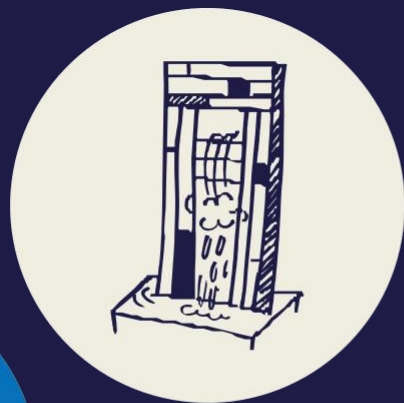


HAMILTON CITY COUNCIL SUBMISSION

Land Transport Rule: Traffic Control Devices (Bilingual Signs) Amendment 2023 - Draft for Consultation

Waka Kotahi NZ Transport Agency



30 June 2023



**Hamilton
City Council**
Te kaunihera o Kirikiriroa

Improving the Wellbeing of Hamiltonians

Hamilton City Council is focused on improving the wellbeing of Hamiltonians through delivering to our five priorities of shaping:

- **A city that's easy to live in**
- **A city where our people thrive**
- **A central city where our people love to be**
- **A fun city with lots to do**
- **A green city**

The topic of this submission is aligned to the priority '**A city that's easy to live in**'.

Council Approval and Reference

This submission was approved by the Chair of Hamilton City Council's Infrastructure and Transport Committee on 30 June 2023.

Hamilton City Council Reference D-4751867 - Submission # 739.

Key Messages and Recommendations

1. Overall, Hamilton City Council is supportive of the provisions outlined in the **Land Transport Rule - Traffic Control Devices (Bilingual Signs) Amendment 2023 - Draft for Consultation**.
2. We support the introduction of te reo Maaori on traffic signs provided safety is maintained. The safety importance of traffic signs is maintained by retaining the internationally recognised fonts for the English text parts of bilingual signs, as is proposed.
3. Promoting te reo Maaori on traffic signs is safe and appropriate if the te reo Maaori text is quickly and easily read, and for this reason we **strongly support the use of Title Case text for te reo Maaori on all traffic signs**. The lower-case font proposed for te reo Maaori on some sign families is significantly more easily read than the capital case font on others. Title Case text makes the entire sign more easily interpreted at first glance.
4. We submit that the current and proposed signs are not shown to scale, so the correct size and scale of the proposed changes are misrepresented in the consultation document.
5. We submit that many of the signs are supplementary signs and never seen isolated from their primary sign as the consultation document portrays, so the full implications of the proposals on the complete sign set is misrepresented.
6. We submit that the implication that costs associated with the proposals will be minimal does not reflect that most bilingual sign replacements will need larger poles (sometimes two), increased foundations (sometimes requiring specific engineering design), and larger brackets compared with the current signs.
7. We submit that the consultation document is incorrect in stating dual language rural threshold signs were approved in 2018 (page 20). The consequence of the proposals will mean left side rural threshold signs on the network will be inconsistent, confusing road users, and existing left side signs will be non-compliant with the proposed Rule.
8. We submit that the statement that *“there would be a significant cost increase to implement the dual approach for temporary signs option”* (page 32) is without evidential base. 30-50% of temporary warning signs are replaced each year, and the 42 bilingual signs in this proposal are a small proportion of the temporary warning sign family.
9. **The nature of the consultation document means the full implications of the proposals will not be understood by the public and submitters.**
10. We note the Waikato-Tainui preference to use double vowels instead of macrons.
11. We submit that it is an inappropriate burden for Road Controlling Authorities to be responsible for the correct display of localities on traffic signs when the correct names are not available from New Zealand Geographic Board Ngā Pou Taunaha o Aotearoa, which is responsible for providing them.
12. We submit that Bilingual destination and wayfinding signs should not be introduced into Aotearoa until the New Zealand Geographic Board Ngā Pou Taunaha o Aotearoa has confirmed official te reo Maaori place names for most key locations across Aotearoa.
13. We submit that the proposed TCD Rule should require only the use of officially recognised te reo Maaori place names on traffic signs.
14. We strongly disagree with the use of the ‘one series up’ method using capitals for general advisory and permanent warning signs. Specifically, permanent and temporary warning signs are fundamentally the same family, so there is no logic for these proposals to have te reo Maaori on one using upper case and te reo Maaori on the other using lower case (Title Case).

