

Submission on Land Transport Rule - Setting of Speed Limits [2017] (yellow draft)

Send to email to rules@nzta.govt.nz by 5pm, 16th June 2017

PROPOSAL 1

Establish a new speed-setting mechanism that focuses on assisting RCAs to achieve safe and appropriate travel speeds, in particular for areas where there are high benefit opportunities to optimise safety outcomes, economic productivity or both.

The proposed new method seems sensible but it is not yet clear what it will result in when applied.

LSA fundamentally believes that 50km/h is too high a speed in many built up areas and 100km/h is too high in many rural areas.

Given the high occurrence of people exceeding the speed limit, the multiple things that demand attention when driving and the distractions commonly experienced, especially in urban areas, we believe there should be no default speed limit with RCA's having to explicitly consider what is a safe and appropriate speed limit for each stretch of road, consistent with the One Network Road Classification scheme. This would also be more consistent with the message that the appropriate speed is different for different roads – a core part of Changing the Conversation about Speed.

If this view is not adopted then, at the very least, there should be a lower default limit determined for certain places, such as 30km/h in the vicinity of schools and early childhood education centres, hospitals, retirement homes and eldercare facilities, playgrounds and parks as well as local retail business and central business areas.

Another option would be to set the defaults specific to the class of the road under the One Network Road Classification, so that it might be 30km/h on access roads, 40km/h on secondary collectors, 50km/h on primary collectors and arterials and 60km/h on national roads in urban areas.

Benefits of these lower speeds would accrue both in terms of safety (30km/h – making streets liveable!, 2015) but also in decreased fuel use (Rowland and McLeod, 2017) and emissions of pollutants (Newman and Kenworthy, 1992). In urban areas, costs of lower speeds through impacts on travel time are considered to be negligible (Austrroads, 2005).

Therefore we support the intent of the Guide to manage safety on all routes through low cost improvements or lowering speed limits.

PROPOSAL 2

Enable the setting of a 110 km/h speed limit on roads where it is safe and appropriate to do so.

We do not support the higher speed on higher classification routes because although these would only be on routes that are two lane in each direction and with lanes in opposite directions separated by median barriers, we believe:

a) the faster the speed the greater the mess, something acknowledged at page 30 of the Overview document, and

- b) higher speeds use disproportionately greater amounts of fuel and cause disproportionately higher CO2 emissions, and
- c) given the likely limited applicability of 110km/h speed limits, travel time savings are likely to be minimal especially if it simply delivers vehicles to areas of congestion more rapidly, and
- d) having a limit of 110km/h on some routes may lead to drivers expecting to travel at higher speeds on other roads where it is even less appropriate.

With regard to point (c) the difference in travel time per km between a vehicle traveling consistently at 110km/h compared with one traveling consistently at 100km/h is a mere 3 seconds per kilometre. So, on the Tauranga Eastern Link Road (21km), for example, about one minute would be saved if vehicles travelled at 110km/h rather than 100km/h along its entire length. This assumes unimpeded traffic flow which is unlikely to be the case for the times of day when the road gets most use. This, combined with the fact that many users may only travel along part of the road, means that average time savings for individual drivers could be expected to be somewhat less than a minute. Our view is that the risk of greater trauma is simply not worth it.

PROPOSAL 3

Allow for a more flexible, efficient and outcomes-based approach to the requirements for permanent repeater speed limit signs.

Living Streets Aotearoa supports the intent of this proposal. However, we believe that the provision of information to RCAs on a broader range of options to convey information to drivers is insufficient and that such measures should be required to be implemented. According to our observations, traffic engineers are already well aware of the options but many rarely use them, for reasons unknown.

PROPOSAL 4

Enable an RCA to set emergency speed limits on roads directly and indirectly affected by an emergency.

Living Streets Aotearoa supports this except that the time limit of 6 months seems inappropriately brief. Both the Manawatu Gorge closure of 2011-12 and the current closure of SH1 at Kaikoura required, or will require, substantially longer than 6 months to rectify. A time limit of 12-18 months seems more appropriate.

PROPOSAL 5

Clarify the grounds upon which an RCA may set a temporary speed limit.

Although Living Streets Aotearoa supports clarifying the grounds for setting a temporary limit, it believes the wording 'where an unsafe road surface or structure is present' is too narrow and should include the word 'situation' since unsafe situations can arise independently of surfaces and structures.

Also, it is useful for RCAs to be able to set temporary speed limits to conduct trials. For example, as part of measures aimed at lowering the actual travel speed of vehicles through the use of markings, space reallocation etc.

PROPOSAL 6

Approval from the Transport Agency is required before an RCA may set a speed limit of 70 km/h on a road.

