Setting of Speed Limits 2024 consultation

Climate Justice Taranaki submission, 11 July 2024

Introduction

1. Climate Justice Taranaki (CJT)[1] is a community group dedicated to environmental sustainability and social justice. This includes issues of inter-generational equity, notably in relation to climate change. Composed of a broad range of people with varied expertise and life experiences, CJT has engaged respectfully with government on numerous occasions.

2. CJT has submitted on various consultation papers, policies and Bills relating to transport over the past decade. Of most relevance to the current consultation is the Draft Government Policy Statement on Land Transport 2024-34[2].

Submission

3. According to World Health Organisation, globally over 1.25 million people die every year from road traffic crashes which are the number one cause of death among young people aged 15-29 years (WHO, 2017)[3]. An increase of 1 km/h in mean vehicle speed results in an increase of 4-5% of fatal crashes. About half of all road user deaths are 'vulnerable road users', i.e. pedestrians, cyclists and motorcyclists. In Aotearoa New Zealand, road traffic injury hospitalisation and mortality rates are disproportionately high amongst Māori[4]. Taranaki, especially New Plymouth and Stratford districts, have some of the worst statistics in cyclist deaths and serious injuries[5] in the country.

4. The biggest contributor to fatality and serious injuries is speed. According to the official advice to the Minister of Transport, 87 percent of current speed limits are unsafe. One of the most effective interventions to improve safety for all road users is to implement safe traffic speeds. Lower speed limits reduce the consequences of accidents. New Plymouth residents and other communities have voiced their support for lowering speed limits around schools. This makes the proposition of a blanket 50 km/h for urban roads a step backward for road safety and against what communities want. Our tamariki and rangatahi need safe routes to school. Rather than permanent speed reductions at schools, the proposal requires variable speeds. This imposes extra costs, creates confusion and is less safe.

5. Decisions on speed limits need to be evidence-based. The argument that increasing speed limit would save time and increase productivity is unfounded and over-stated[6]. The Transport Minister should be required to provide equal evidence for Ministerial Speed Objectives as Road Controlling Authorities (RCAs) must for speed limit changes.

6. For active transport users like cyclists and pedestrians, who are acutely vulnerable to both real and perceived road danger, the implementation of safe traffic speeds is imperative. Perceived safety is one of the biggest barriers to the uptake of cycling[1]. The majority of our streets do not have protected bike lanes. When active transport modes are made safer and more attractive, notably by lowering vehicle speeds, we can expect increases in uptake. The co-benefits include public health outcomes from the reductions in air and noise pollution and congestion, physical and mental health improvements amongst active transport users, and contribution to a safer climate from emissions reduction. Urban transport modelling showed that CO_2 emissions at a speed limit of 30mph (48.3km/h) were 22.3% greater than at 20mph (32.3km/h)[7].

7. For more detailed comments on the specific proposals, please refer to the submission by North Taranaki Cycling Advocates.

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[1] https://climatejusticetaranaki.info/
[2] https://climatejusticetaranaki.info/wp-content/uploads/2024/04/cjt-sub-gps-land-transport-2024_34-2apr24-final.pdf
[3] https://www.who.int/publications/i/item/managing-speed
[4] https://www.ehinz.ac.nz/indicators/transport/road-traffic-injury-deaths-and-hospitalisations/
[5] https://www.nzta.govt.nz/assets/resources/communities-at-risk-register/docs/communities-at-risk-register-2022.pdf
[6] https://theconversation.com/give-way-5-reasons-why-the-government-should-slow-down-on-raising-speed-limits-233774
[7] https://futuretransport.info/wp-content/uploads/2022/05/Urban-Transport-Modelling-2022-05-16.pdf