

6 October 2023

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

Dear Brent,

### **Director approval for speed changes – State Highway 3 – Junction Street Intersection Speed Zone**

Waka Kotahi as Road Controlling Authority ('RCA') respectfully requests that the Director of Land Transport approves the setting of a Variable Speed Limit (VSL) for an Intersection Speed Zone (ISZ) at Junction Street, New Plymouth, (shown in the map in **Attachment A** to this letter - see ringed area) in accordance with Clause 2.6(2)(a) of the Land Transport Rule: Setting of Speed Limits 2022 (the Rule).

#### **Background**

A 60km/h variable Intersection speed zone (ISZ) on the southern outskirts of New Plymouth at Junction Street is part of a suite of safety improvements proposed for the New Plymouth to Egmont Village SH3 corridor.

#### **Matters for Approval**

Waka Kotahi wishes to complete the speed limit changes for this corridor under the clause 2.6 and considers that the requirements for clause 2.6 have also been met. In particular:

- For clause 2.6(3)(a) Waka Kotahi took into account the guidance and information developed and maintained by Waka Kotahi (Agency) under clauses 3.14 and 3.15 by using Megamaps (Road to Zero Edition) for development of the technical aspects.
- For clause 2.6(3)(b) Waka Kotahi assessed the speed limits of the adjoining roads and considered the impact of the speed change and received feedback from the adjacent RCA.
- For clause 2.6(4) Waka Kotahi considers that there is a good reason for the proposed speed limit to be set before the next plan is published as this ISZ is proposed to be installed ahead of the 2024-2027 SHSMP as it is part of the SH3 New Plymouth to Egmont Village SIP project.
- For clause 2.6(6) Waka Kotahi undertook consultation that generally aligns with the requirements of clause 3.9. The extent and nature of the consultation undertaken is detailed in the Speed Review Memo (**Attachment B**). Notably, the consultation was:
  - greater than four weeks as required by the rule and undertaken in accord with Waka Kotahi (RCA) best practice.
  - was conducted, via the New Plymouth to Egmont Village project page on the Waka Kotahi website, over five weeks from Monday 27 February 2023 to Sunday 2 April 2023, generating 72 responses.
  - was undertaken with Māori (Te Kotahitanga Te Atiawa Trust) who confirmed they have no objections to the ISZ proposal.
- For clause 2.6(7), Waka Kotahi considered consultation submissions received.

Attachment B to this letter is a copy of the approved and signed memo which records the process undertaken for this speed limit change.

If Waka Kotahi receives your approval for setting the speed limit, we will complete the speed change in accordance with clause 2.6, by creating and submitting a land transport record of the speed change.

We appreciate your consideration in relation to the Junction Street intersection speed zone - variable speed limit approval. Please contact me if you wish to discuss any aspect of this letter or require any further information.

