

Setting of Speed Limits

Summary of Submissions

August 2017

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Introduction

Safe speeds are a core component of the safe system approach to road safety, and are a key pillar in *Safer Journeys*, New Zealand's Road Safety Strategy 2010-2020.

New Zealand has a well-established process for setting speed limits although this predates *Safer Journeys*. *Land Transport Rule: Setting of Speed Limits 2003* (the current Rule) sets out the requirements and processes for setting speed limits and incorporates Speed Limits New Zealand (SLNZ) as the methodology for calculating speed limits.

The proposed *Land Transport Rule: Setting of Speed Limits* [2017] (the proposed Rule) replaces the current Rule and removes SLNZ as the speed limit setting methodology. The proposed Rule enables a new approach to speed management on New Zealand roads through a speed limit setting process more consistent with *Safer Journeys*.

The proposed Rule establishes a new speed limit-setting mechanism to help road controlling authorities (RCAs) set safe and appropriate speed limits, in particular in areas where there are high-benefit opportunities. The proposed Rule contains the following key changes:

- a new requirement (including criteria) for the New Zealand Transport Agency (the Transport Agency) to develop and maintain information about the speed for each public road and provide this to RCAs, identifying higher benefit roads in terms of safety outcomes and road use efficiency;
- a new requirement for an RCA to consider the Transport Agency's speed information when considering speed management responses, including reviewing and setting speed limits;
- allowing the setting of a 110 km/h speed limit on specific roads where the design and use justify this and it is safe and appropriate to do so;
- allowing a more flexible approach to the use of repeater speed limit signs;
- providing for Transport Agency notification before speed limits of 70 km/h, 90 km/h or 110 km/h may be proposed and Transport Agency approval before speed limits of 70 km/h, 110 km/h can be set (90 km/h already requires approval)
- enabling RCAs to apply emergency speed limits in specified emergencies; and
- clarifying the grounds on which an RCA may set a temporary speed limit.

The proposed Rule reflects the Government's revised approach to speed management embedded in the Speed Management Guide (the Guide).

The Guide has been created to support the Safer Journeys Strategy and incorporates the Safe System approach¹ and One Network Road Classification (ONRC)², linking travel speeds to levels of safety and road classification. It aims for higher speeds on higher classification, economically important routes where safety features support this and managing safety, where necessary, on other roads through low cost improvements or lowering the travel speed (which may include speed limit changes). In this regard the Guide modernises the approach to managing speed in New Zealand to ensure a more consistent network-wide approach to speed management.

Consultation on the yellow draft of the proposed Rule commenced on 4 May 2017 and closed on 16 June 2017.

¹ The Safe System approach aims for a more forgiving road system that take fallibility and vulnerability into account. Under a Safe System we design the whole transport system to protect people from death and serious injury.

² One Network Road Classification divides New Zealand's roads into six categories based on how busy they are, whether they connect to important destinations, or are the only route available. These categories are as follows: national, arterial, regional, primary collector, secondary collector or access.

A total of 407 submissions were received from the following submitters:

Submitter type	No. of submitters
Road Controlling Authorities	26
Individuals	351 (100 from Facebook)
Businesses and advocacy/special interest groups	16
Industry Associations	5
Road Transport Industry	5
Government – other groups	4

See **Appendix 1** for a full list of submitters.

Please note that all submissions received were recorded, read, and analysed by a review team comprising policy, legal and subject matter experts from the NZ Transport Agency and the Ministry of Transport. This document is a summary of that work. Any views contained in this document, other than a submitter's, are the review team's.

The Proposed 2017 Rule

This section summarises the main changes proposed in the yellow draft of the proposed Rule put to stakeholders and the public during consultation. It should be noted that the proposed Rule will replace, rather than amend the current Rule.

Proposal 1: New speed-setting mechanism

The proposed Rule establishes a new speed limit-setting mechanism that focuses on assisting RCAs to achieve safe and appropriate travel speeds, in particular for areas where there are high benefit opportunities.

The fundamental obligation of an RCA is to set speed limits that are safe and appropriate whenever it reviews a speed limit. To assist RCAs in meeting this obligation, the proposed Rule requires the Transport Agency to provide to RCAs:

- guidance on speed management and how this Rule is to apply; and
- information about speed management for public roads in New Zealand, and in doing so to prioritise information about public roads where achieving safe and appropriate travel speeds is likely to deliver the highest benefits.

Applying the above criteria, the Transport Agency will develop and share information about safe and appropriate travel speeds with RCAs. This will be in the form of regional maps that provide a range of data about all public roads within the RCA's jurisdiction and highlight the top 5–10 percent 'high benefit' speed management opportunities. These maps will also highlight to RCAs appropriate interventions for these high benefit opportunities, based on road classification, which may include safety improvements or changes to speed limits or a combination of both. This is a significant change from the current approach in SLNZ where individual RCAs are themselves responsible for applying specified criteria to their roads.

Further benefits will see RCAs no longer having to engage consultants to undertake work to determine the safe and appropriate speed limit, as the maps will now aid with this. RCAs will be encouraged to plan for engagement resources through their National Land Transport Plan bids, with a set of engagement resources being made available on the Transport Agency's website. RCAs will

be able to utilise the maps to engage in more detailed speed management planning, rather than just one speed limit change at a time.

As under the current Rule, it remains the RCA's responsibility to decide whether to review or change speed limits. However, under the proposed Rule, if an RCA chooses to review a speed limit it must *have regard* to any speed information (including the maps) for that particular road provided by the Transport Agency and any relevant guidance on speed management. The RCA is not obliged to implement any of the information that the maps identify in relation to speed for any particular road. The Transport Agency also retains its current responsibility to intervene if it considers a RCA has not carried out its speed limit setting functions appropriately.

Proposal 2: 110 km/h speed limits

The proposed Rule enables a RCA to set a 110 km/h speed limit on roads designed, constructed, maintained and operated to safely support 110 km/h travel speeds. Before doing so, the RCA must seek the approval of the Transport Agency, which would consider a range of factors before giving approval, including whether the road:

- is a high-volume national road (its road classification);
- is median-divided with at least two travel lanes in each direction;
- has no direct property access;
- has grade-separated intersections;
- has measured crash risks of low to medium for personal risk and no more than medium-high for collective risk; and
- has a low road infrastructure risk.

The criteria recognises that not all roads are the same, and that for highest classification routes with superior safety features higher travel speeds, through setting 110 km/h speed limits, can be justified without compromising safety.

Initial work by the Transport Agency suggests that some of the most heavily used sections of the national road network could meet the proposed criteria for a 110 km/h speed limit. The Transport Agency is the RCA for these stretches of road, which include the Upper Harbour Motorway (SH18), parts of the Waikato Expressway (SH1), and the Tauranga Eastern Link (SH2). Some other sections of the State Highway network are likely to be eligible for 110 km/h in the near future.

Although the Transport Agency is the RCA for all state highways, motorways and expressways, other RCAs may also set speed limits at 110 km/h on suitable roads, if approved to do so by the Transport Agency.

There is no proposal to raise the default (100 km/h) speed limit on rural roads and motorways.

Proposal 3: More flexible approach to requirements for permanent repeater speed limit signs

The current Rule requires a speed limit sign at the point where a new limit takes effect and the proposed Rule retains this. However, the current Rule has prescriptive requirements for reminding road users of the speed limit where it is not the default limit (termed 'repeater signs'). In particular, the current Rule requires regular repeater signs every 2–3 km where the permanent speed limit is over 50 km/h and is not the default rural speed limit of 100 km/h (for example 80 km/h).

The general obligation to use these repeater signs is carried over in the proposed Rule. However, the proposed Rule allows an alternative more flexible approach to repeater sign requirements for

roads with permanent or holiday speed limits.³ Under the proposed Rule an RCA will not be obliged to use repeater signs if:

- a) the length of road is such that a road user would reasonably understand that the speed limit displayed on the last speed limit sign remains the speed limit throughout the whole length of the road; and
- b) the mean operating speed (as measured) is less than 10% above the speed limit for that length of road.

The provision is intended to be used, for example, on a particularly winding stretch of road with a speed limit of 80 km/h, where providing repeater signs at the prescribed distance would be superfluous given the nature of the road and where actual travel speeds are around 80 km/h anyway.

In order to create roads that are more self-explanatory to drivers, the Guide provides RCAs with information on a broader range of options to convey information to drivers including:

- alternative methods of indicating safe and appropriate travel speeds such as road markings and other road-edge marker devices;
- speed threshold treatments – these are used where speed limits change and are a combination of a speed limit sign, place name sign, road markings and traffic island or plantings; and
- the re-allocation of road space to narrow the appearance of the lanes for motor vehicles.

These options will convey messages to enable ready comprehension of a speed limit change, which will enable the RCA to avoid the cost of installing repeater signs at the prescribed distances.

Proposal 4: Emergency speed limits

The proposed Rule introduces a new category of speed limit that will allow an RCA to manage speed limits when an emergency affects the condition or use of any road. This proposal has been developed following the recent Kaikoura earthquakes.

The definition of emergency is based on that used in the Civil Defence Emergency Management Act 2002 and covers major disasters and emergencies such as, floods, technological failures, and epidemics where those events endanger the safety of the public or cause damage to a road.

Under the proposed Rule, an RCA can set an emergency speed limit by installing speed limit signs in accordance with the Rule. However, within 10 working days, the RCA must publish a notice in the *New Zealand Gazette* with details of the emergency speed limit and the reasons why the emergency speed limit is necessary.

It was proposed that an emergency speed limit may be in force for no longer than 6 months.

Proposal 5: Temporary speed limit grounds clarified

Under the current Rule, an RCA can set a temporary speed limit on only two grounds: where there is a construction site or work programme that creates a risk of danger, or where there is a special event.

The proposed Rule clarifies these provisions. “Construction site or work programme” from the current Rule has been split out into two replacement grounds:

³ A holiday speed limit is a maximum speed limit that is force 24 hours a day for a specified period or period, e.g. a lower speed limit on a road that runs through a beach resort that is popular in summer, but only sparsely populated for the rest of the year.

- where physical work occurring on or adjacent to a road impacts the function of the road; and
- where an unsafe road surface or structure is present.

The Transport Agency intends to refresh guidance to RCAs on how and when these new temporary speed limit powers may be used.

Proposal 6: Approval from the Transport Agency required before RCA may set 70 km/h speed limit

The current Rule allows an RCA to set a speed limit of 70 km/h without requiring approval from the Transport Agency.

Under the proposed Rule, Transport Agency approval will be needed before an RCA sets a 70 km/h limit.

The speed management framework and Guide do not recommend permanent speed limits of 70 km/h or 90 km/h and details that these speed limits be used as interim measures until the road is either improved to support travel speeds of 80 km/h or 100 km/h respectively, or until there is public support, or the road can be engineered-down to reduce the speed limits to 60 km/h or 80 km/h respectively.

There are various policy reasons that underlie this approach:

- at higher travel speeds drivers have trouble differentiating speed differences of just 10 km/h;
- by using 20 km/h increments for speed limits between 60 km/h and 100 km/h there are fewer and more recognisable speed limit categories for people to understand and recall; and
- by limiting the use of different speed limits, a more consistent and intuitive speed management system can be created across the network, where people have a greater understanding and appreciation of risk and what a safe and appropriate speed is on a particular stretch of road.

By requiring approval, the Transport Agency can work with RCAs to ensure that speed limits of 70 km/h are set only in appropriate situations as an interim measure.

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.

Under the proposed Rule an RCA must first notify the Transport Agency before proposing a variable⁴, 70 km/h, 90 km/h or 110 km/h speed limit. The notification requirement is new and is not part of the current Rule.

The step of notifying the Transport Agency is additional to the usual procedure set out in section 4 of the proposed Rule, which allows an RCA to set a permanent, holiday, or variable speed limit. This notification must occur before the RCA consults on the proposal.

If, after consultation, an RCA decides that a variable, 70 km/h, 90 km/h or 110 km/h speed limit is appropriate, the RCA must then apply to the Transport Agency for approval before it can set that limit.

⁴ A variable speed limit is a set of alternative speed limits for a road, one of which will be in force at a particular time depending on the presence of specified conditions, e.g: the speed limit is varied to manage effects of congestion.

There are a number of reasons for the notification requirement. It is important that an RCA is aware of the circumstances in which one of these speed limits may receive Transport Agency approval before they consult on a proposal. Similarly, it would help RCAs to have an indication if the Transport Agency is likely to approve the speed limit proposed before it undertakes the necessary work to set a new limit.

For speed limits in excess of 50 km/h the intention is to work towards 60 km/h, 80 km/h and 100 km/h being the predominant limits across the network. Over time this is expected to result in greater distinction between different speed limits, making the safe and appropriate speed easier for road users to recognise.

Comments by Sector

Road Controlling Authorities

26 RCAs made submissions on the proposed Rule. While a range of feedback was provided, no RCA expressed the view that the proposed Rule would prevent them setting a speed limit. Concerns were raised mainly in relation to the cost of installing repeater signs, the requirements for consultation and the use of bylaws for setting and changing speed limits.

