

Setting of Speed Limits 2024 consultation

North Taranaki Cycling Advocates Summary and Tips

The Minister of Transport has released the draft Land Transport Rule: Setting of Speed Limits Rule 2024 for public consultation. The changes proposed in this rule would raise speed limits, result in deaths and serious injuries, make our streets less safe, and strip power from local councils.

Submissions are open until Thursday 11 July. A submission doesn't have to take long, and is a chance to tell our government that you want safe streets for our tamariki, for people on bikes, and for everyone who uses our streets.

Making your submission

To have your say, you can:

- fill out the online survey here:
<https://consult.transport.govt.nz/policy/setting-of-speed-limits-2024-consultation/>
- or email a written submission to speedrule@transport.govt.nz.

What should I say?

Speed is the biggest contributor to the number of deaths and serious injuries on our roads, and official advice to the Minister said that 87 percent of our current speed limits are unsafe. **Safe traffic speeds are one of the most effective interventions for improving safety for all road users; especially for active transport users who are acutely sensitive to both real and perceived road danger.** Research on walking and cycling in Aotearoa shows that perceived safety remains one of the biggest barriers to uptake of cycling¹.

The changes included in this proposal will make it more difficult for our local councils and Road Controlling Authorities (RCAs) to set safe speeds, and will make our streets less safe for everyone, especially vulnerable road users like disabled people, kids, and people walking and cycling.

Overall summary for a quick submission

If you want to send a quick submission via email, we recommend **focusing on your experiences with using our roads, any changes you've noticed with reduced speed limits, and any changes you might make with safer speeds on our streets.** You could also include some of the following concerns:

¹ Attitudes to Cycling and Walking, Waka Kotahi, 2022.

<https://www.nzta.govt.nz/assets/resources/understanding-attitudes-and-perceptions-of-cycling-and-walking/Waka-Kotahi-Attitudes-to-cycling-and-walking-final-report-2022.pdf>

- The reversing of speed limit changes already made **will require local councils to re-consult on work that has already been done**. This creates cost and additional work for council officers, elected members, and local communities who have already given feedback.
- The proposal requires **variable speeds, rather than permanent speed reductions, at schools**, which is an added cost and has been shown to be less safe. Our kids deserve safe routes to school and safer school routes enable independent travel for our communities' tamariki and rangatahi.
- **Safer speeds are a proven method of reducing death and serious injury on our roads**. Lower speed limits reduce the consequences of accidents, and the change in recommendation to a blanket 50 km/h for urban roads represents a step backwards for road safety.
- **When speeds are lowered in our communities, we see increases in walking and cycling**. Making these options attractive and safe for people makes our cities and towns better places to live – it decreases congestion, emissions, noise pollution, and makes our streets more pleasant.
- The proposals seem to assume that communities don't want safer speeds, but our experience with local consultations is that they do. When New Plymouth District Council consulted on reducing speed limits outside our district's schools, **89% of responses were either supportive or strongly supportive of safer speeds**.
- **Our decisions on speed limits should be driven by evidence**, and the Transport Minister should be required to provide as much evidence for Ministerial Speed Objectives as RCAs are required to provide for speed limit changes.

[More detail on individual proposals for online survey](#)

If you're completing the full online survey, here are some additional details for each of the seven proposals. **You can (and should) add your personal experiences and viewpoints as well, and paraphrase any of these points that you want to include**. You can also read more in the consultation document here: [Consultation Document](#)

[Proposal 1 – Require cost benefit analysis for speed limit changes with a focus on travel time, safety and implementation costs](#)

The draft Rule requires RCAs to undertake cost benefit analysis (CBA) when consulting on proposed speed limit changes.

