



Greater Auckland Inc. was established in 2015 to provide evidence-based commentary and encourage informed debate on transport and urban form issues. The Greater Auckland website began in 2008 as the “Auckland Transport Blog”, later simply “TransportBlog”.

We provide commentary and encourage informed and intelligent debate about transport and urban form issues in order to create a Greater Auckland. One which is a better place to live in, to move around, and to connect with others.

Submission on the Draft Land Transport Rule: Setting of Speed Limits 2024

Summary:

We oppose the proposed changes under this draft rule, on the grounds that they are not based on any evidence, would drastically reduce safety on our roads, and override the desires of local communities and Councils – not just in Tāmaki Makaurau, but all over the country.

We note that [Auckland Council](#) has voted strongly to oppose the proposed changes and we thank them for doing so. We also join many organisations with expertise in road safety, transport, and public health in opposing the proposed changes.

The draft rule should not go ahead under any circumstances. It will undoubtedly result in increased deaths and serious injuries of people – especially as it imposes blanket increases in speed, by forcing Auckland and other communities to reverse carefully tailored and evidence-based speed limits. This will not increase productivity, and in fact will mean councils would waste millions of dollars reversing and reconsulting their evidence-based and community-supported plans.

Moreover, the draft Rule does not support the principles established by the Land Transport Management Act, the purpose of which is “to contribute to an effective, efficient, and safe land transport system in the public interest.”

Proposal 1:

This proposal imposes an extra burden on Road Controlling Authorities and adds costly hurdles for communities looking to make their streets safer. While a cost-benefit analysis may make sense for say, an area-wide or city-wide proposal, it is unnecessary and cumbersome to repeat one for every single speed change.

There is already abundant evidence showing the benefits of safe speeds outweigh the costs. Ironically, strictly applying this rule makes all the other proposals highly questionable.

To take just one example: an independent [economic assessment of Auckland Transport's speed management plan](#) showed a benefit/cost ratio of 9.0 for area-wide 30km/h zones 1km around schools, which prevent an estimated 539 deaths and serious injuries (DSI) over ten years. In other words, each dollar invested returns \$9 in benefits, and prevents 539 young Aucklanders dying or receiving a serious injury.

This contrasts with a benefit/cost ratio of 0.2 for variable speed zones at the school-gate (as per the Minister's Proposal 3 below) i.e. this approach would economically cost the country, and would only prevent 29 DSI over ten years. So, on cost-benefit analysis alone, the current approach is approximately 45 times better for the economy. Whereas, compared to the current approach, the Minister's proposal would likely cost the lives and health of 510 young Aucklanders in the next decade – in exchange for 2.2 seconds of 'saved' travel time. We say such a trade-off is entirely unacceptable.

Proposal 2:

Ensuring consultation with local people and affected communities is not a bad thing, and we would generally support that. However, this proposal looks to require a separate consultation for each road, which would be a ridiculous and costly bureaucratic burden to impose. The speed-setting rule must allow consultations to cover a given area of the road network.

We note also that the proposal removes the requirement to consult with Māori on speed management plans. This is both out of step with partnership under Te Tiriti, and deeply at odds with the responsibility to address the [disproportionate degree of harm](#) experienced by Māori on our roads.

Proposal 3:

We do not support this proposal as this is a deadly combination of a blanket approach and tunnel vision. It won't achieve the Transport Minister's stated aim of "protecting young New Zealanders" – rather, it shrinks the safety of children to a narrow window in time and space, and [completely ignores how children travel and how they want to travel](#).

The stated time restrictions make no allowance for half-days and holidays, and ignore the fact that children (and others travelling to and around schools) have the right to move around safely at all times, including on weekends. Moreover, schools function as community hubs all week, at all times.

The proposed distances for the time-restricted limits are also unrealistic: 150m from the school gate is not sufficient in many cases to get a child to a parent's parked car or the nearest bus stop – let alone all the way safely home if they wish to walk or cycle.

Worse, in combination with Proposal 5 and Proposal 7 – which aim to return most city streets to speeds of 50 km/h – Proposal 3 would mean that within minutes of leaving the school gate, children will be required to mix with 50 km/h traffic. This will actively put children in harm's way every day of their young lives, especially given the raised risk of serious injury and death when children are struck by traffic at those speeds.

Moreover, this is likely to discourage children from walking, biking and scooting. This would forfeit all the benefits of tamariki being able to get themselves to school – healthier and happier kids, cleaner air, reduced emissions, parental time savings, and a year-round 'school holiday effect' on congestion at peak times. All of these also have significant benefits towards the stated aims of these changes - productivity.

We also note this rule would impact at least 118 Auckland schools and communities, and will require new signage (NZTA estimates the cost of electronic variable signs [as around \\$90,000 per school](#)) as well as enforcement. Reversing the existing safe speed zones is likely to be highly controversial, at considerable cost of community good will.

The 2022 Speed Rule currently in force allows local authorities to consider the best way to provide safe speeds around schools, which they have done in partnership with schools and communities, to produce tailored outcomes for given locations. It's a highly successful and well-supported approach, with many co-benefits for communities beyond the school gate.

[As Healthy Auckland Together points out:](#)

Permanent safe speed zones are much more effective at preventing deaths and injuries, cheaper to implement, and were supported by 78 percent of school leaders in Tāmaki Makaurau's recent speed management plan consultation.

85 percent of deaths and serious injuries outside schools happen when variable speed limits are not operating.

80 percent of people in New Zealand cities think we should invest to make sure all children can cycle to school safely.

The proposed changes should not be implemented, and decisions around speed limits around schools should be up to local communities, schools, and local authorities.

Proposal 4:

We oppose this proposal completely. Local RCAs (councils and transport agencies) and local people are best suited to set speed limits according to evidence and local context, rather than giving a single Minister authority over every street in the country.

Proposal 5:

We do not support the introduction of blanket speed rises as outlined in this proposal.

Roads vary significantly from place to place, and it's important for local road-controlling authorities to have flexibility regarding what speed people can travel. There's no one-size approach that fits all roads.

Particularly concerning is the proposed increase from 30-40 km/h to a standardised 50 km/h in urban streets. This will drastically lower safety in cities. It's unconscionable that there is no 30km/h option provided even as an exception: this is the internationally recognised "sweet spot" for safety and survival outcomes from crashes, and is widely used around the globe. The prospect of a blanket removal of this option from Aotearoa streets is already causing reputational harm to our country.

Likewise, raising speeds on urban connectors will immediately lower safety on those roads; as will the move to increase speed limits on many of the rural road classifications.

Having a standardised speed limit of 100km/h for interregional connectors will result in more crashes, as these are some of the roads with the most variation. It is critical that these changes do not go through.

Perhaps the only positive in this proposal is the separation of an 'Expressways' class; however, we believe more flexibility and local decision making should be provided under that class as well.

Local authorities and communities must have the flexibility and power to implement evidence-based safety measures where they see fit, and not be forced to adopt an unevidenced blanket approach.

Proposal 6:

Given how poorly evidenced and dangerous the other proposed changes are, incorporating them into a changed criteria is not something we support.

Proposal 7:

We absolutely oppose this proposal, which is not grounded in evidence. These speed reductions have been undertaken by local road-controlling authorities on the basis of evidence, based on a great deal of work and support from local councils and communities, specifically in order to increase safety in these areas.

This blanket, reckons-based reversal would result in more deaths and serious injuries on our roads, especially around schools, at significant cost to public health, wealth and wellbeing.

Councils across the county, [including Auckland Council](#), oppose these reversals. This proposal, along with the rest of the draft rule, should not be implemented.