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SUBMISSION FROM THE NZ AUTOMOBILE ASSOCIATION ON THE PROPOSED SPEED LIMITS AMENDMENT BYLAW 2022

Summary

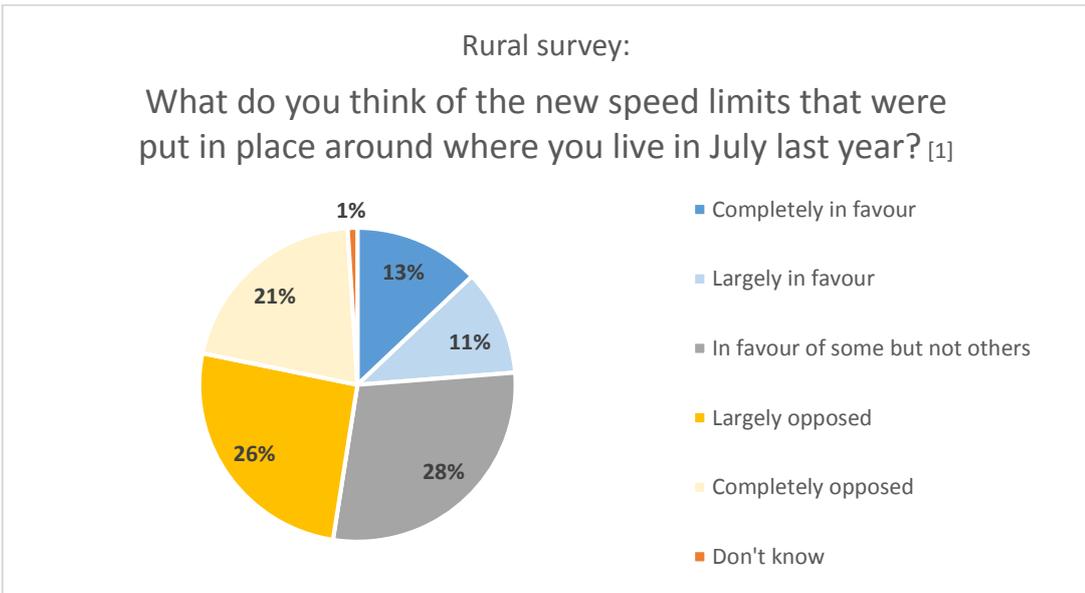
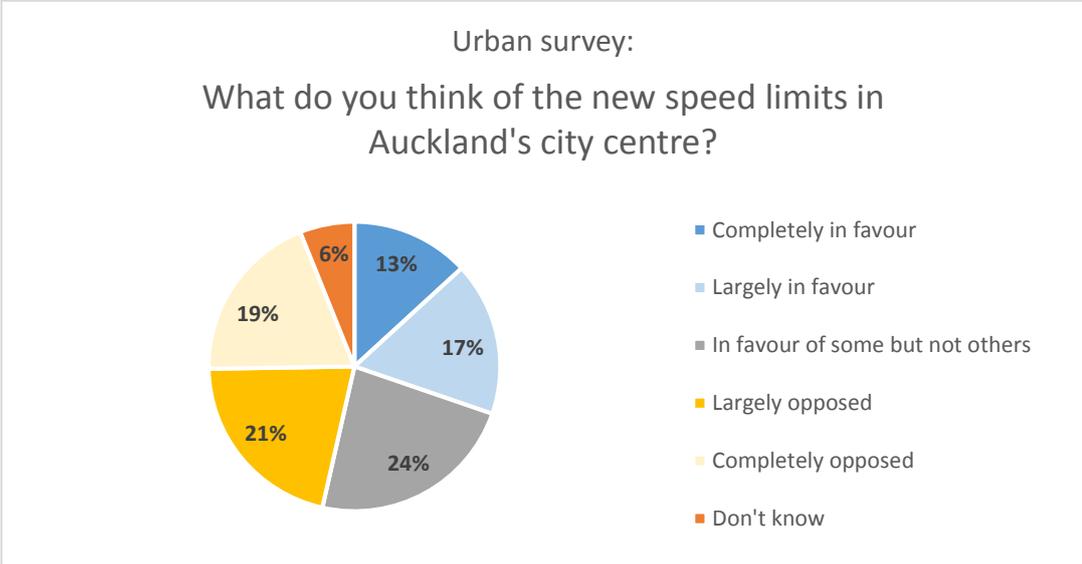
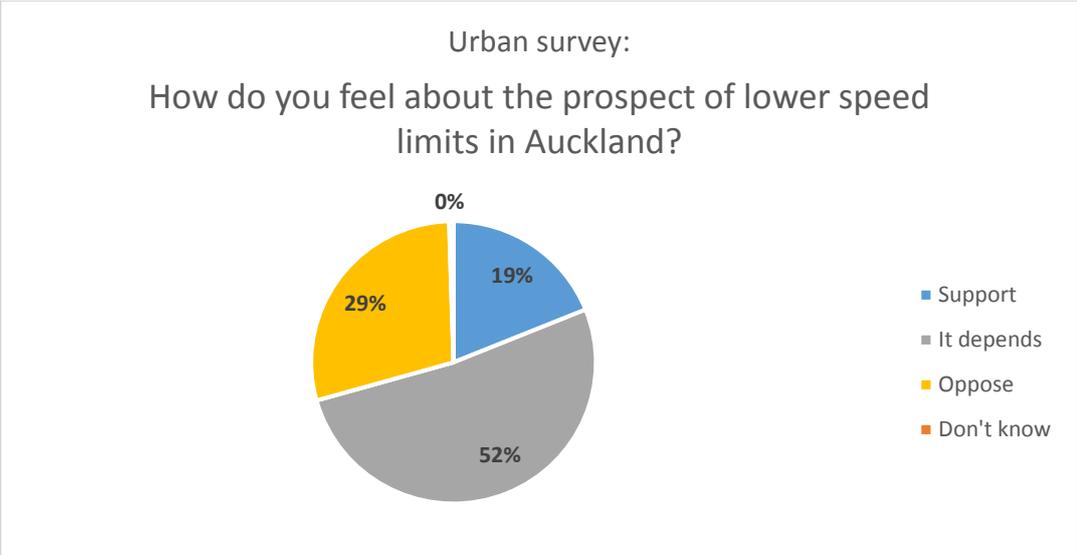
1. The NZ Automobile Association (NZAA) appreciates the opportunity to comment on Auckland Transport's (AT) proposed Speed Limit Amendment Bylaw 2022 (the proposed Bylaw).
2. When it comes to determining what a road's speed limit should be, we strongly believe it should: be informed by a strong evidence base, make sense to the vast majority of people, and be approached in a way that's going to result in compliance. We are concerned that we're increasingly seeing speed limits that don't tick all of these boxes.
3. Our key concern is that speed limits are being put in place which aren't making sense to the public. AA Member survey results show that while the majority of Auckland Members are open to the prospect of lower speed limits around Auckland, this support doesn't flow through to the specific speed limit changes that were put in place last year (and the proposed Bylaw is a continuation of this approach).
4. Public agreement that speed limit reductions are justified, and that resulting speed limits make sense, will maximise public buy-in and compliance and ultimately lead to the best road safety outcomes.
5. This submission therefore calls on AT to:
 - take a more targeted approach to speed limit reductions; focusing on areas of highest risk
 - complete monitoring and evaluation of previous tranche before making decisions on the proposed Bylaw (and any subsequent Bylaws)
 - pursue additional or alternative interventions where proposed speed limits – or recently amended speed limits – don't have high levels of public support or compliance, such as variable limits, changes to the road environment, or alternative limits.
6. It also calls on AT to have an upfront and honest conversation with Aucklanders about its long-term vision for speed limits in Auckland, particularly if proposals currently under consideration are precedent setting (which we expect they are, given the proposed Bylaw represents a continuation of the approach taken in Tranche 1). This will give Aucklanders the opportunity to debate the strategic approach, before specific proposals are in front of them.

