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Dear Sir/Madam

Waikato Regional Transport Committee submission to Speed limit reversal consultation

Thank you for the opportunity to submit on the proposed Speed limit reversal consultation. Please find attached the Waikato Regional Transport Committee's (the Committee) submission regarding these proposals. The submission was formally endorsed by the Waikato Regional Transport Committee at its meeting on 10 March 2025.

Should you have any queries regarding the content of this document please contact Julie Hansen, Senior Policy Advisor Transport and Infrastructure, Transport Policy and Programmes directly on (07) 859 0999 or by email Julie.Hansen@waikatoregion.govt.nz.

Regards,

A handwritten signature in blue ink that reads "Michael Downard". The signature is fluid and cursive, with the first name "Michael" being more prominent than the last name "Downard".

Mich'eal Downard
Chair Waikato Regional Transport Committee

Submission from Waikato Regional Transport Committee on the Speed limit reversal consultation

Introduction

1. This is a submission from the Waikato Regional Transport Committee (the Committee). The Committee comprises elected members from Waikato Regional Council and each of the region's territorial authorities, and regional representatives from NZ Transport Agency, KiwiRail, New Zealand Police and CCS Disability Action (Waikato).
2. The Committee is responsible for preparing the Regional Land Transport Plan (RLTP) for the Waikato region, and as such, has an interest in the outcomes of its work. Road safety and growth and economic development are two of the strategic objectives in the RLTP and are fundamental to contributing to a safer, more efficient regional transport network.
3. The Committee acknowledges the Government's commitment to ensure speed limits are set to assist economic development. The Waikato regional transport network is a critical component of the Upper North Island transport system and freight task, and the safety and efficiency of transport along key strategic corridors is vital for ensuring wider regional and national economic outcomes.
4. The Committee would prefer a more balanced approach to protect public health and community safety, and one that takes a longer-term view of societal, environmental and economic wellbeing.

Key messages and recommendations

5. The Committee appreciates the opportunity to make a submission on the proposals.
6. The Committee is taking the opportunity to advocate for safer speeds on **all** Waikato roads.
7. The Committee is **concerned** that economic development and productivity are considered a higher priority at the expense of safety.
8. The Committee **supports** the retention of the lower speed limits as they were based on:
 - Sound road safety and environmental rationale and evidence
 - Significant public consultation which has always been required by the relevant version of the Land Transport Rule: Setting of Speed Limits associated with speed limit changes
 - Community acceptance and in many cases demand for many of the speed limit changes.
9. The Committee **recommends** there be no changes to any speed limits in any locations under the Rule until such time as the current judicial review process is complete. In the event this is not accepted, then we recommend delays to any changes as per the following paragraphs.
10. With regard to speed limits outside schools, the Committee **recommends** that either:
 - a. NZTA takes steps to ensure RCAs (including NZTA as an RCA) 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.
11. The Committee seeks to **retain the current speed limit** along State Highway 3 at Rukuhia. The Committee considers it premature to increase speed limits now and recommends speed limits are reviewed as part of the wider long-term network planning for the area through the Southern Links project.

12. The Committee recommends retaining the current speed limit along the area of State Highway 1 between Hātepe and Tūrangi, along the shores of Lake Taupō due to the safety and resilience risks in the area.
13. With regard to the proposed auto-reversal of the speed limit on State Highway 26, the Committee recommends that the proposed “auto-reversal” be delayed until planned safety improvements and the revocation of the state highway category has been completed so that the appropriate speed limit can be decided on in consultation with Hamilton City Council and the local community.

