



## SUBMISSION

---

To: Waka Kotahi (NZ Transport Agency)

Submission: Interim State Highway Speed Management Plan 2023-2024

Date: 12 December 2022

Sent to: [info@nzta.govt.nz](mailto:info@nzta.govt.nz)

This feedback was also submitted online at:  
<https://www.nzta.govt.nz/safety/what-waka-kotahi-is-doing/interim-state-highway-speed-management-plan/have-your-say/>

Contact: Billy Clemens, Policy Advisor  
La Ara Aotearoa Transporting New Zealand Incorporated  
[billy@transporting.nz](mailto:billy@transporting.nz) 04 471 8283

Nick Leggett, CEO  
La Ara Aotearoa Transporting New Zealand Incorporated  
[nick@transporting.nz](mailto:nick@transporting.nz) 04 472 3877

## **Ia Ara Aotearoa Transporting New Zealand submission to Waka Kotahi on the Interim State Highway Speed Management Plan 2023-2024**

### **Introduction**

- 1 Ia Ara Aotearoa Transporting New Zealand Incorporated (Transporting New Zealand) welcomes the opportunity to make a submission on the Waka Kotahi Interim State Highway Speed Management Plan 2023-2024 (ISMP). As a national association representing road freight transport companies, our members and their staff have a strong interest in ensuring that the State Highway network operates safely and efficiently.
- 2 Having reviewed the consultation draft and consulted with our membership, Transporting New Zealand is broadly supportive of the changes proposed by the ISMP.
- 3 Transporting New Zealand supports the ISMP's focus on high-risk areas (including schools and marae) and the targeted approach to speed management. This targeted, or "pragmatic" approach (as described at page 7 of the consultation document), is preferable to blanket, large-scale speed reductions. This is in line with Transporting New Zealand's support for evidence-based speed policy that contributes to the credibility of speed management.
- 4 Transporting New Zealand hopes that Waka Kotahi will continue this targeted and pragmatic approach during the development and implementation of the 2024-27 State Highway Speed Management Plan.
- 5 Transporting New Zealand does have some specific feedback to provide on several of the regional implementation programmes, detailed below.

### **Tairāwhiti – Gisborne**

- 6 Transporting New Zealand has no objection to the proposed speed limit changes. However, we note that Tairāwhiti – Gisborne is the only region not to have "Freight network" listed as a regional consideration. This should be reassessed when Waka Kotahi develops the 2024-27 State Highway Speed Management Plan.
- 7 The Te Tairāwhiti Regional Land Transport Plan 2021-2031 notes that the region will experience rapid growth in freight, particularly export log volumes to the port and other sites, and growing traffic volumes on key urban routes (page 10). It is important that these freight considerations are adequately taken into account in future work.

### **Te Taihū – Nelson, Tasman and Marlborough**

- 8 *SH6: Ellis Street intersection speed zone (ISZ)*
- 9 Transporting New Zealand's regional sector advisor for the upper South Island considers that Waka Kotahi should prioritise the introduction of merge lanes at this intersection over a speed decrease.
- 10 *SH6: Jackson Road / Graham Road intersection speed zone (ISZ)*
- 11 Transporting New Zealand's regional sector advisor for the upper South Island considers that an ISZ could disrupt traffic flow and contribute to dangerous driver frustration and unsafe driver conduct.

- 12 The ISZ will cause traffic to bunch up as it slows down, reducing the opportunities for anyone pulling out of Jackson Road to merge with the traffic flow, which in turn encourages drivers to pull out when the way is not clear.
- 13 A better alternative would be a pull-in bay in the centre of the road for right turning traffic and a pull in / merge bay on the left-hand side of the road for left turning traffic. This would allow all turning traffic to merge-in together.
- 14 *SH1: Riverlands School*
- 15 Transporting New Zealand's regional sector advisor for the upper South Island has queried Waka Kotahi's justification for this proposed school speed limit, given that school pickups and drop offs occur away from SH1 on Alabama Road. Students and caregivers walking, cycling or scootering use a walkway / cycleway separated from SH1, and the school itself is well fenced.
- 16 Transporting New Zealand would appreciate any further supporting information that Waka Kotahi can provide on this proposal.

### **Te Tai o Poutini – West Coast**

- 17 *SH7: Reefton township*
- 18 Transporting New Zealand's regional sector advisor for the upper South Island has queried Waka Kotahi's justification for this 50kmph to 40kmph speed limit reduction. This road has light traffic flow and appears to be low risk. Transporting New Zealand would appreciate any further supporting information that Waka Kotahi can provide on this proposal.

### **Waitaha – Canterbury**

- 19 *SH77: Methven township north*
- 20 Transporting New Zealand's regional sector advisor for the lower South Island considers that this speed limit should be a continuation of the 50 kmph speed limit from Methven past the new Ōpuke Thermal Pools.
- 21 The Methven Community Board and the Ashburton DC Road Safety Committee has been trying to get the speed limit reduced to 50 kmph since the Pools were opened.
- 22 Reducing the speed limit from 100 to 80 kmph is simply not enough of a reduction as there are pedestrians walking and crossing the road. Often, people driving do not see the Pools' gateway in time, and there is a high risk of vehicles getting rear-ended. A 50kmph limit would not unduly disrupt traffic flow or negatively impact motorists.

### **About Ia Ara Aotearoa Transporting New Zealand**

Ia Ara Aotearoa Transporting New Zealand is a national membership association representing the road freight transport industry. Our members operate urban, rural and inter-regional commercial freight transport services throughout the country.

As the peak body and authoritative voice of the road freight sector, Transporting New Zealand's purpose is creating the environment where trucking operators can drive successful, safe, sustainable businesses. Our strategic priorities are:

- Providing one industry voice for advocacy

- Promoting the road freight transport industry
- Attracting talent and promoting workforce development
- Supporting our members and customers
- Sustainability, safety and responsible emissions reduction

New Zealand's road freight transport industry employs 33,000 people (1.2% of the total workforce), and has a gross annual turnover in the order of \$6 billion. This is part of a wider transport sector that employs 108,000 people and contributes 4.8 percent of New Zealand's GDP. Road freight transport accounts for 93% of the total tonnage of freight moved in New Zealand (MoT National Freight Demands Study 2018).