

# Summary of submissions: Draft Land Transport Rule: Setting of Speed Limits 2024

## Submissions received

Consultation on the draft Land Transport Rule: Setting of Speed Limits 2024 ran from 13 June to 11 July 2024. We received a total of 8,180 submissions through the survey and the email inbox.

These were from:

- Individuals – 7,997
- Groups – 138
- Road controlling authorities (RCAs) – 45

For the purposes of this summary:

- The *group* category includes schools, iwi, advocacy and community groups, and non-governmental organisations.
- The *individual* category includes those who submitted on behalf of a business as well as themselves.
- Responses were coded *unclear* if officials were unable to classify them as either support or do not support or if they discussed issues not related to the proposal.
- Duplicate or blank responses were removed where possible. However, due to the number of responses we received, some of these may remain in the final count.

## Overall themes

Some submitters commented on the general intent of the draft Rule as a whole, rather than each proposal. Many individuals who submitted via email focused on the reversal proposal, and to a lesser extent, variable speeds outside schools.

Overall, each proposal received broad support. When broken down into submitter groups, most individuals supported the proposals. For each proposal except proposal 2 (strengthen consultation requirements), most groups and RCAs did not support the proposal.

Those in support of the draft Rule felt it proposes a reasonable and common-sense approach to setting speed limits. Supporters of the reversal proposal often felt frustrated by reduced speed limits and believed they are slowing down the economy, and in some cases causing motorists to perform risky overtaking manoeuvres. Some submitters discussed specific roads they believe should be reversed. Others suggested road safety initiatives should focus on other factors that contribute towards crashes, such as driver education, enforcement or reducing driver distractions.

Submitters who supported the cost benefit analysis (CBA) and consultation proposals felt they will increase transparency and ensure RCAs clearly articulate why they are proposing a speed limit reduction. Some submitters supported the CBA proposal but suggested other impacts should be included, such as vehicle operating costs and environmental impacts.

Almost all submitters supported reducing speed limits around schools, but there was mixed feedback on the proposed approach.

Submitters who opposed the proposals or the Rule in general were mostly concerned about the safety impacts of increasing speed limits. Some referenced studies or research that has shown lower speeds to achieve better safety outcomes. Many submitters pointed out the significant costs of road crashes, including costs to the healthcare system, emergency services, and loss of productivity through injuries and road closures.

Many referenced specific examples of roads with reduced speed limits that have improved safety outcomes and made the road and neighbourhood feel safer. Many submitters commented that lower speed limits encourage more people to walk, cycle or scoot around their streets and felt this should be encouraged to reduce congestion and vehicle emissions. Some felt the travel time saving from increased speed limits is minimal and road safety is more important.

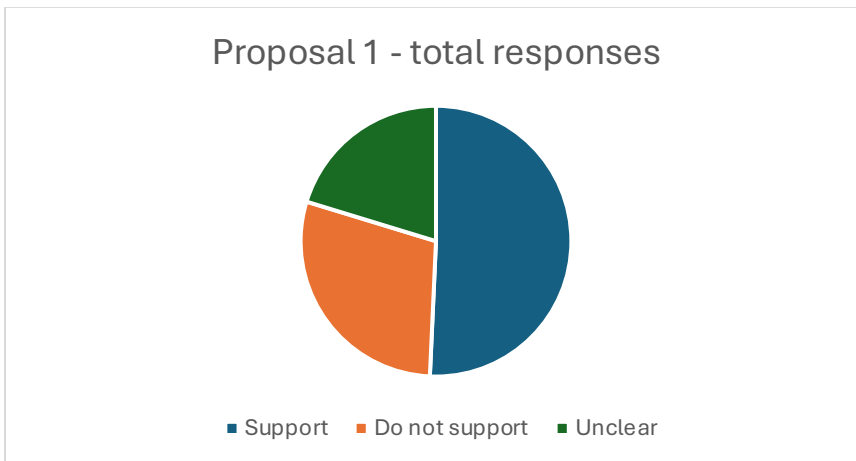
Others opposed the Rule because they felt speed limits should be set by local councils in consultation with their communities, with some suggesting the Rule amounts to Government interference in local decision-making. This sentiment was especially clear in submissions against the reversal proposal. Many submitters who did not support this proposal expressed concern at the Government imposing blanket reversals of speed limits that had been reduced with community support. Some submitters, including most RCAs, focused on the cost of reversing speed limits, noting that RCAs have not budgeted for it and will have redirect money from other roading projects to pay for it.

Others opposed the Rule because they were concerned it does not take climate or emissions impacts into account. This issue was raised in response to the CBA proposal, and in the classifications and reversals proposal.

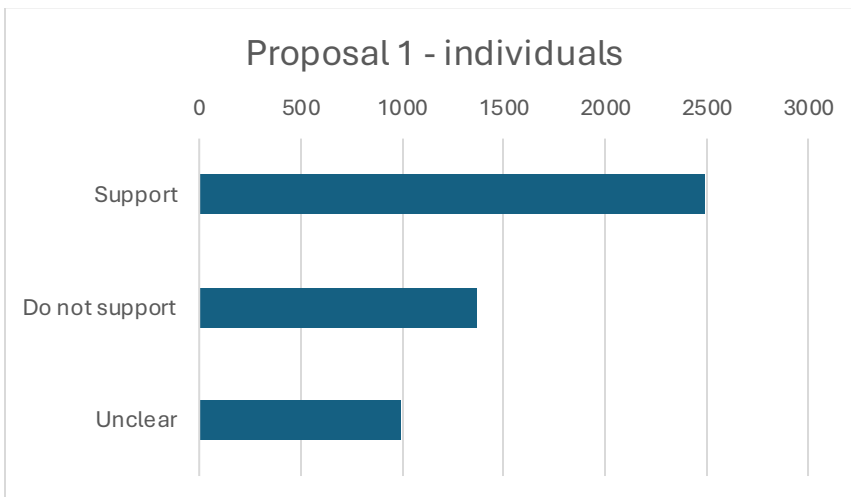
## Proposal 1 – Cost benefit analysis

A total of 4,970 submissions commented on this proposal, made up of 4,853 individual submitters, 72 groups and 45 RCAs.

