



**Hamilton City Council – Staff Submission**

# **Speed Limits Consultation for the Waikato**

**NZ Transport Agency**

**13 March 2025**



# 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 with 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 13 March 2025.

Submission # 791

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.

## Introduction

1. Hamilton City Council staff welcome the opportunity to make a submission to the NZ Transport Agency on its **Speed Limits Consultation for the Waikato**, and in particular, the potential impact of the proposals for Hamilton.
2. Hamilton City Council takes an active interest in the road safety space, including our 15 July 2024 staff submission to the **Draft Land Transport Rule: Setting of Speed Limits 2024** – [refer here](#)
3. Our Key Messages and Recommendations are outlined as follows.

## Key Messages and Recommendations

### 4. Overall Comments/Feedback

5. We welcome the opportunity for consultation on specific speed limit reversals that are provided by the *Land Transport Rule – Setting of Speed Limits 2024* (clause 11.4(2)(b)).
6. Global evidence is clear that increasing speed limits is contrary to best road safety practice and contributes to worsening of air quality and heightens health impacts<sup>1</sup>.
7. We therefore support the retention of speed limits as they were originally set as they were based on sound road safety and environmental rationale.
8. **School Speed Limits**
9. We support reduced speed limits at schools. However, we note that under these proposals schools along specified roads that have not had school speed limits formally introduced (not required until 1 July 2026 (*Land Transport Rule – Setting of Speed Limits 2024* clause 5.4)) will experience a speed limit increase outside their school gates until the school speed limit is implemented.
10. The stated intent of the *Land Transport Rule – Setting of Speed Limits 2024* is to implement lower speed limits outside school gates, not to increase them.
11. We submit that either:
  - a) The NZTA takes steps to ensure RCAs (including NZTA as an RCA) urgently implement school speed limits for schools on specified roads facing speed limit reversals before the speed limit reversal takes effect; or
  - b) Speed limit reversals along specified roads with schools that have not yet had school speed limits formalised be delayed until the school speed limits are able to be introduced.

### 12. SH3 Rukuhia

13. We specifically support the retention of the 80km/h speed limit on State Highway 3 (SH3) Ōhaupō Road, between Dixon Road within Hamilton City and Rukuhia Road to ensure the road length will be safer for the rapidly growing number of people living, working, and travelling through the area.

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<sup>1</sup> **Speeding towards danger: the concerns and consequences of increasing speed limits on our roads**; Christopher Wakeman, Shanthi Ameratunga, Teuila Percival, Braden Te Ao, Jamie Hosking; *New Zealand Medical Journal* Te ara tika o te hauora hapori; 2024 Aug 2; 137(1600). ISSN 1175-8716; <https://www.nzmj.org.nz/>

## SH3 Rukuhia

14. We strongly support retaining the current 80 km/h speed limit for SH3 Rukuhia for the following reasons:

a. **High Crash Rate and Unfunded Infrastructure Needs**

The area has a history of a high crash rate, and the Raynes Road intersection requires an upgrade to a roundabout to improve safety. However, this critical infrastructure work remains unfunded. Retaining the 80 km/h speed limit is a necessary interim measure to mitigate risks until the intersection can be upgraded.

b. **Safety for Bus Passengers and Pedestrians**

The Te Awamutu bus service operates in this area, picking up and dropping off passengers, including school children. As a rural area with no footpaths, passengers must walk on the shoulder of the road. A lower speed limit enhances safety for these vulnerable road users.

c. **Traffic Conditions and Road Alignment**

Even prior to the speed limit reduction from 100 km/h to 80 km/h, most vehicles were travelling at lower speeds due to congestion and the curvilinear road alignment, which inherently restricts higher speeds. The current 80 km/h limit aligns with actual traffic behaviour and road conditions.

15. The following additional analysis supports retaining the existing 80km/h speed limit:

a. **Travel Time and Crash Data**

- **Route Length:** 3.3 km.
- Travel Time at 100 km/h: 118.8 seconds.
- Travel Time at 80 km/h: 148.5 seconds.
- Maximum Time Saving: 27.9 seconds (under ideal conditions, excluding the 60 km/h variable speed limit at Raynes intersection and potential traffic delays).

b. **Crash Data**

- Since the implementation of the reduced speed limit, several crashes have occurred, including:
  - One fatal crash, where speed and driver-related issues were suspected.
  - One serious injury crash at the Raynes Road intersection, attributed to failure to give way, likely due to visibility issues caused by a shielding vehicle. Notably, the driver on SH3 was travelling at 75 km/h, exceeding the 60 km/h variable speed limit.
- While the timeframe since the speed limit reduction is insufficient for robust crash rate analysis, severe injury crashes recorded were primarily due to road user factors. No serious injuries have been attributed to drivers complying with the lower speed limits.

c. **Speed Limit Compliance and Crash Risk**

- Retaining the 80 km/h speed limit ensures better compliance with the 60 km/h variable speed zone at Raynes Road. A smaller speed differential (20 km/h) is more achievable for motorists, reducing the likelihood and severity of crashes.
- Raising the speed limit to 100 km/h would create a larger speed differential (40 km/h), likely reducing compliance with the 60 km/h zone and increasing crash risks.

d. **Negligible Time Savings versus Safety Trade-Off**

- The maximum time saving of 30 seconds (under optimal conditions) is negligible and does not justify the increased risk of casualties associated with higher speeds.

16. In conclusion, the 80 km/h speed limit should be retained due to its alignment with actual traffic conditions, improved compliance with the 60 km/h variable speed zone, and the negligible time savings

offered by a higher limit. The potential increase in crash risk and severity outweighs the minimal benefits of a 100 km/h speed limit. Retaining the current limit ensures the safety of all road users, particularly vulnerable pedestrians and bus passengers, while addressing the area's high crash rate and unfunded infrastructure needs.

## Further Information and Opportunity to Discuss our Submission

17. Should the NZ Transport Agency 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](mailto:Glenn.Bunting@hcc.govt.nz) in the first instance.
18. We would also welcome the opportunity, if available, to discuss our submission with the NZ Transport Agency.

Yours faithfully



**Lance Vervoort**  
**CHIEF EXECUTIVE**

#### **FURTHER INFORMATION**

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