Living Streets Aotearoa has doubts about the merit of this proposal because if the objective is to set speed limits that are safe and appropriate based on the various criteria mentioned under Proposal 1 then setting a 80km/h limit when a 70km/h one is appropriate will result in a less safe situation while setting a 60km/h one will result in a less efficient one. It seems to be an unnecessary step for an RCA to have to seek NZTA approval for setting a 70km/h limit. What might achieve the intended outcome of this proposal (fewer speed limit categories) in a better way, is to allow RCAs to set 70 (or 90km/h) speed limits without seeking NZTA approval but then require periodic reports from them as to the steps they have taken and intend taking to decrease the number of stretches of road that have these speed limits with a further requirement that some level of decrease be achieved over time (accompanied by either a lowering to 60km/h or road improvements to justify raising it to 80km/h).

PROPOSAL 7

Require an RCA to notify the Transport Agency of any proposal to set a speed limit of 70 km/h, 90 km/h, 110 km/h, or a variable speed limit.

The intent of this is very similar to that of Proposal 6, seeking to give NZTA greater influence over speed limit setting decisions in an attempt to decrease the number of speed limit categories in commonly use across the country. The comments made about Proposal 6 apply here also.

However, variable speed limits are also included in Proposal 7. These are used in the vicinity of some schools and involve a long-winded process to implement.

Living Streets Aotearoa is of the view that the speed limits near schools should be a standard 30km/h during the period 45 minutes prior to the school day commencing and for 30 minutes after it ends. This would provide the consistency that the new setting of speed limits is said to be partly aimed at.

30km/h is recognised internationally (including by the WHO) as the appropriate and safe speed limit near schools.

Standardising it would result in one more category of speed limit for drivers to cope with but then they wouldn't have to think about whether this was a school to which a lower speed limit applied or not.

This standard should apply to both urban and rural schools. However, provision would need to be made to exclude motorways etc that are adjacent to schools if the motorway does not impinge on pupils' access to the school.

Minor Changes to Setting Speed Limits Regime

Living Streets Aotearoa supports the proposal under this section.

Comments on specific parts of the yellow draft version of the Land Transport Rule: Setting of Speed Limits 2017

Cl.2.3(2) Living Streets Aotearoa is of the view that pedestrian, disabled and bike rider road user groups should be specifically consulted along with the currently-listed Automobile Association and the Road Transport Forum. These groups, not currently included in this clause would need to be funded appropriately to carry out this valuable function of providing their perspectives to the decision-makers.

Cl.3.4(1) Living Streets Aotearoa believes there should be no default speed limit and that having them is contrary to the whole idea of specific speed limits for different stretches of road. Instead, each RCA should explicitly consider each road under its jurisdiction and actively set a speed limit which is safe and appropriate. Having defaults set in the Rule will open up the possibility of some RCA's doing nothing and simply accepting the default setting on all its roads instead of going through a deliberate process of considering the appropriateness of this.

Cl.9.2(2)(b) states that a speed limit repeater sign needn't be installed within the distance specified in Schedule 2 if the mean speed is within 10% of the speed limit for a stretch of road. Is this meant to be the mean or the 85%ile? If it is the average then it could mean that about 50% of vehicles are travelling more than 10% faster than the speed limit. This implies (assuming a normal distribution of travel speeds) that perhaps only a third of vehicles may be travelling within the speed limit which seems to be a very poor outcome.

Thank you.

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About Living Streets Aotearoa

Living Streets Aotearoa is New Zealand's national walking and pedestrian organisation, providing a positive voice for people on foot and working to promote walking friendly planning and development around the country. Our vision is "More people choosing to walk more often and enjoying public places".

The objectives of Living Streets Aotearoa are:

- to promote walking as a healthy, environmentally-friendly and universal means of transport and recreation
- to promote the social and economic benefits of pedestrian-friendly communities
- to work for improved access and conditions for walkers, pedestrians and runners including walking surfaces, traffic flows, speed and safety
- to advocate for greater representation of pedestrian concerns in national, regional and urban land use and transport planning.

For more information, please see: www.livingstreets.org.nz

References

Newman and Kenworthy (1992) *Winning Back the Cities* cited at p369 in <https://www.nap.edu/read/9676/chapter/13#369>

Rowland, T. And McLeod, D (2017) Time and fuel effects of different travel speeds. NZTA Research Report 582.

30km/h – making streets liveable! (2015) See references under tables on webpage <http://en.30kmh.eu/2015/12/07/how-road-safety-in-european-cities-is-increasing-thanks-to-30-kmh-20mph/>

Austrroads (2005) Balance between Harm Reduction and Mobility in Setting Speed Limits: A Feasibility Study. Austrroads Publication No. AP-R272/05.