

15 June 2017

Setting of Speed Limits Rule [2017]  
Rules Team  
NZ Transport Agency  
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**Via email:** rules@nzta.govt.nz

To the New Zealand Transport Agency Rules Team

### **Land Transport Rule: Setting of Speed Limits 2017**

Thank you for the opportunity to comment on the New Zealand Transport Agency's (NZTA) proposed *Land Transport Rule: Setting of Speed Limits [2017]* (the Rule).

The Royal Australasian College of Surgeons (RACS) is the leading advocate for surgical standards, professionalism and surgical education in New Zealand and Australia. RACS is a not-for-profit organisation that represents more than 7000 surgeons and 1300 surgical trainees and International Medical Graduates. As part of its commitment to standards and professionalism, RACS strives to take informed and principled positions on issues related to surgical care in New Zealand. Many Fellows of the College see the effects of road safety issues on a regular basis and in the case of trauma surgeons, almost daily. As such, this consultation has been of interest to both RACS' New Zealand Trauma Committee and its wider Australasian Trauma Committee.

RACS' trauma committees are committed to improving the management of trauma, as well as preventing and mitigating injuries where possible. One component of this is advocating for improvements in road safety, particularly with regards to recognising the major role that speed plays in the causation of road trauma.

Generally speaking, RACS supports the intent of the proposed Rule and its goal of a sustained reduction in deaths and serious injuries on New Zealand roads. RACS agrees that it is appropriate that New Zealand's procedures for assessing safe speeds are updated to reflect advances in methodology and that ambiguous elements from the 2003 Rule are clarified to avoid the inconsistent application of speed limits across the country. There are, however, some elements of the proposed Rule that RACS does not support – namely, the provision of a 110km/h speed limit, and changes with regards to repeater speed limit signage.

RACS does not have any specific comments on proposals 1, 5, 6 and 7. Our feedback on proposals 2, 3 and 4 are provided as follows:

#### **Proposal 2: Enable the setting of a 110km/h speed limit on roads where it is safe and appropriate to do so**

RACS considers the proposal to establish a 110km/h speed limit to be the most significant element of this consultation and has serious concerns as to the negative impact it may have on New Zealand's road users in return for what we consider to be very little gain. While we acknowledge that the proposed 110km/h speed limit is only intended to initially apply to a small portion of our "very best roads", we still believe that this increase poses an unacceptable risk and will have a detrimental effect on the way our wider road network is used in general.

One of RACS' primary objections to the proposed speed limit arises from the clear correlation between speed and severity of trauma in road accidents. While we understand that the roads which have been identified in the consultation as appropriate for the 110km/h limit have been engineered with high speeds in mind and feature design choices to limit the likelihood of an accident, we still do not believe that such measures adequately mitigate the risk of introducing this higher speed limit. At 110km/h there will be an even greater variation in speed between heavy vehicles restricted to 90km/h and other road users, along with motorists having less time

to react to changing conditions than they would have had travelling at 100km/h. Where an accident does occur at such a high speed, we would anticipate the resulting trauma to be severe.

A further concern is that the impact of the increased speed limit will not just be limited to the small number of roads currently identified in the consultation document. On page 16 of the consultation overview, the document states that “at higher speeds drivers have trouble differentiating speed differences of just 10km/h”. We recognise that this statement refers to the gradual removal of 70km/h and 90km/h categories; however, we believe that the same logic applies to the proposed 110km/h category. Our concern in this regard is that road users will inadvertently continue to travel at 110km/h when returning to roads even less suited for this higher speed limit.

When one considers that there will only be a relatively small decrease in travel time for road users, RACS believes that there is insignificant justification for this increased speed limit and therefore cannot support this proposal. If the NZTA elects to continue with this proposal, RACS would urge caution and recommends that the impact of its introduction be closely monitored.

### **Proposal 3: Allow for a more flexible, efficient and outcomes-based approach to the requirements for permanent repeater speed limit signs**

Under this proposal, Road Controlling Authorities (RCA) will no longer be required in certain circumstances to place repeater speed limit signs every 2-3kms. According to clause 9.2(2), this will apply where the nature of the road is such that a user would understand that the speed limit displayed on the last sign remains the speed limit throughout the length of the road and where the mean operating speed is measured as less than 10% above the speed limit for that length of road. As justification for this proposal, the consultation document cites repeater signs as being cost-ineffective in some instances for RCAs, particularly on roads where their speed is “self-explaining” to drivers.

RACS does not believe that this is an appropriate justification for what will ultimately result in the number of signs reminding road users of the speed limit being reduced. Repeater signage does not just serve as an indicator for the speed limit on a length of road, but also as an explicit and clear reminder for motorists to check that they are travelling at or below the maximum safe speed. We do not agree that this essential role can be performed to the same degree by a “self-explaining” road, even where the mean operating speed is below the speed limit.

While RACS welcomes the broad range of options available to RCAs in the Speed Management Guide to help convey information to drivers such as road marking and road-edge markers, we believe that these should always be used as a supplement to, rather than a replacement for, repeater signage. RACS therefore does not support this proposal.

### **Proposal 4: Enable an RCA to set emergency speed limits on roads directly and indirectly affected by an emergency**

RACS believes that enabling an RCA to set a lower speed limit in an emergency situation is a positive and pragmatic proposal. It is essential for the safety of road users that where an emergency causes an unexpected increase in a road's traffic volume or otherwise renders the road unsafe for its original speed limit that RCAs are able to rapidly respond to speed management concerns. We therefore support the introduction of such a mechanism on the basis that it can only be used in emergencies to set a speed limit that is lower than the road's original speed.

RACS appreciates the opportunity to comment on this important consultation and hopes that the final version of the *Land Transport Rule: Setting of Speed Limits [2017]* will help to make all users safer on New Zealand's roads.

Yours sincerely



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Chair, RACS New Zealand Trauma Committee