



## SUBMISSION

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To: Tasman District Council

Submission: Phase Two Speed Limit Reductions Consultation

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## **Ia Ara Aotearoa Transporting New Zealand submission to Tasman District Council on Phase Two Speed Limit Reductions**

### **Introduction**

1. Ia Ara Aotearoa Transporting New Zealand (Transporting New Zealand) welcomes the opportunity to submit on Tasman District Council's proposals to lower speed limits as part of Phase Two of its Speed Management Plan.
2. Transporting New Zealand is the national membership association representing the road freight transport industry, with 1,200 member companies operating urban, rural, and inter-regional freight services. Our sector directly employs over 55,000 New Zealanders and moves 93% of the country's freight by tonnage.

### **Transporting New Zealand comments**

3. We acknowledge and appreciate Tasman District Council's (the Council's) approach has been road-specific - individual proposals are provided for specific roads within each ward, rather than applying blanket speed reductions over a significant geographical area. We commend the Council for avoiding a universal reduction and undertaking road-by-road evaluations.
4. While a considerable number of documents were provided by the Council to support this consultation we noted that it did not include the respective Cost Benefit Disclosure Statements (CBDSs) for each road. We sought and received that information under the Local Government Official Information and Meetings Act (LGOIMA).
5. The CBDSs were key to our submission and we recommend that the Council provide these as a matter of course when undertaking any future consultation on speed limit proposals.
6. 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 the Council 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.
7. CBDSs for each road were valuable in demonstrating the common disconnect between the speed limit displayed and the current mean operating speed. They clearly show that regardless of the speed limit drivers will adapt their speed to the conditions and therefore care must be taken to not over rely on the influence of a sign and a change in speed limits.
8. Slowing down traffic can unnecessarily create disbenefits to productivity and our members have raised concern at that risk. For example, one member said:

*"Slowing speeds down on main or semi-main roads is insane and an absolute pain for businesses trying to keep the flow of traffic up."*

While other members have questioned the necessity of reductions on roads with low traffic volumes or minimal crash histories:

*“I can’t believe the TDC can waste so much money on silly things like signs on roads very few drive on... there are no statistics showing multiple accidents in the past. These roads will not be patrolled, and those who speed will continue to do so.”*

9. Members also remain concerned that reduced limits alone will not improve safety without consistent enforcement. We request that the Council clarify how it will work with Police to ensure compliance if new limits are adopted, especially on roads important for freight and commercial traffic.
10. Transporting New Zealand supports a road-by-road, risk-based approach in principle, but urges the Council to carefully consider whether every proposed reduction is necessary based on local risk data and freight impacts, avoiding unnecessary reductions where safety benefits are unclear or minimal.
11. With most of these changes Transporting New Zealand is generally supportive of the community’s desire for speed limit reductions. However, our position is largely due to the current mean operating speeds typically already being significantly less than the proposed reduced limits. As just one example, Goodall Road in Motueka has an existing limit of 100 km/h and the Council is proposing to reduce the limit to 80 km/h. The current mean operating speed on that road is 36 km/h and therefore, despite the proposed speed reduction Transporting New Zealand do not anticipate any significant changes, positive or negative from most of the proposed reductions.

#### **Comments on specific roads in each of the areas**

12. The following comments are based on the CBDS information we received under the (LGOIMA) for each specific road.
13. With the exceptions of the following we support all of the proposed changes in the Phase Two Richmond Map Book:
  - a. Richmond Urban Road No Footpath Table: Hill Street (South of Hart Road)  
We recommend that the Council reconsider whether this speed reduction from 50 km/h to 40 km/h is sensible and justified. The level of roadside development in this area is considerably reduced compared to further north, and this is demonstrated by the current mean operating speed of 45 km/h being significantly higher than current mean operating speed of 34 km/h in the northern section of Hill Street. The Council’s very low estimate in the annual crash reduction of 0.05 to 0.01 minor crashes indicates that the likely benefits are negligible compared to the losses to road users in the additional travel time therefore this proposed change does not appear to be justified.
  - b. Richmond Specific Road Table: Lower Queen Street (809 Lower Queen Street to end)  
We recommend that the Council reconsider whether this proposed speed reduction is sensible and justified. The current mean operating speed of 71 km/h is considerably less than the current limit (80 km/h) and it shows that drivers are already adapting their speed to the local conditions. However, that current mean operating speed is significantly higher than the proposed reduction of 60 km/h. There have been no crashes in the last five years and

the Council estimates that the safety benefit will be negligible. Therefore, this change does not appear to be rational or justified.