Auckland Transport support the proposed Rule and noted that the “Setting of Speed Limits Rule is aligned with the International Transport Forum’s 2016 Zero Road Deaths & Serious Injuries Report, the national Safer Journeys Strategy and Auckland’s draft Safe Roads Strategy.” Auckland Transport asked the Transport Agency to “ensure that the Rule provides for best possible balance between the need for a consistent and robust process for setting safe and appropriate speed limits against the need to avoid unnecessary burdens in terms of inflexible, bureaucratic, procedures and wasted time and money resources.” Auckland Transport’s interpretation was that the proposed Rule could result in an obligation to send written communication to all people affected by a speed limit change, which they stated could be up to 1.4million people.

The project team agrees that such an outcome would be unreasonable but this is not what is intended for consultation to be considered reasonable. The project team, as a result, recommended that the explicit need for “in writing” be removed as this level of prescription is no longer necessary due to the level of case law around what constitutes reasonable consultation.

Western Bay of Plenty District Council, which would potentially have a 110 km/h road in their jurisdiction, were supportive of the proposed Rule, as was the Waikato Regional Council.

Signage requirements garnered differing opinions, though a majority understood the intent of this proposal. Western Bay of Plenty District Council noted that “any reduction in signage assets would present savings.” A contrary view was expressed from Rangitikei District Council that “the change may increase workload (monitoring) for Council in ensuring that the operating speeds are within the prescribed thresholds.” The Transport Agency considers that this will be mitigated through the regular provision of data and because the provision is an alternative to the use of repeater signage. RCAs can themselves assess the relative merits of the two alternatives and settle on the least cost option.

RCAs generally support the proposed Rule because it will help them to embed the Guide across their networks. Rangitikei District Council commented that the proposed Rule “will assist in developing a more consistent and self-explanatory roading network throughout New Zealand”, a sentiment shared by several other RCAs.

Special interest groups and businesses

A varying range of special interest groups and businesses made submissions, with a majority providing support for the overall intent of the proposed Rule, albeit with a few concerns raised.

Concern was raised that an RCA could be required to explicitly consider what is a safe and appropriate speed limit for each road – in effect trading off safety for efficiency. This was a view adopted and shared by Skypath Trust and supporters, particularly for non-motorised road users. The potential for a safety trade off was considered by the project team. It concluded this is not the proposed Rule's intent and there are sufficient provisions to ensure reasonable allowance for non-motorised road users through the criteria set out for reviewing and setting a speed limit.

Brake, the road safety charity, had a number of concerns, mainly about the 110 km/h speed limit and limits around schools. They commented that “the main risk of increasing speeds to 110 km/h is that if there is a crash, the impact speeds could be higher, and the resulting trauma more severe.”

The Royal Australasian College of Surgeons were supportive, but concerned about enabling 110 km/h speed limits. The group felt “that this increase poses an unacceptable risk and will have a detrimental effect on the way our wider road network is used in general.”

The Motorcycle Safety Advisory Council commented that while speed has an economic flow on effect, especially for freight movement, consideration needs to be given to the relationships of large trucks to the new speed limits. But overall support was given for the proposed Rule. Fonterra also gave support to the proposed Rule and the intended outcomes, while urging the Transport Agency to retain the 90 km/h speed limit for heavy vehicles given that roads set at 110 km/h will be multi-laned, providing safe opportunities for passing.

Spokes Canterbury, a cycling advocacy group, noted that “NZTA can perform a valuable service in helping RCA's to prioritise the roads which will best benefit”, while urging for a cycling advisory panel to be set up to provide a voice to these road users. Living Streets Aotearoa also noted concern in relation to cyclists and walkers not being considered by an RCA when considering a speed limit change proposal.

The Transport Agency notes that in the consultation criteria, any other organisation or road user group that the RCA considers to be affected must be consulted. Moreover, the Guide specifically highlights the need to consider people walking and cycling when managing speeds.

Industry Associations

Overall, industry associations (including transport and non-transport associations) supported the proposed changes.

Federated Farmers NZ were of the view that rural or local roads may see reduced funding and were concerned given the importance of these roads for the primary sector, with the risk that this could compromise the viability of farming businesses.

The Institute of Professional Engineers New Zealand (IPENZ) supported the Rule overall, but raised concerns with the proposed increase to 110km/h on some roads, including the potential environmental impacts due to increased emissions. IPENZ recommended that the Transport Agency “publically release any analysis that evaluates the benefit cost ratios for the individual road sections

tested and any quantified analysis of the implications of the Proposed Rule, including impacts on increased emissions”.

A Driver Trainer submitter noted that the increase to 110 km/h will increase fuel consumption and runs counter to NZ’s climate change commitments. They noted that the majority of vehicles are at their most economical at 80-90 km/h, and noted risks around drivers’ abilities, speed differential, traffic congestion and the crash severity with higher impact speeds.

The New Zealand Traffic Institute (TRAFINZ) represents a wide group of local authorities. It generally supports the intent of the proposed Rule, but commented that RCAs will incur costs to implement the proposed Rule. However, TRAFINZ also said that developing a Speed Management Plan would allow an RCA to carry out consultation on a number of roads, keeping the cost at a more manageable level. TRAFINZ also noted that “RCA’s will benefit from the provision of key data on safe and appropriate speeds...information to assist in prioritising where to achieve safe and appropriate speeds...and the removal of costs associated with the collation of data.”

Road Transport Industry

A number of comments were received from road transport industry submitters working in different areas of the transport sector.

Representatives of the heavy vehicle industry wanted the open road speed limit for heavy vehicles to remain at 90 km/h. The Bus and Coach Association and the Road Transport Forum (RTF) noted that the desire to move to 60/80/100 km/h limits does not fit with the requirement for heavy vehicles to travel at a maximum of 90 km/h on open roads. The Motor Trade Association noted the risks associated with increasing the maximum speed limit to 110 km/h, and stressed that to support this, correct maintenance and servicing of vehicles becomes even more important.

The NZ Automobile Association (NZAA) supported the Guide, and the ability to set 110 km/h speed limits on suitable roads. The NZAA noted it had advocated for this change in the past, and surveys show 70% of NZAA members support this change. However, they disagreed with the proposal for flexible requirements for permanent repeater speed limit signs, noting that cost should not be the primary driver in determining the frequency of speed signs.

The RTF supported most of the proposals including the need for consistency across the network, and the ability to set 110 km/h speed limits. In relation to setting safe and appropriate speeds, the RTF agreed with the reference to economic productivity in addition to safety when determining speed limits. The RTF noted that the revised Rule provides a logical and simplified framework for the management of speed setting.

The Governance Group of the Code of Practice for Temporary Traffic Management (CoPTTM) suggested that remote detection systems such as point-to-point speed cameras could be used as an enforcement measure alongside changes to speed limits.

Government – other groups

Submitters classified in this group are organisations that consist of public sector representatives, but are not, as an organisation, an RCA.

Local Government New Zealand provided overall support for the proposed Rule, noting that often RCA’s and their councils work closely with regional and central office representatives of the

Transport Agency, which helps to align and understand road safety and speed management objectives. Its only concern was the requirement to notify the Transport Agency prior to consulting on a 70 km/h speed limit on the grounds that there are often circumstances where this speed is the appropriate balance between efficiency and safety.

The Canterbury Regional Road Safety Working Group, consisting of members from the Canterbury Regional Council, the Accident Compensation Corporation (ACC), NZ Police and various other bodies, supports the proposed Rule but noted concern over 110 km/h speed limits on expressways and reiterated that an increase in speed for heavy vehicles would not be supported.

Waitemata Local Board support “the update to the Setting of Speed Limits Rule consistent with the Safe System approach to road safety”, noting that the Board wished to work alongside the Transport Agency and Auckland Transport to proactively review all speed limits within the area. The Board also urged the Transport Agency to adopt a safety first approach for the setting of speed limits.

Analysis by Proposals

This section analyses submissions made on the proposed Rule - proposal by proposal. Feedback through submissions is summarised and analysed, with recommendations made on proposals where appropriate.

For ease of reference, the conclusion and analysis section for Proposal 1 is directly under the subject given the wide gambit of issues covered. For all other proposals, the conclusion and analysis is found at the end of the section.

Proposal 1: Speed setting mechanism	Agree	Disagree	Other
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.	57	145 (139 related to “safety first approach”)	56

A total of 258 submitters commented on Proposal 1.

Of the 57 submitters who agreed with the proposal, 26 fully supported it, while 31 agreed with comments or offered qualified support.

No submitters directly opposed the Guide as a whole, nor the speed-setting mechanism contained in the Guide.

The 145 submitters who opposed the proposal disagreed with its focus on high benefit opportunities to optimise safety outcomes, economic productivity, or both. Most of these submitters supported the submission of Skypath Trust⁵ that advanced a “safety first approach” over efficiency or economic productivity considerations (discussed and analysed below).

The remaining 56 submitters neither agreed nor disagreed with Proposal 1, but made comments or gave suggestions.

⁵ Skypath Trust has been developed and championed by the Auckland Harbour Bridge Pathway Trust. It is a charitable trust whose aim is to have a world class walking and cycling facility on the Auckland Harbour Bridge.

Twenty-four RCAs commented on Proposal 1. Of these, 17 RCAs supported the proposal, often with comments and suggestions, 6 neither agreed nor disagreed, and 1 disagreed with the proposal.

The RCA that disagreed (Timaru District Council) preferred the retention of SLNZ - the formulaic assessment for setting speed limits found in the current Rule.

Overall, industry associations and bodies from the road transport industry that commented on Proposal 1 were in support. The NZAA stated that the proposed Rule and Guide will result in better management of speed and lead to greater consistency across the network. Similarly the RTF agreed with the proposal and in particular the inclusion of economic productivity as part of the assessment criteria for a safe and appropriate speed limit. RCAs agreeing with the proposal commended the Speed Management Guide's ability to deliver relevant data and safe and appropriate speed information and provided positive feedback on the usefulness of accessing information about areas of high benefit opportunity.

Waitomo District Council stated "stronger guidance and enhanced information systems will help ensure better and more consistent outcomes." Likewise, Rangitikei District Council said the proposal "would reduce the workload for the Council and assist in providing...information about locations in the network where the most significant safety gains can be achieved."

A number of individuals and community associations also agreed with the proposal. The Geraldine District Promotions and Development Association said they strongly welcomed the new approach to engagement through the proposed Rule, discussing their concerns about the state highway with busy heavy vehicle and tourist traffic running through the main street of their town.

Issues raised by submitters can be broken down into nine main themes, which are outlined below.

a) Safety first approach

139 submissions advanced a "safety first" or "safe as reasonably practicable" approach in opposition to the proposal. Many of these submitters directly supported the Skypath Trust's submission, suggested wording for these submissions was provided on their website, which many made use of. Other individuals or special interest groups offered views that aligned with the Trust's position.

Skypath Trust and its supporters emphasised New Zealand's high road toll, especially when compared with Northern European countries. They also compared New Zealand's higher default speed limits for urban streets and rural roads with those from these countries. The submitters maintained that reducing speed is critical if the number of serious deaths and serious injuries on New Zealand's roads are to be reduced.

These submitters opposed Proposal 1, stating it maintains a "fundamental flaw" in the current Rule that prohibits a "safety first" approach to speed limit setting.

These provisions were identified as being the definition of safe and appropriate speed: "a travel speed that optimises safety and efficiency outcomes," and the purpose section at clause 1.3(c) which states that RCAs are "encouraged to prioritise roads where achieving safe and appropriate travel speeds is likely to deliver the highest benefits in terms of safety outcomes, economic productivity, or both".

Skypath instead recommended that the proposed Rule requires speed limits that are "safe as is reasonably practicable given the road function, design, users and the surrounding land use", emphasising a "safety first approach" to speed limit setting.

Several individuals and a number of interest groups, including the cycling group Spokes Canterbury and road safety charity Brake also aligned with a safety first approach.

Brake was concerned that the proposed Rule and the Guide "use language that suggests safety may be compromised in favour of economic productivity." Brake stated that safety should be first

priority, and that the proposed Rule should focus on the safety of the most vulnerable road users first. Similarly, Spoke Canterbury said efficiency must be secondary to safety.

Skypath Trust noted that a guiding principle of the Health and Safety at Work Act 2015 (HSWA) is that people in the workplace should be given the highest level of protection against harm as is reasonably practicable. The organisation questioned why efficiency and economic productivity should feature in the equation for speed limits given it is not considered in health and safety legislation.

Further, both an individual submitter and Masterton District Council sought clarification about whether there would be any potential implications under the HSWA for an RCA for failing to comply with a lawful requirement under the proposed Rule.

Some submitters maintained that there was no evidence of a link between traffic speed limits and efficiency/economic productivity, adding that there was evidence that reduced traffic speeds increase network efficiency due to lower numbers of crashes and improved traffic flows at intersections.

Spokes Canterbury said that speed should not be equated with efficiency. "Should this attitude carry over to urban streets [the] impact this proposal could have on people who cycle could easily be catastrophic both personally and for the country."

Analysis and conclusions

The approach taken in the Guide and proposed Rule support the Safer Journeys Strategy vision of a safe road system increasingly free of death and serious injuries.

It is not the intent of the proposed Rule, or the Guide that economic productivity should be prioritised over safety. The objectives of the Guide are:

- to ensure a consistent sector-wide approach to managing speeds so they are appropriate for road function, design, safety and use, and
- to help RCAs identify and prioritise parts of their network where better speed management will contribute most to reducing deaths and serious injuries while supporting overall economic productivity.

