



**Hamilton City Council – Staff
Submission**

**Draft Land Transport Rule:
Setting of Speed Limits
2024**

Ministry of Transport

15 July 2024



Improving the Wellbeing of Hamiltonians

Hamilton City Council is focused on improving the wellbeing of Hamiltonians through delivering to our five priorities of shaping:

- **A city that's easy to live in**
- **A city where our people thrive**
- **A central city where our people love to be**
- **A fun city with lots to do**
- **A green city**

The topic of this staff submission is aligned to all of Hamilton City Council's five priorities.

Council Approval and Reference

This staff submission was approved by Hamilton City Council's Chief Executive on 15 July 2024.

Submission # 769

It should be noted that the following submission is from staff at Hamilton City Council and does not therefore necessarily represent the views of the Council itself.

Key Messages and Recommendations

1. Hamilton City Council staff welcome the opportunity to make a submission to the Ministry of Transport on the **Draft Land Transport Rule: Setting of Speed Limits 2024 (the Rule)**.
2. This submission points out a number of technical and implementation challenges with the Rule as drafted, along with some recommendations that staff believe are important and should be considered when finalising the Rule.
3. Staff note that Hamilton City Council has never introduced 'blanket speed limits' in Hamilton City.
4. Staff note the new Rule's focus on undoing supposed 'blanket speed limits' and implementing lowest common denominator distances for speed limits outside school gates and times of operation will:
 - a) Adversely impact Hamilton City Council's good speed management work and reputation with its community developed over many years; and
 - b) Take away the ability of local authorities to make decisions based on the specific and varied needs of their communities; and
 - c) Increase delays to traffic by over 200%, or over three times, compared to the current, well researched and tested times of operation; and
 - d) Cost approximately \$600,000 to undo recently completed work at a time when Hamilton City Council has already set its Long Term Plan for the 2024-25 year and such expenditure has not been provided for and will add cost to ratepayers.
5. Staff believe that the proposed hours of operation of variable speed limits outside school gates are excessive and will create unnecessary and new delays and will result in driver frustration and increase the likelihood of ignoring the signage.
6. Staff have concerns about the proposal to introduce static variable speed limit signs on main roads.
7. Staff have concerns about the restrictive definition of 300m for 'outside a school gate' in urban environments.
8. Staff have concerns about the proposed amendment to the Land Transport (Road User) Rule 2004 to introduce default variable speed limit times and which would be reflected in the Road Code.
9. Staff note that none of the proposals for reversing speed limit reductions have a safety assessment associated with them. International evidence is very conclusive that increasing speed limits exponentially increases safety risk, and that 100km/h rural and 50km/h urban speed limits are not the Safe and Appropriate Speeds for most rural and urban roads in New Zealand.
10. Staff also note that the mandated speed range requirements of the proposed Rule will prevent already consented economic development in Pukete, northern Hamilton.
11. Staff are concerned about additional costs being imposed onto Road Controlling Authorities (RCAs) to undertake a Cost Benefit Analysis (CBA) for each and every speed limit that it wishes to implement.
12. Staff recommend that vehicle operating costs (fuel costs) are included as an impact to be considered in a speed limit change CBA.
13. Staff are concerned that RCAs' easy access to nationally consistent crash and travel speed data, required for the CBAs, is being altered.

14. Staff do not support the removal of the requirement for the NZ Transport Agency to develop and maintain guidance on the use of mean operating speed for setting speed limits as this data in an accessible and nationally consistent form is essential for speed limit change CBAs.
15. Hamilton City Council has been using the consultation approach being proposed – staff therefore support that all RCAs (i.e., including the NZ Transport Agency) follow the same consultation requirements.
16. Staff are therefore concerned that Section 12.2 (2) and (3) of the proposed Rule are only available to the NZ Transport Agency and that there is no recognition given to the consultation process Hamilton City Council has used and the community support that Hamilton City Council has had for recent changes.
17. Staff recommend that not only the NZ Transport Agency, but also local RCAs, have the ability to retain speed limits for roads where they can demonstrate community acceptance.
18. Staff agree with the proposal to introduce a Ministerial Speed Objective provided it is timely.
19. Staff have concerns with introducing a binding schedule of speed limit classifications that specify speed limits available for each road type.
20. If a binding schedule of speed limit classifications is introduced, staff recommend:
 - a) Having a 60-100km/h range for interregional connectors.
 - b) That the tables in Schedule 4 with the speed limits ranges are clearly noted that they refer specifically to permanent speed limits across the road classifications and exemptions.
21. Staff have concerns with all urban streets having a binding and 'blanket' 50km/h speed limit and recommend replacing this with:
 - a) 30-40km/h speed limit range for 'local (residential) streets'; and
 - b) 40-50km/h range for 'main roads' and 'activity streets'.
22. Staff recommend that 'Urban connectors' and 'Urban transit corridors' are included with the 'Rural intersection speed zone' exceptions to Table 1 'Urban street classifications'.
23. Staff have concerns with enabling speed limits of up to 120km/h because this will require significant investment in a limited number of locations and is not the best use of limited funding.
24. Staff believe a longer-term, 10-year outlook for investment, including speed management investment, is important and particularly useful in describing long-term direction when consulting with communities, and recommend that the provision is retained in the proposed Rule.
25. Staff do not support the removal of section 'Māori contribution to creation of plans'.