14. With the exceptions of the following we support all of the proposed changes in the Phase Two Lakes Murchison Map Book:

a. Lakes Murchison Rural Residential Table:

We recommend that the Council check and confirm the mean operating speeds reported for Fairfax Street and Matataikiki Road. Currently both are stated as 0.39 km/h. Transporting New Zealand presume these are supposed to be 39 km/h and on that basis we would support the changes given the current mean operating speeds are still considerably below the proposed speed reduction limits.

b. Lakes Murchison Specific Road Table:

i. Motueka Valley Road

We recommend that the Council reconsider whether this proposed speed reduction is sensible and justified. The current mean operating speed of 86 km/h is considerably lower than the current limit (100 km/h) which shows drivers are already adapting their speed to the local conditions. However, the current mean operating speed is also considerably higher than the proposed reduction to 80 km/h which indicates the proposed speed may not be well aligned with the road environment. While there have been some crashes over the last five years the Council has not estimated any change in crash reduction therefore, this change does not appear to be rational or justified.

ii. Tadmor Valley Road

We recommend that the Council reconsider whether this proposed speed reduction is sensible and justified. The current mean operating speed of 84 km/h is considerably lower than the current limit (100 km/h) which shows drivers are naturally adapting their speed to the local conditions. However, the current mean operating speed is also considerably higher than the proposed reduction to 80 km/h which indicates the proposed speed may not be well aligned with the road environment. There have been four non-injury crashes over the last five years and Council's estimate of an annual safety benefit of a reduction of 0.44 to 0.61 non-injury crashes does not appear to justify the losses to road users in the additional travel time of between 20 and 30 hours.

15. With the exceptions of the following we support all of the proposed changes in the Phase Two Golden Bay Consultation Material:

a. Golden Bay Specific Road Table:

i. Collingwood Quay

We recommend that Council reconsider whether this proposed speed reduction is sensible and justified. The current mean operating speed of 56 km/h is considerably lower than the current limit (70 km/h) which shows drivers are already naturally adapting their speed to the local conditions. However, the current mean operating speed is also considerably higher than the proposed reduction to 50 km/h which indicates the proposed speed may not be well aligned with the road

environment. There have been zero crashes over the last five years and Council estimate there will be zero annual safety benefit. Therefore, this change does not justify the losses to road users in the additional travel time of between 10 and 20 hours.

- ii. Collingwood-Puponga Main Road (Pakawau Bush Road to 1088)  
We recommend that Council reconsider whether this proposed speed reduction is sensible and justified. The current mean operating speed of 59 km/h is well matched to the current limit (60 km/h) which shows drivers are naturally adapting their speed to the local conditions. However, the current mean operating speed is also considerably higher than the proposed reduction to 50 km/h which indicates the proposed speed may not be well aligned with the road environment. There has been one non-injury crash over the last five years and Council estimates an annual reduction 0.06 to 0.11 non-injury crashes. Therefore this change does not justify the losses to road users in the additional travel time of 10 to 20 hours.
- iii. Collingwood-Puponga Main Rd (1088 to 75m south of southern boundary of 1062)  
We recommend that Council reconsider whether this proposed speed reduction is sensible and justified. The current mean operating speed of 62 km/h is considerably lower than the current limit (100 km/h) which shows drivers are already naturally adapting their speed to the local conditions. However, the current mean operating speed is also considerably higher than the proposed reduction to 50 km/h which indicates the proposed speed may not be well aligned with the road environment. There have been zero crashes over the last five years and Council estimate there will be zero annual safety benefit. Therefore, this change does not justify the losses to road users in the additional travel time of up to 50 hours.

16. With the exceptions of the following we support all of the proposed changes in the Phase Two Mouere Waimea Map Book:

a. Mouere Waimea Rural Residential Table

i. Harley Road

We recommend that Council reconsider whether this proposed speed reduction is sensible and justified. The current mean operating speed of 68 km/h is considerably lower than the current limit (80 km/h) which shows drivers are already naturally adapting their speed to the local conditions. However, the current mean operating speed is also considerably higher than the proposed reduction to 60 km/h which indicates the proposed speed may not be well aligned with the road environment. There have been three minor and one non-injury crashes over the last five years and Council's estimate of an annual safety benefit reduction of 0.35 to 0.48 minor and 0.24 to 0.33 non-injury crashes does not appear to justify the losses to road users in the additional travel time of between 20 and 30 hours.

ii. Pomona Road

We recommend that Council reconsider whether this proposed speed reduction is sensible and justified. The current mean operating speed

of 54 km/h is considerably lower than the current limit (80 km/h) which shows drivers are already naturally adapting their speed to the local conditions. However, the current mean operating speed is also somewhat higher than the proposed reduction to 50 km/h which indicates the proposed speed may not be well aligned with the road environment. There have been zero crashes over the last 5 years and Council estimate there will be negligible annual safety benefit. Therefore, this change does not justify the losses to road users in the additional travel time of between 15 and 30 hours.