15. We submit that the legibility of all future bilingual permanent warning signs should not be compromised by the previously made incorrect decision for the single Kura/School sign, and we submit that this decision should now be corrected so that all new Kura/School signs be incorporate Kura in Title Case for legibility and consistency.
16. We strongly disagree with the use of the 'one series up' method using capitals for motorway and expressway advisory signs. We strongly support the use of using sentence case for motorway and expressway signs, which enables colour to be utilised as the method of differentiation.
17. We disagree with different te reo Maaori versions of Aged and Funeral signs on the network as it removes consistency which is one of the fundamental principles of traffic control devices and introduces confusion for road users.
18. We support the advice of the contracting industry that, generally, the bilingual temporary warning sign proposals are impractical, excessive and will be very expensive for the industry, Councils, and the community. We submit that the dual approach to temporary warning signs is a far more practical solution for providing te reo Maaori on temporary warning signs.

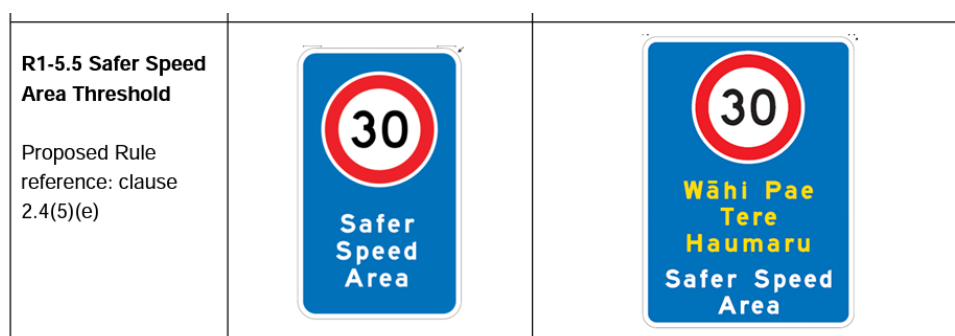
Introduction

19. Hamilton City Council welcomes the opportunity to make a submission to Waka Kotahi NZ Transport Agency's **Land Transport Rule - Traffic Control Devices (Bilingual Signs) Amendment 2023 - Draft for Consultation**.
20. Hamilton City Council stresses it is generally supportive of the philosophy of bilingual signs in Aotearoa and welcomes their introduction as and where appropriate. The significant criticism in this submission is primarily focused on the consultation documentation and inaccurate, and sometimes untrue statements it contains.
21. We support the introduction of te reo Maaori on traffic signs provided road safety is maintained. The road safety importance of traffic signs is maintained by retaining the internationally recognised fonts for the English text parts of bilingual signs, as is proposed.
22. Promoting te reo Maaori on traffic signs is considered safe and appropriate if the te reo Maaori text is quickly and easily read, and for this reason we strongly support the use of 'Title Case' text for te reo Maaori on all traffic signs. The Title Case text that incorporates lower-case font proposed for te reo Maaori on some sign families in this proposal is significantly more easily read than the capital case font on other families. Title Case text makes the entire bilingual sign more easily interpreted and understood at first glance.

Misrepresenting Consultation Documents

i. Sign Sizes and Replacement Costs

23. We submit that there is no mention of the often-significant increase in size of the te reo Maaori versions of the signs. The current and proposed examples are mostly not shown at the same scale. For example, this set of signs is shown in the consultation documents like this:



... should look like this at the correct size and scale:





24. We submit that these size differences will have significant implications for safely locating these signs on the roadside, and for the cost of foundations, post numbers and post sizes to accommodate weight and wind loadings.
25. We submit therefore that te reo Māori signs will generally not be a simple replacement of existing signs when they are due for replacement. Generally, not only will the replacement signs be larger and more expensive (\$430 instead of \$240 for the above sign), the larger signs also require larger poles, sometimes two as in the above example, increased installation costs for the required new foundations (some requiring specific engineering design) for the replacement larger/multiple poles, and the greater pole size requires larger size sockets and mounting brackets.