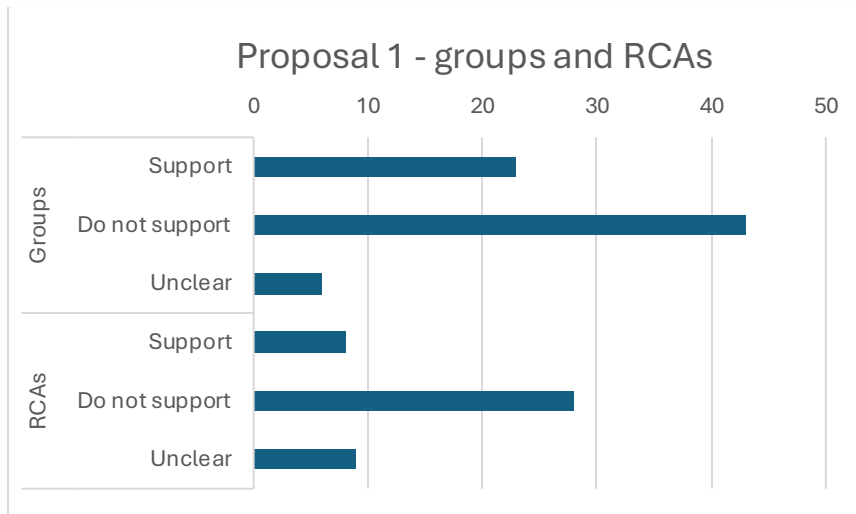
The graph below shows that 51 percent of all submitters supported this proposal, 29 percent did not support, and 20 percent of submissions were unclear. The large percentage of submissions coded as *unclear* could be explained by the fact this proposal was the first question in the survey and a number of individual submitters used this question to express general views on speed limits, rather than commenting on the specifics of the proposal.



Broken down into the submitter groups, 51 percent of individuals supported this proposal, 28 percent did not support, and the remainder were unclear.



The proposal received less support among groups and RCAs – 60 percent of groups and 62 percent of RCAs did not support it.



Most individual submitters who supported this proposal agreed that economic impacts should be considered before making changes to speed limits. Some felt that the impact on business and productivity has not been considered in previous speed limit changes, and they supported requiring this for future changes.

Many submitters noted that while they support the concept of CBA, they had concerns with certain aspects of the proposed approach, such as:

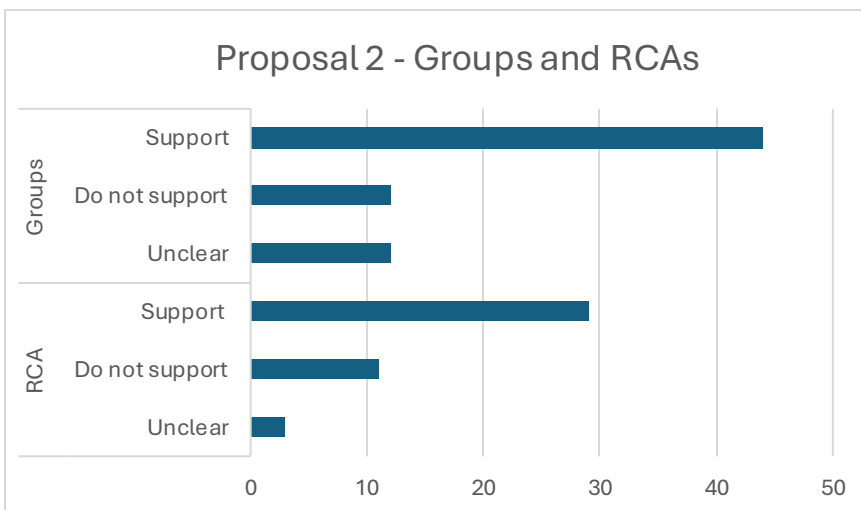
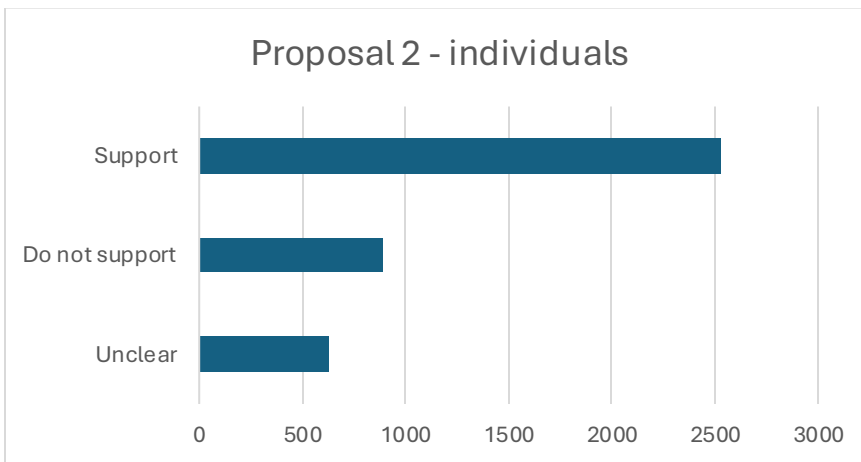
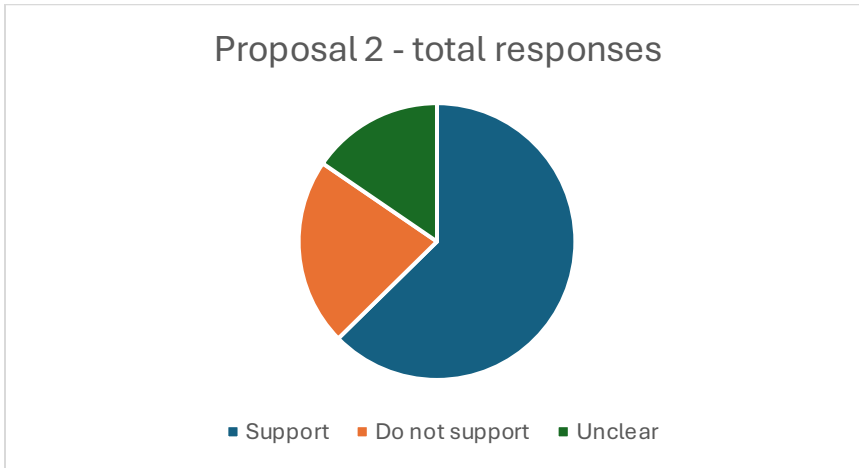
- the cost and resource required for RCAs to undertake CBA on each road rather than at a network level;
- suggestions that impacts such as vehicle emissions, mode shift, vehicle operating costs, and societal impacts should also be included;
- suggestions that CBA should only be required on roads with a certain amount of traffic or of a certain length.

