



ROAD TRANSPORT FORUM NEW ZEALAND INC

ROAD TRANSPORT FORUM NEW ZEALAND'S SUBMISSION ON LAND TRANSPORT RULE SETTING OF SPEED LIMITS [2007] Rule [54001]

Contact: **Kerry Arnold**

Technical Manager

Road Transport Forum NZ

PO Box 1778

Wellington

Ph: (04) 472 3877

Fax: (04) 471 2649

Email: kerry@rtf.nz

June 2017

ROAD TRANSPORT FORUM NEW ZEALAND'S SUBMISSION ON LAND TRANSPORT RULE SETTING OF SPEED LIMITS [2007] Rule [54001]

REPRESENTATION

Road Transport Forum New Zealand (RTFNZ) is made up of several trucking associations for which the Forum provides unified national representation. The Forum members include Road Transport Association New Zealand, National Road Carriers, and New Zealand Trucking Association. The affiliated membership of the Forum is some 3,000 individual road transport companies which operate 16-18,000 trucks involved in road freight transport as well as companies that provide services allied to road freight transport.

The Forum is the peak body and authoritative voice of New Zealand's road freight transport industry which employs 22,600 people (3.0% of the workforce), has a gross annual turnover of \$6 billion and transports about 70% of New Zealand's land based freight on a tonne/kilometre basis.

Introduction

RTFNZ supports the relevance of Safe System objective and One Network Road Classification context connection with the principles associated with setting of speed limits for roads and sections of road that is outlined in the draft Rule. RTF also supports the move to a more modern approach to speed setting as explained in Overview 8 which helps overcome the uncertainty of methods RCAs have had to adopt to achieve appropriate and safe setting of speed for roads they are responsible for. The summary of changes in Overview 6 & 7 reiterates the point the new rule is designed to overcome these short comings by incorporating the newly introduced Speed Management Guide.

An interesting observation that heavy vehicle representation is not identified as participating in the Speed Management guides development phase yet according to our records RTF was involved in the core discussions on the guides development along with the other organizations mentioned.

General comments

RTF is not a practitioner in terms of adjudicating on the appropriateness of setting speed limits on roads (being a road user organization) however the key changes presented in overview 6 and 7 put forward for consideration present a level of logic that is difficult to argue against.

The new requirement for the Agency to provide information to enable RCAs to set safe and appropriate speeds that deliver the best benefits in terms of safety and economic productivity outcomes is a welcome approach.

The additional provisions requiring RCAs to notify NZTA when setting variable speed limits and setting of other specified speeds should lead to more consistency within the one network road classification approach.

RTF also supports the increased maximum speed of 110km/h on roads or sections of the network where the road characteristics and environment provide for that opportunity.

Comments on the Proposals

In terms of the proposals covered in the overview, RTF fully supports **Proposal 1** particularly the inclusion of economic productivity as well as safety as part of the assessment criteria when determining speed limits.

RTF also acknowledges the development of the Speed Management Guide and its influence over the criteria established by the rule. The transition to a more modern approach for speed setting is fully endorsed as is the more consistent network wide approach proposed by the changes.

We note the requirement to have regard to the views of interested parties when decisions about setting speeds being finally determined and the specific duty to consult the chief executive of the Road Transport Forum in clause 2.3(2)(f). This was also in the 2003 rule so it is pleasing to see it retained in the new rule.

RTF supports **Proposal 2** which covers the introduction of a system for setting speeds up to 110km/h as already mentioned is supported by the RTF. The assessment criteria are quite clear.

One of the bullet points refers to low road structure risk. We assume this means the road structure is of sufficient structural integrity that failure and deterioration would appear unlikely. It is an interesting point but a valid one because we have observed some of the new sections of expressways have suffered accelerated surface deterioration within very short time

frames after construction has finished. Another aspect that impacts on vehicle trajectory at high speed is poorly finished patching and seal edge finishes. In some cases, the seal edges are so poorly integrated with surrounding pavement surfaces that heavy trailers can exhibit a phenomenon known as tram lining where the trailer wheels of a heavy combination can track along the longitudinal edge of a lane repair or reseal. In a worst-case scenario, the trailer can be dragged off the road.

The potential for this to occur is not limited to high speed roads. It highlights a road structural aspect that should be considered within the scope of factors that are taken into consideration when setting or approving 110km/h limits.

The RTF view in respect of 110km/h travel speed is that it is not appropriate for heavy trucks. RTF believes the widened speed differential between heavy and light vehicles will ensure safer passing opportunities for the light vehicles and preserve the present fuel consumption characteristics of the heavy vehicles if they remain limited to 90km/h. It should also be noted that heavy vehicle dynamics and roll stability performance is routinely assessed on a notional 90km/h and even though the 110km/h roads will be multi lane and have other desirable safety characteristics, the RTF position is the 90km/h limit should be retained for these vehicles.

Clause 5.3(5) provides for the Agency by notice in the gazette to remove a 110 km/h speed limit but there appears no corresponding requirement or responsibility in this rule to have the RCA concerned remove or amend any speed limit signage.

Proposal 3 is a sensible approach to alleviating the need of speed repeater signs.

Proposal 4 is another sensible and logical approach that allows the RCA to set speed limits necessary to manage to emergency situations and provide the flexibility needed in the event a emergency arises. The reference to the Civil Defense Emergency Act 2002 provides a measure of rigor to the emergency speed setting process. The RTF supports the 6 month limit on speeds set under this proposal.

However, given the difficulties some emergency disasters present and the likelihood of prolonged rehabilitation of networks damaged by quakes and the like consideration should be given to having a procedurally simple renewal process for an emergency speed limit or an alternative emergency speed limit following the completion of the initial 6 month period.

Proposal 5 presents clarification of the grounds upon which an RCA may set a temporary speed limit. Clause 6.1 and 6.4 provide reasonable clarification however we don't think the concept of an 'unsafe road surface' is well understood by the public. The public view of an unsafe road surface may well be that the pavement is destroyed not just having a lower coefficient of friction so the expanded guidance will be an important feature of the temporary speed limit setting procedure.

Proposal 6 The explanation outline provides sufficient detail to see the merit of the changes proposed. The text proposes 20km/h increments suggesting that smaller increments are not as recognizable for drivers. This may be valid point but interestingly two vehicle user groups (heavy vehicles and light vehicles towing trailers) are speed controlled by the road user rule to 90 km/h so they are likely to be confronted reasonably regularly by speed change increments of less than 20km/h.

Proposal 7 is essentially an extrapolation of the proposition covered in proposal 6 but the context is around the application of variable speed limits at speed thresholds or at what we would term intermediate speed thresholds. The introduction stresses the desirability of having recognizable speed limits and speed differentials. RTF has no problem with NZTA running oversight on the speed setting options set out in proposals 6 and 7.

Concluding comments

The revised rule provides a logical and simplified framework to manage the setting of speeds for the road network. The RTF supports the objective of improved consistency in the process and the application of speed limits across the network.