



SUBMISSION

Submission: Old SH1 Peka Peka to Otaki speed limit 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 Old SH1 Peka Peka to Otaki speed limit 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 sections of the old SH1 in Te Horo and Otaki.
- 2 There is nothing confidential in our submission and we permit it to be published in full.

Transporting New Zealand comments

- 3 We note that the cost benefit disclosure statements (CBDS) for all of the speed reduction proposals estimate that they will generate no reduction injury crashes, while on some sections the current mean operating speeds are above the proposed speed limit. Albeit, all the mean operating speeds are below the posted speed limits, in two cases well below the current 100km/h limit, which suggests that the roads are self-explaining a lower speed. The CBDS 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.
- 4 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, as here.
- 5 Whilst the distances of the proposed speed reductions are short, the sections either side of the Otaki River Bridge both have high daily traffic volumes, and the current mean speeds are 61-65km/h compared to the proposed 50km/h.
- 6 Transporting New Zealand has no comment on the proposals for the on/off-ramps other than recommending that the speed sign on the offramp be located close to the exit so as not unnecessarily slow traffic on the expressway too far in advance.
- 7 Transporting New Zealand would be supportive of speed limit reductions on the other sections that matched the current mean operating speeds. To clarify, we would support the following speed limits:
 - a. Taylors Road to Waitohu Valley Road: 60km/h (as proposed)
 - b. South of Waerenga Road to the south end of Otaki River Bridge: 60km/h
 - c. South end of Otaki River Bridge to south of Otaki Gorge Road intersection: 70km/h
 - d. Te Horo township: 70km/h
- 8 We contend that to proceed with the proposed speed limits without any engineering treatment to self-explain a lower limit than the mean speed, particularly on the high-traffic

sections, risks creating a speed enforcement trap on sections of road that were hitherto 70km/h or 100km/h. Merely changing the signs won't engender this behaviour change. And with no expected reduction in injury crashes it is hard to justify why the lower speed limit should be enforced, or moreover, that a lower speed is even justified.

- 9 While acknowledging that the 1km Te Horo township section is defined as peri-urban, in reality, the majority of the 'township' is not located on this section of the road, but on the other side of the parallel expressway and thus fully separated from the traffic on the main road and accessed by an offramp. Whilst there is some activity on the main road which may justify a lower speed, as noted above Transporting New Zealand would recommend 70km/h instead of 60km/h in line with the current mean operating speed.

ENDS