Some submitters who did not support the proposal felt that safety should be the only consideration when setting speed limits and some felt the methodology involves a ‘trade-off’ between human lives and small travel time savings. Some pointed out that the cost of fatal and serious injury crashes far outweighs the benefits of motorists saving a few minutes. Others felt it would be too costly and too much red tape for councils, making it difficult for councils to make any speed limit changes.

Many RCAs submitted that if CBA requirements are introduced, the New Zealand Transport Agency Waka Kotahi (NZTA) will need to provide clear guidance and/or a CBA tool to assist them with the process. Many RCAs also felt it would be more appropriate to undertake CBA at an area or network level, rather than road-by-road. Some noted it would be difficult to gather sufficient data to undertake CBA on short urban streets. Concerns were also expressed about the different approach taken to costs and disbenefits in the draft Rule, when compared with the NZTA Monetised Benefits and Costs Manual.

## Proposal 2 – strengthen consultation requirements

A total of 4,155 submissions commented on this proposal, consisting of 4,044 individuals, 68 groups and 43 RCAs. Most submitters from all submitter groups generally supported this proposal.



Individuals felt the consultation requirements will improve transparency and ensure all affected people will have their voices heard. RCAs supported extending the same consultation requirements to NZTA.

Many submitters, particularly RCAs, noted councils already follow robust consultation processes and did not think the proposal would change how they consult in the future. Many submitters felt that consultation on each road is not necessary and will be costly and lead to 'consultation fatigue' among local communities. These submitters suggested a network approach to speed changes would be more appropriate.

Some submitters thought four weeks for public consultation is not long enough.

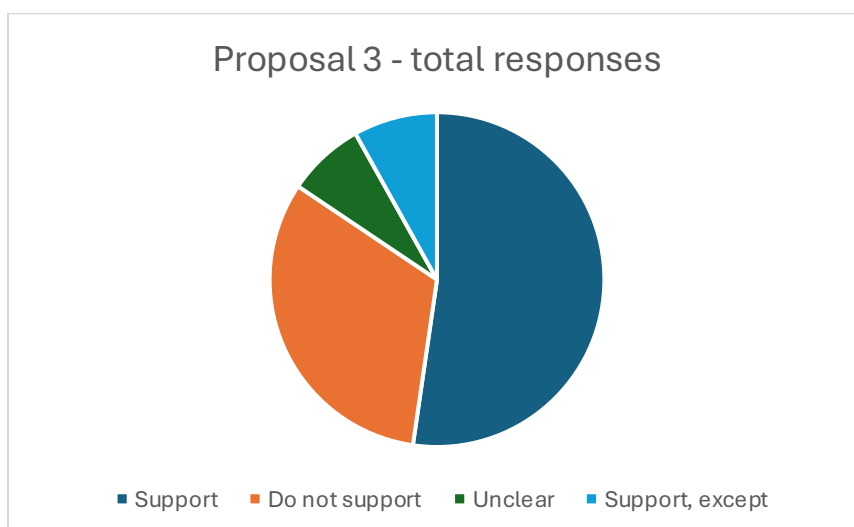
## Proposal 3 – variable speeds outside schools

This proposal received 5,319 total responses, with 5,162 individuals, 113 groups and 44 RCAs commenting. Overall, most submitters supported this proposal, with many noting the importance of reducing speeds around schools at drop off and pick up times, while enabling traffic to move at the usual speed at other times of the day.

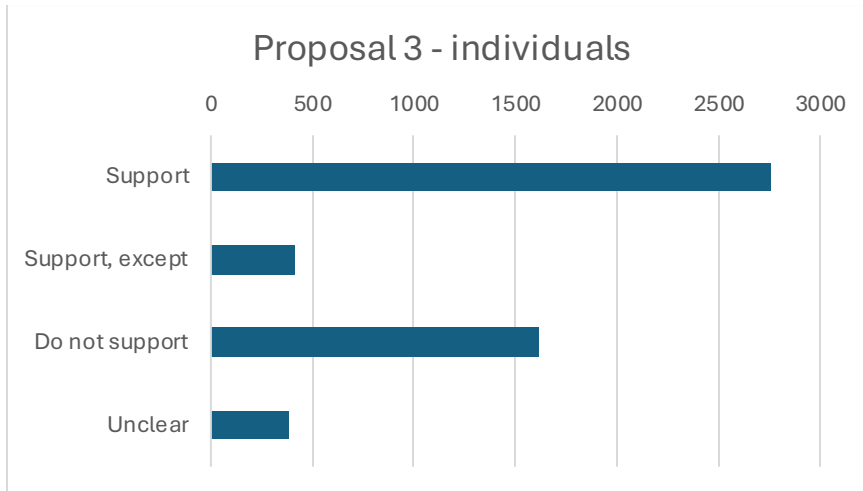
Some submitters supported variable speed limits outside schools but did not agree with all aspects of the proposal - for example, some thought the definition of 'outside the school gate' was too narrow; some thought the proposed 'school travel periods' were either too long or short; some did not support the use of static signs on the main road. These responses are shown as 'support, except' in the graphs below.

This proposal contains several aspects and as such received mixed feedback. Some submissions were difficult to code as either support or not support and officials had to apply judgement in our analysis. As a result, the graphs should be considered broadly representative.