ii. Dual Rural Threshold Signs

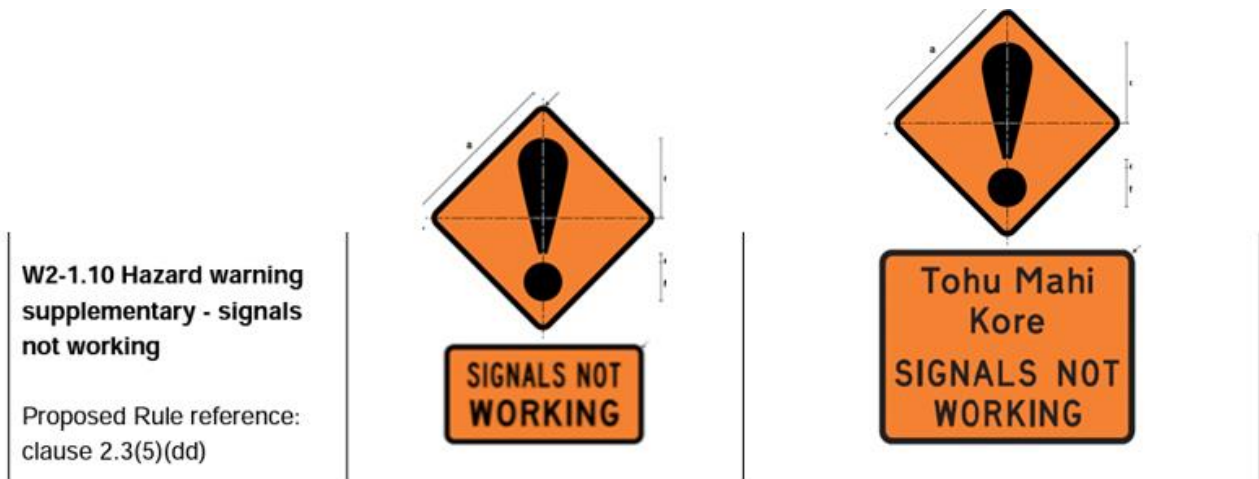
26. The consultation document is incorrect regarding the statement on page 20 that the dual approach for rural threshold signs was approved in 2018. Dual language versions of rural threshold signs have never been officially approved as this would require the sign format to be included in the TCD Rule, which is only being proposed now (note the statement on page 34 “*This is a new sign in the TCD Rule*”). Currently the English versions of this regulatory speed limit sign, complying with the current requirements of the TCD Rule R1-5.2 Rural Threshold, are displayed on the left-hand side ensuring the speed limits at these locations can be legally enforced.
27. The proposal to locate the English version of the signs on the right-hand side will mean all the existing English versions of the signs located on the left-hand side will no longer be legally enforceable (they are a regulatory speed limit sign) as they will not comply with the Rule. The consultation document is misleading as it does not detail that all existing, and currently complying, English language rural threshold speed limit signs will become non-compliant under the proposals and have to be moved to the right-hand side, with complying te reo Māori versions located on the left-hand side. Allowing existing English signs to remain on the left is not safe or appropriate as it will introduce significant inconsistencies for a key regulatory sign, where some dual language speed limit signs will be left/right and others will be right/left, confusing road users and compromising enforcement.

iii. Implications for Complete Sign Sets

28. Most of the warning signs included in the proposal show just the supplementary element of a sign set, and do not show the implications when combined with the primary warning sign. For example, this supplementary sign proposal:

| | | |
|--|---|---|
| <p>W2-1.10 Hazard warning supplementary - signals not working</p> <p>Proposed Rule reference: clause 2.3(5)(dd)</p> |  |  |
|--|---|---|

...should look like this in the correct size and scale, and including the required primary signs as they will be used on the network:



When the full sign set is correctly portrayed, the full implication of the proposals become clear, including that the above sign set increases from 1.5m tall to almost 2m tall. The industry has advised us that each sign will have to have bespoke stands to fit the new sign sizes, and indicated that the entire unit will now require replacement instead of supplementary signs only.

Use of Macrons

29. We note the Waikato-Tainui preference to use double vowels instead of macrons. The proposals specifically exclude this for permanent and temporary warning signs, and the motorway and expressway advisory sign families which are fully specified in the proposed TCD Rule amendment.

