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NZ Transport Agency Waka Kotahi
By email to: speedmanagement@nzta.govt.nz

Tēnā koe,

SUBMISSION: STATE HIGHWAY SPEED LIMITS CONSULTATION MANAWATŪ-WHANGANUI

Thank you for the opportunity to provide comment on the proposed speed limits consultation for six interregional state highways in the Manawatu-Whanganui region. This submission is made on behalf of the Manawātū-Whanganui Regional Transport Committee (RTC).

The RTC comprises representatives from the region's councils as well as NZ Transport Agency Waka Kotahi (NZTA); and holds responsibility for preparing the Horizon's Regional Land Transport Plan (RLTP).

The RLTP outlines a 30 year vision for *"A region that connects central New Zealand and provides resilient, safe, accessible and sustainable transport options"*.

The following four RLTP objectives with associated policies give effect to achieving the vision and strongly correlate to setting speed limits:

- **Travel choice:** Transport users in the region have access to affordable transport choices that are attractive, viable and encourage multi-modal travel.
- **Connectivity and efficiency:** The regional transport network connects central New Zealand and is efficient, reliable and resilient, and supports economic growth and productivity.
- **Safety:** The transport network is safe for all users.
- **Network:** The transport network is well-maintained and integrates with current and planned land use to a level which supports a well-functioning and fit for purpose system.

Ensuring safety of our regional transport network is a key priority of the RLTP. We encourage safe speed limit settings aligned with a safe system approach to ensure safer outcomes within our regional transport network.

Speed management is a key component of road safety and one of a number of aligned measures that work towards the goal of people getting to where they are going efficiently and safely. An efficient transport network has less congestion and consistent mean travel speeds.

It is globally recognised small reductions in mean travel speeds results in large reductions of harm. Modest speed reductions have significant potential to reduce deaths and serious injuries resulting from crashes. No matter what causes a crash, speed is always a factor in the severity of the crash outcomes.

For every extra kilometre per hour of speed:

- The stopping distance increases
- The time to react and avoid a crash decreases
- The impact of a crash is more severe on the person
- There is more likelihood of serious injury or death

While we share central government's drive to increase economic growth and productivity through an efficient transport network; the reversal of the speed limits on the six sections of state highway identified will not appreciably improve economic outcomes through reducing travel times and likely have the opposite effect through increased road closures and increased social costs due to increased serious injuries and deaths.

The cost associated with these reversals does not align with the government's value for money or efficiency values set out in the Government Policy Statement on Land Transport 2024. To test the level of support again to see if it has changed is unnecessary. To re-consult communities after NZTA undertook thorough reviews, consultations and technical assessments is wasting resources, time and also runs the risk of undermining community trust of NZTA's consultation processes.

SPEED LIMIT CONSULTATIONS ACROSS MANAWATŪ- WHANGANUI REGION

Locality	Approx. Length (km)	Section of state highway
SH3 Palmerston North east to Whakarongo	3.4	East of Macpherson Grove to east of Stoney Creek Road
SH3 Ashhurst 80	0.92	South of Cambridge Avenue to northwest of SH57
SH57 SH1 to Heatherlea East Road	8.85	East of SH1 intersection on Kimberley Road to north of Heatherlea East Road
SH1 Ohau to Manakau	5.2	South of Muhunua East Road to north of Waikawa Beach Road
SH1 Manakau to Pukehou Overbridge	1.7	South of railway underpass to Honi Taipua Street to west of Pukehou Rail Overbridge
SH3 Whanganui	1.86	North of Blue Skin Road to north of Tirimoana Place

Table 1: State Highways in Manawātū-Whanganui where speed limits are planned to reverse back to their previous higher speed limit by July 2025 unless consultation shows there is enough public support to keep them at the current lower speed limit.

Specific feedback on the proposed speed review changes has been split into each area where speed limits are proposed to reverse as shown in Table 1.

SH3 Palmerston North east to Whakarongo - East of Macpherson Grove to east of Stoney Creek Road

We support retaining the current speed limit of 80km/h and oppose reversal to 100km/h; to accommodate changing land use, increased vehicle volume and an increase in the number of vulnerable road users using this corridor.

This section of state highway has a poor crash history and the current speed limit reductions have been well received by the local community. We believe there is overwhelming community support to retain the current speed limit of 80km/h.

NZTA conducted a thorough speed review and consultation prior to lowering speed limits in 2022. The reasons for the lowering of speeds have not changed and have only got more compelling for the current speed to be retained.

The Napier Road SH3 corridor is an important transport corridor with the dual function of carrying inter-regional and city traffic movements.

Current and future planned residential developments in this area, from Macpherson Grove to Stoney Creek Road, will increase traffic volume and diversity of road users. A safe speed limit for this stretch of road should consider the contextual differences of an urban environment where more people are likely to be walking, cycling or using public transport to deliver an integrated transport system for different user groups and strike a balance to serve both our communities and our economies.

