

21 March 2024

Brent Alderton
Director of Land Transport
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Private Bag 6995
Marion Square
Wellington 6141
New Zealand

Dear Brent,

Director approval for speed changes – Rakaia Commercial Vehicle Safety Centre Project

New Zealand Transport Agency Waka Kotahi (NZTA) as Road Controlling Authority ('RCA') respectfully requests that the Director of Land Transport approves the setting of the following speed limits required for the Rakaia Commercial Vehicle Safety Centre (CVSC) Project, in accordance with clause 2.6(2)(a) of the Land Transport Rule: Setting of Speed Limits 2022 (the Rule):

- State Highway 1 Weavers Road to Rakaia – from north of Weavers Road to Rakaia township, from 100km/h to 80km/h
- State Highway 1 Weavers Road Intersection Speed Zone – on SH1, approaching the intersection with Weavers Road, from 100km/h to 80/60 variable
- State Highway 1 North Rakaia Road Intersection Speed Zone – on SH1, approaching the intersection with North Rakaia Road, from 100km/h to 80/60 variable
- State Highway 1 Rakaia township – Rakaia township urban area, from 70km/h to 50km/h.

Background

Formally known as weigh stations, CVSCs are sites where enforcement officers from the police and other agencies undertake checks on heavy vehicles including weight, brakes, certificate of fitness, and their drivers, including logbooks and alcohol and drug testing. As a truck passes at normal speeds over the weigh-in-motion scales built into the road, software identifies if it is overloaded, and those drivers are directed into the centre.

The Rakaia Safety Centre is a split facility, so trucks only need to turn left in and left out. The northbound site is between Weavers Road and North Rakaia Road and the southbound site is on the opposite side of SH1 near North Rakaia Road. NZTA is completing the construction of the southbound CVSC, which is expected by April 2024. Then there will be a short period of trialling and testing before it becomes operational. It's expected construction of the northbound site will begin by May 2024.

The proposed speed changes were originally consulted on and submitted for certification under the Interim State Highway Speed Management Plan.

Matters for Approval

NZTA wishes to complete the speed limit changes for this corridor under clause 2.6.

NZTA considers that the requirements for clause 2.6 have been met. In particular:

- For clause 2.6(3)(a) NZTA took into account the guidance and information developed and maintained by NZTA under clauses 3.14 and 3.15 including the MegaMaps tool and One Network Framework for development of the technical aspects.

- For clause 2.6(3)(b) NZTA assessed the speed limits of the adjoining roads and considered the impact of the speed change and received feedback from adjacent RCAs.
- For clause 2.6(4) NZTA considers that there is a good reason for the proposed speed limits to be set.
- For clause 2.6(6) NZTA undertook consultation that aligns with the requirements of clause 3.9. Notably:
 - The consultation period was at least four weeks, from 14 November 2022 - 12 December 2022 as part of the Interim State Highway Speed Management Plan
 - Consultation was undertaken with Māori from the commencement of the project and with ongoing engagement up to the present.
- For clause 2.6 (7) NZTA considered consultation submissions received.

Attachment B is a copy of the approved and signed memorandum that records the process undertaken for these speed limit changes.

If NZTA receives your approval for setting the speed limit pursuant to clause 2.6, it will complete the speed changes in accordance with that clause, by creating and submitting a land transport record of the speed changes and publishing online the information required under clause 2.6(8).

We appreciate your consideration of these proposals. Please contact me if you wish to discuss any aspect of this letter or require any further information.



Vanessa Browne

National Manager, Programme and Standards

Attachment B

Rakaia Commercial Vehicle Safety Centre Project required speed limit changes memo

To Vanessa Browne, National Manager Programme and Standards
Transport Services

Cc James Hughes; Kirstan O'Donoghue; John Baillie

From Stephanie Robinson

Date 21/03/2024

Subject Rakaia Commercial Vehicle Safety Centre Project required speed limit changes memo