The Guide provides a framework to determine safe and appropriate speeds across the whole network taking into account traffic volumes, freight volumes and place functions. This means higher speeds are appropriate on our best roads which carry the most traffic and have a higher economic function, but these roads must be engineered to a sufficiently high standard to support higher travel speeds safely. On lower classification roads, which carry less traffic, and which are not safe at current travel speeds, then the appropriate intervention is to manage speeds down, including reducing speed limits. There is no trade-off between safety and efficiency or prioritising one over the other because the Guide aims to achieve both.

Further, we note when reviewing and setting speed limits under clause 4.4 of the proposed Rule an RCA must have regard to a range of factors including:

- the safe and appropriate speed information developed and maintained by the Transport Agency,
- relevant guidance provided by the Transport Agency, and
- a range of factors from a local context which consider:
 - safety: (crash risk, characteristics of road/roadside, adjacent land use, number of intersections and property access ways)
 - efficiency: (function and use of the road, traffic volume, planned modification to the road)
 - views of interested parties.

Similarly, when formulating speed information for RCAs under clause 4.2 of the proposed Rule, the

Transport Agency must take into account the factors listed above (excluding the views of interested parties, as it is not best placed to gather or understand this information).

As such, both RCAs and the Transport Agency are obliged to have regard to factors that fall under the broad categories of both safety and efficiency. There is no prioritisation of one factor over the other.

The proposed Rule currently defines safe and appropriate speed as “a travel speed that optimises safety and efficiency outcomes.”

Taking into account submitter views, we see that defining “safe and appropriate” speeds in the proposed Rule in this way may have caused confusion. Firstly, the Guide defines the term “safe and appropriate”. Secondly, there is no intention to place an extra requirement on RCAs to have regard to the requirements in 4.4 as well as ensure travel speeds optimise safety and efficiency outcomes (as per the definition).

Similarly, the purpose section at clause 1.3(c) states that RCAs are “encouraged to prioritise roads where achieving safe and appropriate travel speeds is likely to deliver the highest benefits in terms of safety outcomes, economic productivity, or both”.

Taking into consideration submitters’ views we recommend that the words “in terms of safety outcomes, economic productivity, or both” are removed from this particular clause. This will ensure that there is no confusion that RCAs have an extra requirement to prioritise either safety or economic productivity in making decisions on speed limits. It is proposed that other clauses in the Rule are aligned with this approach, removing the words “economic productivity” and instead referring to safe and appropriate travel speeds that are likely to deliver the highest benefits in terms of safety and efficiency. We note that more detailed criteria set out in clause 4.4(2) of the proposed Rule sets out matters which an RCA must have regard to when reviewing an individual speed limit.

The Guide provides information about safe and appropriate speeds and identifies the high benefit areas for intervention. But this does not compel an RCA to undertake a review. An RCA may choose to review and set speed limits within their jurisdiction where there is demonstrable road safety risk at the current speed limit. This could be because of a change in crash patterns or a change in land use or activity on or adjacent to the road, for example a new subdivision. This is all part of the ‘sense testing’ process of the information provided to them by the Transport Agency and this is clearly explained in the Guide.

Some submitters sought clarification about whether there would be any potential implications under the HSWA for an RCA for failing to comply with a lawful requirement under the proposed Rule.

In response, we would encourage these submitters to seek their own legal advice. The primary purpose of the proposed Rule is to instruct on the process of setting speed limits - the proposed Rule does not set out an RCA’s obligations under other legislation.

Recommendations:

- Remove the definition of safe and appropriate speed and amend the use of this term through the proposed Rule to reflect this.
- Remove the words “in terms of safety outcomes, economic productivity, or both,” from clause 1.3(c).

b) Reducing speed limits and addressing default speed limits

A large number of submitters called for a general reduction in speed limits and with it, a reduction in the default speed limits of 50 km/h for urban roads and 100 km/h for rural roads. Submitters with these views included road safety interest groups, Skypath and its supporters, Brake, Living Streets Aotearoa, Cycling Action Network and a number of individuals.

Skypath and its supporters highlighted the difference between general and default speed limits for urban and rural roads (undivided, single carriageways) in New Zealand and for similar roads in Northern Europe.

	New Zealand	Northern Europe
Urban speed limits	50 km/h – 60 km/h	30 km/h – 40 km/h
Rural speed limits	80 km/h – 100 km/h	60 km/h – 80 km/h

The organisation stated international best practice has adopted a “safety first” approach and the default speed limits set in these countries reflected this.

Brake said the current default of 50 km/h is too high for many urban roads and a default limit of 30 km/h would be more appropriate for certain areas including outside schools, early childhood centres, hospitals, shopping centres and central business districts. Living Streets Aotearoa had a similar view.

Brake pointed to a World Health Organisation (WHO) report that emphasised the need for 30 km/h in these areas due to the vulnerability of those road users.⁶

Living Streets Aotearoa suggested no default speed limit at all may be more appropriate, with RCAs having to consider “what is the safe and appropriate speed limit for each road, bearing in mind risks in relation to a busy urban road.”

A further point made by some submitters was that lower general and default speed limits would result in decreased fuel use, lower emissions and more liveable communities. Some highlighted an Austroads study which showed that in urban areas, costs of lower speeds through impacts on travel time are considered negligible.⁷

Analysis and conclusions

The current Rule provides for default speed limits of 100 km/h for rural or open roads and 50 km/h for urban roads. This creates a consistent and certain speed limit environment for road users and RCAs. RCAs can, and do, amend the default limits to provide for safer lower limits when necessary – school speed zones and Christchurch City’s new 30 km/h central city limits are examples of this.

The proposed Rule continues the current Rule’s default limits and does not represent a high degree of change to road users. Wholesale change to the default speed limits would be a high impact change and is not considered necessary or desirable. As noted where needed lower speed zones can and are being implemented by RCAs. This situation will continue to be allowed under the proposed Rule.

In addition, the proposed Rule requires the Transport Agency to prioritise the provision of speed information for RCAs on the higher benefit areas.

Wholesale change arising from default speed limits would also involve significant cost. The road network contains a high number of roads with default speed limits and if the default limits were changed it would require significant and large scale investment to make these roads self-explaining at different speed limits, otherwise the benefits of the lower limits would not be met.

The speed management framework contained in the Guide signals that roads of different function and use should support a range of safe and appropriate travel speeds, so we consider this it is not fundamentally different from the safety outcomes the submitters seek.

The speed management framework recognises that changes are necessary for some roads where current travel speed or speed limits may be too high. These changes could include improving the

⁶World Health Organisation, Global Status Report on Road Safety 2015

⁷Austroads, Balance between harm reduction and mobility in setting speed limits (2005) Austroads Publication No. AP-R272/05).

road design or lowering the speed limit to ensure that the speed limit set was safe and appropriate.

Some submitters stated that lower general and default speed limits would result in decrease in fuel use, lower emissions, and more liveable communities. We accept that slower speeds will support more liveable urban communities, and this is a desirable situation, however the proposed Rule will enable RCAs to achieve this goal introducing a lower speed limit where local communities support this. We do not consider this can only be achieved by having a lower default limit.

In regard to lower emissions, this will arise from lower fuel use, and can also be achieved by promoting free flowing traffic. We consider that realistic speed limits (supported by local communities), better road design and changes in our vehicle fleet resulting in more fuel efficient and lower emission engines, and an increased uptake of low-emission electric vehicles and hybrids are a better means of achieving this goal than changing the default limits.

Recommendation:

- No change.

c) school zones

Some submitters asked for a default speed limit for areas outside schools, with Brake calling for a default limit of 30 km/h in these areas. This view was also shared by Living Streets Aotearoa, which believes that there is a high occurrence of drivers exceeding urban area speed limits.

One individual submitter said a lower speed limit around schools would encourage children, who are easily distracted, to either walk or cycle to school. The Canterbury Regional Road Safety Working Group asked for guidance on speed limits around schools to be issued to local authorities.

Analysis and conclusions

The Transport Agency supports and facilitates the use of 40 km/h variable speed limits where appropriate. Guidance on their use can be found in the Safer Journeys for Schools Guide as well as the Guide Toolbox. The Transport Agency has found these to be effective in bringing down speeds closer to safe system survivable speeds.

There are two issues with introducing a blanket 30 km/h default speed limit around schools. Firstly, road users understand the increased risk and the need to slow down at peak times when children are arriving at and leaving school. Outside of these peak hours the risk is lower and road users would be unlikely to see the need for, or support a permanent lower limit of 30 km/h. Secondly, it would need significant engineering work on roads around schools to make them look and feel like permanent 30 km/h speed environments. This is unrealistic and would not be good value for money when there are higher benefit opportunities to improve roads elsewhere on the network.

For rural schools, a 30 km/h limit, or even a 40 km/h is unrealistic given the open road travel speeds surrounding these areas. For this reason, a variable 60 km/h speed limit before and after school hours, is being adopted as it is also successful in managing turning traffic risk. The variable 60 km/h rural school zones are working well in reducing speeds during peak school activity times.

Information for speed limits around schools is currently available in the 'Safer Journeys for Schools' Guide, which is available through the Transport Agency website at:

<http://www.nzta.govt.nz/resources/safer-journeys-for-schools/>

Recommendation:

- No change.

d) Zone approach to setting speed limits

Auckland Transport asked for confirmation that area-wide treatment of speed limits (a zone approach) would not be too onerous to implement under the proposed Rule. It commented that a road-by-road approach to speed limit setting would contribute to excess signage and less understanding by the public of the goals of speed management.

Analysis and conclusion

The proposed Rule does not preclude RCAs from taking a zone approach to setting speed limits.

This means that they may specify in a bylaw a speed limit for an area and then specify streets where that speed limit does not apply.

In terms of signage, there is a fundamental requirement in the proposed Rule that the speed limit must be identified where the speed limit changes. This is being continued from the current Rule. The form of a speed sign is set out in a separate Rule – the Land Transport Rule: Traffic Control Devices 2004 and this Rule has no provision for speed limit zone signs. However, there is no requirement for repeater signs for speed limits of 50 km/h or less and for higher speed limits, if road users understand and comply with the speed limit, then few repeater signs will be necessary.

Recommendation:

- No change

e) Consultation requirements - singling out specific interest groups

Eight submitters questioned the retention of the chief executives of the NZAA and the RTF as “persons that must be consulted” by RCAs on speed limit proposals under the proposed Rule’s clauses 2.3(2)(e) and (f). Broadly, submitters felt that consultation should be with a representative range of advocacy groups and that the NZAA and RTF should not be singled out over any other representative group. A ninth submitter said schools, pre-schools and other education providers should also be specifically consulted.

Comments from individual submitters raised that specifically mentioning NZAA and RTF implied they had more to say than other groups and that this “suggested bias”. Submitters felt that these groups were “political pressure groups and should not be singled out” and suggested that if the RTF and NZAA chief executives were to remain as consulted persons in the Rule, then the Rule should also “include representative groups to cover pedestrians, cyclists and public transport users.”

TRAFINZ also proposed that specific reference to the NZAA and RTF should be removed from the list “as this perpetuates focus on motorised travel over non-motorised”. TRAFINZ added that the NZAA and RTF are already covered by clause 2.3(2)(h) of the proposed Rule, a catch-all provision that requires an RCA to consult with any other affected user group or organisation. “Without explicit mention of a wide range of road user groups, previous consultations on speed limits have been known to be unsuccessful in obtaining feedback from active travel modes.”

Greypower submitted that the impacts of speed limits are far greater on active transport users than on motorists. Local Government NZ (LGNZ) wanted the references removed, and further recommended that mana whenua are explicitly identified as persons or groups who must be consulted with. IPENZ also supported this position, although adding that it should be extended to include local iwi authorities.

A few individual submitters asked that the proposed Rule require greater engagement with Māori, including one individual, who pointed out that mana whenua often have local knowledge that councils do not and if iwi are specifically consulted they can ensure that items of significance are not damaged.

Analysis and conclusion

We noted TRAFINZ's point that the NZAA and RTF are already covered by clause 2.3(2)(h). However, we believe the requirement to specifically consult with them remains appropriate given they represent a significant numbers of road users affected by speed limit changes and who will may have to change their behaviours on the road.

The proposed Rule at clause 2.3(2)(h) carries over the current Rule requirement that an RCA must also consult with any affected group or organisation. This wording is deliberately broad to ensure that an RCA consults with as wide a range of road users in its community as possible, including representatives of active travel modes, and mana whenua. Achieving this in practice relies on a complete understanding of all potentially affected groups or organisations in a given community, which is a matter of good practice for any RCA so that all community views are brought to light.

The issue of which groups should be singled out for consultation is an important one and we recommend that the matter be fully canvassed when the proposed Rule is next reviewed.

Recommendation:

- No change but the issue of who should be singled out for consultation needs to be fully canvassed at the earliest available opportunity.

f) Cost implications

A number of submitters focussed on some of the costs imposed or savings resulting from the proposed Rule change and the Guide. Several noted the savings from avoiding repeater signs for speed limits. Some (largely RCAs) focussed on the costs associated with processes under the proposed Rule. Others commented on the cost of bylaw making processes which were carried over from the current Rule.

