



High Risk Rural Roads Guide

AA submission

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High-risk rural roads guide – feedback on interim draft

Introduction

The New Zealand Automobile Association (AA) welcomes the opportunity to provide comment on the New Zealand Transport Agency's (NZTA's) High Risk Rural Roads Guide (HRRRG).

As the largest member-based organisation in New Zealand, representing 1.3 million vehicle owners and drivers, the NZAA has a strong interest in transport issues in New Zealand.

General Comment

The HRRRG is a very extensive document which is a significant road safety resource. We see the HRRRG as a major step forward in road safety and a key deliverable of the Safer Journeys 2020 Strategy to target high-risk rural roads. We congratulate the NZTA on the development of this document, and hope to see its widespread use within the industry.

We see one of the key strengths of the HRRG is its ability to help foster a consistent approach nationally to identifying and treating New Zealand's high risk routes, on both the state highway and local road networks. The AA has been concerned for quite some time that the knowledge gap between the state highway and local road sectors has been widening with little effort given to sharing the extensive road safety knowledge that exists in central government with local government. The HRRRG shows a very positive step towards beginning this transfer, however further interaction between the NZTA and local authorities around the guide would be valuable to ensure greater understanding and use of the HRRRG. We think there should be training of some kind (perhaps regional workshops) provided to ensure maximum uptake of the guide – there are local authorities who would greatly benefit from this, especially those who do not have dedicated road safety engineers.

We are also encouraged by the other high-risk guides under development, which we understand include intersection and motorcyclist guides.

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Funding

The HRRRG will prompt a great number of necessary road safety retrofit projects. To deliver on the Safer Journeys Strategy goal of safer roads and roadsides, adequate dedicated funding must be provided to enable these projects to be undertaken. It is not clear to us that adequate funding is provided, and indeed the draft GPS has funding for 5 of the state highway and local road activity classes remaining flat over the next three years. We are concerned that local enthusiasm for improvements will be hindered by a lack of funding available to deliver them.

Classification System

It is not clear how the HRRRG should interact with the state highway classification approach or existing local road hierarchies. There needs to be some guidance to practitioners on how to take the state highway or local road classifications into account in regard to high risk rural roads. This is particularly important in relation to access management issues and speed. In particular we think the guide needs to give greater advice on controlling access as a safety treatment.

KiwiRAP

The AA is very supportive of the use of KiwiRAP (both Risk Maps and Star Ratings) throughout the HRRRG. It is extremely encouraging to see KiwiRAP being used so extensively in a practical way to target road safety investment. In our opinion this practical and detailed application of a Road Assessment Programme is world-leading. In addition to this, the reference to KiwiRAP in the HRRRG will continue to give credibility to KiwiRAP and also highlight its usefulness to the local government sector.

We do note on page 26 that the text of the draft, relating to the 2011 release of updated Risk Maps reads *'At that time, it is likely that the risk band thresholds (figure 4-3) will also be updated to reflect improvements in safety performance'*. As agreed at the last KiwiRAP Technical Working Group meeting on 19 May, the thresholds for the risk categories will remain consistent with the 2008 release. The text will therefore need to be amended.

We also note that the intention is for NZTA and other RCAs to identify their high-risk rural roads every three years in order to provide information in support of maintenance and renewal works included in the three-year NLTP. Should KiwiRAP Risk maps be updated at this same frequency to assist?

Treatment Philosophy Strategy

In general we agree with the Treatment Philosophy Strategy. Sections of road which are high in both collective and personal risk under KiwiRAP should be high priorities for road safety engineering intervention, and are likely to be the routes where large scale transformation works are most critical. Vice-versa those links which are low in both personal and collective risk are unlikely to justify large safety projects.

An issue of potential concern is how this approach is applied. The larger 'transformational' works are likely to be long-term projects requiring significant development time and funding restrictions. Because of the high level of risk to a large number of drivers, some type of safety intervention should be considered in the interim where there are likely to be delays.

Speed and Speed Management

There are a number of references in the HRRRG to speed and speed management.