Use of Title Case

30. We strongly support the use of Title Case lettering on all signs as there is clear evidence that lower case font is easier to read. Our 17 December 2021 submission to the **Land Transport Rule: Traffic Control Devices (Kura/School Signs) Amendment 2021 (Proposed Rule)** sign change proposal ([refer here](#)) stated:
- i. *“Hamilton City Council agree with the idea of including Te Reo on this signage but recommend that it be in Title Case (rather than CAPITALS) as is illustrated in the examples within the consultation document (and below). We believe this will better facilitate future expansion of Te Reo across other road signs in a consistent manner.”*
 - ii. *“Hamilton City Council recommend that italics (Title Case) is the better way to highlight the Te Reo section of the sign - bold is just too similar and/or there is also the risk of the bold text being too visually overpowering/distracting. It also reflects the approach being used elsewhere in the world for bi-lingual signage.”*

- iii. *“Hamilton City Council considers that italics is the easiest way to differentiate between Te Reo and English but recommend that Te Reo be in Title Case as this style is easier to read and as the Te Reo words are (at the moment) less recognised, they should be in the easiest format to read by the public.”*
31. The proposals are inconsistent in this regard as temporary warning signs are proposed using Title Case for te reo Maaori, but permanent warning signs are proposed using upper case te reo Maaori. For example, the te reo Maaori for “SLOW WHEN WET” would have upper case font on the yellow permanent warning sign but lower-case font on the orange temporary warning signs. There is no logic to this, and the difference introduces inconsistency on the network which is inappropriate considering the required importance of these warning signs.
32. We support that bilingual signs promote te reo Maaori provided that the safety importance of traffic signs isn’t diminished. We submit that the safety importance of traffic signs is maintained by retaining the internationally recognised capital case font for the English text. We submit that promoting te reo Maaori in traffic signs is safe and appropriate if the sign text is quickly and easily read. The lower-case fonts proposed for te reo Maaori on the orange temporary warning signs is significantly more easily read than the capital case proposed for the yellow permanent warning signs.
33. We recommend all bilingual permanent warning signs have Title Case for te reo Maaori for consistency with temporary warning sign proposals, and to reduce the size of the proposed bilingual warning signs. This approach is also supported by the international examples shown in the proposal on page 11.
34. We acknowledge the Kura/School sign has already been approved using capital case font for KURA, which was the wrong decision for the reasons we have detailed above, and we submit that this decision should now be corrected so that all new Kura/School signs be incorporate Kura in Title Case (already erected capital case font signs could remain with little consequence). We submit that the legibility of all bilingual permanent warning signs should not be compromised by the incorrect decision made for the single Kura/School sign.

Official Te Reo Maaori Place Names

35. It is noted on page 14 of the proposal that *“naming of places is the responsibility of the New Zealand Geographic Board Ngā Pou Taunaha o Aotearoa.”* We note that very few New Zealand te reo Maaori place names are listed on the New Zealand Geographic Board website. We also note on page 21 *“Where there is no official name, an unofficial name can be used. Road Controlling Authorities are responsible for correctly displaying localities on traffic signs.”*
36. We submit that it is an inappropriate burden for Road Controlling Authorities to be responsible for the correct display of localities on traffic signs when the correct names are not available from New Zealand Geographic Board Ngā Pou Taunaha o Aotearoa which is responsible for providing them.
37. We submit that Bilingual destination and wayfinding signs should not be introduced into Aotearoa until New Zealand Geographic Board Ngā Pou Taunaha o Aotearoa has gone through the process of confirming official te reo Maaori place names for the majority of localities for Road Controlling Authorities to use on traffic signs, and has a quick and robust process for providing Road Controlling Authorities for official te reo Maaori place names if not already listed.
38. We submit that the proposed TCD Rule should require only the use of officially recognised te reo Maaori place names of traffic signs, to remove the inappropriate burden on Road Controlling Authorities to determine the correct te reo Maaori names for destination signs. We note that some te reo Maaori place names have been covered up on signs around lake Taupo due to local disagreement on the correct te reo Maaori place names. The correct names should be only provided by New Zealand Geographic Board Ngā Pou Taunaha o Aotearoa as the single source of

accurate information, and not be the responsibility of individual Road Controlling Authorities to resolve.

