

12 December 2022

Waka Kotahi NZ Transport Agency
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ATTENTION: INTERIM STATE HIGHWAY SPEED MANAGEMENT PLAN

Name: Mayor Denyer
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Dear Sir / Madam

Feedback on the Interim State Highway Speed Management Plan

Thank you for the opportunity to provide feedback on the Interim State Highway Speed Management Plan.

We agree with the intentions of the Interim State Highway Speed Management Plan, with the aim being to lower the total number of deaths and serious injuries in New Zealand by 2030. We agree that this can be achieved through the implementation of speed and infrastructure changes on our State Highways that will make the networks safer. However, we seek to emphasise that reducing speed limits is not a replacement for the necessary continued investment in safety improvements and intersection improvements. It is imperative that it is acknowledged that amending speed limits is only an interim measure and will not address underlying issues, particularly relating to the future proofing of the transport network.

We request that Waka Kotahi undertake education campaigns with the general public to build community acceptance and understanding of any changes to speed limits and the rationale for their implementation. It is imperative that the public understand the reasons behind the changes and the research behind these decisions. Understanding the 'why', is key to increasing compliance and will ultimately save more lives.

The Bay of Plenty region plays a significant role in both producing and transporting goods, and with an increasing population in our region, having safe and reliable roads is imperative. State Highway 2 (SH2) is the most feasible route for access to the Waikato, Auckland, and wider New Zealand for approximately half of our District. It is also a key entry point to the Bay of Plenty for freight, particularly accessing the Port of Tauranga, and for visitors. A safe and efficient route is an absolute necessity for economic and social wellbeing and should be a matter of national importance.

We are appreciative that Waka Kotahi acknowledges that to be successful in achieving its objectives of ensuring our transport system protects and helps us to get to the places and people important to us, that its approach to managing speed needs to ensure users of the State Highway network and local communities are brought along on the journey too. This includes understanding the regional context and the impacts that these proposed changes will have.

The major safety concerns on SH2 north of Tauranga have been an urgent issue for some time and have consistently been raised with Waka Kotahi and the Ministry of Transport. SH2 has suffered from an unacceptably high crash rate which has had a significant negative impact on many people's lives and our communities. Death, grief, life changing injuries and fear have afflicted our people. We ask that Waka Kotahi make this area of SH2 a priority. We seek continued investment in intersection improvements on SH2 and across the State Highway network. For example, the intersection of SH29 and Soldiers Road is also an area of concern and needs action.

Proposed Speed Limit Changes - Supportive

Location	Location Specifics	Existing Speed Limit (km/h)	Proposed Speed Limit (km/h)
Katikati Main Street	Beach Road to Digglemann Park	50	40
Barrett Road intersection speed zone (ISZ)	On SH2, approaching intersection with Barrett Road and Plummers Road	80	80/60
Snodgrass Road intersection speed zone	On SH2, approaching intersection with Snodgrass Road and Te Puna Quarry Road	80	80/60
Te Puna to Bethlehem	East of Te Puna Road to east of Wairoa Bridge	90	80

We are supportive of these proposed speed limit changes, as they will play a role in

creating a safer transportation network in our District for both freight and people.

We are supportive of the reduction in speed in the central Katikati area from 50 km/h to 40 km/h on the Katikati main street from Beach Road to Digglemann Park, as this will create a safer State Highway network in a busy town centre, but we would not support extending the reduction to 40km/h any further than this. We also wish to acknowledge, as we have done through a number of previous submissions to Waka Kotahi that the primary underlying issue for this stretch of SH2 is capacity and safety improvements. Speed limit reviews do little to address this. There is a clear need to deliver the Katikati bypass which will deliver much needed safety, journey reliability and support for our growing communities. It enables the Katikati community to reclaim the town and enjoy a safer community. It would build resilience into the national transport network as the current Uretara river crossing becomes increasingly vulnerable to flooding owing to the effects of climate change. It would also enable more efficient transport of goods to and from the Port of Tauranga and Tauranga City generally.

