

Submission to the New Zealand Transport Authority

In the matter of the:

Draft Land Transport Rule: Setting of Speed Limits 2017

Submission by

Ashburton District Council Elected Members

16 June 2017

Person for Contact: Vincie Billante, Community Relations Manager

1. Context

- 1.1 Ashburton District Council (“the Council”) Elected Members welcome the opportunity to submit to the New Zealand Transport Agency (NZTA) on the *Draft Land Transport Rule: Setting of Speed Limits 2017*. This submission has been prepared by the Elected Members of the Council.
- 1.2 The Ashburton District is located to the south of the Rakaia River and is bounded to the south by Timaru District, to the north by the Selwyn District and shares a narrow border with Westland District Council at its most westerly boundary. It comprises three main urban areas, Ashburton, Rakaia and Methven with the remainder of the District primarily rural and serviced by smaller townships.
- 1.3 Planning and asset management is delivered through a collaborative approach between the Council and regional working groups (including the Mid/South Canterbury Rooding Collaboration). Asset maintenance and renewals are currently outsourced by public tender with administration and quality control undertaken in-house. Road safety is delivered in-house with a focus on collaboration with neighbouring territorial authorities.

2. **PROPOSAL 2: Enable the setting of a 110 km/h speed limit on roads where it is safe and appropriate to do so.**

- 2.1. We support enabling the setting of a higher speed limit on roads where it is safe and appropriate to do so. We request NZTA continue to monitor the implementation of an increased speed limit as we believe a speed limit of 120 km/h *may be* appropriate for some roads in New Zealand. However, we believe continued evaluation is required to determine any future increases.

3. **PROPOSAL 3: Allow for a more flexible, efficient and outcomes-based approach to the requirements for permanent repeater speed limit signs.**

- 3.1. We support this proposal but suggest the speed limits of 80 km/h for gravel roads and 100 km/h for sealed roads are introduced. While we support a more flexible approach to signage, we feel that introducing limits based on the road type for rural roads (gravel and sealed) would be a clear method of communication. As such, signage requirements may be kept to a minimum.

4. **PROPOSAL 7: Require an RCA to notify the Transport Agency of any proposal to set a speed limit of 70 km/h, 90 km/h, or 110 km/h, or a variable speed limit.**

- 4.1. We support this proposal however we are concerned with the long term objective to move towards 60 and 80 km/h given the prominence of 70 km/h areas in Ashburton District.

5. Additional Feedback

5.1. Rule 2.8(6)

We do not support this rule. The use of the word 'direct' implies the Agency will not consult with the road controlling authority. The agency has a high level of discretion to determine 'non-compliance' with rule 2.8. We request clarification on the meaning of 'direct' and suggest this process is carried out in consultation with the road controlling authority.

5.2. Rule 3.4(2)

We do not support this rule as the default speed limits for rural roads are unclear throughout various consultation documents:

- Table 2.2 suggests the default for rural roads is <80 km/h, which contradicts Rule 3.4.2.
- The Speed Management Guide (p. 12) states 'no changes to the default limits are proposed'.
- Figure 1.4 of the Speed Management Guide suggests the default limit for a class 4 'winding open road' will be 60-80km/h.

We therefore seek clarification on the intention of this rule and suggest that the default for rural roads should be 100 km/h for sealed roads and 80 km/h for gravel roads. This should be consistent across the Speed Management Guide and the Land Transport Rule: Setting of Speed Limits 2017. We do not believe there is any benefit in a 60-80 km/h limit for straight sealed rural roads. Such a limit could have significant economic and efficiency implications, given the importance of agriculture to Ashburton District. This speed restriction would slow milk tanker and agricultural transport vehicles.

5.3. Rule 3.31

We seek clarification on how a length of road is determined as per Schedule 1. We suggest a definition is included to state the length of road applies to the full road (as opposed to between intersections).

5.4. Setting of speed limits

We are concerned that speed limit maps were not provided as part of consultation. The Council is responsible for maintaining the roads therefore should have a say over the speed limits.

5.5. Groups that may be disadvantaged

We believe the introduction of reduced speed limits in rural areas could have significant implications for transport in the agricultural industry.

5.6. Requirement for “...the Transport Agency to develop and maintain information about the safe and appropriate speed which is a travel speed that optimises safety and efficiency outcomes) for each road...” (p.6, Overview Document)

We support this requirement but request the inclusion and consideration of *economic* outcomes (as well as safety and efficiency).

6. Thank you for the opportunity to submit on the Land Transport Rule: Setting of Speed Limits 2017.

Cr Stuart Wilson
Chair, Service Delivery Committee

Cr Neil Brown
Deputy Mayor

Cr Peter Reveley
Chair, Environmental Services Committee

Cr Diane Rawlinson
Chair, Ashburton Urban Road Reference Group

Cr Selwyn Price

Cr Liz McMillan

Cr Mark Malcolm