not get the focus that it needs, noting that it is promoted by the World Health Organisation and United Nations as the fifth pillar of the safe system approach to road safety and of the Global Plan for the Decade of Action for Road Safety 2011-2020.
- 3.93 This requires a new way of thinking that considers the injured road user as requiring appropriate levels of support and service through all phases of their use of roads (pre-and post-injury).
- 3.94 The responsibility of road safety agencies does not stop at the point of injury but continues, in some form, until that patient has reached definitive care. This requires conversations and partnerships with care providers in the pre-hospital and in-hospital settings to maximise patient journeys when prevention has failed.
- 3.95 Facilitating the journey from crash site to hospital door will significantly improve outcomes for crash victims. The post-crash response needs to be embedded into transport policy, road safety strategies and action plans as well as improvements around travel and crash site information/accessibility needs (cellular networks and heli-landing pads for example).
- 3.96 It also requires an increased focus into how the post-crash response is organised and funded. Currently a large component of this care is provided by volunteers via ambulance and Fire and Emergency Services. Road Policing is also expected to provide response to activities that are not 'road related'. Consideration of a Department of Emergency Services to coordinate and facilitate responses to ensure optimal post-crash response is suggested.
- 3.97 **DO YOU HAVE ANY OTHER COMMENTS ABOUT THESE FOCUS AREAS?**
- 3.98 HCC supports having focus areas and not having a huge list and scatter gun approach being taken. In the absence of the evaluation work that has been completed, it would appear that these are appropriate focus areas and will achieve the desired target.
- 3.99 **ACTIONS**
- 3.100 Please select three you think are the most important:
- a. **Invest more in road safety infrastructure**
 - b. Introduce a new approach to help people drive at safe speeds.
 - c. Improve the rules for how roads are made and looked after.
 - d. **Make footpaths, bike lanes and cycleways safer for users.**
 - e. Raise safety standards for vehicles coming in to New Zealand.
 - f. Help people to understand the safety of different cars.
 - g. Make all motorbikes have anti-lock braking systems.
 - h. Make it safer for people who drive for work.
 - i. Strengthen regulation of commercial transport services.
 - j. Prioritise road policing.
 - k. Enhance drug-driver testing.
 - l. Support motorcycling safety.
 - m. Review financial penalties and remedies.
 - n. **Stronger leadership, support and working together.**
- 3.101 **Do you have any comments about these priority actions?**
- 3.102 It is understood that the immediate actions indicated in the consultation document will form the initial action plan that will be released with the strategy and that a large majority of these actions

already have work underway. It is therefore not clear why we are being asked to indicate which three we believe to be the most important.

3.103 The key priority should be to ensure that these actions are being progressed and that work has commenced on the development of the next action plan that will provide the step-change needed to achieve the 'challenging but achievable' target that has been proposed in the consultation document.

3.104 **ADDITIONAL ACTIONS**

3.105 **What else do you think we should do to make the roads safer?**

3.106 Accountability needs to be clarified for all agencies that are part of the Safe System.

3.107 The aim should be to have an across Party agreement to at least the strategy (and desirably the actions - but we appreciate that each party may want to have a slightly different approach to achieving the strategy).

3.108 We support motorcycling safety but think that with the increasing opportunities in micro-mobility and there needs to be a wider look to include all two-wheeled devices.

4.0 MEASURING SUCCESS

4.1 **Do you have any comments about the way we intend to monitor our performance?**

4.2 Use of the National Road Safety Committee should be made to ensure regular updates and reports are given by all agencies who have a role to play in the safe system and that this information is readily available to a wide audience.

4.3 There needs to be a common set of evidence presented at a national level for this strategy and for the tackling unsafe speeds workstream.

4.4 Additional indicators for monitoring performance that could be included:

- Data on post-crash response in order to understand the opportunities for improvement from a **system management** perspective.
- Number of deaths and serious injuries where fatigue was a factor in travelling to and from a **workplace**.
- Purchasing of new safer vehicles into the fleet by **workplaces** (businesses, local and central government agencies) and the role this plays in improving the second-hand fleet.
- Understanding impact of legalising marijuana (if and when this legislation is passed) to ensure that it is not lost in a more generic 'drugs' category and to understand **Road User Choices**.
- Both technical and attitudinal data to enable a greater focus on what people say versus what people do. This will also assist in the targeting of educational activities to influence **Road User Choices**.

5.0 A BIT ABOUT YOU

5.1 Your name:

- Hamilton City Council - Robyn Denton, Network Operations and Use Leader, City Transport

5.2 Your email (if you have one)

- Robyn.Denton@hcc.govt.nz

5.3 Organisation (if submitting on behalf of a group)

- Hamilton City Council

5.4 What region do you live in?

- Waikato

5.5 This submission does NOT represent a Māori perspective.

6.0 USE OF INFORMATION

- 6.1 No - we do not wish to have our submission to be anonymous and your name or organisation's name to be withheld from any information that the Ministry of Transport publishes.
- 6.2 We 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.

Yours faithfully



Richard Briggs
CHIEF EXECUTIVE