In particular, four RCAs and LGNZ raised the potential cost implications arising from the new methodology for setting speed limits set out by the proposed Rule, notably the overall costs of implementing the approach shown in the maps provided by the Transport Agency alongside the Guide, which set out which areas of their jurisdictions may require changes to set speeds which are safe and appropriate.

Specific costs related to changing a large number of speed limits raised by submitters include the associated consultation costs, and the cost of replacing repeater signage where there are long stretches of road (particularly where these roads do not meet the criteria to reduce the speed limit sign frequency as laid out by Proposal 3). The other cost issue raised was the need for monitoring mean operating speeds to support the approach under the Rule and the Guide.

Several RCAs sought funding from central government to meet these perceived extra costs arising from the proposed Rule. Suggestions included changes to financial assistance rates or other payments from the National Land Transport Fund.

Analysis and conclusion

Two key issues regarding costs were raised by submitters:

- The potential cost of changing speed limits which were recommended by the maps produced alongside the Guide, such as consultation costs and repeater speed limit sign costs; and

- The cost of monitoring speeds to support the approach under the Rule and the Guide.

We note that the Guide is intended to provide a framework to identify the highest benefit opportunities (5-10% of the roads that require speed management), and should not lead to large scale rapid change or high upfront costs. The Guide recommends certain areas are prioritised; however it is still ultimately the responsibility of RCAs to manage their networks and decide how resources are used for speed limit changes. Focusing on the highest benefit opportunities should increase value for money for RCAs. The changes discussed by RCAs with cost implications may be appropriate to action once speed limit reviews have taken place. However these areas identified by the Guide can be incorporated into long term planning and budgeting by respective RCAs. We also note that the repeater signage flexibility outlined under Proposal 3 should provide an appropriate avenue to alleviate some of these concerns.

Regarding comments on the cost of monitoring road operating speeds (which are to support any repeater signage changes); we note that the monitoring of network performance is part of RCAs' current responsibilities for urban areas (below 50 km/h speed limits). This has now been extended to rural areas, but only where the RCA has chosen to take advantage of the option of not having repeater signs. The cost of the monitoring can be factored in to an RCA's decision to apply no repeater sign option. The Transport Agency will assist in reducing these monitoring costs by making datasets available to RCAs showing current actual operating speeds.

No changes have been proposed to the bylaw making process in the Rule, however we note the comments raised on cost. See item (j) under this proposal for further information.

Funding arrangements, including the allocation of the National Land Transport Fund, are outside the scope of the proposed Rule.

Recommendation

- No change.

g) Consultation requirements

Auckland Transport commented on the need to give RCAs flexibility to decide how consultation will occur to ensure a wide range of interested parties are reached. It was noted that clause 2.3(1) of the proposed Rule sets out a requirement that a RCA must "consult in writing" with persons that may be affected by an urban traffic area or proposed speed limit. This potentially sets up extremely onerous consultation requirements, for example for proposals regarding Auckland motorways or main arterial network routes, which connect 1.4 million people.

Auckland Transport said that given modern communication practices and technology, it would be more suitable to use other engagement methods. It suggested clause 2.3(1) should be drafted in a manner that allows for consultation via newspaper advertisements, social media and websites. Terry Sugrue raised similar issues about the wording of clause 2.3(1) and how this could be interpreted.

Both submitters asked that the definition of local community be considered and guidance issued.

Analysis and conclusion

Consultation needs vary according to the size of the area affected and the speed limit changes proposed. We agree with Auckland Transport that individual RCAs should have the ability to run their consultation processes as they see fit, within legislative requirements. This is what we consider the proposed Rule provides for.

Clause 2.3(1) requires that an RCA must consult "in writing" with persons that may be affected by a speed limit change.

Further, clause 2.3(2) requires that the "persons" that must be consulted include (c) "any local

community that the RCA considers to be affected by the proposed speed limit”.

There appears to be confusion amongst RCAs about whether this requires them to write directly to all members of the local community.

Although we consider that the current wording in clause 2.3(1) allows for consultation to occur through a variety of means as appropriate, we recommend that the clause is amended to provide clarity around the consultation requirements.

Recommendation

- Clarify that Clause 2.3(1) does not require consultation to consist only of writing to the persons or groups listed.

h) Mean operating speeds

A number of submitters commented on this issue. The proposed Rule requires that RCAs must aim to achieve a mean operating speed less than 10% above the speed limit. However, submitters suggested the aim for mean operating speeds should be:

- higher (less than 20% above the speed limit.)
- lower (less than 5% above the speed limit or “at or below the speed limit”)

A number of submitters suggested the 85th percentile of operating speeds be used. Both the mean and the 85th percentile operating speeds are referred to as a measure of appropriateness of speed limits in the current rule.

Some submitters suggested that it would be acceptable to drive at the mean operating speed, despite what speed limit was enforced on a given road.

Finally, several submitters thought that mean operating speed needed to be better defined.

Analysis and conclusion

In some countries the 85th percentile operating speed is used to determine speed limits. The underlying assumption in those systems is that drivers understand the risks associated with the road and drive at an appropriate speed, and the speed limit is the speed at or below which 85% of the traffic travels.

However, this methodology does not align with the safe system approach because drivers generally under estimate the risks associated with speed on any given road. In fact on many parts of the network road users travel too fast for the nature of the road, which is reflected in the crash patterns and the statistics on deaths and serious injuries. For example, on high risk lower ONRC class roads that are posted at the current 100 km/h default, many of these will currently have travel speeds less than 100 km/h, with the more challenging roads having travel speeds around 90 km/h. If the speed limit on these roads was to be reduced to 80 km/h, without doing anything else in response to the risk level, then the impact on mean travel speeds on these roads would be expected to be a reduction of 3-4 km/h. International evidence indicates that this would result in a reduction in serious and fatal crashes of about 5 to 10%. Requiring a target mean operating speed of 10% above the speed limit is an achievable and reasonable measure of performance. A tighter target would dissuade some RCAs from changing the speed limit and the potential crash savings would not be realised. A more relaxed target would not align with the safe system approach to setting safe and appropriate speed limits.

Achieving a mean operating speed less than 10% above the speed limit is not a method of determining the safe and appropriate speed limit, but instead is a measure of compliance that

indicates how well the speed limit is understood by drivers.

The mean operating speed is used because it is a reasonably achievable aim for RCAs. RCAs have recorded crash reductions where they have changed speed limits and achieved a mean operating speed less than 10% above the speed limit.

The mean operating speed is the preferred method, as other methods (i.e. requiring mean speeds at the limits) could see the following flow on effects:

- fewer roads will be signed at speed limits that are safe and appropriate,
- it will take longer to shift driver understanding that these roads are self-explaining at 80 km/h and not 100 km/h, and
- it will take longer to incrementally reduce travel speeds towards the safe and appropriate travel speeds.

Several submitters suggested that it would be acceptable to drive at the mean operating speed, despite what speed limit was in force on a given road. However, this is not correct. The mean operating speed is a measure of actual travel speed on the road and does not necessarily reflect the safe and appropriate travelling speed for a road.

In regard to enforcement of speed limits, police officers have discretion to take action for any speed in excess of the posted speed limit according to circumstances and risks at the time.

Some submitters suggested that the definition for “mean operating speed” to be amended. However, in our view the current definition is adequate.

Recommendation:

- No change

i) Speed limit register

Twelve submitters made comments on the requirements for registration of speed limits by a RCA set out in the proposed Rule at clause 2.6. Themes raised covered the need for a centralised speed limit register use and availability of speed limit data.

A number of submitters advocated for geospatial representation of speed limit data on a national GIS database based on open data principles and standards set out in the New Zealand Government Open Access Licensing (NZGOAL) guidance. HERE Technologies said creation of a national geospatial dataset would improve automotive technology available to the public. Data could be easily developed, maintained and published, and all speed limit changes could be recorded and viewed in one place and interested stakeholders could closely monitor changes. Peter Ramage said RCA registers should be published on their websites, and that of the Transport Agency.

Tauranga City Council suggested a national speed limit register. The council noted that while it publishes its register on its website, the public may not use it, and different RCAs held the information in different formats. A national register would support consistency, up-to-date information, NZ Police and new technologies such as autonomous vehicles.

Christchurch City Council said the Transport Agency could support its One Network approach by publically hosting GIS maps of national speed limits on its website. This would reduce the burden on RCAs and support national consistency in data available to the public.

Hamilton City Council commented that a centralised national register would provide a better level of service for the NZ Police and public; furthermore, a register would also be useful for speed limits notified through the *New Zealand Gazette*, which few members of the public use.

Analysis and conclusion

The Transport Agency will soon initiate a project to establish a web-based national speed limit register.

The comments and suggestions raised by submitters in relation to this topic, such as providing real time access to the register and the provision of a geospatial platform, will be considered by the Transport Agency during the establishment of the register.

In the interim, it is appropriate to prepare for this by allowing RCAs to start to provide information for the speed limit register to the Transport Agency from the time that the proposed Rule comes into force.

Recommendation:

- To facilitate a national speed limit register (preferably on-line), allow RCAs to provide speed limit information to the Transport Agency for the purposes of a national speed limit register, in lieu of maintaining their own registers.

j) Bylaw issue

Multiple RCAs raised concerns about the bylaw process and the use of bylaws for setting speed limits.

Submitters commented that bylaws were costly to make, time-consuming and final decisions lay with Councils.

Hamilton City Council, with the support of LGNZ, said the Rule did not preclude the option of using a speed management plan to outline and consult on proposed speed management activities (including ongoing education and engagement, engineering works and speed limit changes) that would take place in the next three years. This would enable an RCA to efficiently consult with parties on a range of proposed speed limit changes.

The idea of a speed management plan was also raised by Tauranga City Council, who said that this could be used as an alternative method of consultation compared with a time-intensive and costly bylaw process. The bylaw process also inhibited an RCA from providing timely responses for changes on the network.

Auckland Transport submitted that bylaw processes may discourage RCAs from making changes to more appropriate speeds. Auckland Transport states that by its estimation less than a quarter of local government RCAs undertake a full bylaw making procedure to make or amend speed limits. Rather, they use some form of resolution under their bylaw to set speed limits. Using this method, Auckland Transport has passed 128 resolutions under the relevant speed limit bylaw, to alter a speed on a specified road, since its creation in 2010.

Both Tauranga City Council and Auckland Transport also noted the substantial growth in their road networks and that if a new bylaw was required every time a speed limit was set, they would be unable to respond to changes in a timely manner.

Analysis and conclusion

Bylaw making provisions are part of primary legislation, not the Rule. Accordingly, submissions on this issue have been referred to the Ministry of Transport as the organisation responsible for administering the Land Transport Act 1998.

The issues raised are therefore outside the direct scope of the proposed Rule.

Recommendation:

- No change

Proposal 2: Enabling 110 km/h speed limits	Agree	Disagree	Other
Enable the setting of a 110 km/h speed limit on roads where it is safe and appropriate to do so.	124	60	3

A total of 187 submitters commented on Proposal 2. Of those who agreed with this proposal, 105 fully supported and a further 19 gave qualified support.

Thirteen RCAs submitted on this proposal and all were supportive. Most also noted that the proposal would not affect their network directly as none of their roads meet the safety criteria for 110 km/h.

The NZAA, the RTF and the Motorcycle Safety Advisory Council all supported the proposal. The RTF also support the retention of the 90 km/h maximum speed limit for heavy vehicles.

The Cycle Action Network and Living Streets Aotearoa both opposed the proposal.

The most common reasons cited in support were that modern vehicles were safer and new roads were being constructed to a higher standard. Nine of the submissions said they would support an even higher increase to 120 km/h or 130 km/h for the same reasons.

Both those who offered qualified support and those who opposed the proposal said that many road users would think that they could travel at up to 120 km/h, either if there was no Police enforcement on the applicable roads, or if the Police applied what submitters referred to as a 'tolerance' of 10 km/h over the posted speed limit. Some suggested that point-to-point speed enforcement should be considered on these roads to ensure compliance with the 110 km/h speed limit (this involves measuring the average speed of vehicles over a set distance).

Submitters were also concerned that travel speeds could increase on adjoining roads, especially on sections of road with lower speed limits immediately after the 110 km/h stretches.

Another comment common to both qualified supporters and opponents was that this proposal would increase the speed differential between light vehicles and heavy vehicles, which created a risk of harsher braking and accelerating. However, it was also suggested that this would create greater passing opportunities. Related to this it was also suggested that not everyone feels confident travelling at higher speeds, which would also result in less homogeneity in travel speeds.

It was suggested that there are other existing roads which could also be increased to 110 km/h, such as much of the motorway network in Auckland.

Several submissions suggested that as part of the rollout, road users should be encouraged to keep left unless overtaking.

One submission recommended that these roads should also be closely monitored, and there should be a clear management plan in the event of a crash or congestion.

Some submissions commented on how this proposal could affect road user behaviour. One suggested that many road users do not possess sufficient skills to travel safely at this speed. Moreover others stated that this proposal could increase a culture of speeding and would mean that many people who already choose to speed would travel even faster as a consequence.

11 submissions suggested that this proposal would increase the fuel consumption of the vehicle fleet and thus increase carbon emissions which runs counter to international agreements on climate change, to which New Zealand is a signatory.

