



SUBMISSION

To: Christchurch City Council

Submission: Ferry Road Safety Improvements

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Sent to: letstalk@ccc.govt.nz

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Ia Ara Aotearoa Transporting New Zealand submission to Christchurch City Council on its proposed safety improvements to Ferry Road between Wilsons Road and Aldwins Road

Introduction

- 1 Christchurch City Council (CCC) is proposing to install speed humps and pedestrian refuge crossing points at four locations on Ferry Road spanning approximately 400 metres between Wilsons Road and Aldwins Road. (refer Appendix 1, Figure 1)
- 2 Ferry Road is a vital transport route for commuters traveling from the eastern suburbs to the central city with approximately 20,000 vehicles using the road each day. Currently pedestrians crossing this section of Ferry Road must either wait in the flush median strip or walk to the signalised intersections at Wilsons Road/Moorhouse Ave/Ferry Road or Ensors Road/Aldwins Road/Ferry Road to cross safely.
- 3 Ferry Road is the main emergency response route to Redcliff and Sumner.
- 4 Ia Ara Aotearoa Transporting New Zealand (Transporting New Zealand) welcomes the opportunity to make a submission on CCC's proposal.

Transporting New Zealand comments

- 5 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:
 - 5.1. The safety and wellbeing of our drivers and other road users, our drivers are our most valuable asset
 - 5.2. The impacts of transport on our environment
 - 5.3. The transport of goods by road is economically feasible and viable and it contributes the best way it can to benefit our economy.
- 6 Transporting New Zealand's members predominantly operate heavy vehicles, and often those are long vehicle combinations, therefore the focus of our submission is on the impact of this proposal on these types of vehicles however, the impacts of this CCC proposal are highly likely to apply to light vehicles as well.
- 7 Transporting New Zealand believes that now more than ever investment in roading and related infrastructure should be scrutinised to ensure value for money and there is a good return on investment.
- 8 CCC have shown the proposed changes on its "Ferry Road Pedestrian Safety Improvements Consultation Plan". Transporting New Zealand is concerned that CCC's proposal appears very siloed in terms of it only being focussed on pedestrian safety.
- 9 CCC surveyed how people cross Ferry Road. That data was collected on a Thursday and a Saturday, between 7am to 7pm. The respective crossing counts for the four project sections are:
 - Leyden St to Philipstown Courts: 344

- Grafton Street to Shirt Street: 270
- Short Street to Osborne St: 19
- Osborne Street to Isabella Street: 148

- 10 Transporting New Zealand is concerned that the volumes and density distribution of the vulnerable road user activities is much less than the 20,000 vehicle movements per day. All of the latter will need to slow down for the speed humps regardless of the level of risk present. On the face of it, that adverse impact appears disproportionately large given the numbers of pedestrians that would benefit, particularly given the pedestrian counts are for 12 hours of two days.
- 11 There have been important learnings from other cities, particularly Wellington and Auckland regarding the slowing of all vehicles. In particular:
- the adverse impact of increased maintenance costs on buses, and more so for low floor buses; and
 - the impact on emergency service vehicles, particularly FENZ vehicles which have target response times to particular locations.

If CCC has not already, Transporting New Zealand recommend it directly and explicitly engage those industries.

- 12 A vehicle travelling at a low steady state speed produces less carbon emissions than a vehicle that accelerates then brakes to slow down for frequent speed humps. Transporting New Zealand recommend CCC include consideration of this in its impact assessment when justifying this proposal.
- 13 Transporting New Zealand has undertaken some initial assessment of peak journey times from the east to the west and northwest of the city. Given the current high levels of congestion on Brougham Street, real time telematics route advice is already recommending motorists take alternative faster routes, despite those roads not being designed for high traffic volumes. Transporting New Zealand sees significant risk that if these four crossings are progressed, a highly predictable perverse outcome will be increased traffic as new “rat runs” are established through residential streets.
- 14 Transporting New Zealand believe an important factor in achieving successful transport outcomes is having consistency in traffic design with the respective environment. CCC does not appear to have a consistent policy in this regard. Transporting New Zealand recommend CCC collaborate with other road controlling authorities and develop policy and design guidance to ensure these risks are managed in a more consistent manner.
- 15 Transporting New Zealand request that before CCC progress further with this project it provide evidence to show the benefit cost/return on investment and justification for this proposal. The CCC investment case should also take a more holistic transport system approach including not only pedestrian safety, but also other transport outcomes such as productivity, environment and perverse outcomes.

