



la Ara Aotearoa Transporting New Zealand Incorporated

submission to

**Christchurch City Council on
Safe Speed Neighbourhoods**

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Ia Ara Aotearoa Transporting New Zealand submission to Christchurch City Council consultation document on: Safe Speed Neighbourhoods

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 Safe Speed Neighbourhoods programme which is part of the integrated national road safety strategy. Where you are adopting an area-based approach to changing speed limits to provide consistency in communities, settlements and around schools is intended to help drivers know when they are travelling in a safe speed area.
- 2.3 Christchurch City Council (CCC) has requested feedback on its proposals to reduce speeds from 50 km/h to 30 km/h around schools and neighbourhood streets to 40 km/h, as well as some local roads in Banks Peninsular. This is the

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

start of a wide change over a lengthy period of time with safe speeds rolling out over the next 10 years, as funding allows.

2.4 In brief the proposal's rationales include:

- Safe Speed Saves Lives – speed is the difference between walking away relatively unharmed, or being seriously injured or killed in a crash
- Planned safe speed neighbourhoods - when everyone travels a bit slower people feel safer using the street
- Safe speeds near schools – key action of Road to Zero Strategy to set limits around schools by the end of 2027
- Safe speeds in Banks Peninsula – speed limits have already been reduced in several areas, and over the next two years speeds will be lowered to 30 km/h on roads on or around all schools
- Safe Speeds in new subdivisions – speeds will be aligned to the One Network Frameworks national classification system to determine functions of roads and inform decision making.
- Road to Zero Strategy – to significantly reduce death and serious injury on our roads by 40 percent by 2030

2.5 CCC's intention is that its changes in speed limits on local roads will be implemented in the next three financial years, with more safe speeds rolling out over the next ten years as funding allows.

3. Submission

3.1 In principle Transporting New Zealand supports the Safe Speed Neighbourhoods proposal changes that will be implemented in these communities. 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 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 When the speed limit changes are implemented across the area proposed by CCC, its intended goals are less death and serious injury. These goals are not well defined on a community level and appear to be relying on a lot of public commentary on the perceived risks. In the absence of empirical data that clearly identifies the actual risk and intended goals, Transporting New Zealand is concerned that consultation is being undertaken and decisions and changes will be made without all the effected parties being well informed.

- 3.4 In 2016 Christchurch City Council introduced a 30 km/h zone within the central city business district (CBD). We understand the number of crashes resulting in death or serious injury reduced: in the two-year period 2020-2021 there were 60% fewer serious crashes than there had been in the two-year period 2014-2015, prior to the lower speed limits being introduced. This is a highly populated and congested part of the city therefore a 30 km/h speed limit seems appropriate. However, many of the areas where speed reductions are being proposed do not have an environment similar to the CBD therefore we are concerned that these may not make sense to many road users leading to high levels of non-compliance.
- 3.5 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:
- The roads subject to speed limit changes are clearly evident and as such this makes good sense to all users and are “self-explaining roads”. The design and construction should provide natural cues to drivers to operate their vehicles at a safe and appropriate speed.
 - Variable speeds around schools in the 30 km/h area are well designed, clear to all road users and only operate at times when the risk is expected. Outside school hours and holiday times the areas need to be cognisant of the risk profile changes.
 - 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.

4. Concluding comments

- 4.1 In principle Transporting New Zealand supports CCC’s intent to prepare for the lowering of speed limits in many neighbourhoods across Christchurch and Banks Peninsular. Around schools, nearby neighbourhoods the proposed changes are intended to contribute to the integrated national road safety strategy goals. However, we do not believe CCC has completed or provided sufficient information to enable more 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 lowering speeds is a factor in outcomes of death and serious injury from crashes. However just reducing speed limits, slows New Zealanders down, it can cause significant decrease in productivity for the freight sector. This sector delivers 93 per cent of all products that the community need. At a time of inflationary pressures, the costs of slowing a freight sector will have to ultimately be borne by the consumer.
- 4.3 The ability to analyse modelling that illustrates the actual costs, risk and impacts expected from the changes around death and serious injury in the urban environment would be valuable to the commercial sector.
- 4.4 We urge CCC to give fuller consideration to all the impacts and share that information with the wider public so better decisions can be made.

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