Some also asked why there was so little detail on the cost benefit analysis, and implied that the travel time savings would be outweighed by an increase in safety risk and emissions.

The average age of the New Zealand vehicle fleet was also mentioned. The country has a high proportion of older vehicles, which are not only less efficient, but lack the safety features of newer vehicles to protect occupants in the event of a high-speed crash.

Analysis and Conclusions

Road criteria

One of the criteria for roads identified as appropriate for 110 km/h speed limits are that they be multi-laned, which allows for vehicles travelling at different speeds. In addition, they must have safe walking and cycling facilities, either separated pathways or wide sealed shoulders.

These roads are designed to the highest standards and will all have a KiwiRAP⁸ safety rating of at least 4 stars, which enables them to safely support a 110 km/h speed limit (but were not designed to support a speed limit of 120 km/h). They have safety features which are designed to be forgiving, significantly reducing the likelihood of head-on or run off road crashes occurring if road users make a mistake.

A number of other roads were also assessed against the criteria to safely support 110 km/h travel speeds, but they did not reach the required standards, mainly due to their unsuitable geometry or elevation, or containing too many intersections.

Vehicle capability and emissions

The safety of the vehicle fleet will continue to improve over time, even if the average age does not get lower, because the overall quality of the fleet is improving as technology advances.

Vehicles are also becoming more fuel efficient, and the uptake of low-emission electric vehicles and hybrids is increasing.

It should also be noted that while those roads which have been identified as being safe and appropriate to support 110 km/h travel speeds are high volume roads, they represent a very small proportion of the length of the network, so any increase in total transport emissions due to this change is likely to be small.

Cost Benefit Analysis

Certain assumptions were made when the initial cost benefit analysis was carried out for the Regulatory Impact Statement. The Ministry of Transport analysed each road that qualifies with the Transport Agency carrying out a network-wide cost benefit analysis. This was carried out using data held at the time and will need to be reviewed for accuracy. However, the Transport Agency is developing a comprehensive monitoring programme to measure a range of variables on these proposed 110 km/h speed limit roads to ensure these roads are fit for purpose. These variables will include mean operating speeds, the distribution of vehicle speeds (including by lane and by vehicle type – e.g. light or heavy), travel times, emissions, and noise. The monitoring programme will include adjacent and adjoining sections of road as appropriate.

Enforcement and road user behaviour

The Police have discretion to enforce any speed in excess of the speed limit, with that discretion applied according to circumstances and risks at the time. While this approach will also apply to the proposed 110 km/h speed limit roads, this does not mean that travelling in excess of 110 km/h on these roads will be acceptable.

Point-to-point speed enforcement would require a change in other legislation and it is not currently Government policy to enable point-to-point speed cameras. The comments are noted, but considered to be out of scope for the current Rule.

⁸ KiwiRAP is a New Zealand Road Assessment Programme which enables experts to apply objective criteria to analyse the road safety risk of the state highway network.

Road user behaviour will be considered as part of the education materials to support the change should these roads be approved to have a speed limit of 110 km/h.

Recommendation:

The following change is recommended:

- Propose a change to the order of the empowering clause pertaining to the need for an RCA to seek permission from the Transport Agency to commence consultation when considering setting 110 km/hr speed limit. The aim is to clarify that an RCA must notify the Transport Agency that they are considering this speed limit.

Proposal 3: Speed limit signs	Agree	Disagree	Other
Allow for a more flexible, efficient and outcomes-based approach to the requirements for permanent repeater speed limit signs.	53	28	11

A total of 92 submitters commented on Proposal 3.

The majority of submitters who commented favoured the proposals; however some said there were risks posed by reduced signage, costs to RCAs, and the mean operating speed approach.

Submitters who agreed with the proposals noted that often repeater signage is unnecessary and that when fewer repeater signs are appropriate, this presents opportunities to reduce costs without adversely affecting safety outcomes; aligning with the intention to set speeds which are safe and appropriate. Four RCAs suggested that this should also apply to emergency speed limits. Some submitters agreed with the approach, but qualified this with suggested changes, including that this should only apply to areas with a speed limit of over 100 km/h, and that workload and costs may increase due to the need to ensure operating speeds are within the prescribed threshold. Of the 53 submitters who agreed with the proposal, 18 gave conditional agreement or suggested minor changes.

Four RCAs had comments regarding the overall costs of implementing the approach outlined by the Speed Management Guide and the cost of installing repeater speed limit signs where large stretches of road were recommended for change, and some requested funding to implement this.

Submitters who disagreed with the proposals raised the following points:

- Signage should be frequent as people forget speed limits and don't always see signs;
- Reducing speed limit signs will pose safety risks due to drivers who drive dangerously;
- We have multi-lane roads with speed limits of between 60 to 100 km/h and it is unreasonable to expect road users to be able to understand the limit on any given road;
- The use of a 10% mean operating speed approach suggests that driving above the speed limit is acceptable;
- More frequent signage is required given we are retaining a wide range of speed limits;
- There are issues for enforcement of speed limits;
- There is a heightened risk if a single speed limit sign is damaged;
- Despite the potential decrease in repeater signs, there would be added cost due to the need for monitoring of road operating speeds; and
- Cost savings would be negligible, or would be outweighed by increased risk to the public.

One individual submitter suggested that this proposal would be detrimental to road users, as reckless drivers are less likely to understand the message that alternative road treatment methods are intended to indicate (self-explaining roads).

The NZAA disagreed with the proposed approach to reducing repeater speed limit signs, noting that cost should not be the primary driver and there are risks where drivers are likely to misunderstand speed limits particularly where they are not familiar with the road. They also stated that this would create inconsistency and does not align with the objective of roads looking and feeling the same.

Five submitters, including TRAFINZ, questioned the proposed 'mean operating speed' approach or suggested that New Zealand should retain the 85th percentile approach to speed limit setting (a method used elsewhere to determine speed limits, discussed under Proposal 1). Four submitters, including TRAFINZ, also suggested changes to default speed limits (currently 50 and 100 km/h).

TRAFINZ supported the proposal to allow a flexible approach for speed limit signage in principle. In particular, they highlighted the costs for small rural RCAs to maintain the 100 km/h default speed

limit (based on the Transport Agency speed maps indicating high benefit opportunities), and suggested alternative or additional tools to assist this, such as rural speed zones instead of repeater speed signs. However, they also noted the potential for cost savings in other areas. TRAFINZ stated that an alternative approach would be to change default speed limits to 40km/h (urban) and 80km/h (rural). However they suggested that the timing is not right for such a change to default limits, and requested that the Transport Agency and the Ministry of Transport keep this matter under review.

One RCA (Christchurch City Council) disagreed with certain aspects of the proposal, and suggested that RCAs could apply to the Transport Agency for an exception to the repeater sign requirements, because this would be a flexible and cost effective approach. They also noted that the proposed repeater sign exception would apply to most roads in their jurisdiction, and that the proposal would create cost due to the need to collect speed data and the technology required to do this, meaning any cost savings would be redundant.

Conversely, Whanganui District Council suggested this does not go far enough and that RCAs should have more flexibility, particularly for rural network speed signage.

Other suggestions and points included:

- There should be at least 4 signs for the first 2 km of a new speed limit, and then a repeater sign every 5-10 km;
- Repeater signage should be required once the road straightens out;
- There should be greater use of speed limits painted on the road in addition to speed signs, which could encourage foreign drivers to use the correct side of the road;
- Urban areas should contain more frequent repeater signs;
- There are risks posed by foreign drivers not understanding the use of default limits;
- The use of a 10% mean operating speed approach suggests that driving above the speed limit is acceptable; and
- There should be limits of 80 km/h for gravel roads and 100 km/h for sealed roads.

Analysis and Conclusions

We have considered feedback on the 'mean operating speed' approach in relation to the placement of repeater signs (also discussed under Proposal 1). We note that this does not advocate for drivers to travel above the posted speed limit. Instead, this approach provides RCAs with a performance indicator to measure whether drivers are understanding and accounting for the speed limit.

The measure of mean operating speeds, with the aim of ensuring drivers do not exceed 5 km/h above the posted speed limit, is an approach that was taken in the current Rule for urban speed limits (under 50 km/h). This approach has now been extended to other areas including rural roads, with the proposed measure of 10% of the operating speed. We consider this an appropriate indicator of whether drivers are understanding and complying with the posted speed limits. This is a compliance measure which can be applied to repeater sign requirements, because if the mean operating speed is less than 10% above the speed limit, this is an indicator that drivers reasonably understand the speed limit due to the nature of the length of road, and repeater signs would not be required.

In addition, suggestions to use historic speed limit setting methodologies such as the 85th percentile approach do not reflect the Safe System approach. As discussed under Proposal 1, this approach assumes drivers understand the inherent risk of all roads, and the new methods in the Guide identify parts of the network where the safe and appropriate travel speed for the road infrastructure and safety profile is different to operating speeds (high benefit opportunities for speed management).

Changing the default limits was ruled out of scope in the proposed Rule change; however, the speed management framework does signal that roads of different function and use should support a range of safe and appropriate travel speeds. One key consideration is the need to bring the public alongside if any fundamental change, such as a change to default speed limits, is proposed. The

Ministry of Transport road safety survey, carried out annually, consistently shows that over 70% of respondents support retaining the existing 50/100 defaults. As suggested by TRAFINZ, we suggest that this topic be reviewed and reconsidered as appropriate.

The issues regarding potential costs of changing speed limits, and monitoring speeds related to repeater signage have been addressed in the analysis under Proposal 1. These matters relate to the underlying methodology set under the proposed Rule and implemented through the Guide. The proposal for reduced repeater signage where these roads meet the criteria will reduce the costs of changing speed limits in some cases.

The Transport Agency's view is that the alternative suggestion of RCAs applying to the Transport Agency for exceptions for repeater signage would not support the purpose of the proposed Rule and the Guide. The intent is to provide an outcomes-based approach and the flexibility for RCAs to manage speed limits according to local circumstances.

A number of the suggestions raised by submitters can be managed by RCAs, consistent with the Guide, including: marking speed limits on roads as an alternative to speed signs, repeater signs where roads become straight, road engineering to support this change, and safe and appropriate speeds being set.

The Speed Management Guide Toolbox provides a range of good practice solutions available to RCAs, which can make roads more self-explaining to road users. These include road markings and other perceptual countermeasures, which can achieve the same outcomes as repeater signs and at a lower cost.

We agree with the NZAA that roads of the same function, safety and use should encourage consistent travel speeds. However, roads within a particular functional classification (e.g. access roads) do not always look the same, so a one-size-fits-all approach would not make sense. New Zealand has a diverse natural geography and this needs to be taken into account when finding solutions to support safe and appropriate travel speeds. The key principle behind this outcomes-based approach is to achieve consistent travel speeds, not to specify the types of interventions required to achieve this consistency. Achieving safe and appropriate travel speeds across the network is a long-term aspiration. At present, our best roads can have the same posted speed limits as those with a lower classification under the ONRC due to being high risk roads.

Following feedback on the need for repeater signs for emergency speed limits, we agree it would be helpful to clarify whether the option not to install repeater signage applies to emergency limits. We are of the view that given the criteria are met (the speed can reasonably be understood by the road user, and the mean operating speed is less than 10% above the speed limit) then this can be applied to this proposal. However, we note that there will still be cases where an emergency speed limit will not meet these criteria, and will require repeater signs for safety reasons.

We agree it would be helpful for the Transport Agency to provide further guidance to RCAs regarding intersections and sign distances, and this will be considered as part of further development of the Guide. Other guidance on the placement of speed limit change signs may be appropriate.

Recommendations:

The following change is recommended:

- Clarify that the flexibility for repeater signage in Clause 9.2(2) applies to both 9.2(1) (a) and 9.2(1) (b), which includes temporary and emergency speed limits.

Proposal 4: Emergency speed limits	Agree	Disagree	Other
Enable an RCA to set emergency speed limits on roads directly and indirectly affected by an emergency.	74	6	11

A total of 91 submitters commented on Proposal 4.

Most submitters who commented were in favour of the proposals; and out of the 74 submitters who agreed, 20 gave conditional agreement or suggested minor changes. Those in favour noted that this is a practical and efficient approach, and an important step to improve how RCAs can respond to emergency situations and account for local circumstances.

Among submitters who agreed with the proposal, 14, including many RCAs and TRAFINZ, wanted more flexibility or a longer maximum period (the proposed period was six months). Often emergency situations take longer than six months to resolve, and emergency speed limits should apply as long as the original cause for that limit is still valid. However, the NZAA supported the 6 month limit, as did the RTF, who recommended that there be a simple process to renew emergency limits as applicable.

Some submitters wanted a longer maximum timeframe of 12-24 months, or a review/renewal process for emergency speed limits rather than a maximum timeframe. Submitters also noted that if it is necessary to make an emergency speed limit permanent, the proposed six month timeframe is too short for an RCA to work through the full bylaw process. For example, the Kaikoura earthquake required speed limits to be lowered for much longer than six months. Brake supported the ease of implementing emergency speed limits, and noted that longer time periods may be required such as in the case of the Picton – Christchurch alternate route during SH1 repairs.