We are encouraged by references such as:

“...In this case, a treatment like a review of the speed limit may not necessarily be the most effective strategy as it does not achieve the efficiency, function and user expectations of the road” This statement recognises the diversity of considerations that need to be taken into account when lowering speed limits.

“ The RCA needs to weigh up the capital investments for improved road features against the loss of mobility due to a lower speed limit”. This statement acknowledges that there is a cost to lowering the speed limit over and above the signs and any enforcement required.

We are, however, concerned and discouraged by references such as:

“other measures, such as providing median separation, would be needed to reduce crash severity where safe speed thresholds cannot be appropriately provided”. In our view, this statement has the priority wrong. It is the engineering treatments such as providing median separation which should come first, and where these aren't provided that only then speed reductions be considered and reviewed again after any works have been completed to see if original speeds can be reinstated.

The AA's concerns in relation to speed management on the rural road network are that:

- speed limits will be seen as the easy solution to a road safety problem. Engineering treatments should be seen as the priority, with reducing speed limits as a last resort;
- any speed reductions will be permanent, even if the intention at the time is for them to be an *interim* measure until engineering treatments are possible/funded. We recognise that for some high-risk sections of road, the engineering treatments may be extensive and therefore there will be a time delay associated with their construction, introducing the need for interim measures to reduce the risk to drivers – one option being a reduction in the speed limit. Several of our AA Districts have experienced speed limits not rising again after roading improvements have been made.
- the costs in relation to the loss of mobility and productivity as a result of speed limit reductions are not often taken into account;
- the function of the road needs to be considered when contemplating speed changes; and
- Research quoted in the HRRRG shows the mean speed change in km/h was about $\frac{1}{4}$ of the speed limit change in km/h – so speed limit changes, in themselves, are not going to deliver the safety benefits that might be necessary in some circumstances.

Our preferences in relation to how to manage speeds on the rural road network are:

- for road controlling authorities to be tougher in terms of investigating closing of current access points onto the network where they are contributing to a safety risk on the road. Carefully managing and designing for safe access is an important feature of managing safety consistent with the road hierarchy and its appropriate speed environments.
- for speed limit changes, where practical, to be communicated by using threshold treatments. Research has shown that drivers may notice as few as 1 in 10 road signs and have very poor memory of them.
- for roads to self-explain the speeds that they should be driven at, and to encourage driver self-responsibility to judge speed according to the conditions. We think that the guide should include some more information and ideas on how to create self-explaining speeds – there are a few items sprinkled throughout the document, but it needs to be more substantial and in one place and be presented as a viable (preferable) alternative to simply reducing speed limits. Particularly as self explaining roads (speed) require

little enforcement and achieve higher compliance. We have attached the Ternz/Waikato University paper on 'Self-explaining roads' which may be helpful.

- for engineering treatments to be assessed as a priority before considering a drop in speed limit as the solution to a road safety problem.

Monitoring and Evaluation

The AA is supportive of the inclusion of a section on Monitoring and Evaluation in the HRRRG. This is important to ensure continual improvement in road engineering, and the ability to share best practice and lessons learnt.

Tourist Arrows

One particular safety intervention which is often brought up by our AA District Councils and AA Members is the use of tourist arrow paint markings on the road to serve as a reminder to tourists that New Zealand roads require driving on the left. These were previously considered more relevant in tourist destination areas, however free independent travellers are taking up an increasing percentage of New Zealand visitors and these travellers use the entire network. A national guideline is needed to provide lane keeping arrows consistently on all New Zealand's rural roads. At the moment some areas of New Zealand use these, and others do not. Perhaps the HRRRG could provide some guidance on these.

Data Quality

We also appreciate that the HRRRG provides a number of methods for determining what a high-risk rural road is, including crash prediction tools such as KAT. Crash data can sometimes be of low quality and lead to low quality decisions.

Thank you again for the opportunity to submit on the content of the draft High-risk Rural Road Guide. We believe it is an excellent document and will fill a clear need - our congratulations to the authors. If you have any questions on our submission, please don't hesitate to contact me.

Yours sincerely



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