



la Ara Aotearoa Transporting New Zealand Incorporated

submission to

**Christchurch City Council on
Te Kaha surrounding streets**

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Ia Ara Aotearoa Transporting New Zealand submission to Christchurch City Council consultation document on: Te Kaha surrounding streets

1. Representation

- 1.1 Ia Ara Aotearoa Transporting New Zealand Incorporated (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 (1.2% of the workforce), and has a gross annual turnover in the order of \$6 billion. This is part of a wider transport sector that employs 108,000 people, or 4 percent of the country's workforce and contributes 4.8 percent of New Zealand's GDP¹.
- 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 (MOT) 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 provides sector leadership and believes we all need to operate in an environment where the following must be managed and co-exist:
 - The safety and wellbeing of our drivers and other road users, our drivers are our most valuable asset
 - The impacts of transport on our environment
 - The transport of goods by road is economically feasible and viable and it contributes the best way it can to benefit our economy.
- 2.2 Transporting New Zealand welcomes the opportunity to comment on the Te Kaha surrounding streets plan proposed to better manage the increased activity this area is likely to experience as a result of the new stadium in Christchurch city.
- 2.3 When Canterbury's new multi-use stadium, Te Kaha, opens in 2026 Christchurch City Council (CCC) expect it will frequently host events attracting 15,000 to 20,000 people.
- 2.4 CCC has requested feedback on its proposals to change the streets surrounding Te Kaha to enable the community to live and utilise the new multi-use arena.

¹ [Transport factsheet \(mbie.govt.nz\)](https://www.mbie.govt.nz/transport-factsheet)

- 2.5 In brief the proposals include:
- in various cases reducing vehicle speed limits to 10km/h and/or 30 km/h
 - changing some one way streets to two way streets
 - designing and constructing of better facilities for other road users, in particular pedestrians and cyclists
- 2.6 The locations and areas being considered for the proposed changes are:
- Lichfield Street (Manchester to Madras) Options 1 or 2
 - Madras Street (St Asaph to Latimer Square)
 - Madras Street (Moorhouse to St Asaph)
 - Tuam Street (Madras to Fitzgerald)
 - Lichfield Street (Barbadoes to Fitzgerald)
 - Barbadoes Street (Hereford to Tuam)
- 2.7 CCC's intention is that its designs will reduce the need for expensive area-wide event traffic management plans at each event.

3. Submission

- 3.1 In principle Transporting New Zealand supports the upgrade of the surrounding streets so that they are prepared for the increased activity anticipated. We believe this also links into Government's broader Road to Zero strategy. The roads are the workplace for many of our members. No transport operator wants to send their staff out to work each day and have any of them not come back, or end up in hospital with serious injuries, and nor do they want to injure any third party.
- 3.2 As a consequence of the increased public activity there will be increased exposure to risk and we agree it is important to manage that. As a general comment, we urge CCC to genuinely focus on developing an overall safer system, and implicit in that is taking a systems approach. Underpinning our plea is our growing concern that too many roading authorities have a strategy that is predominantly based on posting lower speed limits, and that in itself is not a good means of changing driver behaviour and achieving better outcomes.
- 3.3 Lichfield Street (Manchester to Madras): It appears there is a significant difference between the options, being either a full street upgrade or a minimal redesign. In our view, to enable submitters to make a reasonably informed decision CCC should have included quantitative information in its "Pros and cons" comparison. As a result of that information not being available we cannot offer a meaningful opinion on which is the better option.
- 3.4 Madras Steet: We are supportive of the designated over-dimensional route for (heavy traffic with oversized loads) not being compromised in any manner.
- 3.5 Tuam Street: We believe the impact, particularly on business owners, associated with the lost car parks on the Madras Street to Barbadoes Street node needs to be fully considered and quantified, or at very least the alternatives for parking

stated. We also consider that changing the node between Barbadoes and Fitzgerald Avenue from a one way to a two way street is a not insignificant change that deserves much more commentary than the several sentences that CCC has provided.

- 3.6 Lichfield Street (Barbadoes to Fitzgerald): We also consider that changing this road from a one way to a two way street is another reasonably substantive change that deserves much more commentary than the two short sentences that CCC has provided. We acknowledge that a 30 km/h speed limit may be appropriate when this node is heavily trafficked by pedestrians however, there does not appear to be any evidence to support that lower speed being appropriate for the other times which will be by far the vast majority of the time. In our view CCC needs to provide a much better case to explain the change and impacts. Furthermore, it is our view that the build environment should influence and provide helpful cues for drivers to operate their vehicles that the appropriate speed. A speed table installed mid-block is not good traffic engineering.
- 3.7 High Street South: We appreciate there has been separate and on-going consultation with the affected business owners, residents and community on this change. In our view the paved right turn lane onto St. Asaph Street creates a risk that pedestrians will not recognise and appreciate that it is a road which in turn could lead to a pedestrian/s and/or cyclist/s colliding with a vehicle. In addition, depending on traffic volumes on St Asaph, queued traffic will tail back down High Street which may create considerable delays and congestion. It appears that the risk of congestion and safety could be better managed if all the traffic passed through the signalised intersection. We believe CCC should undertake and share some traffic engineering modelling and risk analysis before further progressing this proposal.
- 3.8 Transporting New Zealand is concerned that across the national network there is a high degree of inconsistency between posted limits and the respective road environment. There is little discernible change in the road environment and it is often difficult for drivers to ascertain the appropriate limits and there is high dependency on the posted signs. As a consequence, compliance is inherently problematic. In the interests of fairness to road users and to help with enforcement we ask:
- Te Kaha should be surrounded by “self-explaining roads”. The design and construction should provide natural cues to drivers to operate their vehicles at a safe and appropriate speed.
 - CCC should pay attention to road maintenance and ensure the signs are clearly visible and road user sight lines are not unnecessarily obstructed by objects like roadside vegetation.
 - CCC work closely with telematic providers so any changes are widely publicised and drivers get a fair and reasonable chance to adapt to the changes.
 - There should be a considerable amnesty period when changes to speed occur, and enforcement does not occur within several hundred metres of the boundary where the speed limit is reduced.

- There should be appropriate freight delivery access and zones available to ensure transport companies can efficiently operate.

4. Concluding comments

- 4.1 In principle Transporting New Zealand supports CCC's intent to prepare for the increased activity anticipated with Te Kaha. However, we do not believe CCC has completed or provided sufficient information to enable meaningful consultation. In particular, CCC should undertake quantitative modelling and impact and risk assessment that enables better understanding of the options. That analysis should include the impacts of the proposed changes on road users as well as economic impacts on businesses in the affected vicinities. The analysis should also include the environmental impacts, particularly on climate change.
- 4.2 Transporting New Zealand appreciate that Ta Kaha and its events will bring many benefits to the community and around those times we agree there will be relatively high densities of pedestrians and vehicle traffic. However, that busy environment will not be the norm and for the vast majority of the time these streets will function as typical inner-city streets. We are concerned at what appears to be a rather myopic focus by CCC on designing for the exception rather than the norm and by not giving full consideration to the impacts, it is creating significant risk of perverse outcomes.
- 4.3 We urge CCC to give fuller consideration to all the impacts and share that information with the public so better decisions can be made.

END