



Iā Ara Aotearoa Transporting New Zealand

submission to:

Waka Kotahi NZ Transport Agency

on:

SH30 speed limits between Rotorua and Whakatane

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Ia Ara Aotearoa Transporting New Zealand (Transporting New Zealand) submission to Waka Kotahi NZ Transport Agency on: SH30 speed limits between Rotorua and Whakatane

1. Representation

- 1.1 Ia Ara Aotearoa Transporting New Zealand (Transporting New Zealand) is made up of several regional trucking associations for which Transporting New Zealand provides unified national representation. It is the peak body and authoritative voice of New Zealand's road freight transport industry which employs 32,868 people (2.0% of the workforce), and has a gross annual turnover in the order of \$6 billion.
- 1.2 Transporting New Zealand members are predominately involved in the operation of commercial freight transport services both urban and inter-regional. These services are entirely based on the deployment of trucks both as single units for urban delivery and as multi-unit combinations that may have one or more trailers supporting rural or inter-regional transport.
- 1.3 According to Ministry of Transport research (National Freight Demands Study 2018) road freight transport accounts for 93% of the total tonnage of freight moved in New Zealand.

2. Introduction

- 2.1 Transporting New Zealand provides sector leadership and believes we all need to operate in an environment where the following must be managed and co-exist:
 - The safety and wellbeing of our drivers and other road users; our drivers are our most valuable asset
 - The impacts of transport on our environment
 - The transport of goods by road is economically feasible and viable and it contributes the best way it can to benefit our economy.
- 2.2 Transporting New Zealand welcomes the opportunity to comment on Waka Kotahi NZ Transport Agency's (Waka Kotahi) proposed changes to speed limits on SH30 between Rotorua and Whakatane.
- 2.3 Waka Kotahi has requested feedback on reducing speed limits on 14 sections of SH30 and one section of SH2. The reductions in some places are 10km/h and in other places 20 km/h.

3. Submission

- 3.1 Transporting New Zealand supports the aspiration of Road to Zero. The roads are the workplace for many of our members. No transport operator wants to send their staff out to work each day and have any of them not come back, or end up in hospital with serious injuries, and nor do they want to injure any third party.

- 3.2 In our view, the zero is really about zero tolerance to the behaviour that causes deaths and injuries, and we are supportive of that on the condition that the Government and Waka Kotahi genuinely focus on developing an overall safer system, and implicit in that is taking a systems approach.
- 3.3 We are concerned that with the exception of some isolated cases, we are not seeing evidence of investment in an overall safer system and Waka Kotahi's performance on completing capital projects and engineering safety improvements, such as barrier systems, on plan has been extremely poor.
- 3.4 We are also concerned that Waka Kotahi's approach of speed reduction is shifting its responsibility on to road users to manage the inherent risk – often for poorly maintained and/or poorly built roads - and in essence, that is an abdication of responsibility.
- 3.5 Further to 3.4, Waka Kotahi's approach of reducing speed is inconsistent with good risk management practice. The Health and Safety at Work (General Risk and Workplace Management) Regulations 2016 refer to a hierarchy of risk control measures. In essence, in order of the most preferred methodology these are: substitution, isolation, or applying engineering controls. Waka Kotahi takes the weakest and least effective approach.
- 3.6 Our other major concern regards the authenticity of Waka Kotahi consulting on speed "reviews". Waka Kotahi staff have said the reduction of speed limits across the network is a fait accompli and that the consultation being undertaken is merely to formally record that a due process has been followed. Therefore, in our view this consultation is another waste of public funding by Waka Kotahi and it is professionally questionable.
- 3.7 We note that Waka Kotahi has not provided any information on current operating speeds for these sections of road under consultation, for example 85th percentile free flowing speed data. Therefore, there seems little understanding or consideration of the consequential impacts on travel times. Our recommendation is that Waka Kotahi include in their media releases and consultation the fact that where speed limits are reduced, users of transport services should expect an increase in the freight costs on those routes as a result of extra time on the road.
- 3.8 Not only has Waka Kotahi not provided any information about current operating speeds, nor has it provided information on traffic volumes, geometric design, roadside development or the roadside hazards. All these factors are key to setting an appropriate speed and in the absence of that information we are unable to either support or oppose the proposed changes.
- 3.9 We are resigned to Waka Kotahi making these changes regardless, and concerned that currently across the network there is a high degree of inconsistency between posted limits and the respective road environment. There is little discernible change in the road environment and it is often difficult for drivers to ascertain the appropriate limits and there is high dependency on the

posted signs. As a consequence compliance is inherently problematic. In the interests of fairness to road users and to help with enforcement we ask:

- Waka Kotahi pay attention to road maintenance and ensure the signs are clearly visible and driver sight lines are not obstructed by roadside vegetation
- Waka Kotahi work closely with telematic providers so any changes are widely publicised and drivers get a fair and reasonable chance to adapt to the changes
- There should be a considerable amnesty period when changes to speed occur, and enforcement does not occur within several hundred metres of the boundary where the speed limit is reduced.

4. Concluding comments

- 4.1 Transporting New Zealand supports the aspiration of Road to Zero. The roads are the workplace for many of our members.
- 4.2 We are unable to either support or oppose the proposed speed changes.
- 4.3 We are concerned that Waka Kotahi's approach of reducing speed reduction is shifting its responsibility on to road users to manage the inherent risk – often for poorly maintained and/or poorly built roads - and in essence, that is an abdication of responsibility. Waka Kotahi is taking the weakest and least effective approach to risk control measures.
- 4.4 Waka Kotahi does not appear to be undertaking rigorous or substantive analysis. The scope of its analysis is siloed and does not fully consider the impacts on freight movement, and the consequential impacts on the economy and the safety and wellbeing of New Zealanders. Waka Kotahi lacks the ambition to develop an infrastructure that enables freight to move in a way that is commensurate with a world class economy.
- 4.5 If consultation is purely “lip service” and the decisions have already been made, this is another waste of public funding by Waka Kotahi and it is professionally questionable.