

Submission on the “Reshaping Streets” regulatory changes consultation

September 2022



Foreword

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Auckland, New Zealand
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Te Manatū Waka
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Submission on the Reshaping Streets consultation

Tēnā koe,

OraTaiao: NZ Climate and Health Council wishes to offer feedback on the Land Transport Rule: Street Layouts 2022 draft (“Reshaping Streets”) regulatory changes. We acknowledge and are pleased to see the highlighted reasons necessitating the proposed changes on pages 7 and 8 of the discussion document. Streets are the most abundant public places in our urban environments, and as outlined in the draft will have an increasing importance as urban intensification gathers pace.

The particular focus on health (“streets need to support public health”) is most welcome. Our 2022 Active Transportation Policy Statement¹ summarises our position on active transport. Even more recent New Zealand studies show that nearly 10% of all deaths in Aotearoa occur prematurely due to air pollution from motor vehicles and road trauma², without even taking into account the massive negative impact our current transport system has through contributions to physical inactivity, noise pollution, neighbourhood severance and mental ill-health.

We strongly support a change in how our streets are imagined- not as simple thoroughfares or places to store private vehicles, but as part of living, healthy communities. The proposed changes will go some way to giving agency back to neighbourhoods and communities, which has been highlighted as a key plank of our climate adaptation response, and will, if implemented correctly, contribute to improvements in physical and psychological well-being. We are pleased to support the overall aims of

¹ https://www.orataiao.org.nz/orataiao_active_transportation_policy_statement

² <https://environment.govt.nz/news/study-reveals-the-health-impacts-and-social-costs-of-air-pollution/>

the draft changes, though we make recommendations where necessary to strengthen and expand on them.

Yours sincerely,

A handwritten signature in purple ink, appearing to read 'COFFEY'.

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A handwritten signature in black ink, appearing to read 'Summer'.

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About OraTaiao

OraTaiao: The New Zealand Climate and Health Council is an organisation calling for urgent, fair, and Tiriti-based climate action in Aotearoa; we recognise the important co-benefits to health, well-being and fairness from strong and well-designed mitigative policies.

We honour Māori aspirations, are committed to the principles of te Tiriti o Waitangi, and strive to reduce inequities between Māori and other New Zealanders. We are guided in our practice by the concepts of kaitiakitanga (guardianship), kotahitanga (unity), manaakitanga (caring), and whakatipuranga (future generations).

OraTaiao has grown over a decade to more than 900 health professionals concerned with:

- The negative impacts of climate change on health, well-being, and fairness;
- The gains to health, well-being, and fairness that are possible through strong, health-centred climate action;
- Highlighting the impacts of climate change on those who already experience disadvantage or ill-health (i.e., equity impacts);
- Reducing the health sector's contribution to climate change.

As well as individual and organisational members, we are backed by 22 of New Zealand's leading health professional organisations for our Health Professionals Joint Call to Action on Climate Change and Health (see https://www.orataiao.org.nz/friends_and_supporters). This support includes the New Zealand Nurses Organisation, Public Health Association, the Royal Australasian College of

Physicians and the Australasian College of Emergency Medicine, plus numerous other specialist colleges. Together, these organisations represent tens of thousands of our country's health workforce.



As an organisational member of the Climate and Health Alliance, and of the Global Climate & Health Alliance, we work with a worldwide movement of health professionals and health organisations focused on the urgent health challenges of climate change - and the health opportunities of climate action. OraTaiao signed the Doha Declaration on Climate, Health and

Wellbeing of December 2012, which reflects this international perspective.

Proposal 1: A new approach for piloting street changes

1. Do you support providing RCAs with new powers and requirements to install pilots, and set requirements for how to install them? Why/why not?

Yes, OraTaiao strongly supports the increasing use of pilots to allow a flexible and adaptable method for trialling changes. It is important however that they are not used to delay changes that should be clearly mandatory, especially around safety- in these instances a permanent solution is best implemented as the first step

2. Do you support pilots being used as a way to publicly consult with communities? Why/why not?

Yes, OraTaiao supports pilots as a way to rapidly roll out street changes, however it is important that access to the usual forms of consultation are kept open and that pilots do not become the only or main method of consultation. This is especially important in the pilot planning stage, so that the pilot can be well-designed as possible. Any consultation and feedback process must be robust and eliminate bias as much as possible (e.g. online feedback may exclude sectors of the community).