General comments

14. The Committee previously submitted on the Land Transport Rule: Setting of Speed Limits 2024 (the Rule) and is disappointed that its concerns, and those of many submitters appears to have not been heeded.
15. The Committee remains concerned with the Government’s direction, especially where economic development and productivity are considered a higher priority and are at the expense of safety. The raising of speed limits as required under the Rule will have implications for communities within our region due to the likely and predictable outcomes on road safety, and growth and economic development.
16. Our main concerns continue to be focussed on speed limits around schools, the lack of consultation opportunity available where speed limits are being “auto-reversed” on both local roads and state highways, and the absence of evidence to support these changes.
17. The Committee acknowledges the current consultation relates only to some state highways, but is taking the opportunity to continue to advocate for safer speed limits across all categories of road within the Waikato Region affected by the Rule.
18. The Committee supports the retention of the lower speed limits as they were based on:
 - Sound road safety and environmental rationale and evidence
 - Significant public consultation which has always been required by the relevant version of the Land Transport Rule: Setting of Speed Limits associated with speed limit changes
 - Community acceptance and in many cases demand for many of the speed limit changes.
19. In addition to the above, the Committee is concerned about the cost to taxpayers and ratepayers of the required changes i.e. new sign costs. This is a particular frustration for communities that had realised the benefits of, and were very much in favour of reduced speeds and is considered to be a waste of time and money.

Alignment with government policy

20. The Waikato regional transport system is vital to supporting a productive and growing regional economy and facilitating wider national economic benefits.
21. Outcomes anticipated in the Government Policy Statement on land transport (GPS) include:
 - Economic growth and productivity
 - Reduced journey times and increased travel time reliability
 - Less congestion and increased patronage on public transport
 - Improved access to markets, employment and areas that contribute to economic growth
 - More efficient supply chains for freight
 - Improved safety
 - Reduction in deaths and serious injuries

22. The Committee considers the proposal to increase speed limits within the Waikato region will frustrate efforts to achieve the outcomes sought in the GPS and other government policy direction such as the National Policy Statement on Urban Development, and the Going for Housing Growth policy initiative.

Road safety

23. The Waikato region has a road safety problem, with deaths and serious injuries (DSI's) consistently one of the highest in the country. Over the last 5 years, 19% of New Zealand's total number of fatal crashes occur in the Waikato, despite the region having only 10% of the national population. This continues to be of serious concern to the Committee and the identification of safety as a strategic objective of the Waikato Regional Land Transport Plan 2024-54 reflects this.
24. Analysis of crash data for the region shows that roads with a speed limit of 100kmh, whether state highways or local roads, have the highest recorded DSI statistics. The typical road trauma death in the Waikato is a 25-39 year old male driver, travelling on a 100kmh state highway. The Committee is concerned that the reversal of speed limits (to 100kmh from the previously lowered 80kmh) under the new Rule, could increase the risk of fatalities and serious injuries on many of the region's rural roads.
25. The Committee urges the New Zealand Transport Agency to consider international best practice and evidence-based decision making to achieve the road safety outcomes envisioned for our region. These current proposals will, in the opinion of the Committee, undo the good work that has been done around the country to make our road users and communities safer.
26. There is compelling evidence that with higher speed limits, there will always be higher rates of injury and death. Even where speed is not the main contributing factor to a crash, speed is what determines the outcome i.e. whether someone will live or die, or carry the lifelong impacts of transport crash related trauma.
27. Around half of major trauma cases presenting at hospital emergency departments in New Zealand are as a result of transport crash injuries. This not only imposes significant intangible, emotional and financial costs to individuals and families, but also to the nation's already overstretched health budget.
28. The Committee is of the view that higher speed limits and the inevitable outcomes do not support the economic growth agenda of the government.

Economic growth and productivity

29. The government has indicated its case for raising previously lowered speed limits relates to time savings leading to enhanced productivity and economic growth.
30. Evidence suggests the benefits of predicted time savings are overstated and won't always increase productivity. This is especially true in urban areas where much of a journey is spent slowing and stopping due to congestion and at intersections or junctions. This is important given the proposed speed limit changes within the Hamilton urban area.
31. The Committee believes it is illogical to blame the nation's poor productivity levels on lower speed limits that purportedly slow traffic flow, when other factors that impact traffic flow are not being addressed. Lower productivity levels, and their associated costs to businesses and individuals can be attributed to travel time reliability, among other things. Under optimum conditions, it may be possible for all drivers to experience free-flowing traffic at their "desired" speed but this is rarely possible due to crashes, congestion, traffic signals and so on.