Submitters opposed to the proposal noted the following comments:

- This should be combined with temporary speed limits, and one submitter disagreed with the use of the term emergency or suggestions that limits would always be lowered;
- RCAs take too long to respond, and temporary speed limit setting should not be changed; and
- There is a risk that RCAs would more readily lower speed limits but take too long to raise them again.

Some submitters, including several RCAs, contended that these speed limits should not be required to be published in the *New Zealand Gazette*, noting that the RCA register or advertisement in local papers is sufficient.

Two RCAs (Rangitikei District Council and Queenstown Lakes District Council) suggested that emergency speed limits be excluded from the requirement to be included in their register of speed limits, because the register is contained in a bylaw, which would add time and cost to amend.

TRAFINZ supported the ability for RCAs to introduce emergency speed limits without consulting the Transport Agency. They suggested a longer timeframe as noted by other submitters, and suggested that the proposal to reduce repeater signage should apply to emergency speed limits (see analysis under Proposal 3). TRAFINZ suggested an amendment to the wording to allow for flexibility in publishing speed limits in the *Gazette* if there remains a risk to people or roads to ensure speed limits are not removed due to clerical errors. TRAFINZ also noted that there should be clear guidance on the mechanism used by the Transport Agency or the Commissioner to remove an emergency or temporary sign.

A number of submitters questioned the definition of an emergency, and suggested that this directly reference the Civil Defence Emergency Management Act 2002.

Other suggestions included:

- That different colours should be used to differentiate emergency speed limits from permanent limits;
- That this proposal should go further and allow emergency services to set emergency speed limits depending who is first to respond;
- That information about emergency speed limits should be available on a national public Application Programming Interface (to allow real time information to drivers through applications such as Google Maps);
- That where emergency speed limits are posted, the sign should state the reasons, date and the engineer who approved the limit;
- That road markings should be changed to signal the emergency speed limit zone;
- That the Guide should provide information on requirements for emergency speed limit setting;
- That the limit should return to the original limit or consultation be undertaken to impose a different speed limit following expiry of the 6 month speed limit; and
- That emergency limits should not be left for an extended time period.

Analysis and Conclusions

Emergency speed limit signs will be in the same form as permanent signs. The suggestion to use different colours was considered, but it could confuse drivers or lead to road users treating these speed limits differently. Emergency speed limits should be treated the same as permanent speed limits by road users and if the signs do not look like a normal speed limit, then drivers might think they are not enforceable.

The definition of an emergency in this section of the proposed Rule is based on the Civil Defence Emergency Management Act 2002. However this has been adapted to ensure it is more appropriate to emergency circumstances which may affect a road (Clause 7.1(1) of the proposed Rule). We consider this appropriate; it provides RCAs the ability to implement a lower speed limit if in their opinion there is a risk of danger to any person or of damage to a road due to an emergency. Related to this, the suggestion to allow emergency services the ability to set emergency speed limits, we note that the provision in the proposed Rule is for civil defence emergencies. The Road User and Traffic Control Devices Rules allow for emergency services to lower the speed limit on the roadside when there is a crash, fire or similar emergency.

We agree that RCAs could benefit from engagement or guidance around emergency speed limit requirements, and the Transport Agency will consider providing this, such as through the Guide. Regarding comments that this should be combined with temporary speed limits, the Transport Agency notes that emergency limits are for very specific circumstances in which a civil defence level emergency exists. Emergency speed limits do not affect RCAs' ability to set temporary speed limits.

We consider that publishing emergency speed limits in the Gazette is still an appropriate notification to road users given it is available to people outside of the direct area. The proposed Rule does not preclude public notification through other means such as local newspapers.

The Transport Agency considered exempting emergency speed limits from inclusion in the register of speed limits because of cost. However, we believe that this requirement should be included for emergency speed limits as proposed.

It is intended that a national register of speed limits will be available in the future to inform Intelligent Transport Systems (ITS) software and technologies. Emergency speed limits are intended to be used when the situation meets the definition of an emergency as set out in the proposed Rule, and we believe that where possible road users should be made aware of how such situations have impacted roads (through the register and notification through the Gazette). We also note that while temporary speed limits are not required for inclusion in the register, emergency limits are more likely

to be needed for longer time periods and there is a greater need for their inclusion in the register to allow road users to plan their journeys.

Regarding TRAFINZ's comment on the mechanisms used by the Transport Agency or the Commissioner to remove any emergency or temporary speed limit sign, this is covered by the powers of investigation and notification related to RCA procedures (Clause 2.8 of the proposed Rule).

In relation to submitters' requests for a longer maximum timeframe for emergency speed limits, we consider there are good reasons to amend this proposal. Recent events, such as Kaikoura, have shown that emergency speed limits may be required for timeframes longer than 6 months, and we recognise that 6 months is a short timeframe to undertake changes to permanent speed limits if required. We consider a timeframe of 12 months, with the ability to renew this if the circumstances continue to meet the definition of an emergency situation, is a suitable maximum timeframe to balance administrative costs and ensure that speed limits are not left for long periods of time without review.

Recommendation:

The following change is recommended:

- Increase the maximum timeframe for when emergency speed limits can apply from 6 to 12 months.

Proposal 5: Temporary speed limits	Agree	Disagree	Other
Clarify the grounds upon which an RCA may set a temporary speed limit.	60	6	14

A total of 80 submitters commented on Proposal 5.

Most submitters who commented were in favour of the proposed change; and out of the 60 who agreed, 29 gave conditional agreement or suggested minor changes. The benefits that were noted included the clarification of when it is appropriate to set temporary speed limits, and that the changes would increase consistency and efficiency.

Submitters opposed to the proposal did not provide much detail as to why they did not agree with the approach to clarifying the grounds for setting temporary speed limits.

Living Streets Aotearoa noted that this may be a useful method for RCAs to set temporary speed limits to conduct trials, and suggested that the word 'situation' should be added given unsafe situations can arise separately from surfaces and structures. Other submitters, including TRAFINZ, also suggested that the powers for setting temporary limits should be widened to include other circumstances.

One submission questioned why the limit would be lower for work adjacent to or near the road, and suggested lower limits should only apply when workers are present and could be impacted by drivers if this is intended to protect them.

One RCA (Auckland Transport) suggested clarifying the wording and widening the definition to include haulage routes. They suggested clarifying that a special event is an activity held over a short and defined period. They also suggested that the requirement for a temporary speed limit to be at least 20 km/h below the posted speed limit where that is greater than 50 km/h be removed.

The Governance Group of the Code of Practice for Temporary Traffic Management suggested that the threshold for temporary speed limits of 10 km/h less than the permanent speed limits should be raised from 50 km/h to 60 km/h. They noted that a greater range of lower permanent speed limits are now in use and the 50 km/h threshold could be raised for the 10 km/h reduction for temporary speed limits. They submitted that:

“There are in use positive traffic management measures that encourage and enhance the reduction in the speed of road users both approaching and travelling through work sites where these temporary speed limits are in use. It is also believed that road users are now more attuned to temporary traffic managed work sites and are reacting positively to what is perceived as a reasonable reduction in their speed in the lower speed environments”.

Other suggestions included:

- That construction areas should have dual speed limits operating during active construction and non-work hours;
- That speed limits should only be set by the appropriate people, as they are often impractical and left too long;
- That a speed limit should only be in place a certain distance from the hazard;
- That there is inconsistency in how temporary speed limits are currently applied by RCAs across the country;
- That temporary speed limits should apply for special events at maraes;
- That temporary barriers should be installed on motorways so that speed limits do not have to be lowered;
- That this include the ability to set temporary speed limits where the volume or type of traffic on the road as changed temporarily, affecting safety;
- That citizens should be protected from unrealistic enforcement; and

- That information on temporary limits should be publicly available in real time through a national software interface (also see analysis in Proposal 4).

Analysis and Conclusion

The Transport Agency notes the following submitters' suggestions can be considered and addressed as appropriate under the proposed Rule and through an RCA's Traffic Management Plan:

- time periods for special events (including at marae and near schools);
- that limits should be set by appropriate people;
- that temporary limits to be removed when work is concluded;
- that there should be dual temporary speed limits during active and non-work hours; and
- questions regarding the distance of speed limit changes from hazards.

The need for further guidance on the grounds for setting temporary speed limits will be discussed further with RCAs. We note in relation to a number of submitter comments on the circumstances and surrounding areas, that the proposed Rule compels an RCA to take all practical steps to ensure that a road user would reasonably understand the cause of the temporary speed limits. It is important that road users receive clear messaging about temporary limits as this is critical to achieving compliance.

In relation to one comment about limits applying only when workers are present, the Transport Agency notes that temporary speed limits are required to be set according to the risk to both the road workers (if present), and road users. Construction areas and new reseals may require lower temporary speed limits than the original limit to ensure the safety of road users and the integrity of the construction works.

We consider there are good reasons to allow a longer maximum timeframe for temporary speed limits, consistent with the proposal for emergency speed limits. Allowing a timeframe of 12 months will align speed limit timeframes with temporary traffic management plans and ensure there is not additional administrative burden for longer term projects. However, the Transport Agency notes that this is intended as a maximum allowable time, and temporary limits should not be kept in place for longer than necessary.

We agree that there are likely to be cases where the safe and appropriate temporary speed limit could be 10 km/h below the permanent speed limit. Examples could include roads permanently posted at 80 km/h, where a 10 km/h drop to a temporary 70 km/h would be safe and understandable to road work operations users, but a drop to 60 km/h or less would not appear to be justified and might be disregarded by many road users. In addition, this change would support the ability of RCAs to manage these decisions and set safe and appropriate speeds in line with the Guide, while also ensuring that speeds are not lowered unnecessarily.

Living Streets Aotearoa's comment about the use of temporary speed limits for trial purposes (trailing traffic control devices) has some merit and will be considered when the Rule is next reviewed. At this stage, this cannot be completely analysed and a change cannot be recommended.

Recommendation:

The following changes are recommended:

- Amendment to provide that temporary speed limits must be at least 10 km/h below the permanent or prevalent speed limit, and no temporary limit may be higher than 80 km/h.
- Amendment to increase the maximum timeframe for temporary speed limits from 6 to 12 months, this will provide alignment with temporary traffic management plans.
- Amendment to add 'the nature and level of risk to the public' as a consideration when setting a temporary speed limit.

Proposal 6: Approval for 70km/h	Agree	Disagree	Other
Approval from the Transport Agency is required before an RCA may set a speed limit of 70 km/h on a road.	49	25	3

A total of 77 submitters commented on Proposal 6. Many of the submissions noted that the country's diverse geography has produced many different types of road environments and hence the New Zealand road network is not well suited to moving towards a 60/80/100 km/h division. It was noted that the 70 km/h speed limit can be appropriate in certain circumstances, as many roads on the network are not safe to be travelled at 80 km/h. These roads often do not look similar to roads where it is self explaining to drivers that the safe and appropriate travel speed is 60 km/h.

The 70 km/h speed limit was noted to be a well established tool to reduce speeds in rural areas, in particular between the open road 100 km/h and 50 km/h urban area on the outskirts of townships.

Of the RCAs who commented on this proposal, seven fully supported, a further four gave qualified support and two opposed. LGNZ and TRAFINZ also opposed the proposal.

One RCA (Hastings District Council) supported this proposal, but qualified their support in stating there are significant benefits from 90 km/h speed limits on some roads where a significant proportion of the traffic is heavy vehicles which are required to travel at a maximum of 90 km/h anyway.

One RCA (Western Bay of Plenty) and LGNZ challenged the veracity of the statement that road users have trouble differentiating differences of 10 km/h at higher travel speeds, stating that this was not backed by evidence and was contrary to the perceived 4 km/h Police threshold. It also suggested that 70 km/h speed limits were an appropriate balance between efficiency and safety.

3 submissions suggested changing the open road 100 km/h default speed limit and creating 20 km/h divisions of 50/70/90/110 km/h limits. Statements around this raised that the proposed 60/80/100/110 km/h regime invalidated the premise of both Proposal 6 and 7.

Analysis and Conclusions

Existing 70 km/h speed limits

It appears some submitters misinterpreted the intent of this proposal as implying that 70 km/h speed limits would be removed. This is not this proposal's intent, and existing 70 km/h speed limits will continue in force until reviewed and amended. It is acknowledged that New Zealand has a diverse road network and moving towards a 60/80/100 km/h system is a long-term aspiration. The intent of the proposed Rule and Guide is to encourage RCAs to focus on the high benefit opportunities supplied in the first iteration of the maps provided by the Transport Agency. Following the initial maps⁹, every three years further high benefit opportunities will be identified through the maps, allowing for gradual change across the network.

Through the identification of high benefit opportunities, there will be a mixture of engineering roads to both lower and raise the speed limit depending on the conditions of different roads. This will match the long term goal of the Transport Agency to have travel speeds matching the real conditions of the road.

The higher benefit opportunities identified in the safe and appropriate speed information provided to RCAs will identify some roads which currently have 70 km/h speed limits, but are unsafe at that travel speed. The Speed Management Guide identifies the appropriate intervention for these high

⁹ Refer to page 4 for discussion on maps provided to RCAs by the Transport Agency.

benefit opportunities to achieve safe and appropriate travel speeds of either 60 km/h or 80 km/h, but there is still no compulsion on RCAs to change an existing 70 km/h speed limit under this proposed Rule.

