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SUBMISSION FROM NZAA ON LAND TRANSPORT RULE: TRAFFIC CONTROL DEVICES (KURA/SCHOOL SIGNS) AMENDMENT 2021

1. The NZ Automobile Association (NZAA) appreciates the opportunity to comment on the Land Transport Rule: Traffic Control Devices (Kura/School Signs) Amendment 2021.
2. The NZAA is an incorporated society with over 1.8 million Members. It represents the interests of road users who collectively pay over \$3 billion in taxes each year through fuel excise, road user charges, registration fees, ACC levies, and GST. The NZAA's advocacy and policy work mainly focuses on protecting the freedom of choice and rights of motorists, keeping the cost of motoring fair and reasonable, and enhancing the safety of all road users.

Summary

3. When deciding how the increased use of te reo Māori in New Zealand's road signs can be best achieved, it is imperative that the unique requirements specific to road signs (as a subset of general signage) are respected and accounted for in the finer details of implementation. This may result in decisions made for te reo Māori on road signage being different to those made for te reo Māori on general signage.
4. The AA supports Waka Kotahi's preference for te reo Māori to be in italics as opposed to bold on the bilingual school traffic sign. We also support the introduction of these signs to be aligned with the proposed speed rule changes with the assumption that this does not compromise the usual care, attention and due diligence undertaken around signage changes.
5. We support the introduction of a permanent school speed limit sign, but are concerned that cost discrepancies between a permanent and flashing variable speed limit sign could result in RCA's opting for a permanent speed limit when a variable speed limit would be more suitable.
6. With the proposed removal of 'school zone' warning signs, there must be adequate speed limit signs up at the beginning and ending of the school speed limit changes, to clearly communicate the speed environment to motorists.

Submission

7. This submission is formatted to address a number of specific questions raised in the consultation document, in addition to some general requests relevant to an increase in bilingual signage.

Proposal 1: Making the 'school' traffic sign bilingual

Do you have any feedback on the proposed design of the new Kura School Traffic Sign?

Do you have any feedback on the use of italics or bold to differentiate te reo Māori from English?

8. The consultation document proposes two options for the Kura School traffic sign. One has 'kura' in bold, the other in italics. We support Waka Kotahi's preference for the use of italics to differentiate between the two languages rather than bold, because:
- Waka Kotahi sites the use of bold for te reo Māori could compete with the critical safety message. That is, there is evidence that readers attend to bold type first, meaning the majority of drivers would be at first attracted to the language that will (at least initially) be unfamiliar to them. Whilst the slight delay in comprehension might not matter in general signage, as Waka Kotahi's Research Note 005 *Bilingual traffic signage* states, traffic signage differs from other signage because of the 'unique challenges faced in the roadside context'. For example, traffic signs must 'be identified and understood in a fraction of a second as people glance up from the roadway while driving';
 - Bold font is already in use in destination signage, so would be ineffectual in differentiating the two languages on those signs; and
 - Bold font in regulatory and warning signs would likely result in them needing to be larger, potentially causing complexity and safety concerns.

In your opinion, which of the two options (italic or bold) seems clearer to read and quicker to understand?

9. In our view, it is important that the two languages are distinguishable enough from each other that drivers can quickly locate the language they are most familiar with. We think that the Italics does that most clearly. While it's difficult to tell from just looking at the proposed Kura School traffic signs, the international examples provided in the research and consultation reports provide a clearer picture of how more complex signs would look. However, to accurately assess which is clearer to read, research in the driving context should be used, rather than opinions based on looking at reports.
10. It would also be useful to be able to consider how these decisions will impact on the destination and regulatory signage, as presumably this decision on Kura School traffic signs will set a precedent. If the Kura School traffic signs are to set the style for future signs then it is recommended that focus groups or other forms of market testing be undertaken so that any decision is based on motorist research.

