

THE NEW ZEALAND AUTOMOBILE ASSOCIATION INCORPORATED

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SUBMISSION FROM THE AA ON KATOA, KA ORA – AUCKLAND'S PROPOSED SPEED MANAGEMENT PLAN 2024-2027

- 1. The NZ Automobile Association (AA) appreciates the opportunity to comment on Katoa, Ka Ora: Auckland's proposed speed management plan 2024 – 2027.
- 2. The AA is an incorporated society with over 1.8 million Members, including over 335,000 Aucklanders. The AA was founded in 1903 as an automobile users' advocacy group, but today our work reflects the wide range of interests of our large membership, many of whom are cyclists and public transport users as well as private motorists.
- 3. As a Membership organisation, we survey AA Members to inform the content of our submissions. This submission is primarily informed by a survey of over 900 Auckland AA Members, the results from which are included throughout this submission, with further information included in Appendix 1.
- 4. Given the scale and scope of the proposals outlined in Katoa, Ka Ora, this submission predominantly focuses on principles and provides high level observations rather than commenting on individual roads or proposals.

Summary

- 5. The AA recognises that speed management, including speed limit reductions, is an important road safety tool. We also firmly believe that speed limits need to have the public's endorsement; public agreement that speed limits are appropriate is central to achieving good levels of compliance, which is needed to maximise safety benefits.
- 6. The AA agrees with the principle of lower speed limits around schools and considers this to be a concept the vast majority of people are on-board with. As a general principle, we feel variable speed limits around schools are most appropriate as this approach ensures lower speed limits are in place when children are travelling to and from school and there are greater levels of activity on the road and roadside, including children, and therefore a higher degree of risk. We consider variable speed limits need to be complemented with electronic flashing signage.
- 7. We continue to be concerned that too many speed limits are being put in place that don't have sufficiently high levels of public support. We strongly urge AT to undertake further work to understand how the community feels about different speed limits/speed limit proposals and why. Where support is low, AT should explore the reasons for this and seek to address them.

- 8. We are also concerned that as motorists increasingly encounter different speed limits on the roads (typically, but not limited to, 30km/h, 40km/h and 50km/h on urban roads and 60km/h and 80km/h on rural roads), there will be more instances of motorists finding themselves wondering what the speed limit is. To maximise compliance, and therefore safety, AT needs to take all reasonable steps to communicate the speed limit to motorists, not only through regular speed limit signage but also interventions like road surface markings.
- 9. When safety cameras are used to assist with compliance of speed limits, we firmly believe these need to be signposted; advising motorists of the cameras' presence and of the speed limit. Signs alerting motorists that a camera is operating and informing them what the speed limit is is likely to result in much fewer people exceeding the speed limit, which is the best result for safety.

AA views on speed management

- 10. The AA recognises that speed management, including speed limit reductions, is an important road safety tool. Reductions in speed limits have consistently been proven to result in reductions in trauma from crashes, and can be a relatively cheap and easy way to bring down harm on the roads.
- 11. At the same time, we firmly believe that speed limits like all rules need to have the endorsement of the public. Consensus amongst the public that speed limits are appropriate for the roads to which they apply is central to achieving good levels of compliance, which is needed to maximise safety benefits. If a speed limit feels unreasonably slow to people, then it is very difficult to get the majority of people to comply.
- 12. Our Member research suggests most Auckland AA Members are at least open to the idea of speed limit reductions. A 2021 survey found that while just under a third were opposed to the prospect of speed limit reductions around the region and a fifth were in favour, the majority just over half sat somewhere in the middle; not showing outright support but not showing outright opposition either. This suggests to us that speed limit reductions have the potential to have the support of the public, so long as the public understand and agree with the rationale for them and that the resulting speed limit seems reasonable and sensible.
- 13. We therefore believe that the best results will be achieved when the public agree that there is a road safety problem that needs addressing and that the lower speed limit is well-suited to the road environment. The outcomes of this approach will be good levels of compliance without the need for heavy enforcement, improved road safety, and more support from the public because they feel that transport authorities are listening to their communities and reflecting their views.

