

12 November 2019

New Zealand Transport Agency

National Office

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**RE: Proposed speed reduction SH6 – Nelson and Marlborough**

The Road Transport Forum (RTF) is the national body representing the road freight transport industry. We endorse the submission of our constituent associations NZ Trucking Association and the Road Transport Association. In addition, we wish to make the following points.

1. There is a clear Government objective to reduce speeds across large tranches of roads and highways in New Zealand. The road freight industry recognises that some sections of highway may require speed reduction to improve safety, however we believe the initial position taken by NZTA should be to invest in better design of our roads and an improvement of quality, driver experience and road speed conditions. Reducing speed is a crude way of dealing with a complex issue. It won't have the desired impact.

Below are the crash statistic comparisons for the Kapiti Expressway north of Wellington. The first example presents the data for crashes on the new road, the second on the old highway that is still in use and the third on the old highway when it was SH1. This demonstrates better design and engineering of roads leads to fewer accidents, injuries and deaths. It's worth noting that the speed limit on the former SH1 both today and in 2015 and 2016 was between 60km-80km per hour and the new expressway is 100km per hour from start to finish. Lower speeds don't equal lower accidents. Better quality roads do.

**Kāpiti expressway (Mackays to Peka Peka), March 2017 - February 2019**

0 fatal crashes - 1 serious injury crash and 8 minor injury crashes

**Old State Highway 1 route, March 2017 - February 2019**

0 fatal crashes - 3 serious injury crashes and 12 minor injury crashes

**Old State Highway 1 route, 2015 and 2016**

1 fatal crash - 7 serious injury crashes -26 minor injury crashes

2. The blanket approach to speed reduction on SH6 will slow down the people and the productivity of the Nelson and Marlborough regions. This totals 114km of highway transporting foods and goods between hugely productive sectors in the New Zealand economy. Getting these goods to market is vital to their value and to the livelihoods of thousands of farmers, growers and workers in both regions. We would like to make the offer to NZTA officials to spend some time travelling with road freight operators in the region, who could explain to them the additional time and cost that will be added if there is a wholesale speed reduction on this route. We are also of the view that additional trucks will have to be run on the route by some operators as they will not be able to complete their current runs in the longer times that speed reduction will bring. You are welcome to contact me to set up opportunities to travel with trucking operators to see the issue from their perspective.
3. We have investigated the 20 fatal crashes cited by NZTA from 2009 to 2018 as justification of a speed limit reduction on the route. None of these were caused by excessive speed. Our contention is there is no justification for reducing speed on this route and that the move is driven by ideology rather than evidence. Indeed, our understanding is that this road was not even identified by the Safer Journeys Risk Assessment Tool ("Mega Maps") as being a road that required speed reduction. It would be good for NZTA to provide commentary on this point for our members and the public. If this is correct, how has this speed reduction been justified?
4. Given that the touted benefit of the new approach to Safer Journeys was the engagement and consultation functionality, we contend that there should be a public hearing on the speed changes proposed on this route to allow verbal public submissions and for full evidence to be presented by NZTA and examined with full transparency by communities and businesses who use this road and be negatively impacted by the proposed changes. We would be happy to verbally submit on hearings into this matter.

Lastly, please don't slow these regions down, invest in better quality roads to improve the safety of all motorists.

Yours sincerely

Nick Leggett

**Chief Executive**