iii. Westdale Road

We recommend that Council reconsider whether this proposed speed reduction is sensible and justified. The current mean operating speed of 62 km/h is considerably lower than the current limit (80 km/h) which shows drivers are already naturally adapting their speed to the local conditions. While the current mean operating speed is also a little higher than the proposed reduction to 60 km/h there have been zero crashes over the last five years and Council estimate there will be negligible annual safety benefit. Therefore, this change does not justify the losses to road users in the additional travel time of between 20 and 30 hours.

iv. Redwood Road Appleby

We recommend that Council reconsider whether this proposed speed reduction is sensible and justified. The current mean operating speed of 62 km/h is considerably lower than the current limit (80 km/h) which shows drivers are already naturally adapting their speed to the local conditions. While the current mean operating speed is also a little higher than the proposed reduction to 60 km/h there has been only one non-injury crash over the last five years and Council estimate there will be negligible annual safety benefit. Therefore, this change does not justify the losses to road users in the additional travel time.

b. Moutere Waimea Specific Roads Table

Eighty Eight Valley Road

We recommend that Council reconsider whether this proposed speed reduction is sensible and justified. The current mean operating speed of 61 km/h is considerably lower than the current limit (70 km/h) which shows drivers are naturally adapting their speed to the local conditions. However, the current mean operating speed is also significantly higher than the proposed reduction to 50 km/h which indicates the proposed speed may not be well aligned with the road environment. There have been zero crashes over the last 5 years and Council estimate there will be negligible annual safety benefit. Therefore, this change does not justify the losses to road users in the additional travel time.

17. With the exceptions of the following we support all of the proposed changes in the Phase Two Motueka Map Book

a. Motueka Rural Residential Table

i. Umukuri Road

We recommend that Council reconsider whether this proposed speed reduction is sensible and justified. The current mean operating speed of 69 km/h is considerably lower than the current limit (80 km/h) which shows drivers are already naturally adapting their speed to the local conditions. However, the current mean operating speed is also significantly higher than the proposed reduction to 60 km/h which indicates the proposed speed may not be well aligned with the road environment. There have been zero crashes over the last five years and Council estimate there will be negligible annual safety benefit. Therefore, this change does not justify the losses to road users in the additional travel time of between 150 and 210 hours.

ii. Whakarewa Street

We recommend that Council reconsider whether this proposed speed reduction is sensible and justified. The current mean operating speed of 53 km/h is considerably lower than the current limit (80 km/h) which shows drivers are already naturally adapting their speed to the local conditions. While the current mean operating speed is also only a little higher than the proposed reduction to 50 km/h there has only been one non-injury crash over the last five years and Council's estimate of an annual reduction of 0.19 to 0.23 non-injury crashes does not appear to justify the losses to road users in the additional travel time of between 20 and 30 hours.

iii. Wildman Road

We recommend that Council reconsider whether this proposed speed reduction is sensible and justified. The current mean operating speed of 57 km/h is considerably lower than the current limit (70 km/h) which shows drivers are already naturally adapting their speed to the local conditions. While the current mean operating speed is also already slightly lower than the proposed reduction to 60 km/h there have been zero crashes over the last five years and Council estimate there will be negligible annual safety benefit. Therefore, this change does not seem necessary or justify the losses to road users in the additional travel time of between 10 and 20 hours.

b. Motueka Specific Roads Table

i. Riwaka-Kaiteriteri

We recommend that Council reconsider whether this proposed speed reduction is sensible and justified. The current mean operating speed of 46 km/h is considerably lower than the current limit (80 km/h) which shows drivers are already naturally adapting their speed to the local conditions. Given the current mean operating speed is also already significantly lower than the proposed reduction to 60 km/h Transporting New Zealand question Council's confidence in whether a speed limit change is the best approach to delivering the estimated safety benefits.

ii. Sandy Bay-Marahau Road

We recommend that Council reconsider whether this proposed speed reduction is sensible and justified. The current mean operating speed of 56 km/h is considerably lower than the current limit (80 km/h) which shows drivers are already naturally adapting their speed to the local

conditions. Given the current mean operating speed is also already significantly lower than the proposed reduction to 60 km/h Transporting New Zealand question Council's confidence in whether a speed limit change is the best approach to delivering the estimated safety benefits and whether it justifies the losses to road users in the additional travel time of between 30 and 50 hours.

**END**