Proposals on speed limits around schools

- 14. Katoa, Ka Ora is Auckland's first speed management plan prepared under the new Rule for setting speed limits the Road User (Setting of Speed Limits) Rule 2022 (the Rule).
- 15. The Rule places new requirements on road controlling authorities relating to speed limits around schools. Specifically, they must use reasonable efforts to ensure that by the end of 2027 all roads around schools have speed limits in place that are consistent with the Rule's requirements. We understand that under the Rule, 30km/h (either permanent or variable) will be the speed limit around schools in almost all instances, though limits of up to 60km/h are permitted if certain criteria are met.

16. The AA agrees with the principle of lower speed limits around schools and considers the vast majority of people are on-board with this. Indeed, our recent AA Member survey indicated at least 97% of Auckland AA Members support the use of lower speed limits around schools (97% support for lower speed limits on major urban roads around schools, 98% support for lower speed limits on rural roads around schools, and 99% support for lower speed limits on quiet urban roads around schools).

Proposals for variable 30km/h limits around schools in urban/built-up areas

- 17. Katoa, Ka Ora proposes a number of roads around schools in the urban/built-up area have variable speed limits. These involve 30km/h speed limits at school start and finish times, and are typically proposed on higher speed and/or higher volume roads.
- 18. As a general principle, we feel variable speed limits around schools is the most appropriate approach to reducing speed limits around schools. This approach means the lower speed limit is in place at the start and end of the school day, when children are travelling to and from school and there are greater levels of activity on the road and roadside, including children, and therefore a higher degree of risk.
- 19. The use of variable speed limits around schools in urban/built-up areas is the preferred approach amongst Auckland AA Members. In our recent Member survey on speed limits around schools, when respondents were asked when lower speed limits around schools should be in operation, 'at the start and end of the school day' was far and away the favoured approach, while only around 10% felt they should be in place at all times.
 - on minor, quiet roads around schools in urban/built up areas 72% think lower speeds should be in place at the start and end of the school day, 18% think it should depend on the local school/community, 9% think lower speeds should be in place at all times, and 1% think there should never be lower speed limits in place (1% don't know/have no opinion)
 - on major, busier roads around schools in urban/built up areas 70% think lower speeds should be in place at the start and end of the school day, 16% think it should depend on the local school/ community, 11% think lower speeds should be in place at all times, and 3% think there should never be lower speed limits in place (1% don't know/have no opinion).
- 20. Variable speed limits are undoubtedly preferred by AA Members because they make sense to them lower limits are in place at times when they can see the potential for a road safety problem. As a result, we expect this approach will translate into good levels of compliance.
- 21. When it comes to signposting variable speed limits, AT needs to take all reasonable steps to ensure motorists are aware of them. For this reason, variable speed limits in urban areas should generally be complemented by electronic flashing signage. While we expect local residents will be aware of the location of schools, other motorists may not be, and electronic flashing signage will assist with this. The exception may be on quiet residential streets, such as cul-de-sacs, where road users will almost exclusively be residents and will undoubtedly already be aware that a school is nearby. In these cases, static signage will likely be sufficient.

- The AA considers variable speed limits are the most logical approach to reducing speed limits around schools.
- Variable speed limits should be accompanied by electronic flashing signage on most streets.

Proposal for standardised operating times for variable school speed limits across Auckland