Introduction

7. The NZAA appreciates the opportunity to comment on AT's proposed Bylaw.
8. The NZAA represents the interests of its 1.8 million Members, including over 330,000 Auckland Members. The NZAA's advocacy role is focussed on articulating the voice of the reasonable motorist on transport issues.
9. The NZAA agrees with speed management, including speed limit reductions, as a road safety tool. However, we have concerns that speed limits are being put in place that don't make sense to people.
10. This submission:
 - sets out the findings of two recent Auckland AA Member surveys, which sought feedback on the new speed limits that were put in place in Auckland last year;
 - makes recommendations, based on the survey findings, which we believe would help to maximise public buy-in and compliance with speed limit changes in the proposed Bylaw along with any future speed limit changes;
 - calls on AT to have an up front and honest conversation with Aucklanders about its long-term vision for speed limits in the region.

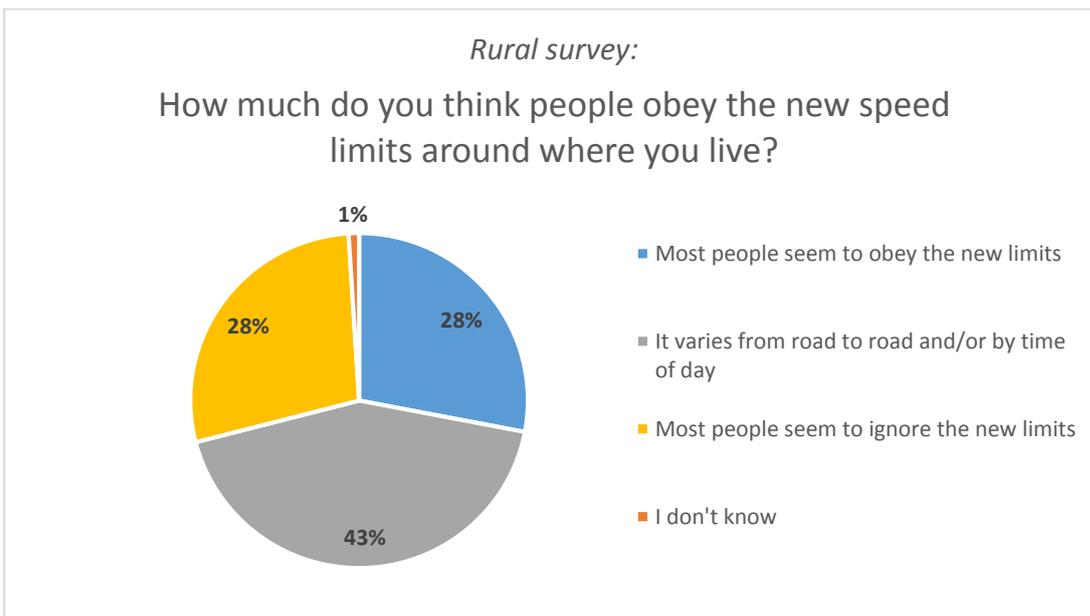
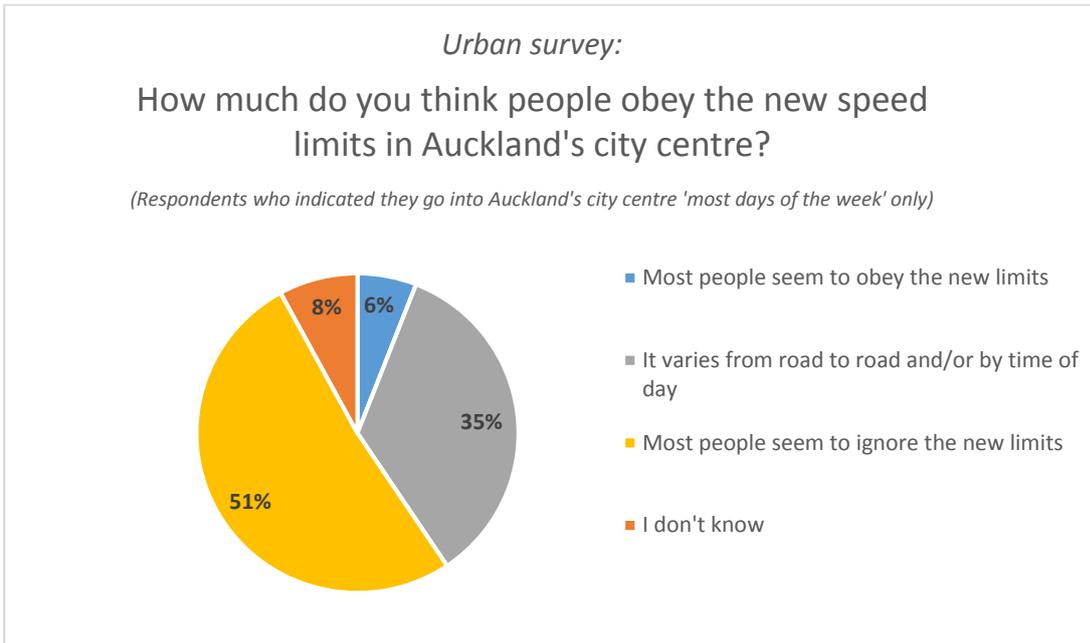
AA Member views on Auckland's new approach to speed limit setting

