



**CYCLING
ACTION
NETWORK**
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Re: Review of NZTA's Speed Management Framework

We know that lower traffic speeds are safer for all road users, and especially active transport users. The Cycling Safety Panel's final report makes the following recommendations in relation to the setting of traffic speeds in New Zealand¹:

- "Ensure the needs of cycling are considered in the implementation of the Safer Speeds Programme"
- "Reduce speeds around key destinations e.g: schools, shops, community facilities"
- "Use reduced speeds to reduce risks where infrastructure treatments not yet possible"

NZTA is revising the New Zealand Speed Management Framework and Speed Limit Setting Rules. A final draft of the Speed Management Framework has recently been issued, however the following concerns have been identified:

1. The objectives of the draft Speed Management Framework are narrow and conflicting, ie... "*reduce the risk of death and serious injury, while supporting overall economic productivity*" (pg 5). The approach of 'balancing' safety with economic productivity violates the Ethics principle of Vision Zero road safety²: "Human life and health are paramount and take priority over mobility and other objectives of the road traffic system". Furthermore, it overstates the ability of the posted speed limit to generate a high throughput of motor vehicles; which is typically more influenced by the intersections, traffic lights, traffic congestion, road works, crashes, slow moving vehicles, etc.

The narrow objectives of the draft Speed Management Framework fail to recognise the wider significant benefits of lower traffic speeds, such as:

- (a) attracting people to walk & cycle; as specifically sought by the recent Cycling Safety Panel recommendations
- (b) place making and liveability
- (c) reducing transport emissions (eg: CO₂, noise, particulate matter and toxins)
- (d) enhancing network efficiency and providing greater travel time reliability for motor vehicles users.

¹ Safer Journeys For People Who Cycle (December 2014), extracts are from pg 13

² "Sweden's Vision Zero: no fatalities or serious injuries in road traffic". World Health Organisation.

2. It requires roads to be "used frequently by pedestrians and cyclists" (p. 9) before lower speeds are considered. Thus the stalemate: few people cycle because the traffic is too fast, the speed limit is not reduced because there are few cyclists.

Apart from the limited situations of CBD/town centres and shared space zones, where an existing "high" concentration of cyclists or pedestrians is required (Tables 4.1 and 4.2), there is no specific consideration of cyclists. This does not appear to be in keeping with the recommendation of the Cycling Safety Panel's final report to "ensure the needs of cycling are considered".

3. The adoption of the One Network Rooding Classification (ONRC) is inappropriate because the ONRC method of classification assumes that there is safe provision for walking and cycling. The footnote on page 11: "Over time safer provision will be made for people who cycle these routes" is unacceptably vague and is key reason for reducing traffic speeds until the safer provision has been provided.
4. The use of KiwiRap and the Infrastructure Risk Rating (IRR) to guide the speed management process do not meet the needs of active transport users. Active transport users have critical requirements (such as shoulders, low speed differentials or dedicated provision) that get lost in the complex and abstract formulations of the KiwiRap and the IRR which encourage "conventional³" street design⁴ and generate simplistic results (eg: 3 stars or "High") which focus on the safety of motor vehicle users. They do not sufficiently take into account the needs of active transport users.
5. There is a requirement for a significant number of casualties before lower traffic speeds are considered for implementation. This could be considered immoral. And it creates another stalemate: active transport users respond to fast traffic by no longer walking or cycling, hence there is a low number of cyclists or pedestrians being killed or injured – this low rate of casualties is used as justification not to implement safer speeds for cyclists or pedestrians.
6. The worked examples in the draft Speed Management Framework show that active transport users are not considered in the speed management process.

Overall, the draft Speed Management Framework regards lower speeds as only to be implemented as a last resort measure if there is a high crash rate or major land use change. The Framework does not pick up on the international trends of proactively adopting lower urban and rural traffic speeds for the broad range of benefits they provide.

The Framework is largely silent on meeting the needs of vulnerable users, such as pedestrians, mobility users, and cyclists. Hence it fails to meet the Safe System requirement to adequately consider needs of all users and their safety.

³ "Conventional street design is founded in highway design principles that favor wide, straight, flat and open roads with clear zones that forgive and account for inevitable driver error. This is defined as "passive" design. In recent years a new paradigm has emerged for urban streets called proactive design. A proactive approach uses design elements to affect behavior and to lower speeds. Embracing proactive design may be the single most consequential intervention in reducing pedestrian injury and fatality." USA's NACTO Urban Street Design Guide Overview, 2012.

⁴ 'If you design streets like gun barrels, then people will drive like bullets' - Ian Lockwood, US Transport Planner

Hence, we seek changes to the draft Speed Management Framework, in particular:

- a) Recognising the wide range of benefits of lower traffic speeds (this includes: more liveable cities, increased transport choice, reduced emissions, reduced casualties, improved flow and network reliability);
- b) Ensuring the needs of vulnerable transport users are considered for all roads, without requiring a significant number of casualties before reducing speed limits;
- c) Adopt the best practice learnings from the leading nations for road safety, where 30 and 40 km/h on urban roads, and 60 and 80 km/h on rural roads have widely implemented. Make it easier to implement low cost traffic calming measures, such as raised table pedestrian crossings, which have the dual benefit of calming traffic and improving walkability;
- d) Actively consult with user groups representing vulnerable road users;
- e) Prioritise safety of users first. Per the principles of Vision Zero, road function and traffic throughput must be secondary considerations. Adopt the recommendations of the Cycling Safety Panel's final report as outlined in the introduction above;
- f) Rather than trying to change public opinion to accept lower speed limits whilst seeking to establish nation-wide consistency of speed limits (that are typically too high), NZTA should simply be freeing up the rules to make it easier for the 'early adopter' RCA's to implement and demonstrate that lower speeds are the way of the future. Over time the other RCA's around the country will follow. This has been how speeds have been made safer in the countries with the safest roads.

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