Pilots should also have a clear mechanism to allow changes within the period of the pilot. A process for interim review and modifications if necessary, should be required for all pilots

3. We propose that pilots could be installed for up to 2 years. Do you think this time is:

☒ **suitable?** ☐ too long? ☐ too short?

If you answered too long or too short, what would be a good time period?

Suitable, with the stress on “for up to” so that pilots can become permanent earlier than 2 years once benefits are clear. See also question 2 above on the necessity of interim review.

6. Do you support RCAs being able to lower the speed limit on a road to support the installation of a pilot?
☒ **Strongly agree** ☐ Agree ☐ Disagree ☐ Strongly disagree ☐ I don't know ☐ Neutral

Strongly Agree

7. Do you support RCAs being able to trial new signs, road markings or signals as part of a pilot? ☒ **Strongly agree** ☐ Agree ☐ Disagree ☐ Strongly disagree ☐ I don't know ☐ Neutral

Strongly Agree

Proposal 2: Filtering and restricting traffic

8. Do you support RCAs having clear powers to install objects as modal filters? ☒ **Strongly agree** ☐ Agree ☐ Disagree ☐ Strongly disagree ☐ I don't know ☐ Neutral

Strongly Agree

9. We are also interested in your views on whether we should make any changes to our rules related to regulatory filters. Should we investigate creating signs and markings to create pedestrian and cyclist only zones on sections of the roadway? ☒ **Yes** ☐ No ☐ I don't know

Yes, though we support the use of modal rather than regulatory filters in the first instance.

10. Do you support the removal of “unduly impede vehicular traffic entering or using the road” from the Local Government Act 1974? ☒ **Strongly agree** ☐ Agree ☐ Disagree ☐ Strongly disagree ☐ I don't know ☐ Neutral

Strongly Agree

11. Do you support RCAs having clear powers to restrict or prohibit traffic for the specified purposes? ☒ **Strongly agree** ☐ Agree ☐ Disagree ☐ Strongly disagree ☐ I don't know ☐ Neutral

Strongly Agree

Proposal 3: School Streets

13. Do you support RCAs and schools working together to provide more spaces for children to walk, cycle or ride a device to school by restricting access on some streets during pick up and drop off times? ☒ **Agree** ☐ Strongly agree ☐ Disagree ☐ Strongly disagree ☐ I don't know ☐ Neutral

Agree (with caveats below)

14. If there is anything that you think RCAs and/or schools need to consider when designing or installing School Streets?

The recommended changes do not go far enough to protect vulnerable young active transport users. Changes should be permanent around schools rather than just at “drop-off” and “pick-up” times (see below for our concerns about the use of these terms). Schools have regular movement of people throughout the day, and are heavily used outside school hours as community hubs. Changes should be implemented to support safe active and independent travel at all times. This overlaps with our concerns that the proposals for School Streets have an emphasis on signage, and recommend that this should switch to recommend street infrastructure modification in the first instance (e.g. cul-de-sac development)

As an aside, we would like to draw attention to the inappropriate use of car-centric terms like “drop-off” and “pick-up”. It is more appropriate to use more neutral and less car-promoting terms like “the beginning and end of the school day”.

Proposal 4: Community Streets

15. Do you support residents being able to create Community Streets with approval and support from RCAs?

✓ **Strongly agree** ☐ Agree ☐ Disagree ☐ Strongly disagree ☐ I don't know ☐ Neutral

Strongly Agree

16. Do you think the proposed requirements for Community Streets are: ✓ **satisfactory** ☐ too prescriptive

☐ not prescriptive enough

Satisfactory

17. Is there anything else that you think RCAs need to consider before approving a Community Street? Is there anything else that should be included in guidance?