32. Crashes can close roads for hours, forcing drivers to delay travel, or use alternative, often longer routes. Higher speeds may not be the cause of the crash, but they determine the outcome and the length of time it may take to reopen a road to traffic.
33. An increasing population in the Waikato region (at a growth rate higher than the national average) means an increase in travel demand more broadly. Growth in the Hamilton metro area increases traffic volumes and accelerates congestion and safety problems, increases travel times, and affects efficient freight and people movement.
34. The direct economic costs as a result of congestion include:
 - Cost of travel time delay imposed on users (passengers as well as freight)
 - Cost of unreliable travel time in passenger transport
 - Cost of the excess fuel consumption
 - Associated cost of CO2 emissions due to excess fuel consumption.
35. Conversely, intersection efficiency and traffic queueing are beneficially affected by lower speeds owing to reduced spacing, improved merging of traffic flows and decreased collisions. Studies have reported that lower speed limits can in fact reduce travel times in urban areas.
36. Higher speed limits and going faster will not solve the problem of excessive traffic for the road space available.
37. The Committee considers it important to recognise the role public transport plays in reducing congestion, improving travel time reliability for drivers and enabling higher productivity, as well as improving safety. Additionally, it is possible to undertake work on public transport during a trip which is not possible when driving. This should be added into productivity calculations.

School speed limits

38. The Committee is disappointed that the new Rule's focus on undoing supposed 'blanket speed limits' outside school gates and times of operation, will adversely impact the Road Controlling Authorities' (RCAs) good speed management work and reputation with communities, developed over many years.
39. The Committee notes that school speed limits in the region have been developed with RCAs in line with national guidance, collaboratively with the schools and are bespoke to each school's circumstances. For this reason, school speed limits have safely (and transparently for drivers) supported school specific opening and closing times, together with their children's specific assembly and dispersion requirements for the surrounding neighbourhood.
40. The Committee supports reduced speed limits outside 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) will experience a speed limit increase outside their school gates until the school speed limit is implemented.
41. 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.
42. The Committee submits that either:
 - a. NZTA takes steps to ensure RCAs (including NZTA as an RCA) 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.

Comments on specific State highways

43. Road Controlling Authorities (RCAs) in the Waikato region have made substantive progress over the last few years, working with their communities to provide safer speed environments for all road users. These decisions have been evidence-based and supported by the community.
44. The Committee notes that current consultation is only open on two areas of state highway within the region. Given the work of territorial authorities as RCAs to improve road safety within their communities, the Committee is disappointed that New Zealand Transport Agency does not offer the same courtesy to those communities directly impacted by automatic speed limit reversals on State highways.
45. The Committee comments below on the two State highways open for consultation, and on the others facing automatic reversal of speed limits.
46. Of relevance to each of them though, is that these speed limit reversals apply to only small lengths of road as a proportion of the overall network or journey. The Committee questions whether the negligible efficiency gains outweigh the potential costs.

State Highway 3 – Rukuhia

47. The Committee **supports the retention of the current speed limit** along State Highway 3 at Rukuhia.
48. The Committee supports the Waipā District Council position which is that the current 80kmh speed limit be retained due to its alignment with actual traffic conditions, improved compliance with the 60kmh variable speed zone, and the negligible time savings offered by a higher speed limit.
49. The potential increase in crash risk and severity outweighs the benefits of a 100kmh speed limit. Retaining the current limit ensures the safety of all road users, particularly vulnerable pedestrians and bus passengers (who alight from public transport buses along this stretch of road with no footpath), while addressing the area's high crash rate and unfunded infrastructure needs.
50. This area is part of the Southern Links Roads of National Significance project. The Committee considers it premature to increase speed limits now and **recommends** speed limits are reviewed as part of the wider long-term network planning for the area.