- 22. While not mentioned in the draft Katoa, Ka Ora document, AT's feedback survey indicates consideration is being given to standardising operating times for variable school speed limits. It indicates this seeks to deliver on the principle of Katoa Ka Ora taking 'an easy to understand' approach.
- 23. At face value, we understand the appeal of a standardised approach for the operating times of variable school speed limits across Auckland AT could advertise the times that variable school speed limits are in operation, and motorists could learn these. In theory, this approach would be 'easy to understand'.
- 24. In practice, however, we don't think this approach will make sense on the ground. If operating times were standardised, variable school speed limits will need to be in operation to encompass all schools' start times and finish times. While we are not aware of every school's bell times, we are aware of a school that finishes at 2.30pm, and others that finish at 3.30pm. This suggests to us that the afternoon variable school speed limit would need to apply from 2.25pm until probably 3.45pm (and that's assuming that no schools in Auckland start earlier or finish later than the ones we're aware of).
- 25. Under this approach, a motorist travelling at 3.40pm past a school that finished over an hour earlier would still be subject to a 30km/h speed limit, even though school children would presumably no longer be walking home. Equally, a motorist travelling at 2.30pm past a school that doesn't finish until 3.30pm would also be subject to a 30km/h speed limit, even though children would not be leaving the school for another hour.
- 26. Our view is that a standardised approach to operating times for variable school speed limits will not make sense to motorists on the ground if they are in operation well beyond the period during which children are coming and going from a school which will need to be the case if the standardised operating times cover all of Auckland's schools. We expect this approach could damage the public's buy-in to lower speed limits around schools, which they currently support because they understand that there is a higher degree of risk when children are coming and going from school.
- 27. A preferable approach would be one where the operating times for school speed limits are determined by the bell times of the school(s) to which the speed limit applies. Where multiple schools with different bell times are in close proximity to one another, it likely will make sense for the variable speed limit to be in operation for a longer period, but where a school is not located near other schools, its variable speed limit should only operate based on its own bell times.
- 28. We also consider that on all but the most quiet residential streets (such as culs de sac), the variable speed limit needs to be communicated to the public with electronic flashing signage, as this is the approach that's most likely to ensure motorists are aware that a reduced speed limit is in operation.

• The operating times of variable school speed limits should not be standardised across the region, they should be determined by the bell times of the school(s) to which the speed limit applies.

Proposals for permanent 30km/h zones ('safe school or neighbourhoods zones') in urban/built-up areas

- 29. Under Katoa, Ka Ora, AT is proposing to continue the roll out of permanent 30km/h residential zones, with these identified as 'safe school or neighbourhood zones' in the consultation material.
- 30. While we are not opposed to permanent 30km/h zones in residential areas in principle, our view is that like all speed limits they need to be well suited to the look and feel of the roads to which they apply, and have good levels of public support.
- 31. Some roads within proposed 30km/h zones are classified as 'Urban Connectors' under the One Network Framework. These are roads that are identified as playing a key movement function, and are therefore roads where 30km/h may not be well suited to the road. (We also note that while some urban connectors are included in proposed permanent 30km/h zones, for other ones AT is proposing variable speed limits, and for others 40km/h speed limits are proposed).
- 32. When speed limits aren't well suited to the road and road environment, compliance issues arise. This can be demonstrated through the findings of the most recent speed compliance report in Great Britain, which reports very poor compliance with 20mph (32kmph) speed limits – noting that the monitoring sites are on roads without traffic calming, and tend to be on through-roads rather than smaller residential streets. Specifically, it found that under free flow conditions, 87% of cars exceeded the speed limit at the 20mph (32kmph) sites, and the average speed of cars at these sites was a bit above 40km/h.
- 33. When it comes to public support, while we appreciate it will vary by location, we're not typically seeing high levels of support for 30km/h residential zones amongst the public. Our recent survey of Auckland AA Members found that:
 - When asked what the default speed limit should be in suburban residential areas, 61% say 50km/h, 21% say 40km/h and just 7% say 30km/h (3% say 'more than 50km/h' and 7% say 'it depends')
 - Of the just over 300 respondents who indicated they live in a neighbourhood where the speed limit has been reduced to 30km/h in recent years, 57% say they oppose the speed limit, 28% indicate they support the speed limit, and 13% say they have mixed views¹.
- 34. These findings are broadly consistent with AT's own research² which found fairly low levels of support for 30km/h speed limits on residential streets specifically 28% support on busy residential streets and 23% support on quiet residential streets. We note that the same research found slightly greater levels of support for 40km/h speed limits on residential streets, but even so, support still only ranged from 34% (for quiet residential streets) through to 41% (for busy residential streets).

¹ Due to the relatively small number of survey respondents who indicate they live in a 30km/h neighbourhood, the margin of error for these findings is 6% at a 95% confidence level.

² KANTAR AT Roading Customer Satisfaction, p.28

- 35. We believe that before AT proceeds with any permanent 30km/h residential zones, it needs to ensure each proposal suits all roads in the proposed zone (taking into consideration matters such as the road's classification and vehicle speeds), and has high levels of community support. Where support is low AT should explore the reasons for this, and seek to address them to boost support before proceeding or reconsider the proposal. In the meantime, it may be that a variable speed limit around any schools within the area makes most sense to meet the requirements of the Rule.
- 36. When permanent 30km/h neighbourhood speed limits are put in place, these need to be complemented with comprehensive signage, road markings and infrastructure to minimise the chances of motorists wondering what the speed limit is.

