



11 July 2024

Audrey Sonerson
Chief Executive
Ministry of Transport

Dear Audrey,

Setting of Speed Limits 2024 consultation

Local Government New Zealand (LGNZ) welcomes the opportunity to submit on the Ministry of Transport's (the Ministry) Setting of Speed Limits 2024 consultation.

LGNZ recognises the importance of getting speed limits right. That means balancing the safety of all road users with people and freight getting to their destinations in an efficient manner. Likewise, there needs to be a balance struck between allowing local communities, who know their roads best, to determine safe speed limits for their areas, while maintaining a level of consistency that ensures road rules are easily understood by all road users.

The proposed new approach does not get the balance right.

While this new proposed approach does give councils the ability to adjust speed limits to local settings, there are significant time and money costs associated with doing so, even within the ranges of the new binding schedule of speed limit classifications. When this is coupled with the reversal of speed limit reductions made since 1 January 2020, the proposed new system is inherently biased towards the speed limits set before this date, regardless of whether those limits were informed by evidence or robust consultation with communities. The costs will be particularly acute for smaller councils or those with particularly large roading networks.

While some speed limit reductions may have attracted criticism, discussions with councils suggest many of these changes enjoyed broad support from communities. The sweeping approach the Government has taken to reversing these speed limits means that councils will now have to undertake a significant amount of "double handling" if they wish to reinstate any speed limit reductions made since 1 January 2020. Even if councils clearly demonstrated public support and a sound evidential basis at the time, they will need to repeat consultation and research they have already undertaken. In a time where council resources are stretched to their limits, this is a poor use of officers' and elected members' time. The Government's blanket approach is also inconsistent with its commitment to localism.

We are also concerned that the new policy risks an increase in deaths and injuries on our roads.

We know from research conducted by the Ministry that as well as traffic accidents causing significant grief due to deaths and injuries, they also impose a significant cost on the country, with the Ministry's latest figures showing the social cost of road crashes and injuries in 2022 (even under the previous regime of lower speed limits) was \$11.57 billion.

Local Government New Zealand
Level 3, 3 Eva Street Te Aro Wellington
6011 // PO Box 1214 Wellington 6140 //
Aotearoa New Zealand // lgnz.co.nz



There is clear evidence that reductions in speed limits can have a meaningful impact on reducing deaths and serious injuries on our roads – one council told LGNZ that a 30kph speed limit in place in their CBD since 2012 had reduced accidents by 45%. It is not clear to us that the likely negligible improvements on travel times from reversing speed limit reductions are worth the negative impact on road safety, nor that they come close to offsetting the social costs.

The proposed variable speed limit outside schools appears impractical. While we accept that the current rules have meant parts of some communities have had permanently lower speed limits, due to the clustering of schools together, the proposed new rules add cost and complexity while not accounting for the increased activity and prevalence of pedestrian activity around schools outside the stated hours that variable speed limits would apply for. One council from a small city told LGNZ this change could cost anywhere between \$100,000 to \$810,000 in replacing signs alone, with most of this variance depending on whether the replacement signs were static or electronic.

We are also concerned that the proposed new Ministerial Speed Objective introduces another layer of detail in central government direction that RCAs most follow, which may not always align with the current Government Policy Statement on land transport (GPS). It could also undermine local decision making and risks increasing administrative costs on councils if it changes regularly. However, we are pleased that, according to the Ministry of Transport, neither the new rule nor any future Ministerial Speed Objective will be used to make councils undertake wholesale reviews of speed limits across their entire networks.

Successive governments have now embraced a prescriptive, top-down approach to speed management.

We believe an alternative approach is warranted that embraces localism and trusts communities to make the right decisions about their own roads, within broad parameters set by Government.

In particular, the changes we would like to see are:

- Central and local government working together to encourage greater use of regional speed management plans, as an alternative to excessive central direction;
- Not proceeding with introducing a Ministerial Speed Objective;
- A simplified process (including any cost-benefit analysis) for changing speed limits that trusts that local communities know their roads and residents best;
- A greater focus on safety, recognising the human toll and social cost inflicted by traffic accidents.

LGNZ thanks the Ministry for the opportunity to submit on the Setting of Speed Limits 2024 consultation. We would be happy to work with the Government on the recommendations and issues raised in our submission. For further information or if we can be of any assistance, please contact William Blackler, Senior Policy Advisor, at William.blackler@lgnz.co.nz.



Yours sincerely,

Campbell Barry
Acting President, Local Government New Zealand

Neil Holdom
LGNZ Transport Forum Chair