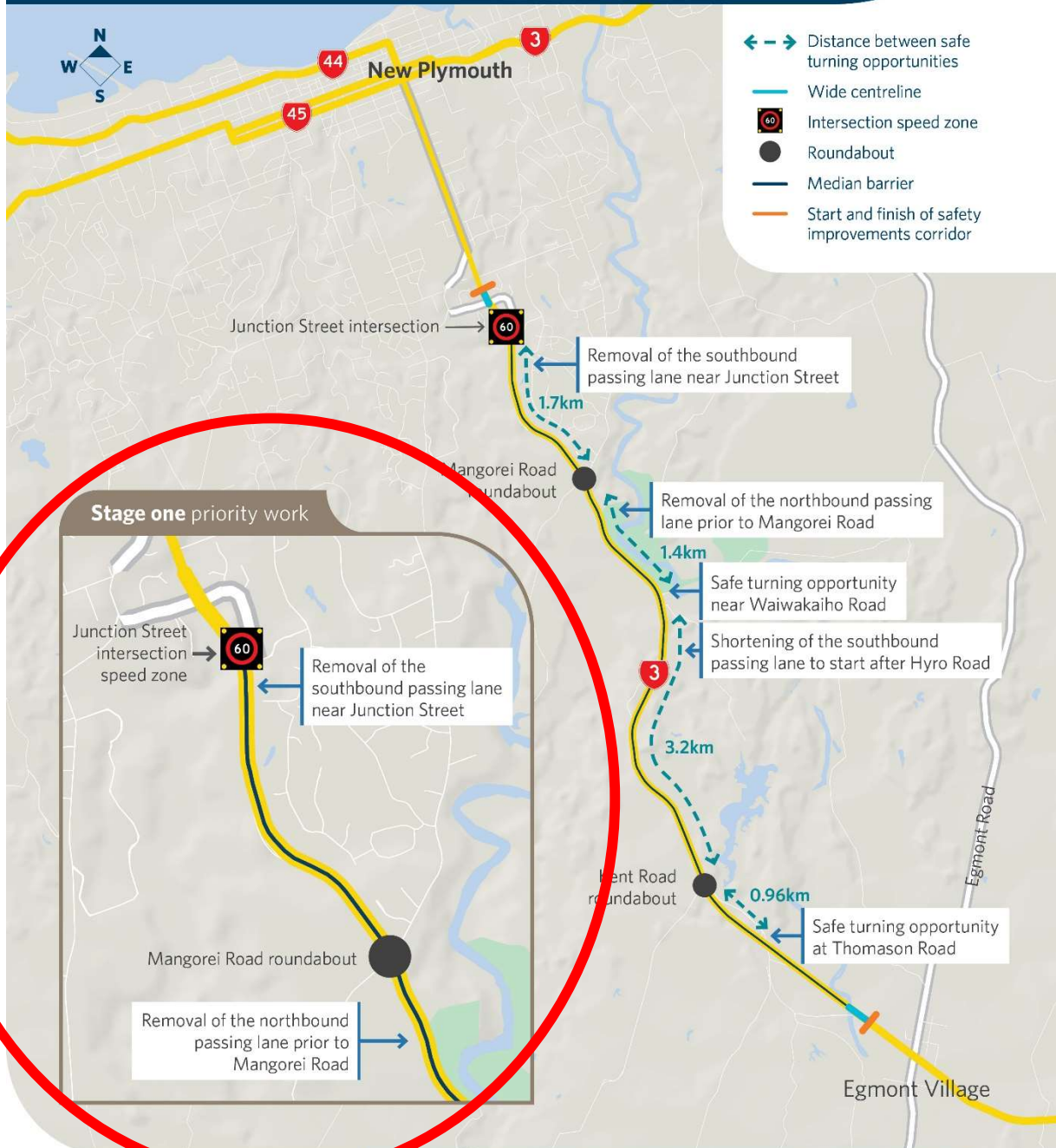
A handwritten signature in blue ink that reads "V C Browne". The signature is written in a cursive style with a large initial "V" and "C".