Proposal 1: Destination Signs

39. **Q1: Do you think that destination family of signs present a good opportunity to achieve the goal of incorporating more te reo Māori onto Aotearoa New Zealand’s transport network?**
40. Yes.
41. **Q2: What are your thoughts on the use of colour to differentiate te reo Māori and English text on the destination family of signs?**
42. We strongly support the use of Title Case lettering on all signs as there is clear evidence that lower case font is easier to read, and we also strongly support the use of colour to differentiate the te reo Maaori on destination signs.
43. **Q3: Do you have any other feedback on the designs of this overall family or individual signs? Please see Annex 1 and reference any individual signs where applicable in your response.**
- i. The Wellington example of the dual rural threshold sign R1-5.2 Rural threshold (Option A) Proposed Rule reference: clause 2.4(5)(b) shown on pages 18 and 34 is incorrect as it does not include Te Whanganui-a-Tara in yellow font as the te reo Maaori version of Wellington. The sign would be significantly larger if it correctly included all the bilingual text and was shown in the correct size and scale.
 - ii. We submit that Huri Mauii and Ara Mauii on signs A11-1 Advanced direction – word message - Proposed Rule reference: clause 2.4(5)(jjj) and A12-1 Advanced lane designation – word message - Proposed Rule reference: clause 2.4(5)(nnn) are in Title Case for improved legibility. The lower-case font proposed for te reo Maaori on other sign families is significantly more easily read and makes the sign more easily interpreted at first glance.
44. **Q4: Do you think that the dual sign option is a suitable way to display both te reo Māori and English messaging on Aotearoa New Zealand’s transport network? Can you explain why or why not?**
45. Yes, the dual sign option is preferred as the signs are smaller than the equivalent bilingual ‘Welcome To’ option. However, we **disagree** with the proposal to have the te reo Maaori on the left (refer to our comments in “Dual rural threshold signs” above). This would require all the existing versions of these signs on the network to be changed or they will not comply with the new TCD Rule. These signs are regulatory speed limit signs and must be erected in accordance with the TCD Rule for the speed limit change to be legally enforceable. All existing signs around Aotearoa have the Rule complying English version on the left-hand side, and the proposal would mean they would become inconsistent, non-complying and unenforceable with the new Rule.

Proposal 2: Public and Active Transport Signs

46. **Q5: Do you think that the public and active transport family of signs present a good opportunity to achieve the goal of incorporating more te reo Māori onto Aotearoa New Zealand’s transport network?**
47. Yes.

48. **Q6: What are your thoughts on 9 recognize the one series up method to differentiate te reo Māori and English text on the public and active transport family of signs?**
49. We **disagree** with the one series up method to differentiate the languages. We submit that the safety importance of traffic signs is maintained by retaining the internationally recognised capital case font for the English text. We submit that promoting te reo Maaori in traffic signs is safe and appropriate if the sign text is quickly and easily read. The lower-case font proposed for te reo Maaori on other sign families is significantly more easily read and makes the sign more easily interpreted at first glance.
50. **Q7: What are your thoughts on the use of colour to differentiate te reo Māori and English text on the bus and coach stop signs?**
51. We strongly support the use of Title Case lettering on all signs as there is clear evidence that lower case font is easier to read, and we also strongly support the use of colour to differentiate the te reo Maaori on the bus and coach stop signs.
52. **Q8: Do you have any other feedback on the designs of this overall family or any individual signs? Please see Annex 2 and reference any individual signs where applicable in your response.**
53. No.

Proposal 3: Walking and Cycling Wayfinding Signs

54. **Q9: Do you think that the walking and cycling wayfinding family of signs present a good opportunity to achieve the goal of incorporating more te reo Māori onto Aotearoa New Zealand's transport network?**
55. Yes.
56. **Q10: What are your thoughts on using colour to differentiate te reo Māori and English text on the walking and cycling wayfinding family of signs?**
57. We strongly support the use of Title Case lettering on all signs as there is clear evidence that lower case font is easier to read, and we also strongly support the use of colour to differentiate the te reo Maaori on the walking and cycling wayfinding family of signs.
58. **Q11: Do you have any other feedback on the designs of this overall family or any individual signs? Please see Annex 3 and reference any individual signs where applicable in your response.**
59. Refer to our comments regarding te reo Maaori place names above – we submit that the proposed TCD Rule should require only the use of officially recognised te reo Maaori place names on traffic signs to remove the inappropriate burden on Road Controlling Authorities to determine the correct te reo Maaori names for destination signs. The correct names should be only provided by the New Zealand Geographic Board Ngā Pou Taunaha o Aotearoa as the single source of accurate information, and not be the responsibility of individual Road Controlling Authorities to resolve.