Speed limit regime and options for 70 km/h speed limits

The intent of this proposal is to restrict the creation of further 70 km/h speed limits unless the 60 km/h and 80 km/h safe and appropriate travel speeds are unachievable in the short term and 70 km/h is an appropriate interim option. As the holder of safe and appropriate speed limit information across the network, the Transport Agency is well-placed to test that all the other options have been fully explored before approving a 70 km/h or 90 km/h speed limit.

As previously mentioned in Proposal 2, the changes contained in the proposed Rule are not intended to represent a high degree of change to road users. The current road network contains a high number of roads set at 100 km/hr which is the safe and appropriate speed. If there were to be a change away from the proposed 60/80/100/110 km/h regime, existing 100 km/h roads would need to be engineered down to allow for a speed limit of 90 km/h to be set. Further, no roads in New Zealand have been designed and built to support 120 km/h speed limits.

While 70 km/h speed limits are common on the outskirts of many rural towns, there is no evidence that they are any more effective than other ways of managing travel speeds down, such as advance warning signs or gateway treatments.

Road users ability to differentiate

In response to submitter comments questioning the veracity of whether road users have trouble differentiating the differences of 10 km/h at higher travel speeds, research by Professor Sam Charlton from Waikato University suggests road users could not easily differentiate between roads which have speed limits differing by 10 km/h at higher travel speeds.

Recommendation:

- No change required

Proposal 7: Notification of certain speed limits	Agree	Disagree	Other
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.	48	20	1

A total of 69 submitters commented on Proposal 7. There was a significant overlap between the comments received on this proposal and Proposal 6.

Of the 48 submissions in support, seven of these were conditional support. The two main conditions noted were as follows:

- Some RCAs have many existing 70 km/h speed limits so the phasing out of these should be managed, and
- That new 70 km/h speed limits should be allowed where there is strong community and road user support and they can be considered to be safe and appropriate.

One submitter commented that a 60/80/100 km/h system was a good idea as long as roads were self-explaining at these speeds.

Several submitters supported this proposal on the grounds that achieving national consistency was important.

One submitter opposed the proposal noting that in congested conditions, urban state highways usually operate at around 90 km/h anyway.

Of the RCAs who commented on this proposal, eight fully supported, three conditionally supported and two opposed the proposal. The most common reason RCAs cited in support was the need to achieve national consistency.

One RCA (Auckland Transport) opposed on the grounds it would add time and costs to the process, while another (Western Bay of Plenty) opposed on the grounds that RCAs know their networks best.

Tauranga City Council drew attention to the issue of variable speed limits outside schools. However, they also commented that the wording in Clause 4.5(2) could be amended so that Transport Agency approval could be given to a specified type of variable speed limit provided set conditions were met.

Submissions on both Proposals 6 and 7 from Tauranga City Council, Auckland Transport, Hamilton City Council and Gisborne District Council drew attention to the approval process for variable speed limits outside schools and those that are already in place. It was noted that under the already Gazetted approval, variable speed limits outside schools should not require Transport Agency approval under this proposed Rule.

Palmerston North City Council commented that there is considerable community pressure to extend the network of variable speed limits outside schools in their jurisdiction. There is a perception that children attending schools in higher speed locations are not safe and that there is an inability to rectify this to placate the community.

Analysis and Conclusions

Notification process

As discussed in Proposal 6, the intent of these changes is to restrict the creation of new 70km/h speed limits unless the 60km/h and 80km/h safe and appropriate travel speeds are unachievable in the short term and 70km/h is an appropriate interim option.

Requiring an RCA to notify the Transport Agency allows for this to be sense-tested before an RCA proceeds to wider engagement and consultation. The Transport Agency does not agree this will add time and costs for RCAs. Although it adds an extra step to the process, it is designed to avoid RCAs investing time and effort in progressing proposals for 70 km/h and 90 km/h speed limits which would not have the Agency's support at the formal consultation stage.

Variable speed limits around schools

Traffic Note 37 sets out a well-established process which clarifies the process of setting variable speed limits around schools. The Transport Agency is satisfied that this is the best way to facilitate RCAs in the process of setting these speed limits.

In considering the issues around the variable limits for school areas, our attention was drawn to the role of Rural Intersection Active Warning Systems (RIAWS). These are important road safety measures which act to slow traffic on a main route when there is traffic approaching from an intersection. By slowing through traffic, the crash risk will be reduced, so we believe these should still be allowed under the proposed Rule.

Recommendations:

The following changes are recommended:

- Clause 3.4(3)(b) – provision to be amended to make it clear that a variable speed limit does not entirely displace a default or permanent speed limit at all times.
- Clause 4.5(2) – Add an exception for new variable speed limits that are already covered by the agency approval (e.g. generic approval for variable speed limits in school zones).
- Clause 5.1(1)(a) – Amend to allow variable speed limits to manage crash risk in terms of RIAWS.

General comments and issues raised

The review received comments of a general nature made by 102 submitters. Many of the comments outlined below are beyond the scope for specific action by the review; however the comments have been noted

The comments have been grouped into the following themes:

- Driver Education
- Enforcement
- Speed limits
- Speed Management Guide
- Road construction, road design, road repairs
- Signage
- Crash analysis

Of these, driver education, enforcement issues and the appropriateness of current speed limits attracted the most attention.

Driver Education

About 45 comments relating to driver education were submitted. A large proportion of these focused on the need to educate drivers about keeping left unless passing, with some noting that a 110 km/h speed limit needed to be paired with specific education on the keep left requirement. Others said more signs were needed reminding drivers to keep left. Many also wanted greater enforcement of the keep left rule. Other submitters noted that driver education would be necessary to prepare for 110 km/h speed limits. Education about driving on motorways was also raised. Drink driving education, educating and testing foreign drivers, and encouraging cyclists to use cycleway were other points raised on this theme. One submitter said more money had to be spent on driver education. Another submitter recommended a review of the driver licensing system to ensure better driving skills training.

Comment and analysis

Comments of submitters on driver education are noted. There are a number of other programmes underway which address (or look at) driver education initiatives. Though beyond the scope of this Rule project, driver behaviour will be considered as part of the education materials to support the change to 110 km/h roads.

Enforcement

Twenty-seven comments on enforcement issues were made by submitters. Many enforcement-related comments were made in the context of the proposed 110 km/h limit for certain roads. As noted above, along with driver education, submitters wanted greater enforcement of the keep left rule. Heavy vehicles and towing vehicles should be required to keep left at all times according to some commenters. Some asked whether speed tolerances would be applied on 110 km/h roads. More broadly, submitters wanted more effort put into enforcement of speed limits and slow vehicles. On slow vehicles, one submitter said it was negligent for agricultural machinery to be on the road for more than 5 km and RCAs need to prevent stress and inconvenience. The submitter supported banning and impounding vehicles going 50 km/h under the speed limit, and a driver driving 30 km/h under the limit should be disqualified from driving. It was raised that the 'holiday' speed limit (i.e. tolerances applied by Police) confused drivers and should be scrapped.

Some suggested more speed cameras were needed and that speed cameras should target heavy vehicles. Auckland Transport, the TRAFINZ, IPENZ, Brake and Code of Practice for Temporary Traffic Management advocated the introduction of new enforcement technology such as point-to-point cameras (these cameras track a vehicle's average speed between cameras). Stronger enforcement of temporary speed limits was raised by a number of submitters. For example, Civil Contractors NZ said drivers exceeding temporary limits created a danger to workers. One individual submitter wanted the Transport Agency and Police to determine from what point a speed limit would be enforced, giving an example of speed limits not being enforced within 200 metres of a speed sign outside Bunnythorpe, which in his view endangered the public. Two submitters advocated the use of speed regulators in vehicles as a speed management tool.

Comments and analysis

The comments on enforcement are noted. A wide range of issues relating to driver behaviour and enforcement of these were raised. However enforcement of road rules such as keeping left, complying with speed limits (whether default or temporary) and slow vehicles is a Police activity; it's not within the scope of this review to recommend changes to Police enforcement policy. Requiring heavy or towing vehicles to keep left at all times is impractical in situations where slow traffic (e.g. a tractor) is encountered.

Police officers have discretion to take enforcement action for any speed in excess of the posted speed limit with that discretion applied, according to circumstances and risks at the time. Support for the introduction of point to point cameras is noted, however this requires change to other legislation – again it is not within the scope of this review to recommend such a change.

Speed limits

Thirty-four comments representing a wide range of views on speed limits were submitted. Views on the heavy vehicle limit were divided between those who wanted the limit raised, those who wanted the current limit retained, and those who wanted it lowered. One submitter recommended that vans, rental cars and motorhomes should be limited to 100 km/h on 110km/h roads. The submitter said high sided motorhomes and vans would present a hazard if driven at the higher speed.

A number of submitters commented that modern cars could be safely driven at speeds higher than 100 km/h. Other submitters sought differential speed limits on multi-lane roads, depending on how well built the road was. For example, one submitter suggested 140 km/h for divided motorways, 120 km/h on quality undivided motorways, 100 km/h on 'regular' roads with a 120 km/h limit on passing lanes. Having higher speed limits on passing lanes was advocated by several submitters, while one submitter recommended a 120 km/h limit for toll roads. An alternative view was that traffic densities on some roads were too heavy to warrant the current limit, and 80 km/h should apply instead.

Some submitters commented more specifically on current speed limits on Auckland's Western Motorway, the Waterview Tunnel and the impact of 110 km/h limits on the wider Auckland state highway network. Comments were also made on the speed limits on the Waikato side of the Kaimai Range (SH 29) and Himatangi Beach and environs.

Comment and analysis

Points raised by submitters are noted. The setting of particular speed limits is out of scope of this review and lies with RCAs. Many suggested higher speed limits were warranted in a range of situations. The more general point in response to higher speed limits, is that no roads in New Zealand are suitable for speeds in excess of 110 km/h. Heavy vehicle speed limits are set under the Road User Rule and there is no intention to review this part of the Rule. Comments on speed limit setting in areas such as Auckland or in localities such as Himatangi Beach are more appropriately addressed by the relevant RCA as part of traffic management planning.

Road design, construction and repairs

Five submissions raised issues about the quality of road design, construction and repairs. One individual submitter said the Agency needs to ensure roads are future-proofed by not building single lane major routes. Another submitter raised that it was very difficult to keep left if not overtaking in some motorway scenarios, for example at off ramps. The New Zealand Insurance Council wanted consideration given to design of safe passing lanes.

On road construction and repairs, two submitters said contractors should be made liable for quality issues. Another went further, suggesting engineers should be named on signs alongside reasons for any roadworks. This submitter also suggested repair crews are accountable for work that didn't support a given speed limit and fines for contractors who failed to remove temporary speed limit signs within 30 minutes of work completion. The RTF, commenting on the integrity of road structure, said some new roads have suffered surface deterioration soon after being completed. The RTF noted the key risk for heavy vehicle trailers (where patching and seal edges are poorly done and trailers risk coming off the road) applies to both high and low speed roads.

Comment and Analysis

Comments of submitters are noted. On road design the Guide encourages RCAs to 'engineer up' where safety performance is poor and there is a strong case for investment to bring major routes up to the required standard to support existing or higher travel speeds. RCAs have standard procedures for maintaining roads to appropriate standards, and robust systems for monitoring road surfaces.

Speed Management Guide

Hastings District Council made a number of comments on the Speed Management Guide:

- it does not adequately consider amenity or wider community outcomes;
- it would benefit from use of plain English;
- the maps contain several inaccuracies that need to be updated before application;
- the Guide does not consider use of future technologies to manage speed and bring about wider safety benefits.

Comment and Analysis

The council's comments are noted and have been referred to the Guide's authors. However the Guide is intended to provide the broader approach being requested in terms of the ability to allow for the use of future technologies.

Meanwhile, the review of the current Rule is focused on the mechanisms and requirements for changing speed limits, in the context of the Guide.

Signage

A small number of general comments were made about signage construction, placement and numbers of signs. These included suggestions that speed limits painted on roads would help tourist drivers stay on the correct side of the road, signs should be made of frangible materials that easily came apart when hit by a vehicle (reducing risk of injury and damage), and more signs were needed to reinforce safety (e.g. keep left).

Comment and analysis

Submitter comments are noted. Road Controlling Authorities are responsible for decisions about signage and road markings. Frangible signs are covered by the Traffic Control Devices Rule 2004, with supporting best practise guidelines to support RCAs in their decision making.

Crash analysis

Three submitters commented on research into crashes. One said research should be focused on crash causes, not factors, while another said research should be on the factors behind crash causes. A third submitter commented that driver inattention is a crash cause.

Comment and analysis

Points raised by submitters are noted.

Safer Journeys 2010-2020, aims to improve New Zealand's road safety by introducing a Safe System approach. A Safe System approach looks across the road system to achieve safe roads and roadsides, safe speeds and safe road use. It also notes that road safety is everyone's responsibility.

To further understand road crashes and trauma on our roads the Ministry of Transport, along with its road safety partners, are consolidating and enhancing a research programme to gain a better understanding of road safety issues to guide policy, investment, enforcement and research.