Introduction

26. Hamilton City Council staff welcome the opportunity to make a submission to the Ministry of Transport on the **Draft Land Transport Rule: Setting of Speed Limits 2024**.
27. This submission is structured under the following key areas:

General Comments

Proposal 1 – Requiring cost benefit analysis for speed limit changes. The draft Rule requires RCAs to undertake cost benefit analysis (CBA) when consulting on proposed speed limit changes.

Proposal 2 – Strengthen consultation requirements. The draft Rule ensures RCAs undertake genuine consultation and increases transparency of decisions in response to feedback received.

Proposal 3 – Require variable speed limits outside school gates. The draft Rule requires variable speed limits outside school gates during school travel periods.

Proposal 4 – Introduce a Ministerial Speed Objective. The Objective will set out the Government's expectations for speed management.

Proposal 5 – Changes to speed limits classifications. The draft Rule proposes a schedule of speed limits classifications for each road type.

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.

Proposal 7 – Reverse recent speed limit reductions. The draft Rule proposes that certain speed limits reduced since 1 January 2020 will be reversed by 1 July 2025.

Other Matters

- Speed Management Committee
 - Regional Speed Management Plans
 - Higher Speed Limits on Certain Roads
28. Staff have also made specific comments on other changes that have been made in the proposed Rule that are not detailed in the consultation document:
 - i. Removal of 10-year outlook removed from Section 3.9 'Content and form of plans'.
 - ii. Removal of Section 3.10 (current 2022 Rule) 'Maaori contribution to the creation of plans'.
 - iii. Removal of the requirement for the Agency to develop and maintain guidance on the use of mean operating speed for setting speed limits.
 - iv. Schedule 4 is related to permanent speed limits only.

General Comments

29. Staff note that Hamilton City Council has never introduced 'blanket speed limits' in Hamilton City.
30. All school-related speed limits in Hamilton City have been developed together with the schools and are bespoke to each school's circumstances, safely and transparently supporting their specific opening and closing times, and their children's specific assembly and dispersion requirements for the surrounding neighbourhood.
31. All school speed limits have been consulted on twice already in accordance with the proposed Rule, once at the time of the speed management plan development, and again associated with the implementation at each school. School speed limits have good community support from a well-engaged

community, and Hamilton City Council has over 20 years of experience in operating effective and efficient variable speed limits around schools.¹

32. Staff note that the new Rule's focus on undoing supposed 'blanket speed limits' and implementing lowest common denominator distances for speed limits outside school gates and times of operation will:
- Adversely impact Hamilton City Council's good speed management work and reputation with its community developed over many years.
 - Take away the ability of local authorities to make decisions based on the specific and varied needs of their communities.
 - Increase delays to traffic by over 200%, or over three times, compared to the current, well researched and tested times of operation.
 - Cost approximately \$600,000 to undo recently completed work at a time when Hamilton City Council has already set its Long Term Plan for the 2024-25 year and such (unwarranted and wasteful) expenditure has not been provided for and will add unnecessary cost to ratepayers.
33. Staff note that none of the proposals for reversing speed limit reductions have a safety assessment associated with them. The international evidence is very conclusive that increasing speed limits exponentially increases safety risk, and that 100km/h rural and 50km/h urban speed limits are not the Safe and Appropriate Speeds for most rural and urban roads in New Zealand:
- The risk of involvement in a casualty crash is twice as great at 65 km/h as it is at 60 km/h, and four times as great at 70 km/h.²
 - By combining evidence from different sources, it has been estimated that speeds above New Zealand's Safe and Appropriate Speeds are involved in around 71% of injury crashes.³
34. Staff note the reference to *Rowland and McLeod (2017), "Time and fuel effects of different travel speeds"* as evidence to the statement *"The draft Rule may lead to some economic benefits in reducing travel times"*. The referenced study was only on six selected arterial type routes, not the 'first mile/last mile' residential street network that the proposed Rule requires 50km/h speed limits, and for which there will be little to no reduced travel times, particularly compared with 40km/h which better reflects mean speeds across these parts of the network.
35. Staff note that the mandated speed range requirements of the proposed Rule will prevent already consented economic development in Pukete, northern Hamilton. The proposals will stop the imminent development of a new Pak n Save supermarket in Pukete as it has a resource consent requirement that the speed limit on Wairere Drive, in the vicinity of Karewa Place, is reduced to 60km/h. Wairere Drive is classified as an urban transit corridor for which 60km/h is not available under the proposed Rule.
36. The requirement to reduce the speed limit to 60km/hr to enable the development to proceed was the decision of independent planning commissioners following exhaustive traffic engineering caucusing of the parties. The 60km/hr speed limit requirement on Wairere Drive is to accommodate new traffic