**Vanessa Browne**  
National Manager, Programme and Standards

# Attachment A



## New Plymouth to Egmont Village Proposed safety improvements



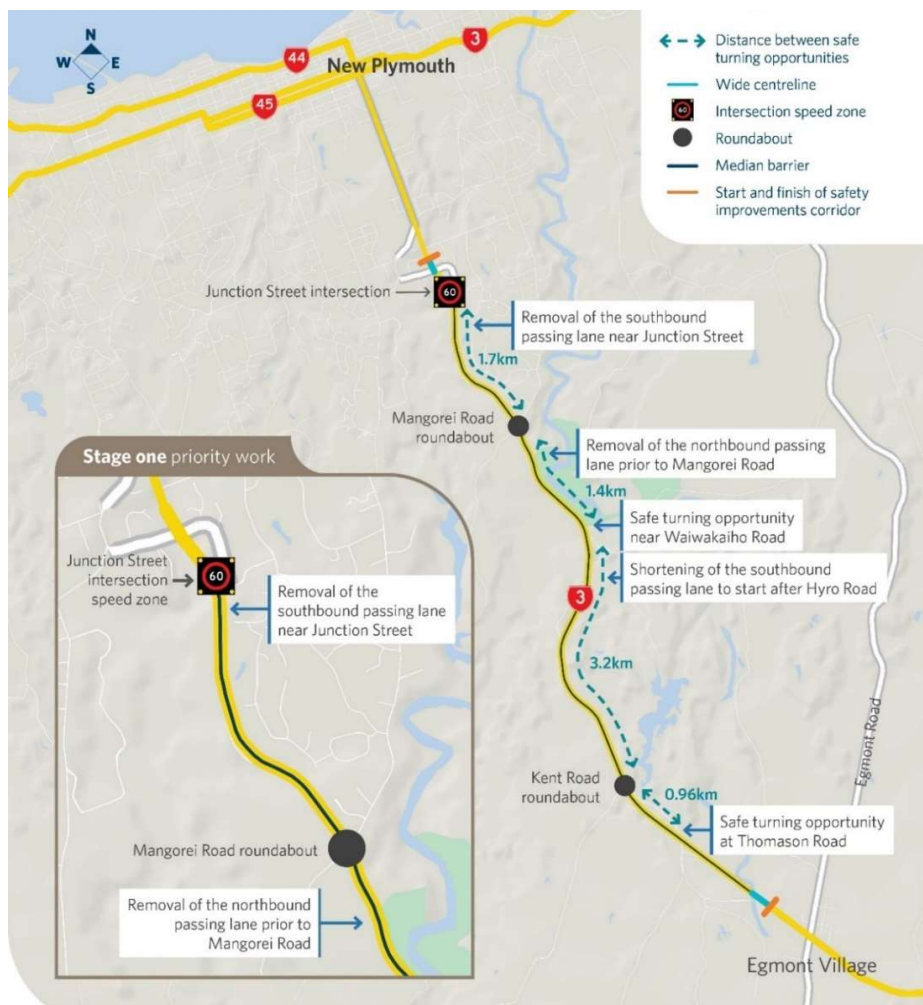
## **Attachment B**

**To** Vanessa Browne  
**Cc** Kirstan O’Donoghue; James Hughes  
**From** Sree Harsha Nutulapati, Project Manager  
**Date** October 2023  
**Subject** SH3 New Plymouth to Egmont Village safety improvements project – Junction Street Intersection Speed Zone

## SH3 New Plymouth to Egmont Village safety improvements project – Junction Street Intersection Speed Zone

### 1. Background

An Intersection Speed Zone (ISZ) on the southern outskirts of New Plymouth at Junction Street is part of a suite of safety improvements proposed for the New Plymouth to Egmont Village, SH3 corridor. At this location, the SH3 corridor is classified under the ONF as Inter-regional Connector.



The New Plymouth to Egmont Village SH3 corridor improvements are proposed as part of the New Zealand Road Safety Strategy, Road to Zero, which targets a 40% reduction in the number of people killed or seriously injured on our roads by 2030.

This memo outlines the rationale for introducing an ISZ at this location and the consultation that has taken place. It accompanies a submission letter to the Director of Land Transport requesting an alternative method to set speed limits: Director approval before next plan (cl2.6).

## **2. Rationale for ISZ**

SH3 from Egmont Village through this area to New Plymouth was identified as a route which required a safe system transformation; specifically median barriers and wide centrelines as a mid-block treatment and intersection treatments in support to maintain its current level of service as an inter-regional classification in the One Network Framework (ONF). Roundabouts and turnaround facilities would be required to support the median barriers on this part of the network.

As the main route linking New Plymouth to the rest of Taranaki and the lower North Island, it was considered appropriate to maintain a 100km/h speed limit where appropriate. However, the posted speed differs from the safe and appropriate speed of 60km/h shown in MegaMaps. With the implementation of 8.35km of median and side barriers planned for the rest of the route and upgraded facilities at intersections, this will allow 100km/h to remain as the posted speed limit on the wider corridor.

Junction Street intersection was cited as a potential risk on SH3 with turning movement intersection crashes within the 100km/h speed zone. It was not required as a turnaround facility and another, more appropriate location was preferred nearby (at Mangorei Road).

Four options were considered at this location:

- Complete closure.
- Banning right turns.
- A roundabout.
- Intersection Speed Zone.