- Cost benefit analysis should be completed to support speed limit changes, but the **required analysis should be broad and should cover all of the below, not just what has been identified in the rule:**

- The social cost of death and serious injury crashes
 - The impact of emissions, noise, and vibration on health
 - The impact of the production of greenhouse gasses
 - The impact on the user experience within the transportation network, which include vehicle users, public transport users, pedestrians, and cyclists.
 - The impact on travel time
 - The impact on traffic congestion
 - The impact on vehicle operating costs
 - The impact on road pavements
 - The impact on road operating costs
 - The impact on road design
- A simplified cost-benefit analysis that doesn't assume any change in travel patterns with reduced speed limits or model the health effects of reduced pollution **will over-estimate the travel time costs and under-estimate the benefits associated with speed limit changes**. Therefore, this requirement is likely to make it harder to set safe speeds on our roads and may result in increased death and serious injury.
 - Safety should be a key priority in any analysis, particularly the safety of vulnerable road users like children, disabled people, people walking, and people riding bikes. Travel time and implementation cost are both important, but **we need to ensure that our streets are also safe and accessible to people who can't or don't drive**.
 - We should also **recognise that this analysis would be an added layer of bureaucracy and cost for councils who have already implemented sensible speed limits in their cities**, towns, and near their schools. To ensure consistency and avoid the need for smaller RCAs to rely on costly consultants, the process should be simple and data provided by NZTA.
 - Domestic and international **evidence is very clear that reducing speed limits results in more benefits than costs**. We should use this evidence and enable small changes without a full analysis. Area wide changes to speed limits should undertake consultation and cost benefit analysis, but small local road speed limit changes that save lives should not be required to absorb this extra cost.
 - The Ministerial **directives are not supported with a published CBA, peer reviewed research, or wide-spread support within the road-safety practice community**. The Minister's proposals therefore need to be subject to the same CBA and best practice peer review before any decisions are taken on them, otherwise they risk inadvertently increasing the rate of death and serious injury across the country.

Proposal 2 – ensure RCAs undertake genuine consultation and increase transparency of decisions in response to feedback received.

The draft Rule ensures RCAs undertake genuine consultation and increases transparency of decisions in response to feedback received.

- Consultation should be genuine and decision making transparent, but the draft rule seems to assume that it hasn't been so far. **The processes outlined here align with the approach of our local council. NPDC, with community consultation on this topic.**
- As advocates, we have been involved with consultations from 2020-2023 on safer speeds through NPDC. These processes included iwi and hapū, freight, business, local residents, schools, AA, and other key stakeholder groups. We do not see any change in the approach to the consultation that we have already delivered to our community.
- It's not entirely clear whether there is expectation for re-consulting on changes made as recently as 2023. **Given the time and resources already spent on consultation, having to do it again risks wasted work and significant community fatigue.**
- The proposal removes the requirement to provide processes to provide for Māori to contribute to the preparation of speed management plans. This is **against principles of Te Tiriti o Waitangi**, especially when Māori experience disproportionate rates of deaths and serious injuries on our roads.

Proposal 3 – require variable speed limits outside school gates

The draft Rule requires variable speed limits outside school gates during school travel periods.

- Children travel near and around schools at different times of the day, including evenings and weekends for sports, activities, etc. The **minimal time savings from variable speed limits are not worth the increased risk to children**. We should be reducing speeds around schools at all times to ensure children are able to travel to school safely and independently.
- Static variable speed signs should not be allowed, because evidence shows drivers tend to ignore the lower speed. **Permanent speed limits are easier to enforce, have less risk of ambiguity, and provide overall a greater level of safety** to our tamariki
- In June 2022, NPDC engaged with our community on safer speeds outside schools, on some rural roads and a trial safer speed zone around our hospital. We received a total of 1,252 responses with **89% of respondents either in support or strongly supportive of safer speeds outside schools**. The changes were supported by elected members and included 32 permanent 30km/h, 5 permanent 60km/h and 11 variable 30km/h on arterial roads.
- There are 46 schools in our district and 30 have a permanent speed limit. To adhere to the new rule, existing permanent speed limit signs would need to be removed (est \$13k) and replaced with variable signs (est \$65k for static OR \$650k for electronic) at 34 schools within the district. Therefore, the cost associated with this change in signs alone would be between \$78k and \$663k. **This cost is not planned for in long-term plans, and is unnecessary when there was such strong local support for the permanent change.**

- A 2023 study from Wellington² assessed nine speed management options using cost benefit analysis. Key findings relevant to this proposal are:
 - The permanent speed limits around schools were the only options with a high BCR, driven by crash reduction benefits and relatively low travel time disbenefits.
 - Variable speed limits at schools had the lowest safety benefits due to few crashes near schools during drop-off and pick-up periods.