¹ **Examples of Hamilton City school speed limits report to committee and community response:**

Report to committee: <https://hamilton.govt.nz/your-council/meetings/calendar/detail/traffic-speed-limit-and-road-closure-hearings-panel-202312050930>

Social pinpoint – community responses: <https://hcc.mysocialpinpoint.com/safer-streets-for-students#/>

Hamilton City 2024 Speed Management Plan:

Report to committee:

<https://hamilton.govt.nz/your-council/meetings/calendar/detail/infrastructure-and-transport-committee-202309210930>

Consultation page with copy of submissions etc:

<https://haveyoursay.hamilton.govt.nz/city-transportation/speed-management-plan-2023/>

² Travelling Speed and the Risk of Crash Involvement, Volume 1 – Findings by Kloeden CN, McLean AJ, Moore VM, Ponte G, NHMRC Road Accident Research Unit, The University of Adelaide.

³ Road Safety Evidence Review Understanding the Role of Speeding and Speed in Serious Crash Trauma: A Case Study of New Zealand R.F. Soames Job and Colin Brodie.

signals in close proximity to two other traffic signalised intersections, and to facilitate walking and cycling accessibility for the supermarket.

37. The proposed Rule mandates that Urban Transit Corridors such as Wairere Drive must have speed limits in the 80-100km/h range. Following the independent planning commissioner's decision, the consented 60km/h speed limit was formally consulted on and approved by Hamilton City Council for certification and implementation as part of the Pak n Save development. The Pak n Save supermarket development will no longer be able to meet this resource consent requirement, meaning the proposed Rule will prevent already consented economic development proceeding.

Proposal 1 – Requiring Cost Benefit Analysis for Speed Limit Changes

38. Staff are concerned about additional costs being imposed onto RCAs to undertake a CBA for each and every speed limit that they wish to implement, particularly when the proposed Rule determines that all roads of the same classification must have the same speed limit, no matter how different they are.
39. Staff note that the proposed CBA requirements focus on the more limited range of impacts of safety, travel time and implementation costs. If CBAs are going to be required, they should be based on nationally consistent, robust data that reflects the full scope of benefits and costs.
40. Staff recommend that vehicle operating costs (fuel costs) are included as an impact to be considered in a CBA in clause 3.3(2) of the proposed Rule. Even the key reference used on page 3 of the supporting document “Rowland and McLeod (2017), Time and fuel effects of different travel speeds” acknowledges this:

“Fuel consumption and maximum speed were highly correlated with on all three of the long routes. Maximum speed was a significant predictor of increased fuel consumption on all three long routes” (page 7 of the research).

“This information will inform the conversation on the costs and benefits of different speed limits” (page 8 of the research).

41. The information provided within the Consultation/Supporting Document is confusing as to how the cost-benefit analysis will consider travel times. Page 7 includes the statement:

“Costs include any negative impacts attributable to the change (for example, increased travel times and increased number and severity of crashes) and implementation costs”.

42. However, it then states:

“The approach would not enable negative impacts like increased travel times to be treated as a disbenefit for the purposes of calculating any benefit cost ratio”.

43. A disbenefit is the same as a cost, so these two statements contradict themselves. Staff also cannot see anywhere in the proposed Rule that increased travel times should not be considered a disbenefit/cost as part of a Cost Benefit Analysis. In fact, 3.3(3) in the proposed Rule states:

“Any positive impact must be treated as a benefit and any negative impact must be treated as a cost”.

44. Staff are also concerned that RCAs' easy access to nationally consistent data, required for the CBAs, is being altered:

- a) For the safety component of CBAs, RCAs are very dependent on the crash data being managed by NZTA in the Crash Analysis System (CAS), particularly as the timeframes for processing the non-injury data is currently up to seven months following the receipt of the traffic crash report. Non-injury data is very useful when looking at trends and using a predictive/preventative approach to crashes i.e., not waiting for someone to be killed before doing something. It is common knowledge

that if there are lots of non-injury crashes happening, then it is just a matter of time/luck before there is something serious.

- b) Travel time changes required for the CBAs are based on actual travel speeds, not changes in the speed limit number posted on signs. RCAs would use mean speed information supplied by NZTA for this purpose, but we note that the requirement for the Agency to 'develop and maintain guidance on the use of mean operating speed for setting speed limits' (ref 3.14(a) of current 2022 Rule) is removed from the proposed Rule.

