



**la Ara Aotearoa Transporting New Zealand's response to Land Transport Rule;
Traffic Control Devices (Kura/School Signs) Amendment 2021
4 November 2021**

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1. Representation

- 1.1 Ia Ara Aotearoa Transporting New Zealand (Transporting New Zealand) is made up of several regional trucking associations for which Transporting New Zealand provides unified national representation. It is the peak body and authoritative voice of New Zealand's road freight transport industry which employs 32,868 people (2.0% of the workforce), and has a gross annual turnover in the order of \$6 billion.
- 1.2 Transporting New Zealand members are predominately involved in the operation of commercial freight transport services both urban and inter-regional. These services are entirely based on the deployment of trucks both as single units for urban delivery and as multi-unit combinations that may have one or more trailers supporting rural or inter-regional transport.
- 1.3 According to Ministry of Transport research (National Freight Demands Study 2018) road freight transport accounts for 93% of the total tonnage of freight moved in New Zealand.

2. Introduction

- 2.1 Transporting New Zealand comments on the Kura /school signs is focused on the Amendment Rule Overview as opposed to the amendment rule itself. We have taken the Overview cover reference *Overview for consultation* as guidance for the discussion on the proposed changes.
- 2.2 Where appropriate, we will use as references to our comments the relevant page numbers and paragraph headings of the overview.

3. Substantive comments

- 3.1 We understand that by simple observation there are many signs and destinations on the network where the Māori place names are used as opposed to any attempt to anglicise these. They have been fully accepted without any comment, having become part of the everyday language. Furthermore, we note the Overview makes the point there are low numbers of bilingual signs (Page 6) and the proposed change is an early and relatively simple opportunity to introduce another additional bilingual sign into common usage. It's probably an ideal stepping stone because we would expect most motorists to be familiar with the standard school signs and the safety and accompanying speed management considerations that they imply, due to the movement and density of children in the vicinity of any school environment.
- 3.2 We note the discussion (page 7) to advance the use of te reo Māori and the school traffic signs provide an opportunity to take this initiative further. The fact this overview is dealing with only one sign shows that this first step is a very tentative one, even taking into account the context that this amendment is bound by i.e. the

Traffic Control Devices Rule, and the legislative framework that underpins the rules amendment process. This initial step toward bilingual signage, and the process around the introduction of this single sign, raises the question whether this approach is sustainable when considering the concept of bilingual signage in its entirety.

4. An alternative approach

- 4.1 Our suggestion to overcome this complex amendment process to advance bilingual signs is as follows. Once the text style and format, display style, and sign colour features such as borders have been determined for this particular sign (which interestingly seems to cover all three purposes or functions e.g., Regulatory, Warning and Advisory as set out on page 6), it should be relatively easy to provide in the body of the Rule a provision that enables specified characteristics for bilingual signs that can be used where appropriate, without the necessity of going through a formal consultation process. This would appear a particularly useful approach given the possibility of more te reo Māori on traffic signs across New Zealand over the coming years, a point made at the top of page 8.
- 4.2 We appreciate the approach we have suggested is outside of the scope of this consultation phase, but it seems an infinitely more sensible approach than carrying out repetitive consultations on what is essentially the same sign context. It's not as if the te reo Māori version, or te reo duplicate language display, is trying to convey something different than the New Zealand English sign examples set out in the Traffic Control Devices Rule.

5. International experience with bilingual traffic signs

- 5.1 The discussion on the international experience in the Overview (page 8/9) is a useful back drop of evidence that probably answers most concerns, especially the typical safety concerns that are likely to be raised by commentators.
- 5.2 It is possible for some individuals their acuity and responsiveness could be impacted by the bilingual signage but, as Waka Kotahi has found, there is little evidence to support any deterioration in safety or the safety responses of motorists.
- 5.3 Most drivers we assume would fleetingly cast an eye over the sign and respond accordingly. However, we would agree text clarity is of the utmost importance, especially around school environs.
- 5.4 On balance, most of the new Kura signs are going to be on local roads and we would expect the majority of drivers would be familiar with the territory around the school anyway, and also largely familiar with pedestrian patterns and traffic controls in place at the relevant school start and closure times. It could be argued any potential reduction in safety is likely to be so small it can't be adequately quantified.
- 5.5 Publicity is most likely to overcome an unfamiliarity with the change in the sign, but even this is perhaps something of an over emphasis given the standard school sign will still be obvious.

6. What changes are proposed?

- 6.1 This section **proposal 1** (page 11 onwards) discusses the various formats and text and format considerations of the new signage. Although there is some discussion on the text style Italic or bold, Table 1 (page 13), the research findings tend to guide our view more toward the bold text. The Table 2 (page 14) assessment also tends to favour the bold text approach.
- 6.2 Interestingly, on a pure visual basis, the italic text looks more in keeping with the intentions behind this sign change.
- 6.3 We note Waka Kotahi favours the italic version and the discussion points out the balance between italics and bold is finely weighted.
- 6.4 On a purely analytical approach, bold appears best, but when all the display forms are considered in the overview diagrams, along with additional displays and advisory signs, italics win out.
- 6.5 In summary we would support the use of italics.
- 6.6 In many ways we have answered the series of questions one to three on page 15. These changes are expected to have little impact on our members and in response to question 5, we would support aligning the timing of the Kura sign with the proposed speed changes.

7. Design elements

- 7.1 We support the retention of the present design elements. This is an important step to maintaining the integrity of the sign and conveying its meaning and context to road users.
- 7.2 This approach supports the need to maintain some level of continuity, thereby reducing any likelihood of misunderstandings of the meaning or intention of the sign.

8. Proposal 2 - Speed limit sign

- 8.1 The example shown new R1-6.2 uses an italicised *KURA* which is interesting and, in our view, the correct approach given the earlier discussion on bold versus italics.
- 8.2 We support the new permanent Kura school speed traffic sign.

9. Proposal 3 - Changes to existing signs

- 9.1 We support the design changes proposed on pages 17/18 and have no additional comments on the three questions listed on page 18.

10. Proposal 4 - Removal of warning signs

- 10.1 We have no concerns about the removal of the existing series of signs as there are new ones that offer the similar advice to road users.

11. Concluding comments

- 11.1 The wider use of te reo Māori in the road safety environment is an interesting initiative that should be supported, particularly when the New Zealand English translations are retained as with the signs that form part of this review.
- 11.2 The model presented is not materially different from other jurisdictions that provide bilingual road signage, or multi lingual signage, which suggests to us the move to bilingual signage is in step with international convention.