



Submission on NZTA's Interim State Highway Speed Management Plan (ISMP) 2022

send to: speedmanagement@nzta.govt.nz

due date: 5pm, Monday 12 December 2022.

consultation document at <https://www.nzta.govt.nz/assets/Safety/docs/interim-state-highway-speed-management-plan/draft-ismp.pdf> and <https://nzta.govt.nz/safety/what-waka-kotahi-is-doing/interim-state-highway-speed-management-plan/>

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We would like to receive email updates on speed management.

Our details

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Are you submitting on behalf of an organisation? Yes

Organisation: Living Streets Aotearoa (LSA)

What region(s) are you providing comments on: All

1. LSA strongly supports the 10-year vision of the ISMP stated (p5) as
'... a state highway network where no-one is killed or seriously injured.'
2. We also support the intention (p5) that
'All schools, including kura kaupapa Māori and Kura ā Iwi, on the state highway will have safe and appropriate speeds around them, making it safer and more enjoyable for our children to walk, cycle and scooter to and from home.'
3. And we agree that lowering speed limits through settlements located on state highways (p5) will make it 'easier to walk alongside on footpaths and easier to cross the state highway.'
4. LSA supports the 5 objectives (to 2030) stated on pp5-6

- The state highway network is safer with reduced numbers of deaths and serious injuries.
 - People using the state highway network or living alongside it feel safer, improving their own wellbeing as well the liveability of places.
 - A greater proportion of the state highway network will have posted speed limits that match their safe and appropriate speed.
 - Proposals for managing speeds on state highways will take account of the local context and be aligned with the local road network features, ensuring there is consistency for drivers.
 - We will have brought our communities, partners and stakeholders on the journey with us, with greater numbers of people supporting our proposals to manage speeds better
5. Most of these objectives can be objectively measured but the second one is about how people feel. We urge NZTA to actively monitor this through surveys of users and residents as well as counts of road side users, especially in small settlements or near roadside attractions.
 6. We understand this ISMP pertains to the 2022-2024 period but that a similar approach will be used in developing the 2024-2027 State Highway Speed Management Plan. We agree that an integrated speed regulating, infrastructure modification and enforcement approach is necessary. Speed limits are only one tool to manage speeds - design of the street and things like the excellent raised crossing on SH2 in Wairarapa are essential for helping drivers comply with speed limits.
 7. We endorse the Safe System principles (p6) but point out, in respect of the second principle stated there

'the human body has a limited physical ability to tolerate crash forces before harm occurs'

that we should not consider all humans alike. Children are less able to tolerate crash forces than are young and middle-age adults. Furthermore, features of modern motor cars aimed at decreasing injury to pedestrians (such as bonnet and windscreen design) are of limited benefit to children because they are likely to be struck in the upper parts of their bodies rather than in their lower or mid bodies as for adults and so not end up rolling over the bonnet.
 8. Additionally, the majority of new motor cars being brought into NZ have comparatively poor design when viewed for a pedestrian safety perspective, being so big and tall that even adults are being hit in their upper bodies.