Proposal 5: Closing roads for other functions and events

18. What is your view on limiting how often a road can be closed for regular events? ☐ There should be a limit, like the current limit ☐ The limit should be increased to enable closures once per week ✓ **There should not be a specific limit?**

There should not be a specific limit

19. Do you support the proposal to put all road closure powers for events in one piece of legislation? ✓

Strongly agree ☐ Agree ☐ Disagree ☐ Strongly disagree ☐ I don't know ☐ Neutral

Strongly Agree

20. Do you support the proposal to update notification requirements for events, so that RCAs can notify the public in any way that they consider appropriate at least two weeks before an event? ✓ **Agree** ☐ Strongly agree ☐ Disagree ☐ Strongly disagree ☐ I don't know ☐ Neutral

Agree

21. The 1965 Regulations require an RCA to be satisfied that the promoter of an event has adequate insurance to cover any damages from the event. Should these insurance requirements be kept if powers and requirements for events are shifted to the Street Layouts rule? ✓ **No** ☐ Yes ☐ I don't know.

No- It would be impractical for many planned community events to obtain insurance. The RCA should establish that the nature of the event is such that it is unlikely to result in damage. The RCA should hold insurance that covers in the unlikely event of damage.

Proposal 6: Pedestrian Malls

22. Do you support the proposals to make the consultation requirements and appeals process for creating pedestrian malls consistent with other types of street changes? ✓ **Agree** ☐ Strongly agree ☐ Disagree ☐ Strongly disagree ☐ I don't know ☐ Neutral

Agree- however, clarification is needed on who controls pedestrian malls once they have been established. The consultation process should be streamlined to allow RCAs to make decisions based on expert advice on how best to meet the communities needs and not the opinions of a vocal minority.

23. Do you support the proposal to shift the powers and requirements for establishing and managing pedestrian malls to the new rule? ☒ **Agree** ☐ Strongly agree ☐ Disagree ☐ Strongly disagree ☐ I don't know ☐ Neutral

Agree

Proposal 7: Transport shelters

24. Do you support the proposal to remove the prescriptive consultation requirements for installing transport shelters? ☒ **Strongly agree** ☐ Agree ☐ Disagree ☐ Strongly disagree ☐ I don't know ☐ Neutral

Strongly Agree

Part 8: Further comments

General

In general, we strongly support these changes. We encourage the use of systems thinking and clarity on priorities. The priority is the care for the planet and life on earth, and for people (which included equity). Liveable cities require systems thinking. Transport needs to be seen in terms of people not 'land transport' and, as you have noted, not cars. Liveability includes the air breathed, noise and safety.

Public health benefits

We support accelerating the development of active and public transport infrastructure because this will deliver significant health benefits for people (1,2).

Equity

Transport is an important equity issue both in terms of ethnicity (3) and gender (4,5).

Green spaces

We are pleased to see green spaces mentioned. A significant amount of a city's green space consists of monocultures at the roadside (6,7). Trees and biodiversity are very important in their own right as well as for climate adaptation (8), peoples' health (9,10) and other benefits (11,12). Although not addressed by the proposed legislation changes, we wish to signal the need to allow city councils to convert street verges from grass or hard surface to tree and native plants.

Noise

Liveable cities must be quiet enough to be consistent with health. Transport contributes significantly to city noise but city councils are powerless to enforce transport-related noise limits because authority is siloed, for example, land transport for road noise and the aviation authority for aircraft noise. Noise is an important determinant of physical health (13,14), and mental health (15,16). and mortality (17). People partaking in active transport are particularly exposed to noise as well as air pollution (18–20). Therefore, we urge policy makers to review the legal foundations of noise regulation.

References

1. Patterson R, Panter J, Vamos EP, Cummins S, Millett C, Lavery AA. Associations between commute mode and cardiovascular disease, cancer, and all-cause mortality, and cancer incidence, using linked

Census data over 25 years in England and Wales: a cohort study. *Lancet Planet Health*. 2020 May 1;4(5):e186–94.