State Highway 1 – Hātepe to Tūrangi, Lake Taupō

51. The Committee **supports the retention of the current speed limit** along the area of State Highway 1 between Hātepe and Tūrangi, along the shores of Lake Taupō.

52. The Committee supports the position of Taupō District Council which is that the current speed limits be retained, especially through Waitahanui and other lakeside settlements along State Highway 1. In particular, the existing 60kmh should be retained near the Motutere campground for safety reasons due to the number of pedestrians crossing State Highway 1 to access Lake Taupō. Safe and accessible pedestrian access to the lakeshore, with safety risks at State Highway 1 crossings managed appropriately is one of the outcomes sought in the recently approved Motutere Reserve Management Plan.
53. Additionally, the area around Bulli Point is identified as the highest priority significant transport project in the Waikato Regional Land Transport Plan, due to resilience and safety issues. This project has been approved for funding through the National Land Transport Programme.
54. The Committee **recommends retaining the current speed limits** of 60kmh through each of the lakeside villages and a consistent speed between them. Recognising this is a nationally important strategic route, there are some physical constraints, which necessitate a speed that is appropriate for the environment, rather than a blanket speed that may not be suitable.

State Highways 1C and 26 within Hamilton City

55. The State highways within the Hamilton City boundaries might technically be state highways, but they function as urban arterial routes feeding into major city employment, education and visitor destination precincts such as Waikato Hospital, University of Waikato, and Hamilton Gardens, as well as providing access to adjoining residential suburbs.
56. The Committee is **opposed** to the proposal to increase speed limits in these locations without public consultation and recommends an opportunity be given to communities to provide feedback through a public consultation process.
57. Of particular concern to the Committee is State Highway 26 Morrinsville Road. This road, while not fronting any school properties is in close proximity to three levels of schooling and has a signal-controlled pedestrian crossing used by many students from the surrounding schools.
58. The Committee notes concern within at least one of the school communities about safety, noting that there have been serious injuries sustained by school children along this stretch of road. The risk of injury makes parents reluctant to allow children to walk or cycle to school, leading to congestion in this area of the city.
59. New Zealand Transport Agency is undertaking the revocation process to transfer this section of State Highway 26 to a local road to be controlled and managed by Hamilton City Council.
60. The Committee supports Hamilton City Council in its work with New Zealand Transport Agency on the speed limits for State Highway 26. Speed limit changes are required for the section of road within the city that will be revoked once planned safety improvements have been completed.
61. However, we do not understand why this state highway is included in the list of roads to have their speeds reversed automatically. Raising speeds in this area makes no sense and corridor needs to acknowledge all road users. This proposal makes no concession for input from local communities. The Committee **recommends** that the proposed “auto-reversal” be delayed until planned safety improvements have been completed and the appropriate speed limit is decided on in consultation with Hamilton City Council and the local community.

62. Similarly, State Highway 1C has a prominent role as a feeder to the Waikato Hospital precinct, as well as being a main thoroughfare for freight, and access to suburbs on the western side of the city. There are therefore many competing and conflicting uses for this road from emergency service vehicles, pedestrians such as hospital staff, patients and visitors, heavy freight, and local residents.
63. Again, the Committee **recommends** a public consultation process be allowed.

Judicial review

64. The Committee understands an application has been lodged for a judicial review of the Transport Minister's decision when adopting the Setting of Speed Limits 2024 rule (Rule), on the basis the Rule is inconsistent with the minister's objectives under the Land Transport Act.
65. The Committee **recommends** there be no changes to any speed limits in any locations under the Rule until such time as the review process is complete.

Further engagement

66. The Committee is concerned at the reversal of previously agreed speed limits, particularly where there has been strong community support for safety improvements, including lower speed limits.
67. The Committee looks forward to future opportunities to engage and provide feedback or commentary on any of these issues.

Submitter details

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