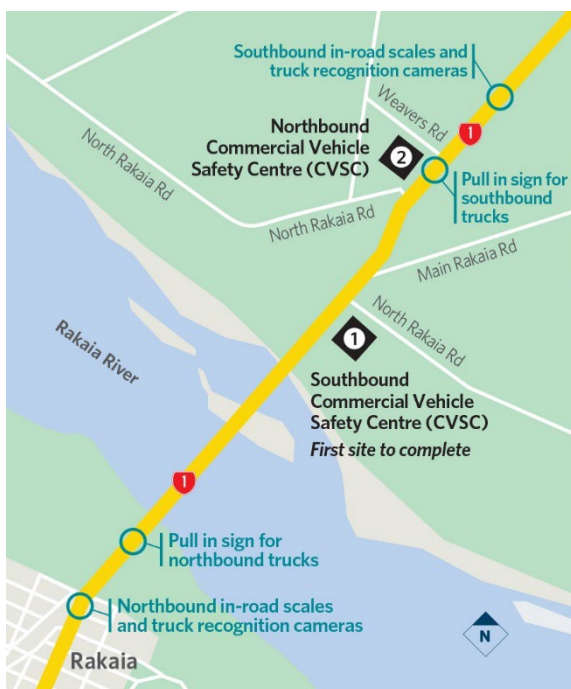
Rakaia Commercial Vehicle Safety Centre Project required speed limit changes

1. Scope

New Zealand Transport Agency Waka Kotahi (NZTA) as Road Controlling Authority ('RCA') respectfully requests that the Director of Land Transport approves the proposed speed limits required for the Rakaia Commercial Vehicle Safety Centre (CVSC) Project. This memo outlines the process that NZTA has undertaken to assess the proposed speeds. It accompanies a letter to the Director of Land Transport requesting an alternative approach to setting these speed limits: *Director approval before next plan* (Cl.2.6, Speed Rule).

We include four proposals required for the Rakaia CVSC, consulted on and submitted for certification under the Interim State Highway Speed Management Plan (ISHSMP).

2. Location



3. Project description

Formally known as weigh stations, CVSCs are sites where enforcement officers from the police and other agencies do checks on heavy vehicles and drivers including weight, brakes, certificate of fitness, logbooks and alcohol and drug testing. As a truck passes over the weigh-in-motion scales, software identifies if it is overloaded, and those drivers are directed into the centre. The Rakaia CVSC is a split facility, so trucks only need to turn left in and left out.

Waka Kotahi is completing the construction of the southbound CVSC, which is expected by April 2024. We'll then begin a short period of trialling and testing before it goes live. It's expected construction of the northbound site will begin in May 2024.

4. Technical Considerations

The CVSC project team road safety audits recommended Intersection Speed Zones (ISZs) be used for turning vehicles at both sites. These ISZs will reduce the risk for all vehicles as slow, heavy vehicles turn in and out of the two CVSC sites. To complement these, we completed an assessment to determine the safe and appropriate speed (SAAS) for the underlying permanent speed limit, the speed limit across the narrow Rakaia Bridge and the Rakaia township. For these proposals, we are looking to set the SAAS, however where we have not proposed the SAAS, we have explained the reason for the departure in the tables below.

4.1 Departures from the NZTA confirmed assessment of SAAS limits

Clause 12.13(2) of the Rule requires a RCA to provide an explanation for any speed limit changes it proposes that do not align with the NZTA (as Regulator) confirmed assessment of the SAAS. The SAAS is a theoretical model drawn from MegaMaps that all RCAs use when assessing speeds on their network.

This explanation, and the assessment that sits behind it, must be undertaken with consideration given to the matters in clause 3.2(1), being:

- 1) *When preparing or providing information for any speed management plan, the Agency (as RCA), each territorial authority and each regional transport committee must have regard to—*
 - a. *the road safety aspects of the GPS on land transport and any Government road safety strategy; and*
 - b. *the desirability of taking a whole-of-network approach to changing speed limits, safety cameras, and safety infrastructure, including considering a range of speed management interventions; and*
 - c. *the guidance and information developed and maintained by the Agency under clauses 3.14 and 3.15, including guidance on the use of mean operating speed when setting speed limits.*

This obligation does not apply when:

- the proposed speed limit is 70 km/h and the SAAS is 80 km/h
- the proposed speed limit is 90 km/h and the SAAS is 100 km/h
- where the proposed speed limit is to a road outside a school and complies with Section 5.

We have assessed and proposed several speed limit changes that differ from the SAAS. These changes and the reasons for them are explained in the table below (Table 1):

Table 1: Rationale for the departure from the safe and appropriate speed

Reason Reference #	Reason	Why a departure from the SAAS is necessary
1	Proposed speed limit implemented as part of a phased approach to implementing the SAAS	We agree with the ONF classification and have also taken into account feedback from stakeholders and the community. We will continue to review the proposed speed limit with the intention of progressing to the SAAS.
2	Lower than SAAS project request for lower speed limit	The project requires a lower variable speed to address the risk of turning traffic

In the speed limit table under 2.2. Proposed speed limit changes, where the departure from the SAAS has occurred this is noted in the 'Safe and Appropriate Speed (SAAS) departure information' column using the following format:

"Departure from SAAS considered appropriate for Reason X, as outlined in Table 1 of this plan"

4.2 Proposed speed limit changes

The proposed speed limits are detailed in the following table.