2. Celis-Morales CA, Lyall DM, Welsh P, Anderson J, Steell L, Guo Y, et al. Association between active commuting and incident cardiovascular disease, cancer, and mortality: prospective cohort study. *BMJ*. 2017 Apr 19;j1456.
3. Randal E, Shaw C, McLeod M, Keall M, Woodward A, Mizdrak A. The Impact of Transport on Population Health and Health Equity for Māori in Aotearoa New Zealand: A Prospective Burden of Disease Study. *Int J Environ Res Public Health*. 2022 Jan;19(4):2032.
4. Russell M, Davies C, Wild K, Shaw C. Pedalling towards equity: Exploring women’s cycling in a New Zealand city. *J Transp Geogr*. 2021 Feb 1;91:102987.
5. Shaw C, Russell M, Keall M, MacBride-Stewart S, Wild K, Reeves D, et al. Beyond the bicycle: Seeing the context of the gender gap in cycling. *J Transp Health*. 2020;18:100871.
6. Marshall AJ, Grose MJ, Williams NS. From little things: More than a third of public green space is road verge. *Urban For Urban Green*. 2019;44:126423.
7. Marshall AJ, Grose MJ, Williams NS. Footpaths, tree cut-outs and social contagion drive citizen greening in the road verge. *Urban For Urban Green*. 2019;44:126427.
8. Rahman MA, Stratopoulos LMF, Moser-Reischl A, Zölch T, Häberle KH, Rötzer T, et al. Traits of trees for cooling urban heat islands: A meta-analysis. *Build Environ*. 2020 Mar 1;170:106606.
9. Elsadek M, Liu B, Lian Z, Xie J. The influence of urban roadside trees and their physical environment on stress relief measures: A field experiment in Shanghai. *Urban For Urban Green*. 2019 Jun 1;42:51–60.
10. Zhu M, Sze NN, Newnam S. Effect of urban street trees on pedestrian safety: A micro-level pedestrian casualty model using multivariate Bayesian spatial approach. *Accid Anal Prev*. 2022 Oct 1;176:106818.
11. Grey V, Livesley SJ, Fletcher TD, Szota C. Tree pits to help mitigate runoff in dense urban areas. *J Hydrol*. 2018 Oct 1;565:400–10.
12. Langenheim N, White M. Green Infrastructure and Urban-Renewal Simulation for Street Tree Design Decision-Making: Moderating Demands of Stormwater Management, Sunlight and Visual Aesthetics. *Int J Environ Res Public Health*. 2022 Jan;19(13):8220.
13. Vienneau D, Saucy A, Schäffer B, Flückiger B, Tangermann L, Stafoggia M, et al. Transportation noise exposure and cardiovascular mortality: 15-years of follow-up in a nationwide prospective cohort in Switzerland. *Environ Int*. 2022 Jan 1;158:106974.
14. Münzel T, Sørensen M, Daiber A. Transportation noise pollution and cardiovascular disease. *Nat Rev Cardiol*. 2021 Sep;18(9):619–36.
15. Gong X, Fenech B, Blackmore C, Chen Y, Rodgers G, Gulliver J, et al. Association between Noise Annoyance and Mental Health Outcomes: A Systematic Review and Meta-Analysis. *Int J Environ Res Public Health*. 2022 Jan;19(5):2696.

16. Li A, Martino E, Mansour A, Bentley R. Environmental Noise Exposure and Mental Health: Evidence From a Population-Based Longitudinal Study. *Am J Prev Med* [Internet]. 2022 Apr 22 [cited 2022 May 21]; Available from: <https://www.sciencedirect.com/science/article/pii/S0749379722001568>
17. Khomenko S, Cirach M, Barrera-Gómez J, Pereira-Barboza E, Iungman T, Mueller N, et al. Impact of road traffic noise on annoyance and preventable mortality in European cities: A health impact assessment. *Environ Int*. 2022 Apr 1;162:107160.
18. Gelb J, Apparicio P. Modelling Cyclists' Multi-Exposure to Air and Noise Pollution with Low-Cost Sensors—The Case of Paris. *Atmosphere*. 2020 Apr;11(4):422.
19. Gelb J, Apparicio P. Cyclists' exposure to atmospheric and noise pollution: a systematic literature review. *Transp Rev*. 2021 Nov 2;41(6):742–65.
20. Marquart H, Stark K, Jarass J. How are air pollution and noise perceived en route? Investigating cyclists' and pedestrians' personal exposure, wellbeing and practices during commute. *J Transp Health*. 2022 Mar 1;24:101325.

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