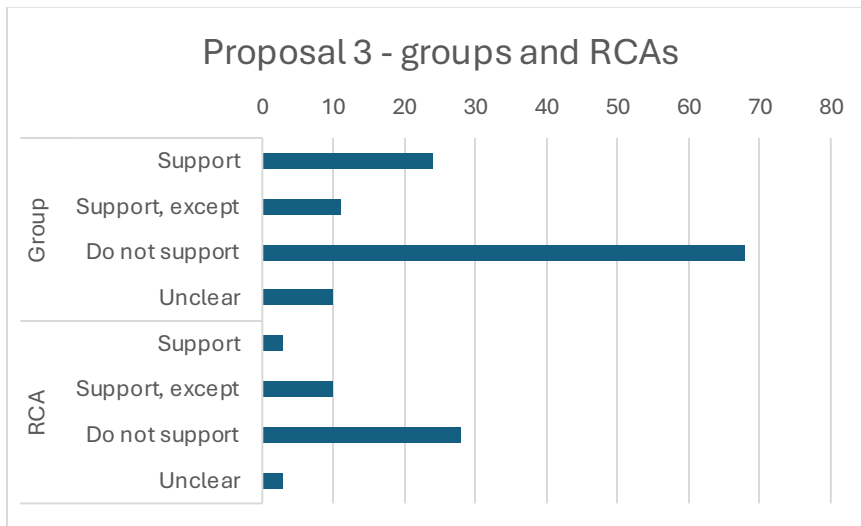
Overall, 60 percent of submitters either supported this proposal or supported it with an exception, 32 percent did not support, and 8 percent were unclear.



For individual submitters, 61 percent either fully supported the proposal or supported it with an exception.



For groups and RCAs, 31 percent fully supported it or supported with an exception and around 60 percent did not support or were unclear.



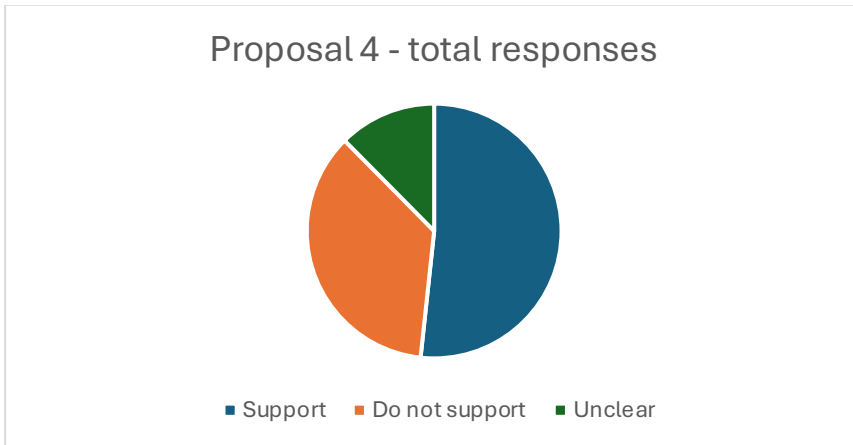
Submitters from all categories, particularly RCAs, wanted more flexibility in how variable speeds are implemented, noting one size does not fit each school in terms of school hours and drop off zones. Most RCAs and many groups would prefer to keep the option of permanent reduced speeds around schools, acknowledging that schools are often busy with sports and other community activities outside school hours.

Concerns were expressed that the proposal does not account for students who walk, bike or scooter to school and by not encouraging active transport, congestion around schools will worsen. Some submissions pointed out that variable speed limits around schools typically provide the lowest benefits and low value for money.

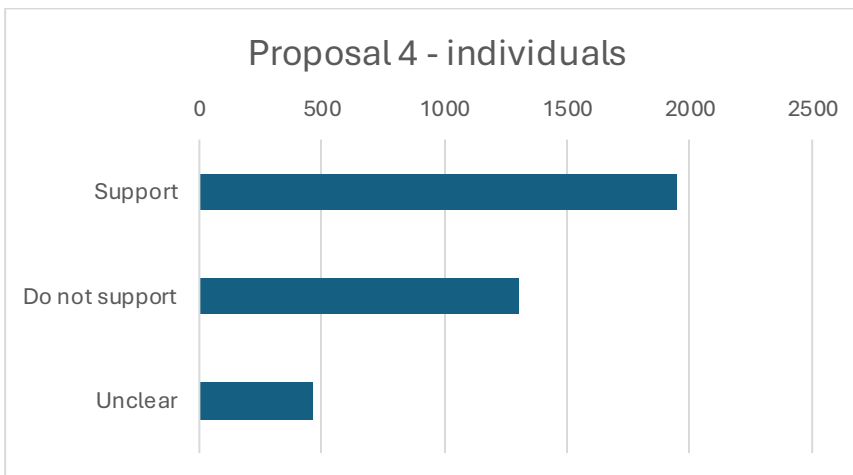
We received feedback from 37 schools on this proposal (included in the group category). Eighteen supported this proposal, 11 did not support and 8 provided other comments that were difficult to code. Most who did not support the proposals wanted permanent lower speed limits around schools.

## Proposal 4 – Ministerial Speed Objective

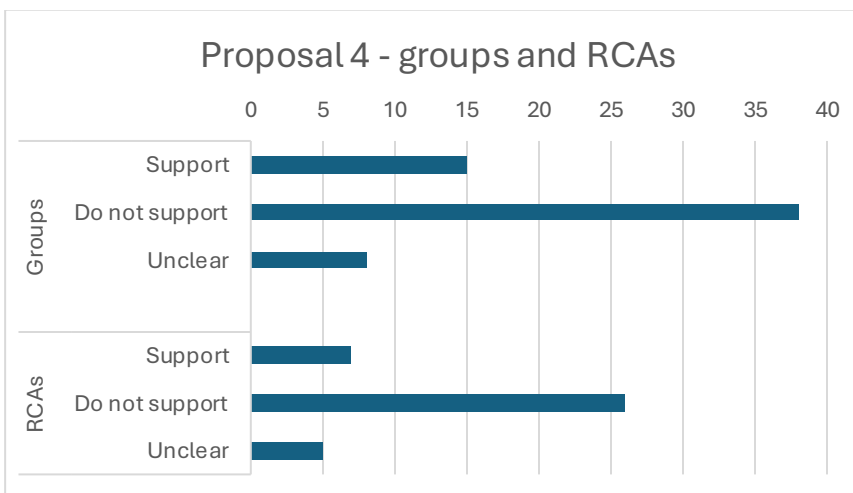
This proposal received 3,818 total responses, with slightly over half of respondents in support.



For individuals, 52 percent of submitters supported this proposal, while 35 percent did not support it.



More groups and RCAs did not support the proposal than support it.