Proposal 4: General Advisory and Permanent Warning Signs

60. **Q12: Do you think that the general advisory family of signs present a good opportunity to achieve the goal of incorporating more te reo Māori onto Aotearoa New Zealand's transport network?**
61. Yes, but we submit the design principle applied is incorrect. The one series up principle for te reo Maaori on these signs is significantly less legible than the case type differentiation for te reo Maaori on the temporary warning signs, so these signs do not promote te reo Maaori as well as they should.




62. Q13: What are your thoughts on the use of the one series up method to differentiate te reo Māori and English text on the general advisory family of signs?

- i. We strongly **disagree** with the use of the one series up method using capitals for general advisory and permanent warning signs. Both permanent and temporary warning signs are fundamentally the same family so the same design principles should apply, otherwise warning signs on the network will be inconsistent, and therefore not safe and appropriate (see “Use of Title Case” above).
- ii. Page 30 of the consultation document details the correct approach that should be taken for permanent warning signs as well:



*“The two languages on these signs will be differentiated through different case types, with te reo Māori displayed in sentence case and English in upper case. Sentence case differentiation has been used to minimise the size increase of the bilingual temporary signs, which is crucial for signs that are used on roads with a higher crash risk. ... **As indicated earlier in this document, sentence case has been shown to improve legibility.** We have maintained the font colour and background colour for this family to promote consistency and familiarity.”*

63. Q14: Do you have any other feedback on the designs of this overall family or any individual signs? Please see Annex 4 and reference any individual signs where applicable in your response.

- i. We **disagree** with different versions for the W16-5.3 Aged - Proposed Rule reference: clause 2.4(5)(ggg) sign. One of the fundamental principles for safe traffic sign design is national consistency. Having two different translations for the same sign creates distraction and uncertainty for road users.
- ii. The translation options for the W16-5.3 Aged - Proposed Rule reference: clause 2.4(5)(ggg) sign:

| | | |
|---|---|--|
| <p>W16-5.3 Aged</p> <p>Proposed Rule reference: clause 2.4(5)(ggg)</p> |  |   |
|---|---|--|

...should correctly be shown like this at equivalent sizes and scales:

| | | |
|---|---|---|
| <p>W16-5.3 Aged</p> <p>Proposed Rule reference: clause 2.4(5)(ggg)</p> |  |  |
|---|---|---|

The proposal creates excessively long and inappropriate signs that will not be suitable for existing single pole installations, and we submit that this sign not be progressed and the design reconsidered.

- iii. The translation options for the W16-5.2 Kindergarten - Proposed Rule reference: clause 2.4(5)(fff) sign:

| | | |
|---|---|---|
| <p>W16-5.2 Kindergarten</p> <p>Proposed Rule reference: clause 2.4(5)(fff)</p> |  |  |
|---|---|---|

...should correctly be shown like this at equivalent sizes and scales:

| | | |
|---|--|--|
| <p>W16-5.2 Kindergarten</p> <p>Proposed Rule reference: clause 2.4(5)(fff)</p> |  |  |
|---|--|--|

The proposal also creates excessively long and inappropriate signs that will not be suitable for existing single pole installation, and we submit that this sign not be progressed and the design reconsidered.

- iv. We submit that the W17-1.1 School bus 'school bus' - Proposed Rule reference: clause 2.4(5)(hhh) is never used. The existing sign is 1.2m long, and the additional word 'bus' is not required as it is always evident that the vehicle to which the sign is attached is a bus. The smaller 900mm long W17-1.2 School bus - 'school' - Proposed Rule reference: clause 2.4(5)(iii) sign is always used by preference:



We submit that the W17-1.1 School bus 'school bus' - Proposed Rule reference: clause 2.4(5)(hhh) sign is deleted from the Rule.