- The AA is not opposed to 30km/h speed limits in residential areas in principle, but believes they need to be well suited to the roads to which they apply and have good levels of community support.
- Before AT proceeds with any permanent 30km/h residential zones, it needs to ensure each proposal suits all roads in the proposed zone and has high levels of community support. Where support is low, AT should explore the reasons for this and seek to address them or reconsider the proposal.
- When permanent 30km/h neighbourhood speed limits are put in place, these need to be complemented with appropriate signage, infrastructure and road markings.

Proposals for variable speed limits around rural schools

- 37. We understand AT has opted for variable speed limits outside rural schools, and we consider this to be a sensible approach given the likelihood that the roads in question self-explain at much higher speeds outside of school start and finish times.
- 38. We note that variable speed limits around rural schools are favoured by Auckland AA Members. When Members were asked when lower speed limits around rural schools should be in operation, 63% think lower speeds should be in place at the start and end of the school day, 24% think it should depend on the local school/community, 9% of think lower speeds should be in place at all times, and 2% think there should never be lower speed limits in place (3% don't know/have no opinion).
- 39. We note that outside some rural schools AT is proposing to lower the permanent speed limit, for example from 80km/h to 60km/h, and put in place a 30km/h variable limit at school start and finish times. We expect that this approach is aimed at eliminating the need for a sudden and substantial reduction in travel speeds when the 30km/h variable limit is in operation.
- 40. While we support avoiding a sudden and substantial reduction in speeds at school start and finish times, we note the potential for the new permanent speed limit to not match the look and feel of the road. This could lead to motorists questioning the rationale for lowered speed limits and potentially result in poor compliance.

- 41. An alternative approach to this situation would be a variable speed limit that is higher than 30km/h which we note is allowed by the Rule. This approach may be appropriate if there are locations where, for example, the school has few or no students arriving by active modes, and all drop-offs and pick-ups occur away from the road corridor and on the same side of the road as the school. (We are also strongly supportive of AT working with schools to put in place changes to the physical environment that will reduce risks, such as creating separated 'pull off' areas for school buses and parents' cars).
- 42. We do not favour either one of these approaches over the other, nor do we believe it needs to be a 'one size fits all' approach. Rather, we believe the best approach for any given location will come down to the individual school, the individual road and the individual community and road users. We urge AT to listen carefully to the community's feedback on each individual proposal.

- We support the use of variable speed limits outside rural schools.
- We acknowledge the complexities of introducing variable speed limits on higher speed roads – notably that it is unsafe to have a 30km/h variable speed limit on a 80km/h road
- We note that an alternative to the approach AT proposes to take in some locations introducing a permanent 60km/h limit outside the school, to complement the 30km/h variable limit – would be to have variable limit that is higher than 30km/h. We expect the desirability of this approach will be dependent on the specific location.

Proposal for variable speed limit around a rural marae

- 43. Katoa, Ka Ora's implementation plan outlines a proposal to introduce a variable speed limit³ outside the Ngāti Kohua marae on Clevedon-Kawakawa Road. The proposal would enable the speed limit to be reduced from 80km/h to 30km/h during tangihanga, when there is activity occurring on the roadway/roadside. The implementation plan indicates that the marae would be able to activate the variable speed limit.
- 44. We support the principle of slower speeds around marae during tangihanga when there is activity on the road/roadside. We are concerned however that the proposal involves a sudden and substantial reduction in the speed limit from 80km/h to 30km/h when the variable speed limit is operating. This significant speed limit reduction presents a road safety risk of its own, with motorists being required to reduce their speed very suddenly and substantially.
- 45. This issue could be addressed with a graduated speed limit reduction, which is the approach being taken around rural schools on high speed roads where variable 30km/h speed limits are proposed. However, in the case of rural marae where the variable speed limit is only proposed for use during tangihanga, we consider that the most appropriate approach would be to put in place a variable rather than permanent speed limit (e.g. of 60km/h) either side of the variable 30km/h speed limit to assist motorists to safely reduce their speed. While this approach may not be ideal, we consider that on balance it would be the best way forward. An alternative would be to have a variable speed limit outside the marae that is higher than 30km/h, but whether this is appropriate will depend on the specifics of the site (such as the presence of footpaths).