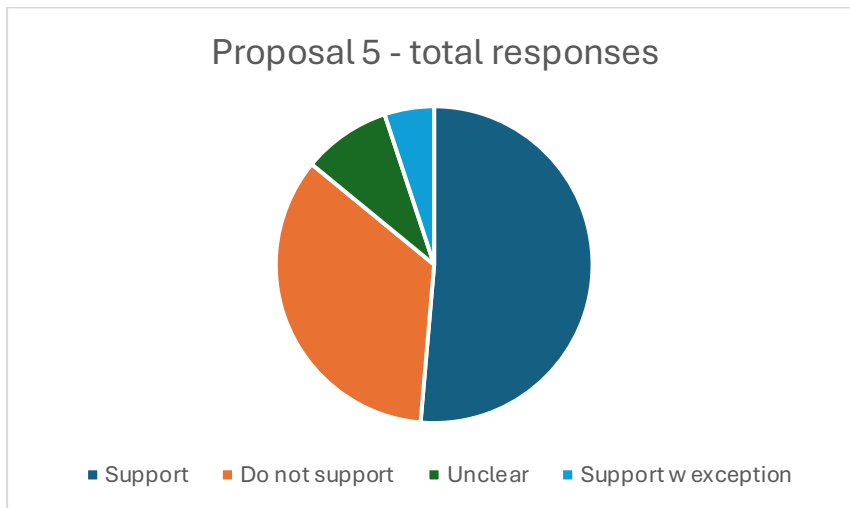
Submitters who supported the proposal felt an Objective would support a more balanced and consistent approach to setting speed limits or thought it would support accountability between RCAs and the Minister. Some submitters did support an Objective but had concerns about how it would be used by future governments.

Submitters who did not support the proposal felt that an Objective would amount to central government interference in local government decision making and could lead to increased bureaucracy and red tape. Some submitters suggested speed limits should be set by experts, without any influence from a Minister.

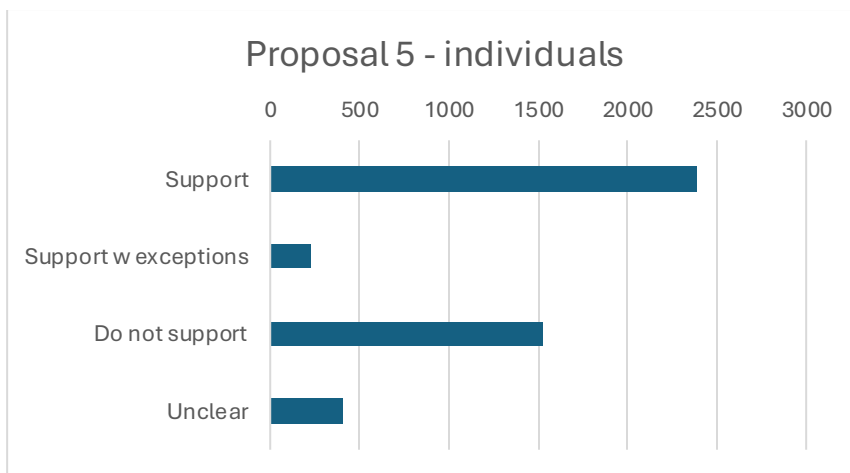
Some RCAs supported the concept of a Ministerial Speed Objective, while noting the timing and content of any objective would be crucial to their ability to implement it. Many RCAs suggested the Government Policy Statement on Land Transport is the best place to outline any ministerial expectations for speed management.

## Proposal 5 – schedule of speed limits

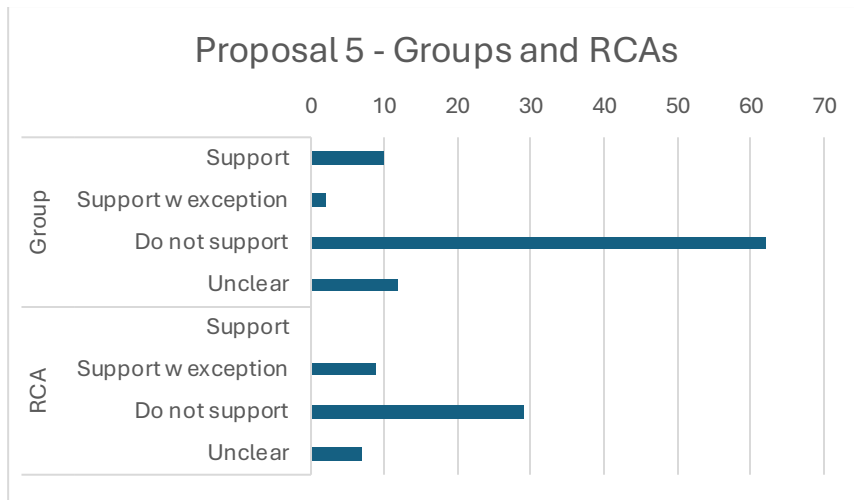
This proposal received 4,678 total responses. Of these, 56 percent either supported this proposal or supported it with some exceptions, and 35 percent did not support.



58 percent of individuals supported the proposal in full or with an exception and 34 percent did not support it.



Many more groups did not support the proposal than support it. No RCA fully supported the proposal, while nine supported it with an exception.



Submitters in support felt that standardised speed limit classifications would support consistency. Some submitters felt that the increased limits outlined within the schedule would lead to economic benefits. Many submitters thought the classifications will reduce confusion amongst motorists.

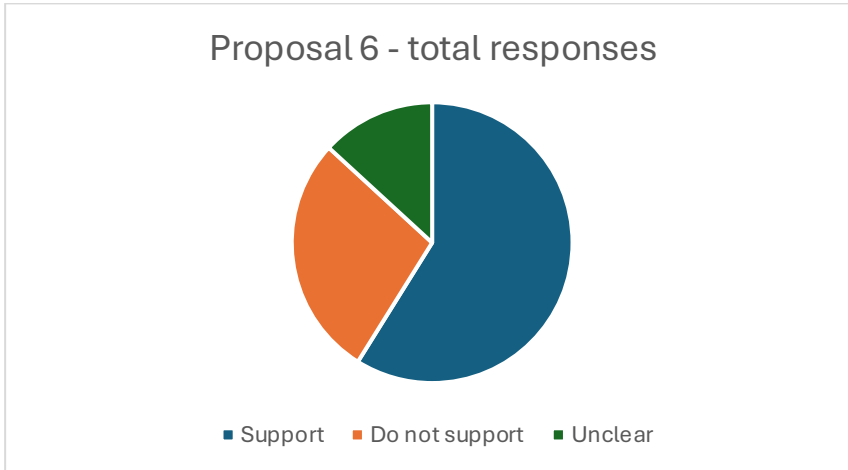
Common exceptions included suggesting that the speed limits for rural road were either too high or too low; preferring 30km/h in some residential and local streets; and suggesting the categories should have ranges of speeds to account for variation of road types within each classification.