11. In 2020, AT rolled out its first tranche of widespread speed limit reductions in Auckland. This involved 30km/h speed limits throughout the city centre (with the exception of Fanshawe St, Nelson St and Hobson St which are 40km/h), in some town centres, and in some residential areas, 80km/h speed limits on 'main' rural roads, and 60km/h speed limits on 'secondary' rural roads.
12. In June 2021, after the majority of the new speed limits had been in place for almost a year, we ran two AA Member surveys to understand what motorists think of the new speed limits:
 - an urban survey predominantly focussed on the speed limit changes that were made in the city centre, and was sent to a random selection of AA Members throughout Auckland. This survey garnered 1,100 responses.
 - a rural survey focussed on the speed limit changes that were made Rodney east, Rodney southwest, Franklin west and Franklin east, and was sent to AA Members who live in these areas. This survey garnered 1,000 responses.
13. The survey findings indicate that while the majority of Auckland AA Members are open to the prospect of lower speed limits around Auckland, this support doesn't flow through to the speed limit changes AT is making on the ground.



[1] There was variation in results by rural area, with support for local changes highest amongst respondents from Rodney east (42% in favour, 24% in favour of some but not others, 32% opposed), and lowest amongst respondents from Franklin west (20% in favour of the changes, 30% in favour of some but not others, 50% opposed).

14. Meanwhile, the results indicate that Auckland AA Members perceive there to be widespread issues with compliance with the new speed limits.



15. The results are illustrative of an approach to speed limit setting that, in too many places, isn't making sense to the public.

16. We believe a change in approach is needed to bring the public on-board with the speed management programme. Public agreement that speed limit reductions are justified and that resulting speed limits make sense will maximise public buy-in and compliance, and ultimately lead to the best road safety outcomes.

Recommendations

17. We have three recommendations for AT to secure greater public buy-in to its speed management programme.

Recommendation: Take a more targeted approach to speed limit reductions; focusing on areas of highest risk

18. We believe that the public will be most likely to agree with the need for speed limit reductions if they agree there is a genuine road safety problem along the road and that the existing speed limit is contributing to it.
19. We therefore recommend AT target its speed management programme much more closely to the roads where speed management treatment will result in the greatest reductions in deaths and serious injuries – that is, the roads identified in MegaMaps’ ‘top 10%’.
20. By focusing on these roads, not only will the biggest road safety gains be achieved, there is a much greater chance of securing public buy-in to the speed management programme.