- v. We submit that 'I Ngaa Raa Kura' on the R1-6.1 Kura School static variable speed limit - Proposed Rule reference: clause 2.4(5)(f) be in Title Case for improved legibility. The lower-case font proposed for te reo Maaori on other sign families is significantly more easily read and makes the sign more easily interpreted at first glance. It will also reduce the width of the sign back to the width of the current sign.

- vi. We submit that 'Ara Waatea' on the A40-7 Shared zone - Proposed Rule reference: clause 2.4(5)(www) sign be in Title Case for improved legibility. The lower-case font proposed for te reo Maaori on other sign families is significantly more easily read and makes the sign more easily interpreted at first glance.

Proposal 5: Motorway and Expressway Advisory Signs

64. **Q15: Do you think that the motorway and expressway advisory family of signs present a good opportunity to achieve the goal of incorporating more te reo Māori onto Aotearoa New Zealand's transport network?**
65. Yes, but we submit the design principle applied is incorrect. The one series up principle for te reo Maaori on these signs is significantly less legible than the case type differentiation for te reo Maaori on the temporary warning signs for example, so these signs do not promote te reo Maaori as well as they should.
66. **Q16: What are your thoughts on the one series up method differentiate te reo Māori and English text on the motorway and expressway advisory family of signs?**
- i. We strongly **disagree** with the use of the one series up method using capitals for motorway and expressway advisory signs. The one series up principle for te reo Maaori on these signs is significantly less legible than the case type differentiation for te reo Maaori on the temporary warning signs for example (see also "Use of Title Case" above).
 - ii. Page 30 of the consultation document details the correct approach that should be taken for motorway and expressway advisory signs as well:

*"The two languages on these signs will be differentiated through different case types, with te reo Māori displayed in sentence case and English in upper case. Sentence case differentiation has been used to minimise the size increase of the bilingual temporary signs, which is crucial for signs that are used on roads with a higher crash risk. ... **As indicated earlier in this document, sentence case has been shown to improve legibility.** We have maintained the font colour and background colour for this family to promote consistency and familiarity."*
67. **Q17: Do you have any other feedback on the designs of this overall family or any individual signs? Please see Annex 5 and reference any individual signs where applicable in your response.**
68. No.
69. **Q18: What are your thoughts on the use of using sentence case for motorway and expressway signs, which enables colour to be utilised as the method of differentiation?**
70. We strongly support the use of using sentence case for motorway and expressway signs, which enables colour to be utilised as the method of differentiation.
71. Format (A) below is significantly easier to 'navigate' at driving speeds than format (B) below, and the te reo Maaori text is easier to read so supports the promotion of the language.

(A)



(B)



Proposal 6: Temporary Warning Signs

72. Q19. Do you think that the temporary family of signs present a good opportunity to achieve the goal of incorporating more te reo Māori onto Aotearoa New Zealand’s transport network? Waka Kotahi NZ Transport Agency | Te Mātāwai

73. Yes.

74. Q20. What are your thoughts on the use of uppercase and sentence case font to differentiate te reo Māori and English text on the temporary family of signs?

75. We strongly support this design principle, which should be extended to all warning signs in particular, together with other general advisory signs that currently incorporate capital case font for the English text.

76. Q21. Incorporating te reo Māori into temporary signs will make them larger. However, increasing the sign size allows the English text to be clearer. How do you think the larger temporary signs may affect transport users and road workers?

i. We submit that the consultation document does not show the size and scale of the changes. Very few of the current and proposed signs are shown to equivalent scale (see examples above) which is misleading submitters to believe costs will be minimised as bilingual signs “are going to replace existing signs or introduced onto the transport network as they are needed” (page 12). The consultation document makes no reference to the following risks and associated costs of replacing the signs:

- a. They will not fit existing standard temporary sign stands and will require bespoke stands to fit the new sizes.
- b. They will not fit the transport trucks that move the signs to and from sites which have specially designed cages and racks for the current sign standard.
- c. They are larger and heavier, and will required heavier bases or weights to reduce blowing over, creating health and safety issues for staff handling them.
- d. They are larger so finding suitable and safe space at the roadside will more difficult.
- e. They will be significantly more susceptible to being blown over, causing both a physical safety hazard and a road safety hazard as the blown over signs won’t be visible to motorists.