The first three options are better aligned with the Safe System Approach, however in the case of removing access (banning right turns or a complete closure) it was very clearly signalled by the community and stakeholders that closing this access onto the state highway was not a viable option. This is due to the state highway providing access to the region for the suburb of Highlands Park along with some sections of urban New Plymouth.

The roundabout option was limited by the geography at the intersection and would require significant earthworks as part of the construction. The access function is able to be met with the existing priority control, so there is not additional justification for roundabout here.

The next significant intersection, SH3 / Mangorei Road, will include a roundabout. A roundabout at this location will address an existing safety issue at this intersection and providing access to both the state highway from a rural connection and a local road. On top of this, Mangorei Road is better location to support the planned wire rope barriers on the route as a turnaround facility.

As the Junction Street intersection needs to remain open, a roundabout is uneconomic and unjustified in this location and represents a duplication of a roundabout required nearby, the Intersection Speed Zone was selected as the best option. It also aligns with the recommended safe and appropriate speed at this intersection of 60km/h. While it does not meet the safe system approach fully, reducing the speed to 60km/h from 100km/h will improve outcomes if someone makes a mistake in this location.

### 3. Consultation on proposed improvements

Community and key stakeholder consultation was carried out on the full range of proposed safety improvements for this corridor in November and December 2021.

Whilst a possible ISZ at Junction St was included in this broader consultation, it was subsequently agreed that a separate consultation would be necessary (seeking feedback on this specific speed reduction proposal) - ahead of any application to the Director of Land Transport to consider this variable speed limit outside of a Speed Management Plan (under Section 2.6 of Land Transport Rule: Setting of Speed Limits 2022).

As a result of this, a specific ISZ consultation was conducted, via the New Plymouth to Egmont Village project page on the Waka Kotahi website, over five weeks from Monday 27 February 2023 to Sunday 2 April 2023, generating 72 responses.

The consultation was promoted via the following means:

- Media release 27 February 2023
- Project enewsletter 27 February 2023
- Website update 27 February 2023  
<https://www.nzta.govt.nz/media-releases/feedback-sought-on-possible-intersection-speed-zone-for-sh3-new-plymouth/>
- Mail-out to local residents from 1 March 2023
- Radio advertising on NZME stations from 10 to 31 March 2023

#### Junction Street, New Plymouth - Intersection Speed Zone proposal

Waka Kotahi NZ Transport Agency would like your feedback on our proposal to create an Intersection Speed Zone at the State Highway 3 intersection with Junction Street in New Plymouth.

If confirmed following public consultation, the Intersection Speed Zone would detect drivers approaching the highway from Junction St or turning right into Junction St from the highway, and reduce the speed limit temporarily on SH3 to improve safety for all road users.

When operating, the zone's two digital signs - located approximately 150m north and south of the Junction St intersection - would display an enforceable speed limit of 60kmh.

These measures would temporarily slow traffic, making it easier and safer for people to pull out of or into Junction St across a high-speed rural road. This would help take the pressure off and protect people by reducing the risk and severity of crashes.

The current 100kmh speed limit would continue to apply at all other times.



It is fair to describe the feedback from the consultation received as 'mixed'. From a total of 46 responses received, 27 responses can be interpreted as being in favour of the proposal. The majority of these also provided further comments and suggestions.

Out of the 27 responses in support of the ISZ,

- 11 responses were directly in support of the ISZ.

- 6 responses further suggested either permanent reduction to 80km/h till proposed Mangorei Roundabout, with
- 10 responses suggesting further permanent reduction to 50km/h or 60km/h.
- Though supportive, 3 responses included concerns over compliance and enforcement.

Three responses suggested right turn ban at Junction St along with speed reduction. During early consultation with NPDC and public as part of wider project, a right turn ban option was removed from consideration due to concerns raised by the council and public regarding impact on local network.

Eight responses were clearly against the speed reduction, and some further suggested significant infrastructure improvements to SH3.

The other responders provided feedback not directly related to the ISZ proposal, instead discussing alternative solutions for the New Plymouth to Egmont Village section of SH3, and the subjects of speed and safety in a more general sense.