We request that Waka Kotahi staff reiterate to the Waka Kotahi Board how improvements to this section of SH2 will provide multiple benefits expected to be provided from the government's transportation policy statement (GPS) and to emphasise the need for a bypass for Katikati.

We note that the SH2/Ōmokoroa Road interim intersection upgrade speed limit assumptions should be provided to the design team to assist this process and support consistency for road users along this corridor.

Proposed Speed Limit Changes - Oppose

Location	Location Specifics	Existing Speed Limit (km/h)	Proposed Speed Limit (km/h)
Regional boundary to Katikati	From regional boundary with Waikato	100	90
Tauriko to regional boundary (Kaimai)	Tauriko to regional boundary with Waikato	100	90

We are opposed to the proposed change to reduce the speed limit on SH2 from the regional boundary of Waikato through to Katikati from 100 km/h to 90km/h. This proposed change was not what was agreed to through the road safety improvements process previously undertaken by Waka Kotahi. The improved safety works were intended to allow for safe travel at 100km/h and therefore the proposed change is not justified.

Furthermore, the proposed change to lower the speed limit from 100 km/h to 90 km/h from the Tauriko to regional boundary with Waikato will mean that cars cannot safely and legally overtake freight vehicles. These vehicles are already restricted to travelling 90 km/h and bringing passenger vehicles to the same speed limit will restrict their ability to

overtake at safe and appropriate times.

The Waka Kotahi business case supporting these safety improvements included the length of SH2 from Waihi to Ōmokoroa again expecting 100km/hr to be reinstated once the safety works had been implemented. It acknowledged the importance of safe and efficient movement of people and goods between the Waikato and Bay of Plenty regions and within the sub-region.

Proposed Speed Limit Changes - Oppose and Need Clarification

Location	Location Specifics	Existing Speed Limit (km/h)	Proposed Speed Limit (km/h)
Kaimai weather (Bay of Plenty)	West of Soldiers Road to southwest of Hanga Road	Various (100, 90, 80, 70, 60, 50) depending on weather	Various (90, 80, 70, 60, 50) depending on weather

We are opposed to the proposed change to reduce the speed limit on SH2 over the Kaimai Ranges between west of Soldiers Road to southwest of Hanga Road.

We seek further clarification on when variable speed limits will be used on SH29 over the Kaimai Range, which we note were trial treatments when initially installed. In the Interim State Highway Speed Management Plan, Waka Kotahi has proposed to introduce a number of variable speed limits for the Bay of Plenty Region. We acknowledge that the Kaimai Ranges can, at times, be a difficult piece of the network to travel on, but the passing lanes and slow vehicle bays help enable road users to use it in a safe manner. We would like further information on when the variable speeds will be used and how they will be used, as these will have large impacts on both the transport of freight and people across our District.

We continue to see these proposed changes as only interim measures for the Kaimai Ranges and that a long term solution to support the safe and efficient movement of goods and people between the upper north island and the Bay of Plenty is needed as this continues to be a high growth region.

Ōmokoroa Intersection

We seek clarification from Waka Kotahi as to why the State Highway 2 / Ōmokoroa Road Intersection has not been included in the Interim State Highway Speed Management Plan. We assume that it may have been intentionally excluded due to its upcoming upgrade addressing safety and capacity issues and that following the completion of the upgrade, community engagement will be undertaken to address the appropriate speed limit. However, certainty around this matter is sought. We expect to be fully involved in this process.

Summary

We support the premise of the Interim State Highway Speed Management Plan and feel that changes to the current speed limits are required, in most areas, for the protection of our residents and visitors' lives and the wellbeing of our communities. However, we ask that further safety works continue to be prioritised in order to support speed limits appropriate for the State Highways in our district to remain as the backbone of a fast and efficient transport network.

We are more than happy to work with Waka Kotahi on any future proposals and look forward to seeing improvements on our State Highway network which will lower the total number of deaths and serious injuries.

Yours faithfully,



James Denyer

Mayor, Western Bay of Plenty District Council