- 45. Staff also note that the higher speed limits proposed will mean additional costs associated with temporary traffic management on the network to reflect the risks associated with higher speed limits. This ongoing cost should be included in the CBA analysis, as well as be considered in the 'RIS'.

Proposal 2 – Strengthening Consultation Requirements

- 46. Hamilton City Council has already been using the consultation approach being proposed and supports that all RCAs (i.e., including NZTA) follow the same consultation requirements.
- 47. Prior to certification by NZTA:
 - a) Hamilton City's Speed Management Plan was developed and approved by Council via a Special Consultative process, following the 'higher standard' requirements of section 83 of the Local Government Act 2002.
 - b) Hamilton City Council has subsequently consulted on each individual speed limit change prior to implementing it.
 - c) All of this information has been made publicly available and there has been full transparency for the decisions made.
- 48. Staff are therefore concerned that Section 12.2 (2) and (3) of the proposed Rule is only available to NZTA and that there is no recognition given to the consultation process we have used and the community acceptance we have for recent changes.
- 49. Staff recommend that local RCAs also have the ability to access 12.2(2) and (3), where they can demonstrate a robust community consultation has been used and resulting community acceptance, to be able to work through the process to retain speed limits for roads that will be considered 'specified roads' under the proposed Rule.

Proposal 3 – Requiring Variable Speed Limits Outside School Gates

- 50. Staff believe that the proposed hours of operation of variable speed limits outside school gates are excessive and will create unnecessary and new delays and will result in driver frustration and an increasing likelihood of ignoring the signage.
- 51. Variable school speed limits current hours of operation in Hamilton City are bespoke to each school (as every school has different operating times), and are for 55 minutes each school day, as is the case for the majority of schools around the country. The proposed Rule would increase this operating time by over 200%, or over three times, to 180 minutes each day, significantly increasing delays to drivers on main roads, and for no tangible safety benefit as there is little or no activity at the school gate during the increased times.
- 52. The increase in operating times will mean that there are speed limits operating when there is no activity at the school gate, leading to frustration and 'bad habits' for drivers as they will not understand the reason for slowing when no children are present:
 - a) From 8.00 am, which is up to an hour before many schools start.
 - b) Up to 9.30 am, which is up to half an hour after most schools start.

- c) From 2.30 pm, which is half an hour before children are let out from classes.
- d) Up to 4.00 pm, which would be an hour after most schools have closed more than half an hour after children have left school completely.
- 53.** The current variable speed limit best practice operating requirements, set out in Traffic Note 37 include:
- a) *Factors required for the successful operation of a 40km/h variable speed limit in a school zone are:*
- *Having times of operation coinciding with on-road, school-related activity.*
- b) *The signs may operate for a maximum period of:*
- *35 minutes before the start of school until the start of school.*
 - *20 minutes at the end of school commencing no earlier than five minutes before the end of school.*
- c) *Unless the signs are manually turned off earlier, they must turn off automatically when the maximum period has elapsed.*
- 54.** Staff therefore recommend that the proposed Rule's hours of operation also have allowance for use throughout the school day, as is currently provided in Traffic Note 37:
- *10 minutes at any other time of day when children cross the road or enter or leave vehicles at the roadside.*
- 55.** This additional provision is regularly used by schools that have extra-curricular activities such as sports activities during the school day and at weekends, and staff recommend that such provisions are retained.
- 56.** Staff have concerns with the proposal to introduce static variable speed limit signs on main roads. The following statement in the supporting documentation is incorrect:
- "The current static variable speed limit signs can only be used on give way- or stop sign-controlled side roads adjacent to the main road. This is due to the size of the font on the static sign and legibility requirements".*
- 57.** The reason static signs are used on side roads is not to do with the font on the static sign or legibility requirements. Static signs are used on side roads simply because drivers will have already passed an electronic sign on the main road when entering the zone, so the static sign is merely a reminder of the main road restriction as they go back onto the main road. For this reason, side roads do not justify the cost of electronic signs as well as on the main road.
- 58.** Staff agree that the size of the font on static variable speed limit signs and legibility requirements is an issue, and it is this that makes them unsuitable/inappropriate for use on main roads. Static variable speed limit signs are never used in isolation from electronic main road signs as they are not effective by themselves, which has been described in Traffic Note 37 (Revision 2, 2011) now for over 20 years:
- "In many jurisdictions, such as some states in Australia and the United States, school zones with special speed limits are indicated by permanently displayed signs. The major drawback of any permanently displayed sign is the manner in which drivers, many of whom pass the same sign regularly without requiring any action in response to it, tend to ignore or fail to see it. Traffic note 37 Revision 2 - Variable signs, which are displayed only when relevant, offer a way in which this drawback can be minimised and may actually enhance driver acceptance of any restriction imposed. Variable signs were used for the Christchurch trials and the results of that study are embodied in these guidelines.^{2,3} In recent years some states in Australia have begun to retro-fit permanently displayed signs with active signs that have flashing lights or electronically displayed speed limits to improve community acceptance and compliance with speed limits in school zones".*