Feedback theme	Summary	Waka Kotahi Comments
Supporting the Intersection Speed Zone	<p>There were many comments of general support for the proposal and decision to reduce speed. The added safety was noted as positive as many people said the area was dangerous.</p> <p>A few submitters that were supportive of the proposal also said they would prefer a permanent speed reduction.</p>	<p>Our intent is to make this stretch of road safer. The intersection speed zone will be part of a range of upgrades that will make SH3 safer between New Plymouth and Egmont Village.</p>
Opposing the Intersection Speed Zone	<p>There was opposition to the Intersection Speed Zone however the reason for the opposition was split.</p> <p>People either opposed because they thought the changes weren't needed or opposed because they believed that measures weren't enough.</p> <p><b>General opposition</b></p> <p>Some believed the Intersection Speed Zone was not needed and would not be helpful. Others said it would be a waste of money and time. The current 100kph speed limit was said to be sufficient and shouldn't be reduced.</p> <p><b>Safety</b></p> <p>Some people thought that the proposal wouldn't help to make the intersection safe and more needs to be done to reduce accidents. There was concern that lowering speed won't stop accidents.</p> <p>Many commentators suggested that there should be a permanent speed reduction on this section of highway instead.</p>	<p>We recognise that they are mixed views amongst the community. While we work to balance these views, we recognise that many people don't agree that upgrade and speed reductions are necessary.</p> <p>Our main goal, however, is to achieve safer roads as part of New Zealand's Road Safety Strategy.</p> <p>Our intent is that the intersection speed zone won't be enough on its own. It will be part of a range of upgrades that will make SH3 safer between New Plymouth and Egmont Village.</p> <p>Alongside the intersection speed zone, we would remove the southbound passing lane at Junction</p>



Feedback theme	Summary	Waka Kotahi Comments
	<p>There were concerns that people will ignore the intersection speed zone signs or get confused about the changing speed limits and cause more accidents instead of preventing them.</p> <p><b>Travel time</b> There was concern that travel times would be increased by lowering speed limits.</p> <p><b>Enforcement</b> It was questioned how the new speed limit would be enforced and concern that the flashing lights will be ineffective without speed cameras.</p>	<p>Street and install flexible median barriers.</p>

#### 4. Māori partnership

In accordance with 3.9 (6) of the Land Transport Rule: Setting of Speed Limits 2022, separate engagement was conducted with the relevant local iwi Te Kotahitanga o Te Atiawa Taranaki who confirmed they have no objections to the proposed ISZ.

#### 5. Requirements of the Rule 2022

The Land Transport Rule: Setting of Speed Limits 2022 sets the process for making new and altering existing speed limits. This process indicates that the preferred method is by a Speed Management Plan. However, the rule has a 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 the Junction St Intersection Speed Zone, Transport Services seek the Director's approval to set a variable speed limit of 60kmh.

This ISZ is proposed to be installed ahead of the 2024-2027 SHSMP as it is part of the SH3 New Plymouth to Egmont Village SIP. This SIP project is also being advanced as it is one of the 'quick wins' projects being put forward and corridor will be under construction soon. It is best if this hardware is to be installed as part of this contract as the Agency does not have to re-establish the construction site and will interfere with regional traffic less. From a cost and reputational point of view, this ISZ should be active and operational to complete this project ahead of the next SHSMP.

## 6. Transport Services recommendation

Transport Services recommends that the Director of Land Transport certifies the 60kmh Intersection Speed Zone at Junction Street.

Corridor Name	Description	Start	End	Length (km)	Speed Limit (km/h)
SH3 Junction Street intersection	Junction Street Intersection with SH3	1694803, 5673864	1694861, 5673574	0.3km	60-100km/h (variable)

## Outcome Endorsement

Name	Position	Date	Signature
Kirstan O'Donoghue	Team Lead (A), Road Safety, SaAS, Transport Services – Programme and Standards	05/10/2023	
James Hughes	Lead Advisor Safety, Transport Services – Programme and Standards	5 <sup>th</sup> October 2023	

## Decision

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

Name	Position	Date	Signature
Vanessa Browne	National Manager Programme and Standards, Transport Services, Office of the GM TS	06/10/2023	