



SUBMISSION

Submission: Land Transport Rule: Setting of Speed Limits 2024

To: Ministry of Transport speedrule@transport.govt.nz

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About Ia Ara Aotearoa Transporting New Zealand

Ia Ara Aotearoa Transporting New Zealand is a national membership association representing the road freight transport industry. Our 1,200 member companies operate and support urban, rural and inter-regional commercial freight transport services throughout the country.

As the peak body and authoritative voice of the road freight sector, Transporting New Zealand helps trucking firms operate successful, safe and sustainable businesses. Our strategic priorities are:

- Providing one industry voice for advocacy
- Promoting the road freight transport industry
- Attracting talent and promoting workforce development
- Supporting our members and customers
- Sustainability, safety and responsible emissions reduction

New Zealand's commercial road transport sector employs 55,384 people (2.1% of the total workforce), and has a gross annual turnover in the order of \$6.4 billion (1.8% of GDP). Road freight transport accounts for 93% of the total tonnage of freight moved in New Zealand (MoT National Freight Demands Study 2018).

Transporting New Zealand submission on the Setting of Speed Limits 2024

- 1 Transporting New Zealand appreciates the opportunity to make a submission to the Ministry of Transport (the **Ministry**) on the Setting of Speed Limits (the **draft Rule**).
- 2 The roads are the workplace for many of Transporting New Zealand's 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 harm or injure any other road user.
- 3 Over recent years Transporting New Zealand has frequently and consistently raised concerns about the way NZTA has managed speed limits. As an example, in March 2022 in our submission to NZTA on its proposals to change speed limits on SH30 between Rotorua and Whakatane we said:
 - a. "We are concerned that with the exception of some isolated cases, we are not seeing evidence of investment in an overall safer system and Waka Kotahi's performance on completing capital projects and engineering safety improvements, such as barrier systems, on plan has been extremely poor."
 - b. "We are concerned that Waka Kotahi's approach of reducing speed reduction is shifting its responsibility on to road users to manage the inherent risk – often for poorly maintained and/or poorly built roads - and in essence, that is an abdication of responsibility. The Health and Safety at Work (General Risk and Workplace Management) Regulations 2016 refers to a hierarchy of risk control measures. In essence, in order of the most preferred methodology these are: substitution, isolation, or applying engineering controls. Waka Kotahi's approach takes the weakest and least effective approach".
 - c. "Waka Kotahi does not appear to be undertaking rigorous or substantive analysis and the scope of its analysis is siloed and does not fully consider the impacts on freight movement, and the consequential impacts on the economy and the safety and wellbeing of New Zealanders. Waka Kotahi lacks the ambition to develop an infrastructure that enables freight to move in a way that is commensurate with a world class economy"
- 4 In light of the above we are very pleased to see the Minister of Transport and his officials proposing some changes.
- 5 Transporting New Zealand supports the Government's vision for a land transport system that boosts productivity and economic growth and allows New Zealanders to get to where they want to go, quickly and safely.
- 6 Transporting New Zealand supports the proposed draft Rule taking a more balanced approach to setting speed limits to ensure economic impacts and the views of local communities and road users are considered alongside safety.

- 7 This submission provides our feedback on the three specific changes provided in the Overview of the Ministry's consultation document and we have then provided commentary on each of the specific proposals in the draft Rule.
- 8 Transporting New Zealand supports changing to a targeted approach to reducing speed limits that focuses on high crash areas and public acceptability.
- 9 With the following caveats, Transporting New Zealand generally supports reduced variable speed limits outside all school gates during drop-off and pick-up times.
 - a. That schools adjacent to roads where the normally prevailing speed limit is high, for example, 80 km/h or greater, have made every practicable effort to ensure children are not at risk of being struck by vehicles on the road such as but not limited to providing off-street parking for vehicles to pick-up school children.
 - b. Where schools adjacent to roads where the normally prevailing speed limit is high, for example, 80 km/h or greater, cannot provide off-street parking, they make every practicable effort to ensure the roadside environment is maintained so motorists approaching the hazardous area have clear sight lines.
- 10 Where roads are built, maintained and managed to safely accommodate it Transporting New Zealand supports speed limits on expressways to be set at 110km/h more easily. This will help drivers of light vehicles to complete passing manoeuvres of trucks more safely.

Proposal 1 - require cost benefit analysis (CBA) for speed limit changes

- 11 In principle Transporting New Zealand supports the proposal to undertake CBA to ensure economic impacts and the views of local communities and road users are considered alongside safety.
- 12 Transporting New Zealand appreciates that the intent of this proposal is to simplify the approach for road controlling authorities (RCAs) and for them to focus specifically on the three areas of safety, travel time and implementation cost. However, Transporting New Zealand recommends that these are the minimum areas that the RCA needs to consider and if there are any other relatively significant benefits or costs associated with other areas, then the RCA is obligated to include them in the CBA.
- 13 We support not requiring a CBA to be completed when setting variable speed limits outside school gates.

Proposal 2 - strengthen consultation requirements

- 14 Transporting New Zealand supports the proposal to strengthen consultation requirements.