This section of state highway has three major intersections and multiple roadside hazards such as ditches, power poles and trees. Increasing speed limits places further pressure on intersections. We encourage NZTA investment in safety infrastructure improvements such as intersection upgrades.

The removal of NZTA funding for planned SH3/Roberts Line intersection improvements underlines the need to retain the current speed setting. Raising the speed limit leading into one of the region's highest risk intersections is irresponsible and places road users at greater risk.

SH3/James Line intersection is seeing increased traffic volumes due to the new residential subdivisions in the area. As further planned developments occur, the risk to all road users increases.

Given years of unrealised discussions and business cases for intersection improvements on this corridor; to reverse speed settings is disrespecting local community concerns and putting lives at risk.

Local council has and is investing heavily in infrastructure to assist residential developments in the Kelvin Grove - Whakarongo area and has been very clear in communicating their plans to NZTA. The Government has been clear it expects local government to "say yes" and increase land supply, specifically residential land supply to assist with housing affordability.

If the Government ignores traffic safety risks related to residential growth; this jeopardises future development and provides mixed signals to local council. Decisions on state highway

speed limit settings should not be made in isolation from broader central and local government, and community objectives.

SH3 Ashhurst – South of Cambridge Avenue to northwest of SH57

We support retaining the current speed limit of 80km/h and oppose reversal to 100km/h, with the view of revisiting this decision at a later date when evidence has been collected on traffic patterns and behaviour once the new highway is open and the shared path bridge is operating.

This section of highway includes access to Ashhurst Domain plus various roadside hazards such as ditches and banks. The area is popular with active transport users accessing the many shared paths, tracks and recreational opportunities in and around the Domain and Manawātū River.

The road crosses the river before a short interval where it meets a roundabout to a soon to be four-lane highway. Until the new Te Ahu a Turanga – Manawātū Tararua Highway complete with shared user path is opened, we think it is prudent to wait until traffic patterns are known and assessed before making any reversals.

If there is a delay in the provision of the shared user path bridge, an increase in speeds in this location will further increase the risk to vulnerable road users attempting to access Te Ahu a Turanga shared path. It would be irresponsible to reverse speed limits at this time and put road users at increased risk of death and injury.

SH3 Whanganui – North of Blueskin Road to north of Tirimoana Place

We support retaining the existing 80 km/h speed limit and oppose reversal to 100km/h.

As outlined in the NZTA consultation document; this section of SH3 provides a connection between Manawātū-Whanganui and Taranaki regions and is used by commuter, tourist and long-haul freight traffic. In addition locals rely on SH3 to access essential services along with travel to jobs, schools and recreational facilities.

Increasing traffic counts, changing land use, various roadside hazards and safety concerns, along with increasing numbers of vulnerable road users; is justification the current speed limit should remain unchanged.

The increasing number of vehicles turning right into Blueskin Road to access school and residences needs to be taken into consideration when determining the speed limit. This intersection has no right turning bay and will require safety treatments if limits are raised.

As highlighted in the consultation document the previous consultation speed changes were well-supported by community and stakeholders. Whanganui District Council has made complementary changes to speed limits on side roads that link to the state highway. These changes were well supported during public consultation. Reverting the speed limit on State Highway 3 in this location would affect users of these side roads and reduce the level of safety across the network.

When speed limits were lowered in 2020 it was estimated to have minimal impact on travel times. Over the entire 2.7km length of the two sections impacted by the initial speed change; the increase in travel time was around 21 seconds. To reverse speed limits citing economic benefits cannot be justified.

The initial speed limit reduction was estimated to reduce the number of crashes by 16%. As well as savings in social costs, this also reduces the amount of time the road is closed due to crashes and reduces inconvenience to drivers.

While outside the scope of this consultation, we believe the automatic reversal of the SH3 section north of Tirimoana Place and south of Turere Place (urban connector) is ill-advised. Increasing this speed limit increases risk to all road users in this growing urban development on the fringe of Whanganui. There is strong community and political support locally for retention of the current 50 km/h urban limit on this section of road as the character of the area has changed significantly in the five years that the lower limit has been in force.

SH57 SH1 to Heatherlea East Road - East of SH1 intersection on Kimberley Road to north of Heatherlea East Road

SH57 in Horowhenua is a key link for people travelling to school and work, and to access essential services. It is also used by freight and people travelling to and from Wellington.

We support retention of the current speed limit of 80km/h and oppose reversal to 100km/h for this section of the state highway. We encourage further investment in safety treatments and infrastructure improvements. This section has a poor crash record and has many roadside hazards including multiple intersections, driveways, and sharp corners. Much of these hazards have been mitigated with intersection improvements and roadside barrier installations, however the road's narrow width prevents the installation of median barriers and many sections of unsafe shoulders, and several dangerous intersections remain.