Submitters who did not support the proposal felt that a schedule of speed limits in the Rule would override the ability for councils to make local decisions. Many submitters were concerned that limits would not be set road-by-road and would fail to address the unique circumstances of individual roads. This could result in speed limits being set that may not be suitable or safe for that road. Submitters were also concerned about the climate impacts of the classifications, and that the proposed speed limits are not consistent with road safety evidence and international best practice.

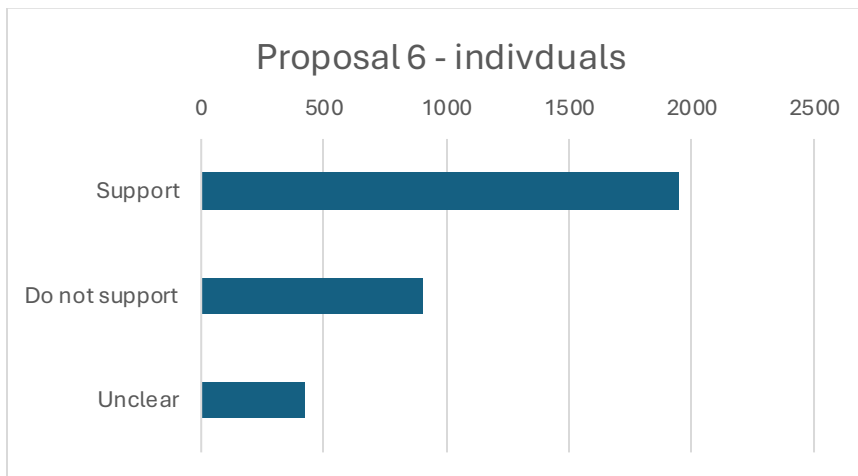
Many RCAs recommended that if a schedule of speed limits were to be introduced into the Rule, it should use classifications consistent with the One Network Framework, provide a range of speed limits available for each classification, and enable 30km/h speeds limits in certain areas.

## Proposal 6 – Director’s certification criteria

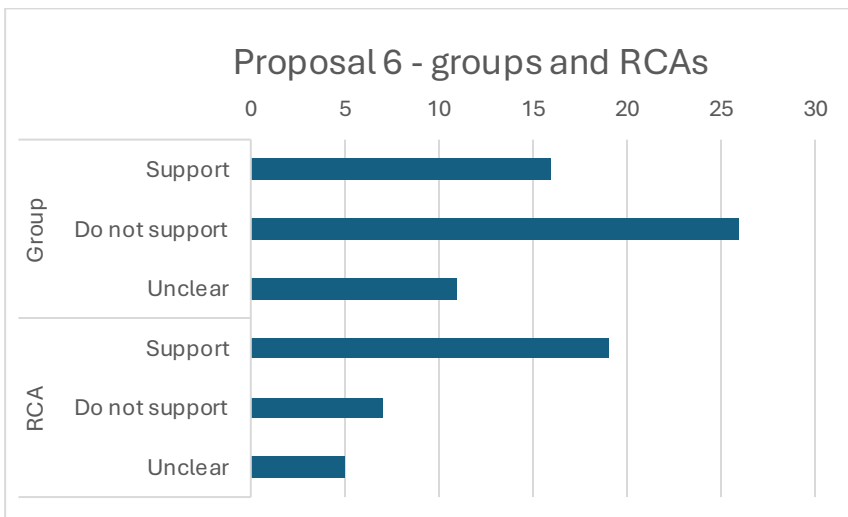
A total of 3,356 submissions commented on this proposal, the majority (3,276) coming from individuals.



Individuals largely supported the proposal.



Fewer groups and RCAs commented on this proposal, with many noting it is largely administrative and the final criteria will need to align with the rest of the final Rule.

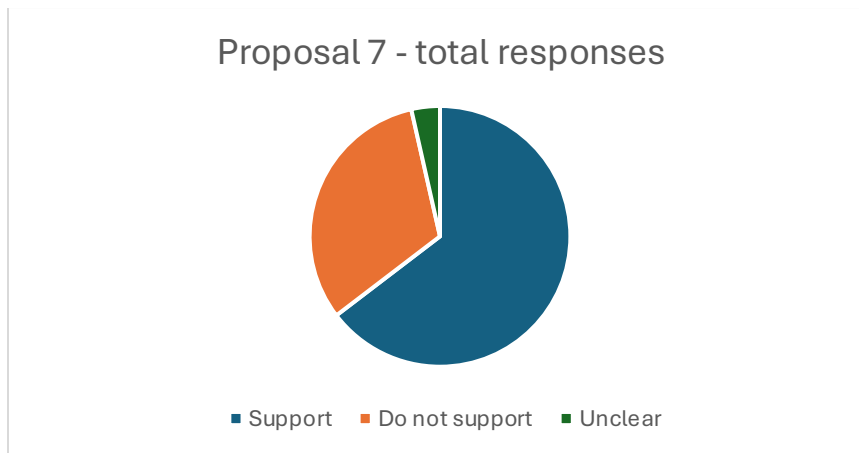


Some submitters supported the proposal because they felt it would encourage consistency, while others agreed with the Director having a level of oversight of local council decision-making.