Appendix 1: List of Submitters

Five individual's names have been withheld from this list of submitters at the submitter's request. If you wish to know these names, please contact the Transport Agency and we will consider releasing these to you in terms of the Official Information Act 1982

Submitter	Submitter number
Michael Macready	Y001
Rowdy – Complete Driver Training Solutions	Y002
Aaron Leece	Y003
James Stewart	Y004
Trevor Clark	Y005
W F Verduyn	Y006
Glen Parrant	Y007
Sherif Ashaat	Y008
Michael Green	Y009
Bruce Humby	Y010
Aidan	Y011
Jason Dark	Y012
Name withheld	Y013
Shelley Stevens	Y014
Bruce Williams	Y015
Theresa Powell	Y016
Ben Rice	Y017
Ray	Y018
Joanna Lee	Y019
W. Rombout van Riemsdijk	Y020
Andrea Shepherd	Y021
Ben Sandle	Y022
Isuru Bodahandi	Y023
Louis Whitburn	Y024
Sheryl Locke	Y025
Angela Williams	Y026
Paul Van Beusekom	Y027
Ricardo Perry	Y028
Andrew Laurence	Y029
David Freeman	Y030
Nic Butterworth	Y031
Cliff Cunningham	Y032
Sam Williams	Y033
David White	Y034
Phillip Cowman	Y035
David Robinson	Y036
Aubrey Smith	Y037
Graeme Swan – Motor Trade Association	Y038
Name withheld	Y039
John Parker	Y040
Marc Whinery	Y041
Phillip Powell	Y042
Roger McLeay	Y043
Robert Monk	Y044
Tej Kumar	Y045

Bevan Walsh	Y046
Mark Gilbert (Motorcycle Safety Advisory Council)	Y047
Robert Culver	Y048
New Plymouth District Council	Y049
Baden Campbell	Y050
Timotheus Frank	Y051
Chrys Horn	Y052
Shane Ponting	Y053
Name withheld	Y054
Hokitika Airport	Y055
Living Streets Aotearoa	Y056
No contact details	Y057
Barry McColl, Fonterra	Y058
Warwick Peterson	Y059
John Parr	Y060
Dale O'Reilly	Y061
Steve Cornwall	Y062
Hawkes Bay District Health Board	Y063
Waitomo District Council	Y064
Western Bay of Plenty District Council	Y065
HERE Technologies	Y066
Connor Spence	Y067
Glenn Meurant	Y068
Richard	Y069
Karen Wisse	Y070
Rangitikei District Council	Y071
Martin Roundill	Y072
Rev Martin	Y073
Diane Thompson	Y074
Jeremy Foster	Y075
Martijn Bakker	Y076
Insurance Council of New Zealand	Y077
Jacob Butler	Y078
Simon Drummond	Y079
Blair Fraser	Y080
Harriet Gale	Y081
Gavin Picknell	Y082
Vishal Rai	Y083
Clive Matthew-Wilson	Y084
David Whyte	Y085
Dave Sharpe	Y086
Phil Stevens	Y087
Kim Ollivier	Y088
Name withheld	Y089

Waimakariri District Council	Y090
Brian O'Neill	Y091
Euan Gutteridge	Y092
Halswell Residents Association	Y093
Damian Leef	Y094
Spokes Canterbury	Y095
Paul Haakma – GPS-it	Y096
Janene Adams - Geraldine District Promotions and Development Association	Y097
David Ross Gandar	Y098
Paula Luijken	Y099
Governance Group for the Code of Practice for Temporary Traffic Management (CoPTTM)	Y100
Ben	Y101
Michael Cairns	Y102
Richard Knight	Y103
Bruce	Y104
Phil Robinson	Y105
Jessica de Heij	Y106
Louise Morrison	Y107
Mark Blackie	Y108
Richard Wallace	Y109
Marieke Numan	Y110
Barry Wasson	Y111
Warwick Marshall – Cycling Action Network (CAN)	Y112
John La Roche	Y113
Jennifer Ward	Y114
Morgelyn Leizour	Y115
Robert Gillies	Y116
Russell Golding	Y117
Lisa and Robbie Kerr	Y118
Brendan Doherty	Y119
Brian Cossar	Y120
Philip Jones	Y121
Brendan Moore	Y122
Richard Wesley	Y123
Kathrine Fraser	Y124
Leanne Karl	Y125
M Heard	Y126
Kris Gledhill	Y127
Jacques Charroy	Y128
Brent Morris	Y129
Brenda Williams	Y130
John Dixon	Y131
Name withheld	Y132
Celia Pankhurst	Y133
John Prince	Y134
Stewart Church	Y135
Gail and Tony Orgias	Y136
Sue Grant	Y137
Glenn Riddell	Y138
Auckland Transport	Y139
Karl O'Connell	Y140
Tony Orgias	Y141
South Waikato District Council	Y142

Rhys Williams	Y143
Rangi Puano Moeke	Y144
Tom Woods	Y145
Dirk	Y146
Steve Moss	Y147
D Purvis	Y148
Kevin Fox	Y149
Stella Brennan	Y150
Merilyn Manley-Harris	Y151
Dr Jonathan Marshall	Y152
Cam Mitchell	Y153
Daniel Harborne	Y154
Juliet Hawkeswood	Y155
Kevin Sisler	Y156
Alison Crabbe	Y157
Anthony Bus	Y158
John Newick	Y159
Dan Salmon	Y160
Palmerston North City Council	Y161
Jo Clendon	Y162
Joanna Hurst	Y163
Fredick Christensen	Y164
Christina Roberston	Y165
Lindsay McMorran	Y166
Gaspar Sanvicens	Y167
Catarina Gutierrez	Y168
Victoria Cartwright	Y169
Damian Dobbs	Y170
Simon Edmunds	Y171
Ross Inglis	Y172
Bob Jones	Y173
Robert Ashe (Green Party)	Y174
Tamara Cartwright	Y175
Taupo District Council	Y176
Gene Clendon	Y177
Kelvin	Y178
David Bryant	Y179
Lawrence von Sturmer	Y180
David Reid	Y181
Judy Barfoot	Y182
South Canterbury Road Safety	Y183
Crispin Balfour	Y184
Civil Contractors New Zealand	Y185
Clare Brown	Y186
Malcolm Gunn	Y187
Nicky Welch	Y188
Peter Ramage	Y189
Max Robitzsch	Y190
Nicholas Carman	Y191
Timaru District Council	Y192
Graeme Lindup	Y193
Cycle Actions Network (CAN)	Y194
Alistair Gunn	Y195
Rob Mills	Y196
Blair	Y197
Martin Thomson	Y198
Keith Salmon	Y199
Daniel Carter	Y200

Mike Bordignon	Y201
Kate Harris	Y202
Adam Parkinson	Y203
Arnold van Zon	Y204
James Thompson	Y205
James Houston	Y206
Rhys Jones	Y207
Craig Down	Y208
Warrick Flower	Y209
Rodney Badcock	Y210
Benjamin Burkart	Y211
Ben Wooliscroft	Y212
Jill Sye	Y213
Anthony Britton	Y214
Tom Trnski	Y215
Vaughan Ujdur	Y216
Tauranga City Council	Y217
David Nutsford	Y218
Richard Barter	Y219
Hayley King	Y220
Eleanor Meecham	Y221
Nigel Owen	Y222
Gera Verheul	Y223
Stefan Olson	Y224
Robert Numans	Y225
Nathan Rose	Y226
Federated Farmers of New Zealand	Y227
Horizons District Council	Y228
Ashburton District Council	Y229
Robert McLachlan	Y230
Kay Jones	Y231
Alastair Smith	Y232
Road Transport Forum	Y233
Matthew Williamson	Y234
Peter Moosberger	Y235
Chris Bird	Y236
Ian Batchelor	Y237
Dr Grant Young	Y238
Heidi O'Callahan	Y239
Luuk van Basten Batenburg	Y240
Simon Vincent	Y241
David MacClement	Y242
Katherine Boag	Y243
Dan Windwood	Y244
Gabriel Gati	Y245
Nick Braxton	Y246
Catherine Mason	Y247
Cycle Aware Wellington	Y248
Greg Bennett	Y249
Logan O'Callahan	Y250
Kipi Paea	Y251
Skypath Trust	Y252
Olga Brochner	Y253
Bindi Chouhan	Y254
Brake (Road Safety Charity)	Y255
Oliver Harris	Y256

John Parker	Y257
George Lane	Y258
Hauraki District Council	Y259
Jenny Andrew	Y260
Number issued in error	Y261
Christchurch City Council	Y262
Canterbury Regional Road Safety Working Group	Y263
Christopher Owen	Y264
Patrick Fergusson	Y265
Peter Kerr	Y266
Rae Storey	Y267
Deryn Cooper	Y268
Chris Werry	Y269
Charlie Baylis	Y270
Masterton District Council	Y271
Lucinda Rees	Y272
NZ Federation of Motoring Clubs Inc.	Y273
Dr David Welch	Y274
Bus and Coach Association of New Zealand	Y275
Terry Sugrue	Y276
Far North District Council	Y277
The New Zealand Automobile Association Incorporated	Y278
Royal Australasian College of Surgeons	Y279
IPENZ Engineers NZ, Transportation Group	Y280
Alex Dyer	Y281
Marianne van der Haas	Y282
Erik Scheltema	Y283
NZ Traffic Institute (TRAFINZ)	Y284
Gisborne District Council	Y285
Whanganui District Council	Y286
Waitemata Local Board (Auckland Council)	Y287
Walter Dend	Y288
Dr Robyn Manuel	Y289
Jolisa Gracewood	Y290
Anne Nicolson	Y291
Shan Lun	Y292
Chris Boxal	Y293
Geoff & Felicity Rashbrooke	Y294
Kiri Barfoot	Y295
Gia Schibli	Y296
Timothy Brown	Y297
Grey Power	Y298
Isabella Cawthorn	Y299
Mike Drummond	Y300
Queenstown Lakes District Council	Y301
Rita de Beer	Y302
Napier City Council	Y303
Tauranga City Council – Confirmed double up of	Y304

submission	
Hamilton City Council	Y305
Waikato Regional Council	Y306
Hastings District Council	Y307
Local Government New Zealand	Y308
New Zealand Association of Optometrists	Y309
Colin Baker	Y310
Ann Felicity Clemance	Y311
Rob Dyer	Y312
Steve Silby	Y313
Aaron Leece	Y314
Paul Roberts	Y315
Julian Kleinbussink	Y316
Alex Fletcher	Y317
Gerd Lentze	Y318
Blair Fraser	Y319
Graeme Young	Y320
Valerie Gow	Y321
Carl Sell	Y322
Leonard Martin	Y323
Chris Courtenay	Y324
Khalid Sheikj Ahmed	Y325
Ashwin Ranchhod	Y326
Tui Nevada Brightwell	Y327
Steve Hennerley	Y328
Daniel Reid	Y329
Matt Pluck	Y330
Graeme Rfb	Y331
Ben Tucker	Y332
Steve Potter	Y333
Alex Fawcett	Y334
Nick Menzies	Y335
Jenny and Brent Compton	Y336
Issy Best	Y337
Matthew Berridge	Y338
Alice Wright	Y339
Andrea L Shepherd	Y340
Shelley Stevens	Y341
Sarah Marrs	Y342
Diane Griffin	Y343
Erin Ben	Y344
Gavin Price	Y345
Nathan Chant	Y346
Matt Graham	Y347
Jacks Jacks	Y348
Cecile Southavong	Y349
Ian Phillips	Y350
Marc Rocard	Y351
Brendan Lochner	Y352
KaranVeer Jasra	Y353
Harjot Singh	Y354
Benzy Too	Y355
Derek Smith	Y356
Yvonne Dasler	Y357
Riaan du Preez	Y358
Rich Thomas Malcolm- Smith	Y359

Megan Cusack Richards	Y360
Barry Jenkins	Y361
Wendy Timms	Y362
Gavin James Perano Hyde	Y363
Mason Bennett	Y364
Lisa Sokol	Y365
John Subritzky	Y366
Stephen Graham	Y367
John Woodage	Y368
Tim Mcleod	Y369
Geoff Upson	Y370
Ope Ewitt	Y371
Daniel Wilson	Y372
Desmond Muller	Y373
Richard Crane	Y374
Ryan McLaren	Y375
John Briggs	Y376
Warren Knight	Y377
Matthew Mottram	Y378
Whanga Kapita Maria	Y379
Gordon Mcherson	Y380
Peter CW	Y381
Cam Holland	Y382
Sian Bradley	Y383
Bryan Whiskey Walker	Y384
Luke Morbey	Y385
Stanley Lammas-Martin	Y386
Dean Winton	Y387
Andrew Iraia	Y388
Trish Whale	Y389
Dave Brogden	Y390
Stephen Knauf	Y391
Francis Tama Phillips	Y392
Baz Gou	Y393
Julia White	Y394
Aroha Ryan Cassidy Dre	Y395
Andrew Fraser	Y396
Tim Drummond	Y397
Emily Hoult	Y398
Deane Nicholls	Y399
Dorian Gray	Y400
Jeremy Freemantle	Y401
Jude Wilkins	Y402
Max Kempthorne	Y403
Aaron Hall	Y404
Jan Powell	Y405
Zeb Rawnsley	Y406
Arnold Mason	Y407
Jonathan Bell	Y408
Dean Winton	Y409