



## SUBMISSION

---

Submission: Palmerston North Speed Management Plan 2024-2027

To: Palmerston North City Council

Sent to: [submission@pncc.govt.nz](mailto:submission@pncc.govt.nz)

Date: 31 October 2023

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

Dom Kalasih, Interim Chief Executive  
La Ara Aotearoa Transporting New Zealand  
[dom@transporting.nz](mailto:dom@transporting.nz)  
04 472 8285

## 1. About Ia Ara Aotearoa Transporting New Zealand

- 1.1. Ia Ara Aotearoa Transporting New Zealand is a national membership association representing the road freight industry. Our 1,100 member companies operate urban, rural and inter-regional commercial freight transport services throughout the country, including in and around Palmerston North.
- 1.2. 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
- 1.3. 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).

## 2. Introduction

- 2.1. This draft speed management plan is being produced in compliance with the Land Transport Rule: Setting of Speed Limits 2022, that the National Party has previously pledged to repeal. Transporting New Zealand submits that the Council should consider pausing this process until the incoming government is able to provide further direction.
- 2.2. Notwithstanding this, Transporting New Zealand appreciates the opportunity to provide feedback on the speed management plan. This submission is focussed on the proposed changes that will impact commercial transport and freight mobility – the City Centre and Milson Line proposals.
- 2.3. Improving road safety is one of Transporting New Zealand's key strategic goals. Local roads and state highways are the primary workplace of many of our members, who all want to see reductions in fatality and serious injury rates from road trauma.
- 2.4. Transporting New Zealand supports a targeted approach to setting safe speed limits that includes consideration of journey times, congestion, and economic productivity.
- 2.5. **Based on the feedback we have received from road freight operators in the area, and the data provided by the Council, Transporting New Zealand does not support the proposed speed limit changes affecting the City Centre and the Milson Line.**

### 3. Feedback on the speed management plan's guiding objectives and policies

- 3.1. Transporting New Zealand submits that the speed management plan's guiding objectives and policies should acknowledge the importance of ensuring freight mobility in and around Palmerston North.
- 3.2. Helpful high-level references to freight considerations have been made in other Council and Waka Kotahi documents, including the Council's Strategic Networks 2023 document (page 6):

*"The city generates 13.51 million tonnes of freight across 8% of New Zealand's total land area. Palmerston North itself contributed around \$5.5bn to the national economy in the year to September 2021. With \$8 billion of infrastructure investment planned and underway in and around our city, we need to find the right balance between catering for regionally significant freight activities while ensuring Palmerston North is a safe, inviting and accessible city for the 90,500 people that call it home."*

- 3.3. Waka Kotahi's Interim State Highway Speed Management Plan 2023-2024 Consultation Draft also listed the freight network as one of three regional considerations for Manawātū – Whanganui, identifying the area as a key freight and transport hub.
- 3.4. While this speed management plan deals with local roads and has a comparatively greater focus on urban areas, it is still important to acknowledge freight considerations in the guiding objectives and policies.

### 4. Milson Line (80km/h – 60km/h)

- 4.1. Transporting New Zealand does not support this proposed change. This road is a key freight route, particularly between Palmerston North and Fielding. Road freight operators do not want to see traffic slowed and frustrated light vehicle drivers engaging in overtaking or tailgating. Bridge weight restrictions on alternate routes also limit freight operators' detour options.
- 4.2. Freight operators we consulted with were concerned that compliance with a 60km/h speed limit would be poor. The proposed change would also introduce three speed zones within a short distance of approximately 1.6km.



Figure 1 – map showing proposed speed limit changes for Milson Line.

4.3. Transporting New Zealand would prefer that speed management infrastructure options were considered instead of a speed limit reduction.

## **5. City Centre (50km/h – 30km/h)**

5.1. Transporting New Zealand does not support this proposed change.

5.2. Transporting New Zealand submits that the impact of the speed reductions on all vehicle commuters, local residents and freight operators should be considered carefully against the crash data. There have been 480 total crashes recorded over the past decade, with 97.91% of those being minor or non-injury crashes (acknowledging the 1 fatal and 9 serious crashes during this time). We do not consider that this data justifies the blanket speed reductions proposed.

5.3. The proposed speed reductions will impact businesses who rely on freight services to supply and transport goods, at all hours of the day. Increased journey time reduces vehicle productivity, which means more trucks need to be deployed, and can put pressure on freight operators who have to comply with work time rules. These disbenefits should be carefully considered when making any changes.

5.4. The inclusion of Broadway Ave as far as Ruahine Street is particularly concerning, given the mean operating speed is currently well above 30km/h between Amesbury St and Albert St. This raises the risk of increased travel times and general non-compliance. In the event that the proposed City Centre changes proceed, Transporting New Zealand requests that the inclusion of Broadway Ave as far as Ruahine Street be reconsidered.



Figure 2 – map showing average speed data for the City Centre and Broadway Avenue (provided to Transporting New Zealand by Council officials).

## **6. Concluding comments**

6.1. Transporting New Zealand is grateful to Council officials for providing supporting data used in developing the draft speed management plan, on request. Similar supporting information (including crash and mean operating speed data) could be proactively shared as part of future public consultations.

6.2. Please use the contact details on the cover page should the Council require any further information relating to this submission.

**ENDS**