ii. The contracting industry advise that, aside from the replacement cost of the larger signs, these changes will cost them millions of dollars to design, fabricate and supply replacement sign stands to not only take the larger signs but also to ensure they won’t blow over (if that is practically possible), and to replace and newly configure their transport trucks with larger vehicles for the larger signs. These costs will then be passed onto the Council through variations to their maintenance and renewal contracts, reducing the value of maintenance and renewals Council will be able to undertake for communities.

iii. We support the advice of the contracting industry that, generally, these proposals for temporary warning signs are impractical and excessive.

77. Q22. Do you have any other feedback on the designs of this overall family or any individual signs? Please see Annex 6 and reference any individual signs where applicable in your response.

i. We submit that ‘Kei Mua’ on the W1-4 Road works supplementary – temporary speed limit ahead - Proposed Rule reference: clause 2.4(5)(u) sign be in Title Case for improved legibility and consistency. The lower-case font proposed for te reo Māori on the proposed temporary warning signs is significantly more easily read and makes the sign more easily interpreted at first glance.

- ii. We **disagree** with different versions for the W2-1.21 Hazard warning supplementary - funeral - Proposed Rule reference: clause 2.4(5)(mm) sign. One of the fundamental principles for safe traffic sign design is national consistency. Having two different translations for the same sign creates distraction and uncertainty for road users.

78. Q23: The dual approach to temporary signs will increase the number of signs on the network. What are your thoughts as to how this might transport users and road workers?

- i. We submit that the dual approach to temporary warning signs is a far more practical solution for providing te reo Maaori on temporary warning signs. We understand this system is successfully used in Wales.
- ii. Our contractor advises that 30-50% of temporary warning signs are replaced each year, and as the bilingual versions including bespoke bases will double their cost, there is no cost difference compared with a new dual sign set. Also, the 42 bilingual signs in this proposal are a small proportion of the temporary warning sign family, and many are bespoke to particular activities so not all are used at the same time by the same contractors. We submit therefore that the statement on page 32 *“There would be a significant cost increase to implement this option compared to the current implementation approach for this programme which is based on replacing the existing signs when needed with the new bilingual signs”* is without evidential base and misleading.
- iii. The dual approach means existing sign frames will be able to be used for both the existing English signs and the additional te reo Maaori signs, so it would be relatively simple to add the te reo Maaori equivalent into the transport trucks.
- iv. While additional trucks will ultimately be required to transport the complete te reo Maaori sign set, it will be a few years before the remaining temporary warning signs are made bilingual. The trucks will also generally be similar in design and size to the current vehicles.
- v. As approved bilingual signs would be duplicated under the dual approach, there is a greater chance of one of the signs remaining standing if the other gets blown over.
- vi. Increasing the number of signs at road works sites should increase work site safety.
- vii. We acknowledge there will be some increased work site safety risk (and cost) associated with putting out and taking in twice the number of signs, however this would be more than offset by not having to lift, manoeuvre and place the larger and heavier bilingual signs and heavier bases as proposed above.

79. Q24: Do you have any feedback on the proposed consequential and/or minor changes to be made to the TCD Rule?

We support the proposed consequential and/or minor changes to be made to the TCD Rule, particularly the definition of ‘School bus’ being amended as it supports the removal of the W17-1.1 School bus - ‘school bus’ Proposed Rule reference: clause 2.4(5)(hhh) sign in the Rule (refer part ‘iv’ to Q14 above).

Further Information and Opportunity to Discuss our Submission

80. Should Waka Kotahi NZ Transport Agency require clarification of the submission from Hamilton City Council, or additional information, please contact **Glenn Bunting** (Urban Transport Policy and Planning Manager - City Transportation) on **021 962 829**, email glenn.bunting@hcc.govt.nz in the first instance.
81. **Hamilton City Council representatives would welcome the opportunity to discuss the content of this submission in more detail with Waka Kotahi NZ Transport Agency.**

Yours faithfully



Lance Vervoort
CHIEF EXECUTIVE

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