Do you support our proposed approach to align the timing of the Kura School sign with the proposed Speed Rule Changes

11. The AA does support the proposal to align the timing of the Kura School traffic sign with the proposed Speed Rule changes from a financial and resource perspective. Beginning with schools is also a good place to start in terms of the opportunity for exposure to a large number of road users and with national coverage. However, we would not want the process to be rushed in order to align timeframes with the proposed Speed Rule. The usual care, attention and due diligence

around signage must be followed to ensure that decisions made here do not set unhelpful, unsafe precedents for the wider suite of signage categories and the more extensive overall bilingual signage project.

Proposal 2: New permanent school speed limit sign

Do you have any feedback on the proposed design of the new permanent Kura School speed traffic sign?

12. We support the proposal that the sign will not use the smaller 600mm minimum diameter, and will instead have a 750mm minimum diameter with 900mm option for rural schools. We also support the flexibility of providing 30, 40 and 60km/h options for the speed limits.
13. However, we are of the view that in many cases, variable (rather than permanent) limits around schools will be most appropriate. Wherever possible these variable speed limits should be accompanied by flashing electronic signs, particularly in rural settings, where travel speeds are likely to be higher – to help ensure motorists are aware of the reduced speed limits and therefore assist with reducing vehicle speeds. As also covered in our submission on the *Setting of Speed Limits 2021* rule, we are concerned that in some instances, RCAs might opt to implement permanent speed limits even though a variable speed limit would be better suited, because of the cost of flashing electronic signs.

Proposal 3: Changes to existing signs

Do you have any feedback on the proposed removal of 'School Zone' from existing traffic signs?

14. We don't disagree with the removal of 'school zone' from existing traffic signs, subject to there being adequate signage (and, if speed limit is permanent, other appropriate infrastructure treatments as necessary) to communicate any speed limit changes both at the entry and exit points where speeds are lowered around the school.

Do you have any feedback on the proposed changes to the two existing school variable speed limit signs?

15. Change to R1-6 sign: In addition to the replacing 'Zone' with 'Kura' the proposal shows a change from the yellow corner lights flashing to a flashing red roundel. It is not clear from the consultation document, but we are assuming that this decision has been made previously outside of this rule change, and/or has been based on road user behaviour research to determine its effectiveness.
16. Change to R1-6.1 sign: The way it is portrayed shows the text for the hours of operation being smaller with the proposed change. We seek assurance that the font size still meets minimum safety/signage standards as this information is important to road users in order to comply with the speed limits at the times they are in place.

Proposal 4: Removal of warning signs

Do you have any feedback on the proposed removal of the three warning signs?

17. In the absence of 'school zone' warning signs, there must be adequate speed limit signage (and, if speed limit is permanent, other appropriate infrastructure treatments as necessary) to clearly communicate any speed limit changes both at the entry and exit points where speeds are lowered around the school.

Do you have any feedback on the removal of the school zone option for the symbolic warning – active flashing light sign?

18. We agree with the removal of this sign as W19-2.1 sign remains an alternative.

Communication and Evaluation

Communication

19. The consultation document mentions that when new or amended traffic signs are implemented the 'familiarity' and 'standardisation' principles of effective traffic signage are temporarily breached. It goes on to say this can be mitigated with pre-implementation communications and engagement so that they're less surprising and more familiar to road users when they first see them.
20. In addition, Waka Kotahi's Research Note 005 *Bilingual traffic signage* concludes that effective implementation of bilingual signage needs 'targeted communication, education and engagement to successfully transition the public'.
21. Our expectation is that Waka Kotahi will engage adequately and appropriately with the public prior to these signs being introduced.

Monitoring

22. Waka Kotahi's Research Note 005 *Bilingual traffic signage* concludes that an effective implementation of bilingual signage needs 'ongoing monitoring to determine the effects of any new sign designs, as well as to close the research gaps that were identified in the overseas cases'. Our expectation is that Waka Kotahi will monitor the effects of these signs to help feed into the wider bilingual signage project.

Further information

23. The NZAA will be pleased to provide any further comment as appropriate. Please contact Simon Douglas (contact details below).

Yours sincerely



Simon Douglas
National Manager Policy & Research

E: s 9(2)(a)

M: s 9(2)(a)