³ The map in the consultation material suggests the 30km/h speed limit is a permanent limit – we suspect this is an error

- 46. We also note that while we expect most motorists are familiar with the concept of and rationale for variable speed limits around schools, they will be less familiar with variable speed limits around marae. We think it would be worthwhile to take steps to ensure motorists are aware of the presence of marae and the possibility of activity on the roadway. We expect this would assist with compliance, particularly if motorists encounter variable speed limits but can't immediately see the reasons for them.
- 47. We note that the consultation material indicates that the Ngāti Kohua marae would be able to activate the variable speed limit. Our understanding is that for marae (and schools) on the State highway network, Waka Kotahi is looking at a system whereby the variable speed limit can be activated for unscheduled activities, but that monitoring and control is undertaken by Waka Kotahi remotely. We understand Waka Kotahi is looking to have an online portal where marae (and schools) can book times for lower limits to operate that Waka Kotahi would then approve. We consider that such an approach would have more safe-guards in place (e.g. to ensure a variable limit isn't accidentally left operating longer than intended) and should be pursued by AT.

- We support the principle of slower speeds around rural marae when there is activity on the road/roadside during tangihanga.
- A speed limit reduction from 80km/h to 30km/h presents a road safety risk. We believe either a graduated reduction using variable speed limits, or a single variable speed limit greater than 30km/h, is needed with the preferred approach dependent on the specifics of the site.
- We believe informative signage would be beneficial to ensure motorists are aware of the presence of marae and the possibility of activity in the roadway.
- AT should pursue the approach being investigated by Waka Kotahi, for monitoring and control of variable speed limits around marae (and schools).

Proposals on 40km/h urban roads

48. Katoa, Ka Ora proposes to put 40km/h speed limits in place on a number of urban roads.

- 49. We anticipate increased confusion amongst motorists as they increasingly encounter different speed limits in urban areas. This will particularly be the case where roads that have a similar look and feel to each other have different limits, and where roads have a very different look and feel to one another but have the same limit. An example of this is the relatively new 40km/h speed limits on Hobson St, Nelson St and Fanshawe St in the city centre, which have a very different look and feel to the roads where 40km/h speed limits are proposed under Katoa Ka Ora.
- 50. As AT increasingly shifts away from the vast majority of urban roads having 50km/h speed limits, alongside ensuring the proposals make sense to the public, our view is that more emphasis needs to be placed on communicating the speed limit to motorists. We note that speed limit signs alone are not sufficient as when people are driving they are focussing on multiple things and research has shown they often miss a speed sign⁴. Alongside speed limit signs, road markings and other interventions need to be explored.

⁴ The Science of Road Signs | AA New Zealand

 We expect there will be increased confusion amongst motorists as they increasingly encounter different speed limits in urban areas, and strongly believe AT needs to do more than just using roadside speed limit signs to communicate speed limits – other interventions, such as road markings, need to be explored.

Proposal on town centre speed limits

- 51. Katoa, Ka Ora proposes the continued roll out of 30km/h zones in town centres.
- 52. Busy town centres with large numbers of shops, pedestrians and cars pulling in and out of parking spaces can be well suited to lower speed limits, and we expect these will receive good levels of community support when implemented well.
- 53. However, our most recent AA Member survey continues to show mixed support for the 30km/h town centre zones that have been implemented to date (recognising that levels of support will undoubtedly vary from one location to the next). When asked how they feel about the 30km/h speed limits they've noticed in town centres/main shopping areas, 43% say they support them, 18% have mixed views, and 38% say they're opposed to them⁵.
- 54. We also note that when asked what they think the default speed limit should be in town centres/main shopping areas, our survey found 30% think 50km/h, 36% think 40km/h and 27% think 30km/h (5% think 'it depends', 1% think 20km/h and 1% think more than 50km/h).
- 55. We recommend AT undertake further work to understand what's driving the mixed views and opposition for lower limits in town centres. It maybe that people are feeling some zones are extending too far, or that the roads don't self-explain at certain times of the day. With further understanding of the concerns that people have, AT may be able to make changes to boost support for and compliance with town centre speed limit reductions.