The existing 80km/h speed limit was implemented in December 2022 due to increased development in Levin, including new retirement villages situated along the highway. The Tara-lka growth area, adjacent to SH57, has the potential to feature 2,500 houses, a small commercial area, new parks and reserves and education opportunities. Longer term, the Ōtaki to north of Levin new highway (Ō2NL) will affect traffic volumes with a key interchange at Tararua Road.

Growth and urban development are rapidly changing the context of this road. This is no longer a rural highway for its full length, the existing 80km/h speed limit is more suitable for the current and future surrounding land use of this road.

Prior to making the speed limit reduction, in 2021 NZTA conducted a review and consultation which showed most people supported some level of speed reduction. This review was conducted on the premise of identifying roads where safe speed limits can make a big difference in saving lives, and where communities are calling for change.

In the two full calendar years the 80km/h speed limit has been in place (i.e. 2023 and 2024), a substantial reduction in the number and severity of crashes has been achieved compared to years preceding the 80km/h speed limit change.

There was a total of 15 crashes, with one serious injury crash and no fatal crashes in this section during 2023 and 2024. Compared with 2021 and 2020, when a 100km/h speed limit was in place there was a total of 27 crashes including two serious injury crashes and one fatal crash. Reversing this speed limit to 100km/h will result in more crashes, and more deaths and serious injuries on this road.

SH1 Ohau to Manakau - South of Muhunua East Road to north of Waikawa Beach Road and SH1 Manakau to Pukehou overbridge - South of railway underpass to Honi Taipua Street to west of Pukehou Rail Overbridge

We support retention of the current speed limit of 80km/h and oppose reversal to 100km/h. SH1 between Levin and Ōtaki has had a very poor safety record over a number of years and has even been referred to as the “Killing Fields” by past mayors of Kapiti and Horowhenua Districts.

Reducing speed limits was part of an effort to prevent people dying and being seriously injured in this high risk corridor. Along with reduced speed limits, NZTA implemented safety improvements on these sections of road. The aligned speed reduction and safety improvements have been successful in reducing road trauma on this corridor of state highway.

Before undertaking the formal consultation process, NZTA completed numerous steps, including a speed management technical assessment of the road. This identified the various existing speed limits on the road were not safe and appropriate for the current road characteristics and roadside environments along this corridor.

The sections of road signalled for reversal involve returning to 100km/h speed limits on curved and narrow bridges with no shoulders, accesses off the highway and many roadside hazards. There are also residential areas, marae and businesses which operate on this road who are not supportive of this change.

In the two calendar years (2023 and 2024) the 80km/h speed limit has been in place, a substantial reduction in the number and severity of crashes has been achieved compared to years preceding the 80km/h speed limit change. There was a total of 25 crashes, with two serious injury crashes and no fatal crashes in this section during 2023 and 2024. Compared with 2021 and 2020, when a 100km/h speed limit was in place there was a total of 44 crashes, including six serious injury crashes and four fatal crashes.

In summary

NZTA originally lowered the speed limits on these six sections of state highway after undertaking technical assessments to understand the road environment, its layout and use, and following extensive consultation with the community, iwi partners, and stakeholders.

We support the work previously undertaken by NZTA and endorse the current settings that were arrived at from previous reviews, consultations, and technical assessments. The

government proposed automatic reversals of speed limits is not based on any strong evidence and instead simplifies transport network decisions to a popularity contest. As highlighted in this submission there are a range of critical factors that should inform the final speed limit setting.

While this submission addresses NZTA speed limit reversals; road safety is grounded in a safe system approach and we stress speed limits are just one tool in addressing the poor safety record of these sections of highway. Aligned system measures are required to create a transport network that enables people to get to where they are going efficiently and safely.

We advocate the government's new Road Safety Objectives prioritise investment in road policing and enforcement, targeted use of safety cameras, investment in resilient and safe new roads, increased maintenance and cost-effective safety improvements such as rumble strips and wide centerlines to support the setting of safe speed limits.

We strongly oppose the reversal of the current 80km/h speed limits in high risk corridors such as SH3 Palmerston North to Ashhurst, SH57/1 Shannon to Ōtaki, and SH3 Whanganui to Taranaki.

The RTC **strongly supports the retention of 80km/h speed limits** as they were based on:

- a. sound road safety evidence and assessment;
- b. significant public consultation which was required by the relevant version of the *Land Transport Rule - Setting of Speed Limits* associated with the speed limits changes;
- c. community acceptance and in many cases demand for the speed limit changes; and
- d. have proved to be effective in reducing road trauma.

The RTC requests that consideration is given to the matters raised in this submission. We do not wish to be heard in support of this submission, however welcome any feedback or questions of clarification. In this instance, please contact Mark Read, Transport Services Manager on 0508 800 800 or by email at transport@horizons.govt.nz.

Nāku nā,

Rachel Keedwell
CHAIR, REGIONAL TRANSPORT COMMITTEE