Proposal 4 – introduce a Ministerial speed objective

The Objective will set out the Government's expectations for speed management.

- Road controlling authorities should set speed limits according to evidence, not according to the whim of a Minister. **Ministerial speed objectives infringe on RCA's ability to respond to local context or aspirations of the local community.**
- Ministerial guidance **should sit within the Ministerial directives in the Government Policy Statement on Land Transport and should be supported by robust evidence-based research** to clearly demonstrate why such directives are justified.
- **Speed should sit within a wider conversation on road safety** and be a part of a safe system approach to reducing death and serious injury on our roads. Any Ministerial speed objective should recognise this context and not sit in isolation.
- District and City councils are in the best position to understand local road safety issues and trends in their districts, engage with the local community and design appropriate solutions to address them. **Ministerial objectives should not override this local expertise.**
- Given the content of this document and the Land Transport GPS, there are **concerns that the ministerial speed objectives may run counter to best practice, research, outcomes of engagement processes and design-led solutions that are supported by the local community.**

Proposal 5 – changes to speed limits classifications

The draft Rule proposes a schedule of speed limits classifications for each road type.

- The **biggest concern here is urban streets changing from a range of 30-40 km/h to a blanket limit of 50 km/h.** Blanket speeds of 50km/h in urban areas will reduce the number of people who feel safe to walk and cycle, which will worsen congestion, climate pollution, and health outcomes.
- By giving one set speed for urban roads, rather than a range, **this rule does not allow for RCAs to support local community aspirations for road safety** and will increase risk of crashes.

² Approaches to Managing Speed in New Zealand's Capital
<https://journalofroadsafety.org/article/56417-approaches-to-managing-speed-in-new-zealand-s-capital>

- **Road Controlling Authorities should be able to retain the speed settings they have implemented** and not spend time, effort, and resources reverting to higher speeds when speed limit changes have been popular and/or resulted in significant road safety benefits.
- Many lower speed areas have been in operation and have been shown to be effective at improving road safety. New Plymouth has had a **30km/h speed limit in operation within the central city since 2012 and it has seen a 45% reduction in all crashes** since its implementation.
- When NPDC consulted with our community in 2022 on 40 km/h speed limit trials along some residential streets to support safer movements near the Taranaki Base Hospital. We received over 1,252 responses to this consultation with **78% of respondents either in support or strongly in support to the proposed safer speeds**. This speed limit was approved and has been installed with community support.
- The current speed limit classifications **allow for increasing the number of people choosing to walk and cycle**, which can reduce the number of vehicles on the road and increase roading efficiency for everyone, including those who drive.
- Most streets in Aotearoa do not have protected bike lanes, and in their absence, we should aim for **safe traffic speeds to support more people to bike more often**.
- The **current speed limit classification also provides a greater opportunity to reduce transport emissions** by reducing the amount of acceleration and deceleration. This ability to both reduce transport emissions and increase the number of our community who choose to walk and cycle align with local and central government Emissions Reduction Plans.

Proposal 6 – update the Director’s criteria for assessing speed management plans for certification

The draft Rule proposes to update the criteria RCAs must meet when submitting speed management plans for certification.

- This change makes sense in the context of the other changes, but **requiring RCAs to adhere to the Ministerial Speed Objective is a concern, because there are risks this objective will be based on ideology and not evidence**.
- We should **allow for more local discretion as to whether full cost-benefit analysis is necessary for minor speed changes and enable RCAs to set safe speed limits lower than the speed limit classifications where appropriate** (e.g. setting limits of 30 km/h in urban areas.)

Proposal 7 – reverse recent speed limits classifications

The draft Rule proposes that certain speed limits reduced since 1 January 2020 will be reversed by 1 July 2025, including:

- *local streets with widespread 30km/h speed limits surrounding a school*
 - *arterial roads (urban connectors)*
 - *rural state highways (interregional connectors)*
- By requiring speed limit reductions put in place by RCAs to be reversed, **this proposal undermines councils and communities who have already made decisions on speed limits in their areas**. This will add costs to local councils and has the potential to frustrate communities who have supported and embraced these changes.
- It would be **more reasonable to ask councils to review existing speed limit changes with a cost-benefit analysis or introduce a mechanism for communities to request a review**. Central government should not be overriding local decision making and community aspirations in this way.