



National Road Carriers Association (NRC) submission on

Draft Setting of Speed Limits Rule



11 July 2024



About National Road Carriers Association

National Road Carriers Association (NRC) is New Zealand's progressive nationwide organisation representing 1500 supply chain company members, who collectively operate over 16,000 trucks throughout New Zealand. NRC advocates on behalf of members and works with central and local government on road transport infrastructure and regulations.

NRC members are committed to providing an efficient, productive, resilient, safe and value for money service that supports the wider economy. To achieve this, trucking operators need a safe, efficient, and sustainable operating environment that enables the efficient and safe movement of goods. Our members primarily operate road freight however a number also operate air, sea and rail freight services.

Some 54% of NRC's membership comprises single vehicle operators and 89% employ 10 or fewer.

General Comments

National Road Carriers Association believes it is the role of central government to determine the parameters for setting of speed limits.

Our members seek nationally consistent parameters that balance the need for:

- Safety for all road users
- Productivity and efficiency that supports economic growth

Proposal 1 requiring cost benefit analysis for speed limit changes

National Road Carriers supports the inclusion of a cost benefit analysis to ensure the full economic impact of any change to speed limits is quantified prior to the change taking place.

This will ensure that changes that have a poor cost benefit ratio can be reviewed before the negative impact occurs.

Proposal 2 strengthen consultation requirements

National Road Carriers supports ensuring Road Controlling Authorities (RCAs) follow the consultation requirements set out in the Local Government Act.

Feedback from our members is that the changes made under the current rule were done without consultation or that the decision was made prior to consultation, with in some cases limits changing before consultation closed. (e.g. Napier – Taupo Rd).

Specifically including businesses, freight users and neighbouring RCAs is also supported.

Having a consistent process of consultation that is transparent with RCA's having to explain how feedback was considered is also welcome.

Proposal 3 require variable speed limits outside schools

National Road Carriers supports the use of variable speed limits that match the increased level of risk at certain times without impacting travel times where there is activity around the school.

We have concerns regarding standardised times being used as it would be beneficial if the limit is varied based on actual activity.

Some schools have events that have high numbers of pedestrian traffic outside of normal school hours that would justify a variable limit being applied.

Conversely, schools have teacher only days where there is little justification for maintaining a lower limit.

Our preference would be to use electronic variable signs. Having to read the fine print on a sign to see which limit applies is in our view problematic.

National Road Carriers would also like to see consideration for Variable Speed Limit signs to be used outside venues located on roads with a speed limit above 50 km/hr where high numbers of pedestrians and or slow moving vehicles occur during specific events. Such as sports grounds or Marae.

Proposal 4 introduce a Ministerial Speed Objective

National Road Carriers agrees that having a clear Ministerial Speed Objective that RCA's must have regard for reduces the opportunities for RCAs to develop inconsistent speed management plans.

Proposal 5 changes to speed limit classifications

National Road Carriers supports the return of urban limits to 50 km/hr, urban connecting roads to the 50-80 km/hr range and rural roads to the 80-100 km/hr range.

Our members would prefer variable speed limits be used for a rural intersection speed zone using electronic variable signs that also alert drivers to the presence of other traffic.

These can be particularly useful to alert drivers unfamiliar to the road that the risk of collision has increased.

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

National Road Carriers supports this proposal as it provides clarity of process that will lead to a more consistent approach to setting of speed limits and less risk of RCAs stepping outside the Ministerial Objective.

Proposal 7 reverse recent speed limit reductions

National Road Carriers supports this proposal to reverse the blanket reductions where it is safe to do so. The blanket reductions have not been received well by our members, many of whom operate 24/7 operations. Having to slow down past a school at 02:00 hrs makes no sense.

Increased use of variable speed limits as used overseas would enable the productivity of the network to match the level of risk.

Likewise, the reduction in open road speeds across parts of the network to 80 km/hr has created frustration as many perceive it has reduced their productivity with no increase in safety.

It is our view that the reductions were not justified with many members perceiving them as RCAs reducing speeds instead of repairing roads.

Our suggestion would be to tighten the timeline to completed by March 2025.

Feedback on other matters

Speed Management Committee

It is our view that this committee will not be required beyond the transition phase to the new rule if:

- The Ministerial Objective is clear and RCAs comply with the Rule.
- The Director of Land Transport has the clear separation from the RCA function of NZTA.

Regional speed management plans

It is our view that if RCAs comply with the rule and the requirement to consult with neighbouring RCAs then there will be no need for regional speed management plans.

Introducing another layer to what should be a simple process adds complexity with corresponding cost.

Higher speed limits on certain roads

Introducing another threshold is worthwhile considering.

National Road Carriers would support the development of a criteria definition of what would qualify a road to have a speed limit above 110 km/hr.

There should be increased requirements for adequate pull over space that would allow

truck trailer combinations to be completely clear of live traffic lanes should they need to stop in case of breakdown.

These sections should have dedicated slow vehicle/freight lanes.

Closing Comments

In summary, National Road Carriers supports the changes proposed in this draft rule.

We would also support further work in identifying other ways to increase road safety that focus on the cause of crashes.

Speed has a direct impact on the crash outcome but poor decision making by drivers is often the cause.

Simply lowering a speed limit does not address the underlying causes of crashes.

National Road Carriers would like to see more emphasis on providing roads that are fit for purpose that have safe passing lanes for cars to pass trucks and safe pull over areas for drivers to safely clear the live traffic lanes.

Contact

James Smith
General Manager Policy and Advocacy
National Road Carriers Association
PO Box 12 100
Penrose
Auckland
Phone: 09 953 3853
Email: james.smith@natroad.co.nz