



# Hutt City Council Setting of Speed Limits 2024 consultation feedback

---

11 July 2024

## Introduction

This document represents Hutt City Council's response to the draft Land Transport Rule: Setting of Speed Limits Rule 2024 (the draft Speed Rule) that was released for public consultation on 13 June 2024.

Hutt City Council has undertaken considerable work since the publication of the Setting of Speed Limit Rule (2022). Three speed management plans have been approved by council for roads around CBD Schools, Non-CBD Schools and City Wide. Hutt City has also implemented the Non-CBD School Speed Management Plan. The cost to-date for development of the plans, consultation and implementation of 400 signs across 43 schools is approximately \$570,000.

Hutt City Council believes that the Council and Community have the best understanding of what speed limits are appropriate to create safe environments for all network users and the Setting of Speed Limits Rule should empower RCA's to incorporate this.

Our feedback is set out under each of the proposals below.

## Engagement feedback proposal

### Proposal 1 – Cost benefit analysis for all speed limit changes

Hutt City Council supports making well-informed decisions and developing an understanding of how decisions impact people, as well as the inclusion of economic benefits in the decision-making process.

Hutt City Council does not agree with the use of crash statistics in the Cost-Benefit Analysis because they are likely to be underreported. The primary source of crash data used by Hutt City Council (and other Road Controlling Authorities) is the Crash Analysis



System database. According to information provided by NZTA, the agency recognises that only one-fifth of all crashes are reported or recorded.

Furthermore, it is recognised that travel time equals distance divided by average speed. However, calculating the travel time saved by increasing speed is difficult due to its non-linear function. Provided that there is no association between safety and travel time with the Cost Benefit Analysis, the criteria set in the draft is deemed unsatisfactory.

### **Proposal 2 – Strengthen consultation requirements**

We agree with the consultation requirements to follow the principles from the *Local Government Act 2002*.

### **Proposal 3 – Require variable speed limits outside school gates**

Hutt City Council disagrees with this proposal. Changing the speed limits that were previously approved to operate at lower speeds (i.e., 30km/h) is likely to cause public opposition, as the perception of safety from the lower speed zones has already taken hold.

Since the sign-off of the School Speed Limits 2022, Council has been working broadly with Community Boards; undertaking public consultation with the community and key stakeholders. In 2023, Hutt City Council received approval to change the speed limits around 43 suburban schools, with these changes receiving support from the public. Feedback during consultation for these changes received 75% support from the community and 100% support from schools. Reversing these speed limits will likely cause safety issues and confusion around schools, due to changed or variable speeds when schools and the public are already used to the safer, lower speeds to protect our tamariki and rangatahi.

When the speed limit changes were proposed by Hutt City Council in 2023, an area-wide approach was recommended. The consultation document suggests implementing variable speed limit changes only on roads immediately adjacent to the schools. Limiting speed limits to operate exclusively near school gates (e.g. within 300m) will not provide a safer environment for whanau to travel to school.

### **Proposal 4 – Introduce a Ministerial Speed Objective**

We believe it is too early to introduce changes to the expectations placed on Road Controlling Authorities regarding setting speed limits. The objectives do not provide evidence that reversing the speed limits will effectively improve transport safety and/or enhance access and mobility.

Councils know their communities the best and are, therefore, best placed to determine what the appropriate speeds and conditions are for their jurisdiction.

Without knowing what the proposed Ministerial speed objective could contain, it is difficult to provide any constructive feedback.

Page 3 of the draft states that “the exact impacts are difficult to quantify”. Council disagrees with this statement, as it is possible to use quantitative data to compare the results of the speed limit changes before and after the current speed limits.

Hutt City Council believes speed limit changes need to be based on a number of considerations including the environment of the road, pedestrian and cyclist usage, location of shops, schools and other amenities to make well informed decisions about speed limits.

### **Proposal 5 – Changes to speed limit classifications**

Hutt City Council partially agrees with these changes. We are not in favour of increasing speed limits in areas where there is a high demand from pedestrians, cyclists and other vulnerable road users who may be exposed to unsafe speeding environments.

Additionally, Council does not support increasing speeds in urban connector areas and beach areas. Our strong preference is for speeds in places like community centres, CBDs, beaches and shopping centres to remain under the current settings.

### **Proposal 6 – Update the Director’s criteria for assessing speed management plans for certification**

Hutt City Council understands that should the draft rule be finalised as presented, the Director’s criteria for assessing plans will be updated.

To reiterate our position, we oppose the use of underreported crash statistics in the Cost Benefit Analysis, the increase of speed limits in high pedestrian areas, and the reversal of recent speed limit changes around schools.

### **Proposal 7 – Reverse recent speed limit reductions**

Hutt City Council does not support the proposed reversing of speed limits, particularly in school zones and areas with high pedestrian and cyclist demand.

The draft does not provide sufficient evidence of the effectiveness of reversing the speed limits and lacks clarity how funding will be distributed to Road Controlling Authorities to implement such changes. Council seeks more clarity on these issues.

The reversing of speed limits also creates an opportunity cost. To-date Hutt City Council has spent approximately \$570,000 on implementing speed limit changes. The money to reverse these changes is estimated to be of a similar order and is money that could have been diverted to other road safety measures.

For a Road Controlling Authority, reversing speed limits requires alternative speed control methods to be considered such as the implementation of traffic calming measures (e.g. raised crossings, chicanes etc). Provided that the GPS does not prioritise the implementation of such devices, HCC is concerned that alternative methods may not be effectively implemented due to budget constraints.

The consultation seeks feedback on the cost of implementing the changes. Excluding the removal of recently installed signage, the requirement for other traffic control engineering devices will vary to establish an estimated cost.

## **Conclusion**

Hutt City Council does not agree with the intent of the proposed changes to the Land Transport Rule: Setting of Speed Limits 2024 (the draft rule).

We believe that the increases in safety for tamariki and rangatahi around our schools would be undone by the proposed changes that we have implemented around 43 schools over the past year. As noted in this submission, we believe that Councils are the best placed to set the appropriate speeds and safety for our communities under the settings of the current rule.