59. Hamilton City Council and Queenstown Lakes District Council have recently worked with NZTA on trials of static speed limit signs for schools on minor residential streets (refer Abley (2024) *“Static variable 30 km/h school zone sign trial: updated analysis and evaluation (18 months post-implementation)”*). This research concluded:

“The purpose of this trial was to determine how effective the static school speed signs were at reducing vehicle speeds around schools. Because of the limitations in the data collection and mixed results that were observed, it determined that the effectiveness of these signs is inconclusive”.

60. The other reason static variable speed limit signs have been shown not to work is that drivers don't know the specific time when they are driving past a school – they might understand what time they are likely to arrive at whatever their destination is, but the time of day is not front of mind for drivers at all times as it is not required for the driving task itself. Electronic variable speed limit signs are considered by staff as the only effective speed limit sign outside schools as they display the correct speed limit directly to the driver at precisely the time they need to know it and act on it.

61. Staff believe that it is clear from:

- a) The initial variable speed limit trials outside schools in Christchurch in 2000.
- b) Use of static signs in Australia that have subsequently been changed to electronic displays.
- c) Twenty years of experience by RCAs across New Zealand in deploying electronic variable speed limit signs according to Traffic Note 37 that that have been proven to work.
- d) NZTA's own most recent 'inconclusive' trial of static variable speed limit signs.

...that “amending the TCD Rule and the Land Transport (Road User) Rule 2004 to allow static variable speed limit signs on main roads” is contrary to best practice and will be detrimental to child safety.

62. Staff have concerns with the restrictive definition of 300m for 'outside a school gate' in urban environments. Children walk and cycle a lot further than 150m from the school gate, and communities Hamilton City Council has consulted with agree they have a right to feel safe when walking to and from their homes. Variable speed limits outside schools should enable flexible, sensible implementation as is provided by the current best practice guidance detailed in Traffic Note 37.

63. Staff recommend that specific 'lowest common denominator' lengths are not inflexibly locked into the Rule and that the existing guidance from Traffic Note 37, which RCAs have used successfully for over 20 years, should be retained for the urban environments as guidance:

“5.2 Length of variable speed limits in school zones - Variable speed limits in school zones should be installed to avoid, as far as possible, side roads with no school frontage. They should be as short as practicable; between 300 metres and 500 metres long”.

64. Staff have concerns with the proposed amendment to the Land Transport (Road User) Rule 2004 to introduce default variable speed limit times and which would be reflected in the Road Code for three reasons:

- a) The proposed default times of 8.00-9.30 am and 2.30-4.00 pm are too long and so include times when drivers generally don't see activity outside schools. Default times are not appropriate for variable speed limits outside schools as school opening and closing times vary – one size does not fit all;
- b) The extended timeframes will mean that the lower limit is in place for a large period of time when there are not children present and many drivers will not be aware of whether or not the limit is applicable or not because they won't be aware of whether the school is actually operational that day e.g., teacher only day, school holidays. Drivers will be less likely to slow and more likely to argue any enforcement activity.

- c) Drivers do not generally know what the time of day is that they are driving past a school, which is why static variable speed limit signs don't work, and why electronic speed limit signs are far more effective when travel speeds are higher and drivers are required to slow (i.e., main roads and in rural areas).

65. For these reasons it is wrong to think that adding school times to the Road User Rule will make illegible static signs on main roads work – it hasn't worked elsewhere and it's trying to fix a problem that doesn't exist – staff believe that electronic speed limits signs are the only effective way to encourage drivers to slow where travel speeds are generally higher (i.e., on main roads and in rural areas).

Proposal 4 – Introduce a Ministerial Speed Objective

66. Staff agree with the proposal to introduce a Ministerial Speed Objective provided it is timely and well in advance of when the 'first draft State Highway speed management plan' is provided to RCAs.

67. Speed Management Plans are an effective way of engaging with communities to develop a long-term view of the approach that RCAs will be taking for speed management activities, including timing of speed limit and engineering changes. Speed Management Plans also enable better planning between adjacent RCAs to ensure logical speed limit changes along roads that move through different RCA jurisdictions.

68. Introducing the Ministerial Speed Objective at the time of the Government Policy Statement (GPS) is too late for RCAs to be able to prepare and consult on Speed Management Plans in order to feed into the preparation of Long Term Plans, so RCAs will all just default to the alternative method of setting speed limits (2.6 of the proposed Rule). This will result in less strategic engagement with communities and more ad hoc, less coordinated speed limit changes.