Proposal 3 - require variable speed limits outside school gates

- 15 In principle Transporting New Zealand supports the proposal to require variable speed limits outside school gates. Prior to a speed reduction being set we contend that consideration be given to eliminating hazards and risk as we refer in paragraph 9. Our further comments

follow in regard the proposed ways and means those limits are considered and implemented.

- 16 Transporting New Zealand supports the Rule setting the proposed total length distances of 300 metres and 600 metres for Category 1 and Category 2 schools respectively noting some variation is allowed where appropriate. We hope this helps provide and build consistent expectations for road users.
- 17 Transporting New Zealand supports the proposal to define school travel periods.
- 18 Transporting New Zealand appreciate there are considerably higher capital and maintenance costs associated with electronic variable signs and therefore we support the proposal to allow static variable speed limit signs.
- 19 Transporting New Zealand supports the proposal to amend the Traffic Control Devices and the Road User Rule to allow static variable speed limit signs on main roads during default school travel times.

Proposal 4 – introduce a Ministerial Speed objective

- 20 Transporting New Zealand supports the proposal to enable the Minister of Transport to set out the Government's expectations for speed management. We think it is of benefit to all road users that there is consistency in the setting of speed limits across the national road network and we believe an important element in achieving that will be the Minister signalling the pace, scale and focus of change that road controlling authorities are expected to work towards.

Proposal 5 – changes to speed limit classifications

- 21 Transporting New Zealand understands the intent of this change is to move back to more standardised speed limits in urban areas (50 km/h) and interregional connectors (100 km/h).
- 22 Given the current inconsistency of speed limit settings across the network Transporting New Zealand believes moving back to more standardised speed limits will be helpful. This change should help remove the doubt and confusion that many road users now have about the actual speed limit on the road they are travelling.
- 23 Transporting New Zealand's view is that when roads are built and maintained to the appropriate design standard for a 110 km/h speed limit, then there is no need for the Director to separately approve implementing that limit. This seems to be adding an unnecessary layer of bureaucracy.
- 24 In May this year NZTA began consultation on increasing the speed limit to 110 km/h on the Kāpiti Expressway, from north of the Poplar Avenue interchange to south of the Ōtaki northern interchange which Transporting New Zealand made a submission on. The proposed change will avoid the considerable time money and effort of similar exercises in the future.

- 25 In light of the above, Transporting New Zealand supports the proposal to introduce a binding schedule of speed limit classifications that specify speed limits available for each road type

Proposal 6 – update the Director’s criteria for assessing speed management plans for certification

- 26 Transporting New Zealand notes this proposed change will enable the Director to ensure that the RCA, when submitting a speed management plan to NZTA for certification, has taken into consideration the appropriate factors such as consultation and a CBA.
- 27 Transporting New Zealand supports this proposal to update the Director’s criteria for assessing speed management plans.

Proposal 7 - reverse recent speed limit reductions

- 28 Transporting New Zealand supports the proposal to reverse the changes made under the 2022 Speed Limits Rule that led to the application of widespread limit reductions to 30 km/h because there was a school in the area. We believe in and prefer a better risk-based approach. We therefore support the proposal, that instead of the whole area being under a 30 km/h limit, a variable speed limit is set on the stretch of road outside the school and applies at defined school travel periods.
- 29 Transporting New Zealand supports the proposal to require speed limits reduced since 1 January 2020 to be reversed on arterial roads and rural state highways. In the case of the latter, Transporting New Zealand supports the proposed deadline of 1 July 2025 by which time the speed limits on these roads will be either recertified or reversed.

Other potential changes outside of specific proposals in the scope of this draft Rule

Speed Management Committee

- 30 Given the debacle with speed limits over recent times Transporting New Zealand is not convinced the Speed Management Committee has added value and nor is it justified. We hope that the proposed changes in the draft Rule that road controlling authorities need to undertake, in particular the improvements to the requirements for consultation and a CBA, prior to seeking the Director’s approval of a change will add considerably more rigour to the setting of speed limits. On that basis Transporting New Zealand does not believe another layer of oversight, such as that by a Speed Management Committee, is necessary.

Regional speed management plans

- 31 Transporting New Zealand supports a whole-of-network approach because a consistent approach to speed limit setting is an important contributing factor to safe driving. Transporting New Zealand was directly involved in this consultation approach with the respective territories in the Taranaki Region last year.
- 32 Transporting New Zealand believes a whole-of-network approach is highly desirable however, we also appreciate that some councils may not be able to resource and support

this approach. Therefore, we believe the option for this approach should be encouraged but not mandated.

Higher Speed Limits

- 33 Transporting New Zealand understands the speed limits of international jurisdictions typically fall between 100 km/h and 120 km/h, however, there are also nearly 20 countries with limits even higher.
- 34 Transporting New Zealand supports the idea of enabling speed limits of up to 120km/h on roads that are built, maintained, and managed, to safely accommodate that speed.
- 35 Initial discussions between Transporting New Zealand and other road freight associations indicate that the implications of increasing the heavy vehicle speed limit are likely to outweigh the benefits. However, we appreciate there will be a range of views within our membership, and we have begun canvassing those views and will update the Ministry in due course.

ENDS