



SUBMISSION

Submission: Waikato speed limits consultation

To: NZ Transport Agency Waka Kotahi
waikato.speed.reviews@nzta.govt.nz

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Contact: Dom Kalasih, Chief Executive
Ia Ara Aotearoa Transporting New Zealand
dom@transporting.nz 027 441 4309

Mark Stockdale, Policy and Advocacy Advisor
Ia Ara Aotearoa Transporting New Zealand
mark@transporting.nz 021 434 097

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 Waikato 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 consultations on State Highways in the Waikato region.
- 2 There is nothing confidential in our submission and we permit it to be published in full.

Transporting New Zealand comments

- 3 Transporting New Zealand is generally supportive of the community's desire for speed limit reductions, however we are cautious of proposals to reduce posted speed limits as the sole means to reduce traffic speeds in order to address feedback from local communities.
- 4 Reducing speed limits alone represents the weakest form of risk control. The Health and Safety at Work (General Risk and Workplace Management) Regulations 2016 prioritise risk elimination, substitution, and engineering controls ahead of administrative measures like speed reduction. We urge NZTA to carefully consider the physical attributes of the road, the roadside development and the presence of hazards that will act as cues to help influence the driver to drive at an appropriate speed rather simply posting a reduced speed limit.
- 5 The Cost Benefit Disclosure Statements (CBDSs) for each road were useful in demonstrating the common disconnect between the speed limit displayed and the current mean operating speed. They show that regardless of the speed limit drivers will adapt their speed to the conditions and therefore care must be taken to not overly rely on the mere presence of a sign and a change in the posted speed limits.
- 6 Slowing down traffic can unnecessarily create disbenefits to productivity and our members have raised concerns about that, while others question the necessity of speed reductions on roads with low traffic volumes or minimal crash histories.

Comments on specific roads

- 7 *SH2 Karangahake towards Waikino.* We recommend NZTA reconsider whether this proposed speed reduction is warranted. The current mean operating speed of 65km/h is considerably less than the current posted limit (80km/h), which shows that drivers are already adapting their speed to the local conditions. However, that current mean speed is marginally higher than the proposed reduction of 60km/h. We note that the CBDS shows majority of traffic on this route are heavy vehicles (8,414 vpd), which we assume has been transposed with the light vehicle figure (756 vpd). Despite the current mean speed, the proposed speed limit reduction is estimated to add 57 hours in additional travel time per day to all vehicles.

- 8 *SH2 Waihi (Parry Palm Avenue), from near the intersection of SH2/Martin Road/Baber Street to near Orchard Road.* We question whether this proposed speed reduction is necessary given the current mean operating speed of 61km/h is less than the current posted limit (70km/h), and on par with the proposed new limit of 60km/h, which shows that drivers are already adapting their speed to the local conditions. There have only been minor or non-injury crashes in the past 5 years, and the proposed reduction is estimated to result in a modest 11% reduction in injury crashes, and reduce the current mean speed by 4km/h.
- 9 *SH2 Waihi (Parry Palm Avenue), from near Orchard Road to near Dean Crescent.* We recommend that NZTA reconsider whether this proposed speed reduction is sensible. It proposes a 40km/h reduction in the current posted limit of 100km/h, albeit over a short distance. However, the current mean speed through this route is 79km/h, suggesting that drivers are already adapting their speed to the local conditions, albeit that the road is self-explaining a speed around 80km/h and not 60km/h without engineering treatments. There are also a substantial number of users on this route, at nearly 8000 vpd, who will incur an estimated 30 hours increase in travel time per day over this short distance. Transporting New Zealand would suggest a proposed limit of 80km/h unless engineering treatments are applied to reduce average speeds further.
- 10 *SH25 Kūaotunu (western approach) from about 200m south of Hildale Crescent, past the boat ramp to just before Kawhero Drive.* We recommend that NZTA reconsider whether this proposed speed reduction is justified, given that the proposed speed limit reduction from 70km/h to 50km/h is estimated to produce no reduction in injury crashes. There has only been one (non-injury) crash in the past 5 years, and the mean operating speed of 67km/h aligns with the current posted speed limit so it is difficult to see what problem this proposal will solve.
- 11 *SH25 Kūaotunu (eastern approach) from about 150m past Blackjack Road to 120m past Cemetery Road.* Similar to paragraph 10 above, we recommend that NZTA reconsider whether this proposed speed reduction is justified, given that there has only been one (minor) crash in the past 5 years. The mean operating speed matches the posted speed limit of 70km/h suggesting the current road design is self-explaining the limit, whereas the estimated mean speed after the reduction to a proposed 50km/h will be higher at 62km/h.
- 12 *SH25 Wharekaho.* We recommend that NZTA reconsider whether this proposed speed reduction from 80km/h to 50km/h is sensible. The current mean operating speed of 57km/h suggests that drivers are already adapting their speed to the local conditions, but that a limit of 60km/h would be more appropriate without engineering treatments. It would be useful to compare what reduction in injury crashes that a speed limit of 60km/h would deliver compared to 50km/h.
- 13 *SH25 Thames to Tararu.* We recommend NZTA reconsider whether this proposed speed reduction is justified. The current mean operating speed of 59km/h is less than the current posted limit (70km/h), which shows that drivers are already adapting their speed to the local conditions. However, it is higher than the proposed reduction of 50km/h. There has only been one minor injury crash in the past 5 years (plus 3 non-injury), and this proposal is expected to reduce injury crashes by 26%, but it will add an estimated 51 hours in additional

travel time per day to a substantial number of road users (10,420 vpd). We suggest a posted limit of 60km/h would be more appropriate, in the absence of any engineering treatments.

- 14 *VSL outside Marae on SH29.* Transporting New Zealand supports the proposals to introduce electronic 60km/h Variable Speed Limit signs to operate at certain times outside two marae on SH29 (posted at 100km/h). VSLs are an appropriate way to reduce traffic speeds at periods of risk to other road users such as vulnerable road users or volumes of turning traffic, but where the road does not otherwise self-explain a lower speed.
- 15 *ISZ near Hamilton Airport.* Similar to paragraph 14 above, Transporting New Zealand supports the use of electronic 60km/h Intersection Speed Zone signs to slow traffic down on SH21 (posted at 100km/h) when approaching traffic is detected on the side roads. These have proven effective on highways with high posted speed limits. The ISZs are effective at slowing traffic down when appropriate, and give approaching traffic on the highway sufficient warning.

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