Proposal 5 – Changes to Speed Limits Classifications

69. Staff have concerns with introducing a binding schedule of speed limit classifications that specify speed limits available for each road type. Roads of the same classification are not created equal, as is reflected in the information NZTA must develop and maintain about speed management for roads (ref 3.15 (2) of the proposed Rule):

- a) The function and use of the road.
- b) Crash and injury risks for all road users.
- c) The characteristics of the road and roadsides.
- d) Adjacent land use.
- e) The number of intersections and property accessways.
- f) Traffic volume.
- g) Any planned physical changes to the road and its infrastructure.
- h) The mean operating speed for the road.
- i) Any other matter the Agency considers appropriate.

70. As but one example, there are many inter-regional connectors that are not currently constructed to safely enable 100km/h speed limits and will require significant investment (such as wide centreline or wire rope barrier implementation) to enable 100km/h speed limits safely.

71. Staff recommend having a 60-100km/h range for interregional connectors, in line with the current guidance, to enable safe and appropriate speed limits to be applied to these roads according to their infrastructure and environment until they can be upgraded to the standard required for 100km/h travel speeds.

72. Staff have concerns with all urban streets having a binding and ‘blanket’ 50km/h speed limit. Considering the One Network Framework (ONF) classifications (<https://www.nzta.govt.nz/planning-and-investment/planning/one-network-framework/>), it seems ‘urban streets’ in Table 1 encompasses:
- ‘local streets’
 - ‘main streets’
 - ‘activity streets’.
73. However, all three have different movement and place functions, and accordingly, staff recommend that all three should have their own appropriate speed limit ranges.
74. The ONF recognises that streets not only keep people and goods moving, but they’re also places for people to live, work, and enjoy. The ONF is designed to contribute to improving road safety and building more vibrant and liveable communities.
75. Staff understand from international best practice that 50km/h is not the safest speed to have in urban areas and neighbourhoods because it significantly increases the chances of pedestrians and cyclists dying if they’re involved in a crash. For over 20 years Hamilton City Council has introduced, and communities have benefited from, introducing 40km/h ‘Safer Speed Areas’, and we have the evidence that these areas, as they have been gradually introduced, are safer than the areas in the City that remain at 50km/h. Over the past 10 years, deaths and serious injuries on 40km/h Safer Speed Areas in Hamilton City have been 33% less than for untreated (50km/h) areas.
76. Auckland Transport began lowering speed limits on many roads four years ago. A report by Abley consultants reveals *“In the 24 months following the June 2020 Auckland speed limit reduction, Phase 1 roads have seen a 30% reduction in fatalities. In comparison, over this same period, the rest of the network has seen a 9% increase in fatalities. For the same period, Phase 1 roads have seen a 21.3% reduction in serious injuries. In comparison, over this same period, the rest of the network has seen a 11.8% reduction in serious injuries”*.⁴
77. The following table details death and serious injury or crash reduction benefits associated with speed limit reductions across New Zealand⁵. The reductions are significant and reflect the death and serious injury increases if the speed limit changes were reversed, clearly showing it would be unsafe to do so.

Location	Speed Limit Change Made	Result
Auckland rural	~500km reduced	26.9% DSi reduction
Mt Maunganui	~7km reduced to 30km/h	21% reduction in crashes
SH2 Maramarua	~25km reduced to 90km/h	36.1% DSi reduction
SH2 Karangahake Gorge	~9km reduced to 80km/h	35% DSi reduction
SH58 Paremata	~4km reduced to 80km/h	48.8% DSi reduction
Hastings rural	~75km reduced to 80km/h	32% reduction in crashes
Wellington suburban	~10-15km reduced to 30km/h	38% reduction in crashes
SH60	~9km reduced to 80km/h	73% DSi reduction
SH6 Blenheim to Nelson	~110km reduced to 60-90km/h	78% reduction in DSi
Christchurch CBD	~10km reduced to 30km/h	48% reduction in injury rates
Christchurch suburban	Addington, Papanui & Sumner reduced to 30km/h	59% reduction in injuries
SH75	~70km reduced to 60-80km/h	13.3% DSi reduction

⁴ <https://www.nzherald.co.nz/nz/auckland-council-votes-against-higher-road-speed-limits-opposing-governments-plan/VVRYMZHUFDCHZAQQM3FY7W34OQ/>

⁵ Courtesy Glen Koorey, ViaStrada, June 2024.