9. These factors make it all the more important to lower speeds of vehicles, especially where there is a higher probability of children being present such as on the roads leading up to schools.
10. Therefore, we believe it is not only inconsistent but also discriminatory to implement 30km/h speed limits near schools in urban areas but limits up to 60km/h in rural areas.
11. Children are as vulnerable to injury and death if hit by a motor vehicle no matter where they are. We urge you to put the safety of children ahead of all other considerations in the vicinity of schools and implement 30km/h variable speed limits for all schools within the 2022-2027 period starting with this ISMP.
12. A parallel should be seen with the law that requires drivers to pass stopped school buses at no more than 20km/h. Just as children can act unpredictably when getting on or off a school bus, they can also act spontaneously when in the vicinity of their school - perhaps in the excitement over another test, or seeing their friends, or the lunchtime swimming session. If 20km/h is considered to be the safe speed to protect children using a school bus then a similar speed should also be seen as the speed that will keep them safe from death or serious injury on the roads outside their schools?
13. The differentiation of schools into category 1 and 2 is largely based on the location and number of children likely to be walking or cycling to school. Generally, drivers moderate their speeds in light of the number of these other road users. At rural schools, where the number of walkers and riders is likely to be lower, this speed moderation is less likely to occur (as drivers see fewer children on the road). Thus, the risk to individual children is likely to be greater. It should be unacceptable to put rural children at higher risk of injury and death by allowing higher speed limits near their schools than are imposed in urban areas.
14. Not only could the limits be variable and so only activated for short periods during the day and only during term time, but also the proportion of the SH network that they would cover would be minimal, hence other effects of such limits would be expected to be minimal. Put safety first!
15. To be consistent with the intention stated on p5 (cited in para 2 above), speed limits outside all schools need to be 30km/h. No higher speed is safe and appropriate to ensuring children's safety.
16. **So we urge NZTA to get rid of the two categories of schools and consider all as category 1, imposing 30km/h speed limits.**
17. Hira School near Nelson is a good example of where an 80/30 variable speed limit is being proposed by NZTA showing it can be done. Another example is Duntroon School

where a 70/30 km/h variable limit is being proposed. These schools have very different circumstances yet 30km/h has been proposed for both. That is sensible as the vulnerability of the pupils is the same whatever the circumstances of the school. The 30km/h limit should apply to all rural schools.

18. If the concern is about travel time for motorists (though it shouldn't be) then it should be considered that a 500m school speed zone with a speed limit of 30km/h would take close to 60 seconds to traverse. One with a 60km/h limit would likely take more than 30 seconds (as the likelihood of having to decrease speed below 60km/h, due to perceived dangers - such as school children - on or near the road, is greater than for having to decrease it below 30km/h). So the additional time taken is, on average, very likely to be less than 30 seconds and this would be only for those people driving through the zone at the time the variable, lower speed limit was in force. Such a time penalty is a fair one when the lives of children are at stake.
19. If NZTA is unwilling to do this then an alternative that could be implemented that would move us toward a non-discriminatory, safe approach is to have 30km/h variable speed limits at those category 2 schools where any of the pupils attending the school live within 2km if it is a primary school and 4km if it has intermediate or high school level pupils. Such distances correspond approximately to the distances pupils of such age might walk or ride to school if conditions felt safe.
20. We believe marae located beside State Highways experience similar safety risks to rural schools. We think that on those occasions when large numbers of people are expected to attend the marae and the marae grounds are within 50m of the road, speed limits on the state highway should be as for schools, i.e. 30km/h.
21. **So, we request that 30 km/h variable speed limits be implemented on State Highways where there are marae grounds within 50m of the road.**
22. Following, are our comments on the proposed speed limits that we do not agree with, listed by region. As stated above, we disagree with the speed limits proposed for category 2 schools and for many marae but will not list them below. They are covered by our comments above and our requests in para 16 and 21. Apart from those mentioned below and those relating to schools and marae, we agree with all other proposed speed limit changes.

Northland - support all

Auckland - support all

Waikato

Ngatea urban from Pipiroa to River roads is Ngatea's main street. Besides commercial properties and the district council offices, there are also two schools and a public domain. With the high number of vulnerable users likely on this street, we think a lower speed limit would be safe and appropriate.

Thus, **LSA requests that the speed limit be a permanent 30km/h.**

Paeroa main street from Station Road to Te Aroha Road is a very busy area with mostly wide footpaths to cater to the numerous pedestrians who use it but with few formal crossing points. Because of congestion, speed is likely to be low anyway .

LSA requests that the speed limit be a permanent 30km/h rather than 40km/h.

Matamata urban: SH24 from the roundabout at the intersection of SH27 to Price Terrace is the main street of Matamata. It has shops, schools and public facilities and also hosts an outdoor market in summer. Matamata is also a major tourist destination resulting in many drivers being unfamiliar with the road.

LSA requests a permanent 30km/h speed limit instead of 40km/h.