Summary of the AA's views

• AT needs to undertake further work to understand concerns around 30km/h speed limits in town centres, and seek to address these to build support.

Proposals on rural roads

56. Katoa Ka Ora also proposes changes to speed limits on some rural roads, predominantly 60km/h and 80km/h limits, with some 40km/h limits. This is consistent with the approach taken to roads in rural south Auckland and parts of Rodney over the last few years.

⁵ N=586. MOE +/- 4% at 95% confidence

- 57. Just under a year after the first tranche of speed limit changes were put in place in rural south Auckland and parts of Rodney, we surveyed local Auckland AA Members to get their views on the changes. Just under a quarter (24%) were in favour of the new speed limits, another quarter (28%) were in favour of some but not others, and half (47%) were opposed.⁶
- 58. We don't consider these results show public endorsement for the speed limits and think this is a problem as AT looks to lower the speed limits on more rural roads. We also note that compliance on some roads is presumably undesirably low, as speed cameras are being installed in a number of locations (our views on this are included below). We believe AT should be looking to secure endorsement from the public for rural road speed limit reductions.
- 59. While we have concerns about levels of public buy-in, we acknowledge that monitoring has shown promising results for road safety, though noting the limitations of the relatively short two-year post implementation study period. We will be interested to see longer term results. (As an aside, we noticed that there were mixed results in both Rodney and Franklin on roads that had a post implementation speed limit of 60km/h, though we appreciate the 24 month analysis period is too brief to draw any firm conclusions on this).

Summary of AA views on rural road proposals

 We continue to have concerns about levels of support for new rural road speed limits. Low levels of support are likely the result of speed limits that the public do not agree are justified or make sense, and we suspect this is resulting in poor levels of compliance on some roads. AT should be looking to secure greater levels of public support for its preferred rural road speed limits.

Proposals on safety cameras

- 60. Katoa, Ka Ora identifies 10 future safety camera sites. We note that most of these sites are on roads where the speed limit has been reduced in recent years, indicating that there is an issue with motorists travelling above the new speed limit on these roads. This reinforces the view we have outlined above that there will likely be issues with compliance if the public don't feel that a speed limit matches the look and feel of the road.
- 61. When safety cameras are used to assist with compliance of speed limits, our view is that these need to be signposted; advising motorists of the cameras' presence and of the speed limit. Signs alerting motorists that a camera is operating and informing them of the speed limit is likely to result in much fewer people exceeding the speed limit in high risk locations, which is the best result for safety. A speed camera that motorists aren't aware of, on a road that is known for having too many vehicles travelling too fast, is unlikely to resolve a speed issue.
- 62. This is demonstrated with the speed camera that is in place on Mill Road. When the speed limit was reduced in mid-2022, the camera was issuing around 8,000 tickets a month. In the first three months of 2023 (the latest available data), the number of tickets issued per month has reduced by about half to around 4,000 but this is still 4,000 instances of people travelling above the speed limit per month. We expect that if the camera was signposted, and motorists were reminded of the speed limit, the number of tickets issued would drop significantly.

⁶ We note there was variation in results by rural area, with support for local changes highest amongst respondents from Rodney east (42% in favour, 32% opposed), and lowest amongst respondents from Franklin west (20% in favour, 50% opposed)

63. We would like to see AT doing more to help motorists to travel at the right speeds, and strongly believe signposting speed cameras – both the future cameras identified in Katoa, Ka Ora, as well as existing speed cameras – is a key part of this.

Summary of AA views on safety cameras

- All reasonable steps should be taken to assist motorists to travel at the right speed, and this includes signposting both current and future speed cameras.
- If speed continues to be an issue after speed cameras are installed, AT should be looking at what more needs to be done to bring down vehicle speeds.

Final comments

64. Thank you again for the opportunity to provide feedback on Katoa, Ka Ora. We would be very happy to meet with you to discuss our feedback or survey findings in more detail, if that would be useful.

Yours sincerely,

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Appendix 1