78. There are numerous international examples where reduced speed limits on streets have had an impact on reductions in road casualties and improved traffic and pedestrian safety. The most recent scientific evidence published on 22 May 2024 has demonstrated that the introduction of city-wide 30 km/h speed limits has resulted in saving more than 37% of lives⁶:
- a. *"Results from 40 different cities across Europe, including Brussels, Paris, and Zurich, indicated that reductions in speed limits improved road safety by decreasing the likelihood of crash risk and the severity of crashes that do occur. On average, the implementation of 30 km/h speed limits in European cities demonstrated a 23%, 37%, and 38% reduction in road crashes, fatalities, and injuries, respectively"*.
 - b. *"Lowering speed limits is often met with resistance due to concerns about potential increases in travel times and traffic congestion. However, research generally indicates that any such impacts range between 3 and 5%, and in some cases, reducing speed limits can even lead to improvements in travel times and congestion levels"*.⁷
 - c. *"It should be noted that the research findings highlighted the importance of context-specific analysis when adjusting speed limits, taking into account factors such as local conditions, traffic volume, and road type"*.
79. Urban residential streets are the 'first mile/last mile' for most trips with mean speeds generally near 40km/h, so higher speed limits provide little to no economic travel time benefit. However, lower residential speed limits provide the 'place' environment for communities, (<https://www.nzta.govt.nz/planning-and-investment/planning/one-network-framework/overview/#putting-people-place-and-movement-at-the-heart-of-planning-and-investment>), enabling safe and accessible travel by all modes to local places they want to go to. Lower speed limits on urban residential streets generally reflect the existing mean travel speeds, not the 'blanket' 50km/h default speed limit in the proposed Rule.
80. Hamilton City Council's District Plan uses design speed environments (DSE) for the design criteria for the form of transport corridors (see Vol 2, Appendix 15, 15-6. <https://hamilton.isoplan.co.nz/eplan/rules/0/4/0/12523/0/82>). The DSEs vary according to hierarchy and surrounding land use, and there are various rules (e.g., sight distance calculations) that link to posted speed limits. For new residential streets, Hamilton City Council's District Plan requires DSEs to align with 40km/h speed limits. The proposed Rule requiring all residential streets to default to 50km/h will create a potentially dangerous scenario when we have existing and new roads built to a 40km/h DSE but are required to have speed limits posted 25% higher.
81. Staff therefore recommend replacing the 'blanket' 50km/h urban streets speed limit proposal with:
- a) 30-40km/h speed limit range for 'local (residential) streets'.
 - b) 40-50km/h range for 'main roads' and 'activity streets'.
82. Combining all these classifications under 'urban streets' and at a blanket 50km/h is far too restrictive for achieving the essential 'movement' and 'place' focused objectives of the One Network Framework.
83. Staff also recommend that the description for the exception 'Urban streets with significant levels of pedestrian and/or cycling activity' is corrected and provides for the appropriate 30-40km/h speed limit range. 'Residential and neighbourhood streets' are not the correct ONF terms. The correct ONF classifications labels i.e., 'local roads', 'activity streets' and 'main roads' are recommended to be used.

⁶ Yannis G, Michelaraki E. Review of City-Wide 30 km/h Speed Limit Benefits in Europe. Sustainability. 2024; 16(11):4382. <https://doi.org/10.3390/su16114382>

⁷ Archer, J.; Fotheringham, N.; Symmons, M.; Corben, B. The Impact of Lowered Speed Limits in Urban/Metropolitan Areas. 2008. Available online: <http://www.monash.edu.au/muarc/reports/muarc276.pdf> (accessed on 18 March 2024).

84. Staff recommend 'Urban Connectors' and 'Urban Transit Corridors' are included with the 'Rural intersection speed zone' exceptions to Table 1. As the tables currently stand, the only urban intersection speed zone speed limit range is 30-40km/h, which is too low for higher-speed urban connectors (up to 80km/h) and urban transit corridors (80-100km/h). A 30-40km/h intersection speed limit isn't appropriate for a corridor expected to operate at 80-100km/h, whereas the 60-70km/h provided for rural intersection speed zones would be. If this change is not made, appropriate intersection speed zone limits would be available for all other classifications except urban connectors and urban transit corridors.

Proposal 6 – Update the Director’s Criteria for Assessing Speed Management Plans for Certification

85. Staff agree with the proposals to updating the Director’s criteria for assessing speed management plans for certification.

Proposal 7 – Reverse Recent Speed Limit Reductions

86. Staff note that the ability to request retention of an amended speed limit due to being able to demonstrate public support for a speed limit introduced since 1 January 2020, but lower than prescribed in the table of speed limit classifications, is limited to the Agency (NZTA) (refer clauses 12.2(2) and (3)).
87. Staff recommend that the same mechanism as provided for NZTA be available to all RCAs so that the lower speed limit can be retained where there is public support and where the consultation that has been undertaken aligns with the proposed Rule.