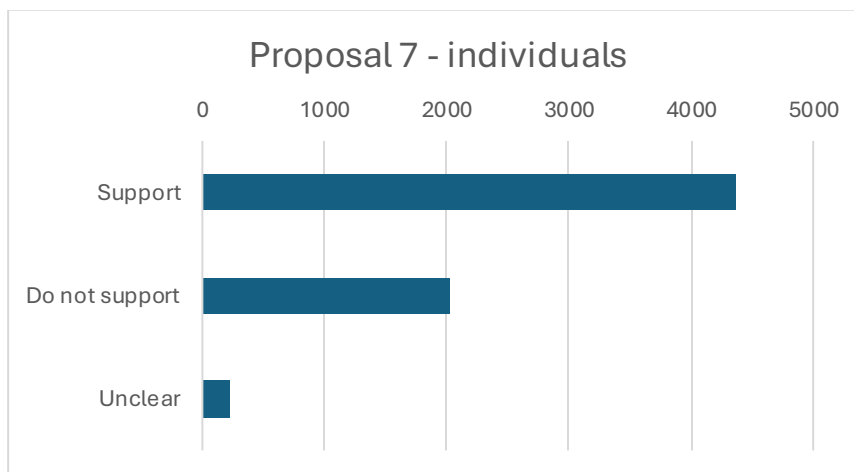
Many submitters did not support this proposal because they disagreed with other requirements of the Rule (such as the Ministerial Speed Objective and CBA) and viewed the Director certification step as another barrier to local councils setting speed limits.

## Proposal 7 – reversing speed limits

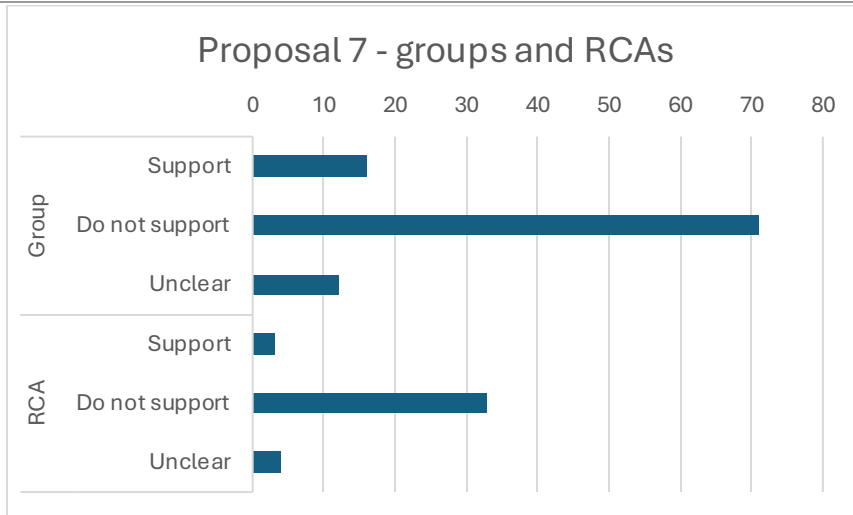
A total of 6,802 submissions commented on this proposal, with 65 percent in support.



Of the 6,621 individuals who commented on this proposal, 4,376 (66 percent) supported it and 2,022 (31 percent) did not support. Of those in support, 420 submitters wanted the reversals to happen sooner than the proposed date. Fifty-five of those in support agreed with the proposal in general but felt that any speed limit reductions applied around schools should be retained.



This proposal was not well supported among groups and RCAs - 72 percent of groups and 83 percent of RCAs did not support it. Of the three RCAs that did support it, two noted they did so except for speed limits around schools.



Many of the submitters who supported this proposal felt frustrated by lower speed limits and some believed the driver frustration led to more dangerous and reckless driving. Some of those who supported the proposal wanted the criteria to go further and include any reductions made under the previous government, including those applied in rural areas.

Some submitters supported the proposal but suggested that speed limits should only be reversed after cost benefit analysis and public consultation had been considered.

Many people who opposed this proposal noted that speed limits were reduced after consulting with local communities, and some thought the proposal would undermine these decisions that were made through local democratic processes.

Many who opposed this proposal were concerned about the impact on road safety, noting it is not accompanied by any safety assessment. Some responders opposed the proposal as they felt the evidence either supported lower limits or more time was required to gather evidence to point toward the appropriate speed limit.

RCAs and other submitters pointed out that the proposal would impose additional unplanned costs on already constrained council budgets. Without any additional funding to implement the reversals, councils expect the money would need to come out of their regular road maintenance or road safety budgets. Some mentioned this does not align with the value for money or efficiency values set out in the GPS 2024 and would be difficult for them to justify to ratepayers.

Many councils were also concerned about the timeframe for implementation. Suggestions for a more achievable timeframe ranged from 18 months to three years.

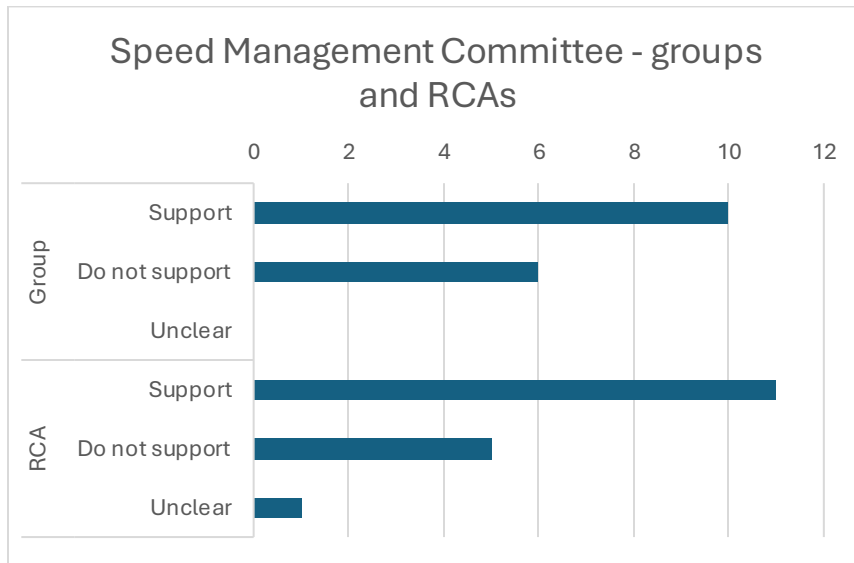
Several RCAs sought the ability to retain lower speed limits if they could demonstrate community support for the lower speed limits, in line with what the proposal provides to NZTA. These RCAs said the speed limit reductions were implemented following thorough consultation (often in response to community requests) and it did not make sense to reverse them if it was against community wishes.

## Other matters

The consultation document also sought feedback on three other matters without putting forward any proposed changes. Given the technical nature of the Speed Management Committee and regional speed management plans, alongside the design of the survey, individual feedback on these was largely unclear. As such, the summary of these matters will focus on group and RCA feedback.