Table 2: Rakaia Commercial Vehicle Safety Centre Project proposed speeds

ISMP reference	SH	Element	Current Speed	Proposed Speed	Safe and Appropriate Speed (SAAS) departure information
1-3	1	Weavers Road to Rakaia	100	80	SAAS is 80km/h
1-4	1	Weavers Road ISZ	100	80 / 60 V	SAAS is 80km/h <i>Departure from SAAS considered appropriate for Reason 2, as outlined in Table 1 of this plan.</i>
1-5	1	North Rakaia Road ISZ	100	80 / 60 V	SAAS is 80km/h <i>Departure from SAAS considered appropriate for Reason 2, as outlined in Table 1 of this plan.</i>
1-6	1	Rakaia Township	70	50	SAAS is 40km/h. <i>Departure from SAAS considered appropriate for Reason 1, as outlined in Table 1 of this plan.</i>

5. Māori Partnership

Partnering with Māori requires a long-term view and commitment to building trusted relationships with iwi, hapū, rūnanga and hāpori Māori. We acknowledge that building and developing relationships takes time and commit to:

- working to the pace of those we meet
- ensuring we listen and understand their needs first.
- investigating how we could support these needs.
- continue exploring how we can be a more responsive partner that enables Māori aspirations.

Māori partnership has been at the broader level with the current engagement focus being on the future long-term solutions pursuant to large infrastructure projects, namely the Canterbury NZUP package and speed and infrastructure projects. It is at this strategic level where NZTA has been working in partnership with local environmental office Mahaanui Kurataiao and mana whenua Te Taumutu and Te Ngāi Tūāhuriri Rūnanga. This partnership prioritises opportunities to weave mana whenua values and cultural themes – such as concepts of travel and place – into infrastructure and understand what environmental measures they would like to see in place.

For this project, Te Taumutu Rūnanga, and Te Ngāi Tūāhuriri Rūnanga provided recommendations to NZTA on stormwater management and earthworks relating to CVSC consenting activity. An opportunity to provide consultation feedback for the ISZ was offered to the Rūnanga via email as well as through the general consultation requirements.

6. Consultation and Feedback

For proposals included as part of the ISHSMP, formal consultation for the speed limit proposals was undertaken over a four-week period between 14th November through 12th December 2022. The consultation was advertised on NZTA website and all submissions were received via the online survey. Consultation material included information on the project webpage; e-newsletter, and email to stakeholders.

6.1. Proposal feedback themes and NZTA response

Table 3 below sets out the feedback themes and responses of the specific proposals we are progressing as part of this alternative method for approval.

Table 3: Feedback themes and NZTA response

Proposal-SH number and location	Feedback from consultation	NZTA response
SH1 Weavers Road to Rakaia	21 submissions support this proposal. Of these, 17 support the 80km/h speed limit	We heard strong feedback on this proposal. Factors raised such as speeds over Rakaia Bridge and feeling unsafe because of its width,

Proposal-SH number and location	Feedback from consultation	NZTA response
	<p>as proposed for this area, but have concerns about the following:</p> <ul style="list-style-type: none"> - speeds over narrow Rakaia Bridge: consider double yellow lines to make passing illegal on the bridge, or install speed cameras to enforce lower speeds - passing lane near Weavers Road intersection to factor in where speed limit starts/ends. <p>Four submissions prefer the speed limit to be reduced further to 70, 60, or 50km/h, especially over Rakaia Bridge and/or leading into Rakaia township.</p> <p>One submission does not support this proposal; believes there are no safety hazards in this area.</p>	<p>reinforce the proposed speed limit for this section.</p> <p>Requests to consider locations (Main Rakaia Road) are included in the proposal.</p> <p>This section has an assessed safe and appropriate speed of 80km/h.</p> <p>Safety infrastructure projects for this NLTP (2021-2024) are currently set. We will consider new infrastructure projects for future NLTP cycles.</p>
SH1 Weavers Road ISZ	<p>Two submissions support these proposals; two customers suggest lowering the permanent speed limit to 60km/h instead of the proposed 80/60km/h ISZ for both intersections.</p> <p>Seven submissions do not support these proposals for the following reasons:</p> <ul style="list-style-type: none"> - think the changes are in preparation to set up a weigh station in this area, which they question/do not support; feel it will worsen congestion, and is dangerous to have trucks slowing down to pull in/out on an uphill section - believes there's no risk to road users in this area; suggests limiting times when trucks/heavy vehicles use these sections of road instead. 	<p>We heard limited support for these speed limit proposals. The feedback has been considered alongside our safety analysis.</p> <p>These speed limits are a key safety treatment for a Commercial Vehicle Safety Centre (weigh station) and mitigates the safety risk posed by the narrow width of Rakaia Bridge. They ISZs will be implemented before the CVSC becomes operational.</p>
SH1 North Rakaia Road ISZ		

