



**la Ara Aotearoa Transporting New Zealand**

**submission to:**

**Waka Kotahi NZ Transport Agency**

**on:**

**SH3 safety between Palmerston North and Ashurst**

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# **la Ara Aotearoa Transporting New Zealand (Transporting New Zealand) submission to Waka Kotahi NZ Transport Agency on: SH3 safety between Palmerston North and Ashurst**

## **1. Representation**

- 1.1 la 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 improve the safety of SH3 between Palmerston North and Ashurst.
- 2.3 Waka Kotahi has requested feedback on the proposed infrastructure changes and thoughts on the current speed limits. The proposed changes include:
  - Installing traffic signals and a raised safety platform at the intersection of SH3 and Roberts Line
  - Constructing cycling facilities along SH3 between Keith Street and Roberts Line
  - Providing refuge islands to help pedestrians cross SH3.
- 2.4 Waka Kotahi has requested thoughts on the current speed limits given it is considering:

- An urban speed limit from Roberts Line on the approach into Palmerston North
- A school variable speed limit for Whakarongo School at the Stoney Creek Road intersection, during school start and finish times.



Figure 1: SH3 looking north on approach to Roberts Line intersection (80km/h temporary)

### 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 understand the benefits that traffic signals bring in the appropriate environment. Can Waka Kotahi provide evidence to show that the traffic volumes justify the introduction of signals?
- 3.4 In the event traffic signals are installed, can Waka Kotahi provide an assurance that this will not have an adverse impact on the geometric design, and in particular, that there will be sufficient lane width and corner widening to allow heavy vehicle combinations, for example 25 m trucks and trailers, to safely compete turning manoeuvres while staying in their lane?
- 3.5 In the absence of quality evidence, we do not support the use of raised platforms in relatively open road environments. We are concerned with Waka Kotahi's recent penchant for introducing these with little, if any, understanding of the longer-term impacts. In earlier discussions with Waka Kotahi, it appears that all traffic will need to slow to a speed of somewhere between 30 and 60 km/h, even

if having right-of-way through the signals on green. The slowing of every vehicle in the stream has negative impacts on the environment including fuel use, noise, and brake emissions.

- 3.6 We support the provision of cycling facilities along SH3 between Keith Street and Roberts Line. As we have raised in earlier submissions to Waka Kotahi, we request the Land Transport Road User Rule be amended to require cyclists to use purpose-built facilities when available. It is frustrating and dangerous for many truck drivers that it is not uncommon to see cyclists still cycling in normal traffic lanes despite there being special facilities provided for them.
- 3.7 In regard to the speed outside the school, we agree that a variable speed limit during school start and finish times would be appropriate, on the proviso that the surrounding environment is changed to provide appropriate cues to drivers that reducing speed is sensible.



Figure 2: SH3 looking north on approach to Stony Creek Road with Whakarongo School on left

- 3.8 We would also urge Waka Kotahi to work with the school to make sure that parents or child carers do not think that the reduced speed limit means it is safe to park on SH3 and increase the risk of pedestrian traffic and children crossing SH3.
- 3.9 We have heard Waka Kotahi say it is taking a system approach to Road to Zero however, in this case we are concerned with Waka Kotahi's level of commitment and authenticity to such an approach. By proposing the infrastructure changes prior to consulting on a speed limit change, these changes appear somewhat disingenuous because once that infrastructure is in place a 100km/h speed limit would clearly be unsuitable. Transporting New Zealand believes that a more transparent and efficient approach to these changes would have been to bundle them together and consult on that package as an integrated systems change.