### Speed Management Committee

A small number of groups and RCAs commented on the Speed Management Committee (the Committee), with more in support of retaining the committee than not.

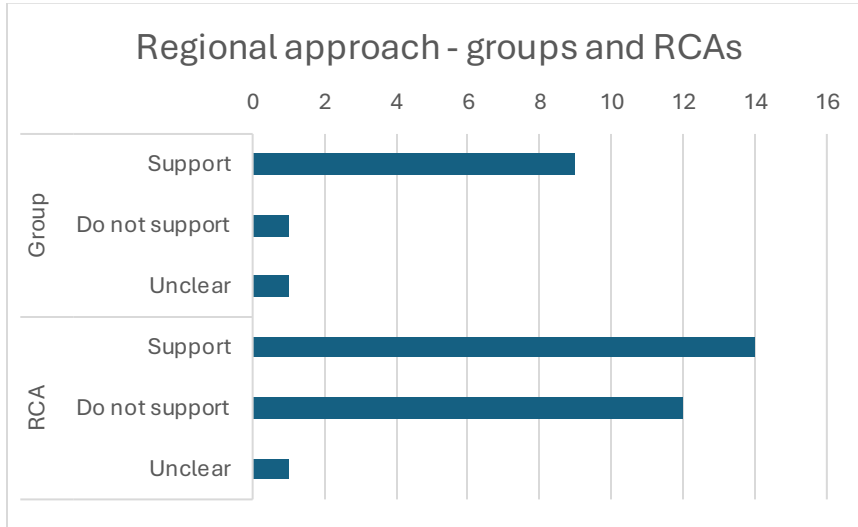


NZTA (as RCA) notes that under current settings, its speed management plans are assessed by an internal panel, the Committee and the Director of Land Transport, and it would support a more efficient review process.

Those submitters in support of retaining the Committee saw value in the independent oversight of NZTA and ensuring clear separation of its roles as regulator and RCA. Some suggested the Committee should have more of a role by evaluating the State highway speed management plan and each region's plan to ensure they are consistent.

Most submitters who did not support retaining the Committee felt NZTA has the expertise and resource to monitor itself and can operate as a regulator and RCA independently of each other. Some felt it was an unnecessary layer of bureaucracy.

## Regional approach to speed management plans



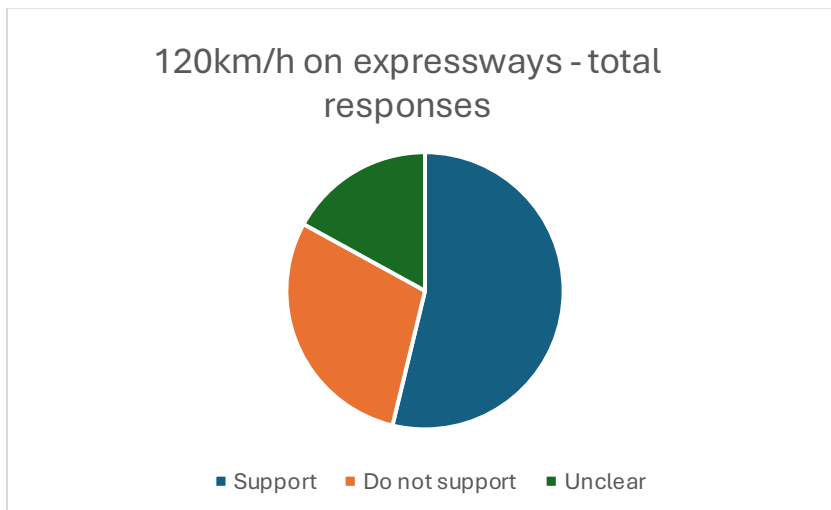
RCAs were split almost evenly between supporting and not supporting the regional speed management plan approach. Some supported the intention of regional speed management plans but acknowledged that the work involved to develop one is complex and difficult to coordinate among RCAs.

Some RCAs believed consistency can be achieved through collaboration and communication between neighbouring RCAs rather than a regional speed management plan.

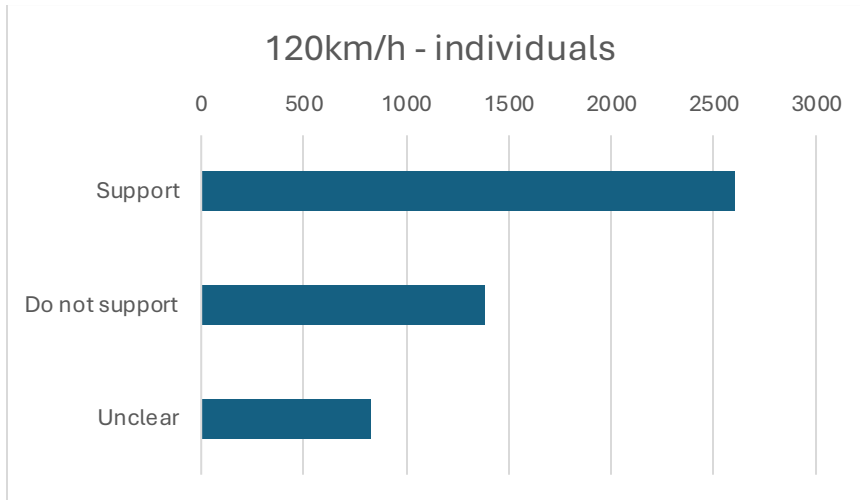
Others suggested consideration should be given to a national approach, or regional plans being developed between the local RCAs and NZTA to ensure local and state highway speed limits align.

## Increase speed limit 120km/h on certain expressways

We received 4,874 submissions on this matter, with 4,812 coming from individuals. Of the total submissions, 54 percent said they thought higher speed limits should be enabled on roads that are built, maintained and managed to safely accommodate that speed, 29 percent did not, and 17 percent provided unclear responses.



Individuals were mostly in support of enabling 120km/h on roads that are built and maintained to safely hold that speed limit.



Groups and RCAs largely did not support the proposal. Most were concerned about the safety impacts of this speed, with many noting that some motorists already travel 10km/h over the speed limit, meaning they would be travelling at 130km/h or more if this was implemented. Many RCAs noted this would only apply to State highways and would not affect them or their roading networks. Others noted that no roads in New Zealand have been constructed for this higher speed limit, and the cost to upgrade or build for this speed is likely to be considerable.