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 members operate 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's purpose is creating the environment where trucking operators can drive successful, safe, sustainable businesses. Our focus areas for the period 2025 to 2027:

- Advocacy and policy
- Improving infrastructure to improve productivity
- Making our industry and our members businesses stronger and more resilient
- Sustainability
- Transporting New Zealand business performance

New Zealand's road freight transport industry employs 33,000 people (1.2% of the total 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 and contributes 4.8 percent of New Zealand's GDP. Road freight transport accounts for 93% of the total tonnage of freight moved in New Zealand (MoT National Freight Demands Study 2018).

END

Appendix 1

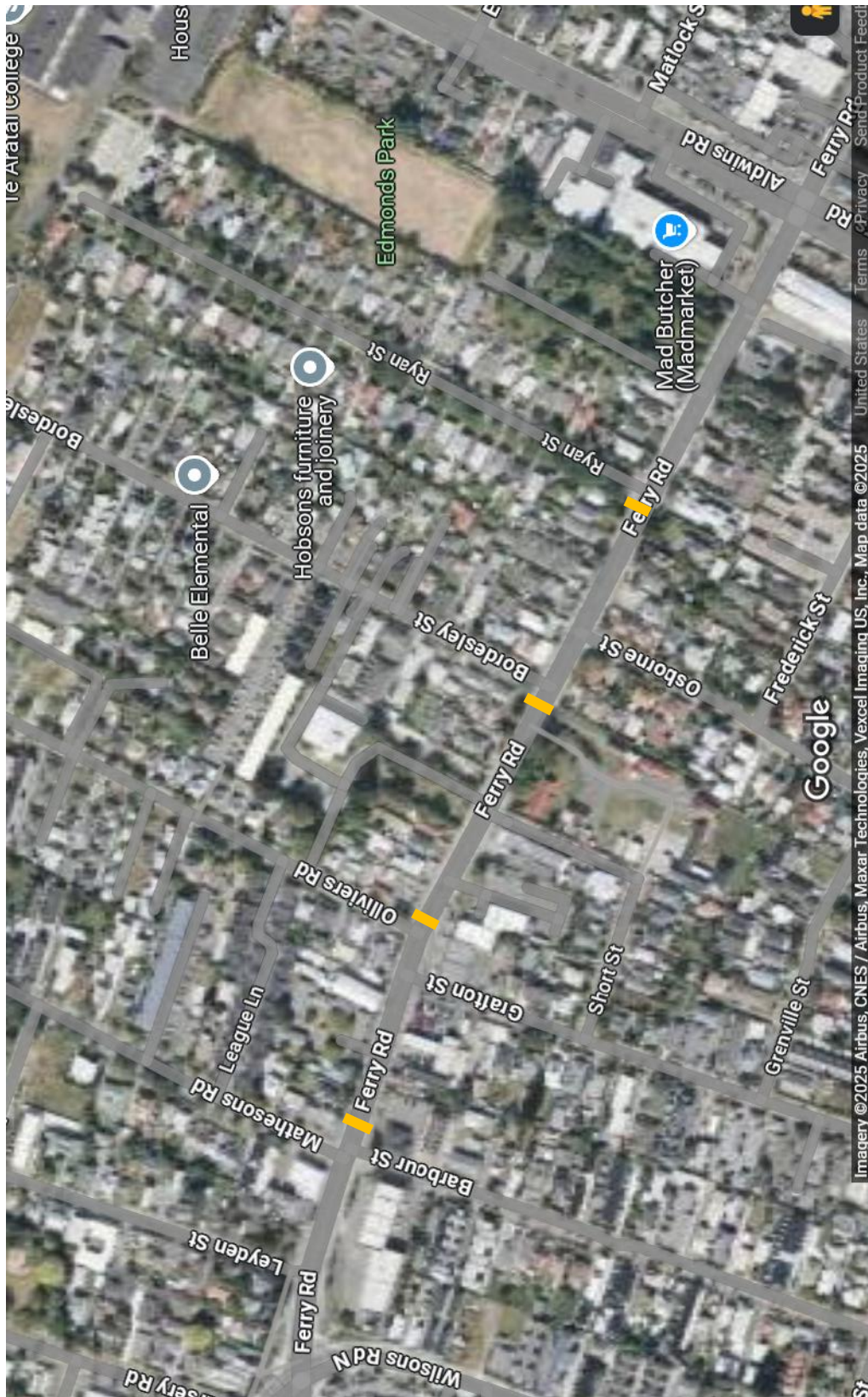


Figure 1: Ferry Road and approximate location of speed humps/pedestrian refuge