Recommendation: Complete monitoring and evaluation of previous tranche before making decisions on the proposed Bylaw (and any subsequent Bylaws)

21. We understand that monitoring and evaluation of Tranche 1 of AT’s speed limit changes are on-going. We are strongly of the view that monitoring and evaluation needs to be completed, and the information shared with relevant stakeholders and the results made public, before further speed limit changes are made.
22. The proposed Bylaw represents a continuation of the approach to speed management that was put in place under Tranche 1 (i.e. 30km/h urban limits, and predominantly 80km/h and 60km/h rural limits). If monitoring and evaluation of Tranche 1 identifies issues – for example with compliance, enforcement, or perceptions – it would make sense to understand this before proceeding with further reductions. Meanwhile, positive results would likely assist with buy-in to the programme.
23. We therefore urge AT to delay final decisions on the proposed Bylaw until after monitoring and evaluation of the Tranche 1 changes is complete, and information is made available to all interested parties. And also to undertake comprehensive monitoring of this tranche, to help to inform decisions on subsequent tranches.

Recommendation: Pursue additional or alternative interventions where proposed speed limits – or recently amended speed limits – don’t have high levels of public support or compliance

24. Where speed limit proposals are not receiving high levels of public support, or where new speed limits are not getting high levels of compliance, we recommend AT pursue additional or alternative interventions.
25. Where a lower speed limit is not justified 24 hours a day but is needed at certain times, variable speed limits which differ by time of day (ideally accompanied by electronic signage), can be an effective way of achieving road safety objectives and winning public support. A good example of this is where low speed limit is needed around a school at certain times of the day, but the nature of the road and the road environment means that that speed limit does not make sense at other times.
26. Where a lower speed limit is justified 24 hours a day but compliance continues to be low, we believe this is a strong need for improved signage (either more frequent signage, or possibly speed limits painted on the road) and/or road layout change should be pursued to help to ensure the speed limit is clear to motorists and that it suits the look and feel of the road environment. An example of this may be in residential areas, where speed bumps can assist in bringing vehicle speeds down.

27. Lastly, where there is low public support and/or compliance with new speed limits, in some cases it may make sense to consider alternative speed limits. For example:
- in urban areas, AT has typically gone for 30km/h limits rather than 40km/h limits, even though MegaMaps has identified 40km/h as being 'safe and appropriate' for the vast majority of roads in question. If public support and/or compliance is an issue, 40km/h limits may be more appropriate while being sufficiently safe.
 - in rural areas, 70km/h and 90km/h limits should be considered as they may be safe and appropriate for the road type, and while currently they can only be put in place with Waka Kotahi approval, as AT will be aware they may soon no longer require approval to be put in place.

Final comments

28. The final comment we'd like to make is to strongly encourage AT to give Aucklanders clarity on speed management plans for the longer term; if AT intends to continue the current approach to speed limit changes (i.e. 80km/h and 60km/h rural roads, and 30km/h in town centres and residential areas) and current pace (approx. 600km/h per year), it should let Aucklanders know.
29. We've noticed that within the consultation material, AT has made comments about its preferences for speed limits – such as that roads in town centres and residential areas are to have 30km/h speed limits. However, these preferences only become clear to Aucklanders when specific proposals are put in front of them.
30. We believe AT should share its intentions with Aucklanders up front, rather than incrementally, so that Aucklanders have an opportunity to debate and comment on the strategic approach rather than only having the opportunity to react to specific proposals to change speed limits on individual roads.

Yours sincerely

Mark Yates
AA Auckland District Council Chair