



SUBMISSION

Submission: Taranaki speed limits consultation

To: NZ Transport Agency Waka Kotahi
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About Ia Ara Aotearoa Transporting New Zealand

Ia Ara Aotearoa Transporting New Zealand (Transporting New Zealand) is a national membership association representing the road freight transport industry. Our 1,200 members (with a combined fleet of 14,000 heavy vehicles) 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 helps trucking operators 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).

Ia Ara Aotearoa Transporting New Zealand submission on the Taranaki speed limits consultation.

Introduction

- 1 Ia Ara Aotearoa Transporting New Zealand (Transporting New Zealand) appreciates the opportunity to provide a submission on NZTA's speed limit consultation on SH3 Waiwhakaiho and SH3 Hawera North in the Taranaki region.
- 2 There is nothing confidential in our submission and we permit it to be published in full.

Transporting New Zealand comments

SH3 Waiwhakaiho

- 3 The proposal is to reduce the section of SH3 just east of New Plymouth city which is currently 80km/h to 60km/h, which is an industrial area with very high daily traffic and relatively high volumes of heavy traffic. However, this will now result in a sudden speed transition from the east (Bell Block) of 100km/h to 60km/h instead of the more gradual 100-80-60km/h transition as at present. We note for example that the current mean operating speed of 76km/h is close to the current posted limit, which not only suggests road users are complying with the limit, but that the arterial nature of the area is self-explaining a lower speed than the open road limit, but higher than urban speeds.
- 4 It is suggested that the speed review has been prioritised because there have been several crashes and near misses at the SH3-Egmont Road intersection, and that the community has raised strong concerns about safety. However, analysis of crash data shows that, in the past five years, fewer than 6 percent of crashes on this stretch had "travel speed" recorded as a contributing factor. By contrast, far more common causes included driver error such as failing to give way, poor observation, and incorrect positioning. Despite this, the Cost Benefit Disclosure Statement assumes a 21 percent reduction in injury crashes if the speed limit is reduced to 60km/h. This suggests NZTA are relying on poor evidence to justify a simple fix, rather than addressing the real issues through engineering solutions at the Egmont Road intersection, such as potentially introducing traffic controls.
- 5 As noted, the speed will now transition from 100km/h (Bell Block) to 60km/h which is a considerable drop. Transporting New Zealand suggests if the lower 60km/h limit is to be introduced that NZTA consider introducing this from west of the Egmont Rd intersection, and retaining the 80km/h limit east of this, and possibly extending it further east towards Bell Block.

SH3 Hawera North

- 6 The proposal is to reduce the current 100km/h and 70km/h section of SH3 to 60km/h, which in part reflects development in this area transitioning from rural to industrial/semi-rural/urban.

This stretch of SH3 has had noticeably busier traffic in recent years, with side roads increasingly supporting commercial operations and lifestyle blocks.

- 7 As noted above, Transporting New Zealand is concerned that speed limit reductions are being proposed as simple fixes instead of engineering solutions. For example, whilst turning onto SH3 from any of the side roads has become more difficult with the rising traffic volumes, the installation of turning bays at Kerry Lane, and particularly Fitzgerald Lane, would be highly beneficial.
- 8 Nevertheless, given the increased activity in this area, Transporting New Zealand suggests a 60km/h limit from Fantham Street to Kerry Lane might be an appropriate mitigation measure to address safety concerns and support responsible traffic management, whilst introducing a short 80km/h limit on the remainder of the section north of Kerry Lane as an intermediate transition to/from the 100km/h area towards Normanby, as a sudden (southbound) drop from 100km/h to 60km/h without engineering treatments warrants an intermediate approach. We note that the current mean speed on this (currently 100km/h) section is 85km/h, which suggests the area is self-explaining a higher semi-rural/industrial speed.

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