Proposal-SH number and location	Feedback from consultation	NZTA response
SH1 Rakaia township	<p>38 submissions strongly support this proposal citing the following factors:</p> <ul style="list-style-type: none"> - local council and community have advocated for this safety improvement for years - lots of children/families use the roads to get around the community, shops, school and the local park - difficult to enter SH1 safely from town's side streets i.e. Michael Street, Rolleston Street, Elizabeth Avenue - hard to cross the road safely as most traffic including trucks going faster than the current 80km/h speed limit; consider installing a safe crossing or underpass as well. <p>Consider no engine/exhaust braking for trucks to reduce noise and install safety cameras to enforce the lower speed limit.</p> <p>Minor concerns about congestion through the township to the bridge.</p>	<p>We acknowledge the safety factors raised in feedback, including the challenge of crossing the road, and that this change has been advocated for a long period of time.</p> <p>This strong community sentiment has been considered alongside our safety analysis and reinforces the need to lower the speed limit at this location.</p> <p>Safety improvements, including infrastructure, are important factors which work alongside speed limits to keep everyone safe. As projects for this NLTP period (2021-2024) are set, we will consider new infrastructure projects in future NLTP cycles, subject to direction from government.</p> <p>Feedback around engine/exhaust braking has been share with the local safety team to assess and monitor.</p> <p>The suggestion for a safety camera for enforcement has passed on to the safety camera team to consider.</p>

7. Requirements of the Speed Rule

The Land Transport Rule: Setting of Speed Limits 2022 sets the process for making new and altering existing speed limits. The Rule has provision for 'out of cycle' certification by using Clause 2.6 'Alternative method for Agency (as RCA) or territorial authorities to set speed limits: Director approval before next plan'.

For these project required speed changes:

- Transport Services provides details of the proposed speed limits and seeks the Director's approval to set these.
- It can be confirmed that regard was taken of the guidance and information developed and maintained by the Agency and that discussions with adjoining RCA have taken place with regards to aligned speed limits.
- Consultation was undertaken over a four-week period and that clause 3.9 was applied. All submissions to the consultation were considered.


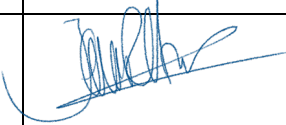
8. Transport Services Recommendation

Transport Services recommend that the Director of Land Transport approves the project required speed changes from the Interim State Highway Speed Management Plan as listed below.

State Hwy	Corridor Name	Description	Start (NZTM)	End (NZTM)	Length (km)	Speed Limit (km/h)
1	Weavers Road to Rakaia	From north of Weavers Road to Rakaia township	1524144, 5158147	1521799, 5155254	3.2	80

State Hwy	Corridor Name	Description	Start (NZTM)	End (NZTM)	Length (km)	Speed Limit (km/h)
1	Weavers Road ISZ	On SH1, approaching intersection with Weavers Road	1524016, 5157994	1523823, 5157765	0.3	80/60 (variable)
1	North Rakaia Road ISZ	On SH1, approaching intersection with North Rakaia Road	1523526, 5157286	1523140, 5156828	0.4	80/60 (variable)
1	Rakaia township	Rakaia township urban area	1521799, 5155254	1521325, 5154246	1.1	50

Outcome Endorsement

Name	Position	Date	Signature
Kirstan O'Donoghue	Team Lead, Road Safety, SaSS, Transport Services-Programme and Standards	20/03/24	
James Hughes	Lead Advisor Safety, Transport Services-Programme and Standards	20/03/24	

Decision

This decision is made by the National Manager, Programme and Standards, Transport Services, Office of GM TS in accord with the authority residing in NZTA.

Name	Position	Date	Signature
Vanessa Browne	National Manager Programme and Standards, Transport Services, Office of GM TS	22/03/2024	