Bay of Plenty

Katikati Main Street: Katikati is a busy centre servicing the surrounding district with its intense horticultural and agricultural activities. The density of roadusers is probably not dissimilar to the central area of larger centres where 30km/h speed limits are sensibly being implemented. Furthermore, many of the vehicles passing along the street are large utes and vans and heavy vehicles making the danger for pedestrians all the greater.

LSA requests that the speed limit through Katikati's main street should be a permanent 30km/h.

We also question removal of the intersection speed zone (ISZ) at the SH30 Te Ngae Road / SH33 intersection especially as priority at the intersection is controlled only by a give way sign. Given there is a high use of SH33 by heavy vehicles the consequences of crashes here are likely to be high.

LSA requests the ISZ be maintained.

Gisborne - support all

Hawkes Bay - support all

Taranaki

There are lots of small settlements on SH3 from Hawera to NP with different speed limits. It would be better to have some degree of uniformity so that people know that when they enter a town's mainstreet they should be travelling slowly, i.e 30km/h.

LSA requests that Hawera, Eltham, Stratford and Inglewood main streets all have permanent 30km/h speed limits whereas in the much smaller Normanby and Midhirst we request it be no more than 50km/h.

Manawatu-Whanganui

Upokongaro urban: This is actually a combined settlement and school location with parking on both sides of the road but buildings on only one side so requiring people to cross the road. There are no formal crossing points.

It is also part of a cycle trail including the nearby Upokongaro cycle bridge across the Whanganui River.

Additionally, although the school has some on-site parking it also has an area outside the school and space on the opposite side of the road sufficient for cars to be parked and from where children would have to cross the road to reach the school (even despite warnings to parents not to do this).

Furthermore, the settlement has a footpath through most of it, sensibly encouraging people to walk. People might like to visit the church or the bridge after a visit to the cafes.

For these reasons, **LSA requests a permanent 30km/h speed limit as it would be safer and more appropriate than 40km/h.**

Greater Wellington

There are several schools (St Marks preschool and school, Wellington College, Wellington High School) on or near SH1 in the vicinity of the Basin Reserve in Wellington. There is also St Patrick's College adjacent to SH1 in Kilbirnie. Pupils come from all over Wellington to attend these schools and so approach them from all directions including across the state highway.

LSA requests variable 30km/h speed limits on SH1 outside these schools and for Wellington High School/Massey University, covering the Buckle St/Arthur St/Taranaki St intersection.

Also, we question the removal of the ISZ at SH2/East Taratahi Road/Wiltons Road. There are only Give Way signs on the two side roads controlling the priority and the entrances of both side roads are broad, encouraging drivers to drive fast and perhaps try to cross between them before SH2 traffic has passed. It is not obvious why removal of the ISZ is proposed.

LSA requests the ISZ be kept.

LSA particularly supports the 50km/h speed limit at the Ngauranga intersection with Hutt Rd - this will be a significant improvement for the very tricky road crossing there and support the development of the shared path Wgtn-Petone Te Ara Tupua. The crossing should also be user-activated and provide sufficient time for the speed of the person crossing, possible with Puffin-type crossings.

Also, **LSA requests that the speed limit on SH1 along Vivian Street from Willis St to Taranaki St should be 30km/h** on account of the high number of pedestrians using both sides of the street and frequently need ing to cross it. This would also be consistent with speed limits in the rest of central Wellington which would assist with achieving compliance.

Top of the South (both Nelson and Marlborough) - support all

West Coast - support all.

Canterbury

The proposal (SH1-2) which would lower the speed limit from 70km/h to 60 km/h from north of the Pegasus roundabout to Woodend would be better if it were 50km/h. SH1 splits the residential area of Pegasus from that of Ravenswood, the latter being the location of a New World and a McDonalds. The roundabout is a two lane one and there is only basic provision for pedestrians and cyclists to cross it. They are required to cross two lanes of traffic twice going and then returning.

LSA requests that the proposed speed limit be changed to 50km/h, if not for the entire 600m distance then at least for the roundabout.

Otago and Southland - support all

Thank you.