



**la Ara Aotearoa Transporting New Zealand  
Submission to:**

**Waka Kotahi NZ Transport Agency**

**on:**

**SH57 Levin to Shannon Speed limits**

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# **Ia Ara Aotearoa Transporting New Zealand (Transporting New Zealand) submission on: proposed changes to SH57 Levin to Shannon speed limits**

## **1. Representation**

- 1.1 Transporting New Zealand is made up of several members include Road Transport Association NZ, National Road Carriers, and NZ Trucking Association. The affiliated representation of Transporting New Zealand is some 3,000 individual road transport companies which in turn operate 16-18,000 trucks involved in commercial road freight transport, as well as companies that provide services allied to road freight transport.
- 1.2 The road freight transport industry is 3.0% of New Zealand's gross domestic product (GDP) and it carries 93% of the nation's freight. We employ around 32,868 people and vocational education is of growing importance in our industry due to a shortage of drivers and other workers.

## **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 Waka Kotahi NZ Transport Agency (Waka Kotahi) is seeking feedback on its proposals regarding speed limit changes to SH57 between Levin and Shannon. Transporting New Zealand (formerly Road Transport Forum) has over a prolonged period of time commented on speed changes proposed by Waka Kotahi.
- 2.3 To supplement this submission the regional trucking associations for which Transporting New Zealand provides unified national representation may, at their discretion, provide local submissions.

## **3. General comment on Waka Kotahi speed management strategy**

- 3.1 Generally, we strongly oppose what is essentially Waka Kotahi making carte blanche reductions in speed limits across the state highway network because:

- 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.
- 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's approach takes the weakest and least effective approach.
- Reducing speed is not as effective in managing risk as remediating the underlying issues of relatively poor road design in terms of lane width, shoulder width, lane separation, curvature and roadside hazards.
- Reducing speed is not as effective as maintaining road surface quality. We believe Waka Kotahi has a legal obligation to provide a safe operating environment. Issues such as skid resistance, rutting and pot holing must be maintained and/or repaired to a consistently good standard.

3.2 Waka Kotahi's risk analysis underpinning its proposed speed limit changes appears to be very narrowly confined to historic data on the social cost of harm to people. The agency's analysis does not appear to take into consideration any meaningful economic and/or social impacts on freight movement which in turn, are likely to result in adverse impacts on the safety and wellbeing of our people, other road users, and the people that rely on the freight we move.

#### **4. Comments on proposed speed limits**

4.1 We would prefer the state highway network to have well-designed and maintained roads with a roadside environment that allows motorists to safely travel at the open road default limit of 100 km/h. However, given that does not appear possible in this case, we agree with the proposed changes for these sections of road.

#### **5. Concluding comments**

5.1 Waka Kotahi is not providing our sector with confidence that it is pursuing long-term solutions to improve road safety performance across the network, and it should be investing more in providing a network that enables motorists to travel safely at the default open road speed limit of 100km/h and heavy vehicles to travel at 90 km/h.