Other Matters

Regional Speed Management Plans

88. Staff support the whole-of-network approach and ensuring national consistency of speed limits intended by regional speed management plans but note that only one regional speed management plan has been submitted to date.
89. However, staff believe the current and proposed Rule makes it too easy for Regional Councils to step away from developing and consulting on a regional speed management plan through encouraging RCAs to use the alternative method of setting speed limits (2.6 of the proposed Rule).
90. Further, timings set by NZTA, and the uncertainty associated with the timings of the GPS and the proposed Ministerial Speed Objective also encourage RCAs to utilise the alternative method of setting speed limits to ensure greater certainty when developing their Long Term Plans. Staff believe it is therefore unlikely there will be many regional speed management plans submitted in the future either, notwithstanding their strategic benefits.

Higher Speed Limits on Certain Roads

91. Staff do have concerns with enabling speed limits of up to 120km/h on roads that are built and maintained, and will be managed, to safely accommodate that speed. The level of investment into Roads of National Significance to enable 110km/h speed limits is significant already, and staff believe the additional investment to enable 120km/h to operate safely over a few short lengths of State Highway would be better invested in enabling a better level of service across the 100,000km of State highway and local road network.
92. Staff note that the freight industry would receive no benefit from more 110km/h or 120km/h roads as heavy vehicle speed limits are restricted to 90km/h.

Specific Comments on Changes in the Proposed Rule

Removal of 10-Year Outlook Removed from 3.9 ‘Content and Form of Plans’

93. Hamilton City Council supported the proposal in the 2024 GPS to amend the Land Transport Management Act to require all future GPS on Land Transport to adopt a 10-year Investment Plan. It is therefore a contradiction that the requirement that a speed management “*plan must set out the objectives, policies and measures for managing speed on relevant roads for at least 10 financial years from the start of the plan*” (3.8(1)(a) of the 2022 Rule) is removed in the proposed Rule.
94. Staff believe a longer-term outlook for investment, including speed management investment, is important and particularly useful in describing long-term direction when consulting with communities and recommend that the provision is retained in the proposed Rule.

Removal of ‘Māori Contribution to Creation of Plans’

95. Staff do not support the removal of section ‘Māori contribution to creation of plans’ (3.10(1) and (2) of the 2022 Rule), noting that this removal would be in breach of the principles of Te Tiriti o Waitangi in recognition of Māori as partners to Te Tiriti. Staff recommend retention of clause 3.10 of the current 2022 Rule ‘Māori contribution to creation of plans’.
96. Staff support the new inclusion 3.10(3) in the proposed Rule in its entirety.
97. Staff support the retention of 3.10(7) in the proposed Rule in its entirety.

Removal of the Requirement for the Agency to Develop and Maintain Guidance on the use of Mean Operating Speed for Setting Speed Limits

98. Staff do not support the removal of the requirement for the Agency to develop and maintain guidance on the use of mean operating speed for setting speed limits (ref 3.14(a) of current 2022 Rule) as this data in an accessible and nationally consistent form is essential for speed limit change CBAs.
99. Staff support the information in the NZTA Speed Management Guide (page 27) detailing the importance of consistent mean operating speed information for speed management:

“Mean speed information can be used to support a network-wide and phased approach to speed management. To identify locations for priority investment in additional speed management, consider mean operating speeds and the gap between these speeds and the safe and appropriate speed limit both at a network-wide level and within the context of movement and place and community wellbeing. Once speed limit changes have been made, mean operating speeds should be monitored. Then, decisions can be made at a network-wide level about locations where additional speed management tools such as communications enforcement and infrastructure can be implemented”.

100. Staff recommend that the requirement for the Agency to develop and maintain guidance on the use of mean operating speed for setting speed limits (3.14(a)) is retained in the proposed Rule.

Schedule 4 Relates to Permanent Speed Limits Only

101. Staff recommend that the tables in Schedule 4 with the speed limits ranges are clearly noted that they refer specifically to permanent speed limits across the road classifications and exemptions, so it is clear that they don’t impact variable (marae, managed motorway, weather, etc), seasonal or temporary (and emergency) speed limits. The tables currently do not allow for:
- 30km/h variable marae speed limits.
 - 60, 80, and 100km/h variable speed limits for managed motorways.
 - 30, 40, 50 and 60 seasonal speed limit options for holiday townships.
 - 60, 70, and 80km/h variable speed limits for changing climatic conditions on interregional connectors.

e) Temporary speed limits across all classifications.

Further Information and Opportunity to Discuss our Submission

- 102.** Should the Ministry of Transport require clarification of the submission from Hamilton City Council staff, or additional information, please contact Glenn Bunting (Urban Integration Principal, Transport - Plan, Strategy and Programming) on 021 962 829, or email glenn.bunting@hcc.govt.nz in the first instance.
- 103.** Hamilton City Council representatives would welcome the opportunity to discuss the content of this submission in more detail with the Ministry of Transport.

Yours faithfully



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CHIEF EXECUTIVE

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