

Bike Waikato Submission to Setting of Speed Limits Rule 2024

Kia ora Ministry of Transport,

Thank you for the opportunity to submit to the Settings of Speed Limits Rule 2024.

Bike Waikato is a community organisation based in the Waikato which aims to get more people biking, safely. The road environment in general and the speed limit in particular plays a large role in how safe we feel biking, and in turn, how many people feel safe to start biking. For that reason, we take interest in the proposed Rule.

Unfortunately, this Rule does little to promote safety, and as such, we do not support the proposed Rule.

We do not support the reversal of speed limits, including outside school gates, due to the significant risk of serious injury and death.

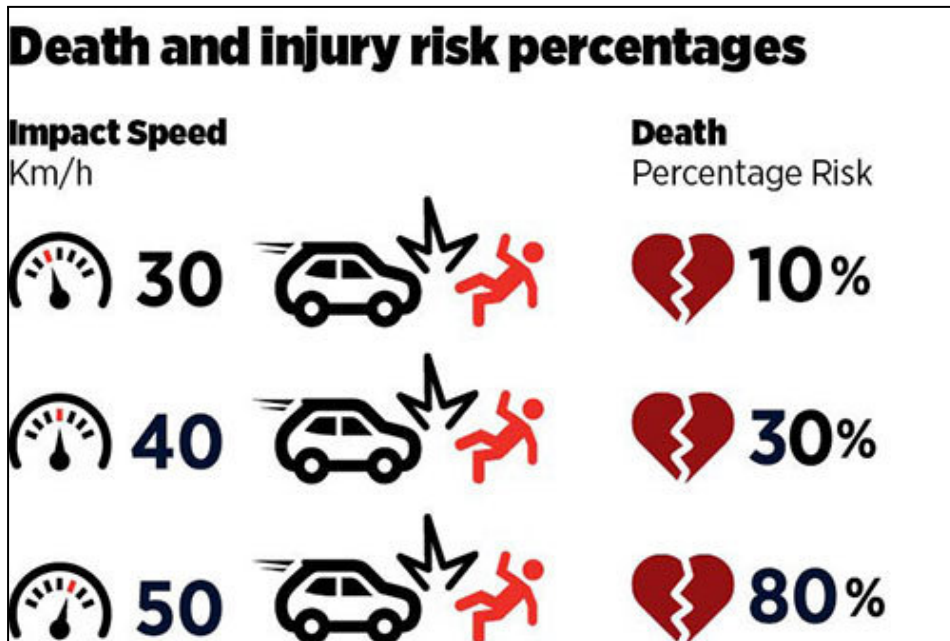
The consultation document notes: “Under the draft Rule, speed limit reductions introduced since 1 January 2020 on local streets will be reversed.” Further, in the Appendix, Table 1 outlines proposed speed limits for different classifications of urban streets. This table states that the speed limit for urban streets should be 50 km/h.

Number	Class of road	Description	Speed Limit
1	Urban streets	Residential and neighbourhood streets, and streets that provide access to and support businesses, shops, on-street activity and services.	50 km/h
2	Civic spaces	Streets mainly intended for localised on-street activity with little or no through movement	10 – 20 km/h
3	Urban connectors	Streets that provide for the movement of people and goods between different parts of urban areas, with low levels of interaction between the adjacent land use and the street	50 – 80 km/h
4	Urban transit corridors	Urban motorways and corridors that provide for movement of people and goods within an urban environment	80 – 100 km/h

This is perplexing because it would mean the Rule would contradict existing guidance and evidence by proposing unsafe operating speeds for urban streets. For example, The [ONF \(One Network Framework\)](#) outlines that the safe and appropriate speed for [local streets](#) is 30 km/h

and the safe and appropriate speed for [urban connectors](#) is 40 km/h (in most cases).

The safe and appropriate speed limit guidelines are important to follow because the risk of death increases exponentially with speed. This is especially the case for tamariki, who are more likely to suffer serious injury or death in the case of a collision. Even a small increase in speed can more than double the risk of serious injury or death, as demonstrated in the figure below.



We know in Aotearoa New Zealand that speed plays a role in most crashes and is a direct causation for the seriousness of an injury in serious and fatal crashes. Head-on and loss of control crashes are the two highest crash types across New Zealand with linkages to driver error factors and speed. Why should we risk life and limb for what is likely to be a minimal (or more likely, negative – see the next section) economic benefit when there is a higher social cost from speed related crashes?

The proposed Rule dismisses the needs and wants of the community.

The previous Rule already had a requirement to consult with the community when making speed limit changes, especially those outside school gates, a process in which Bike Waikato heartily participated. It is not constitutionally right to dismiss the community's engagement in this process.

The proposed change to speed limits outside school gates from permanent to variable additionally imposes additional costs to Road Controlling Authorities (RCAs) without a demonstrated safety or travel time benefit.

The proposed Rule is likely to make the road environment less safe and inviting for people on bikes.

It should be noted that, as per [existing Road Code guidance for people riding bikes](#), we should 'take the lane' (i.e., ride in a central position) in the following situations:

- When riding past parked cars
- When approaching an intersection, particularly a roundabout
- When preparing to make a right-turn
- When riding on a narrow road
- When other road users may attempt unsafe passes

The Road Code also stipulates that we [should take a position where they are visible to other road users](#).

Given the limited bicycle infrastructure in most Aotearoa New Zealand cities and the Government's recent draft Government Policy Statement on Land Transport which reduces their ability to construct more, the above scenarios apply relatively often. However, we also know that drivers can be aggressive towards people riding bicycles, particularly when we are perceived to be 'holding up traffic'.

Regardless of whether they are riding a push bicycle or an electric bicycle, most people riding bikes can comfortably maintain a speed between 20 km/h and 30 km/h. However, very few can reach – nevermind maintain – a speed of 50 km/h.

This means that the proposed Rule is likely to result in increased aggression towards people riding bikes due to the increased difference in speed between the two modes.

We should aim to make streets safer and more inviting for everybody. This Rule will likely achieve the opposite and discourage utilitarian cycling at a time when we desperately need more people to make use of sustainable modes of transportation.

The Rule lacks an evidence-based approach which is likely to lead to further injury and death and less travel time reliability.

The consultation document makes several unsubstantiated claims, in particular that the increase in speed limit will lead to economic benefits through reducing travel times, improve access and mobility due to increasing transport choice and access, and promote public health.

The [World Health Organisation shares](#) that an increase in the average speed by 1% results in a 4% increase to fatal crash risk and a 3% increase to serious crash risk, meaning that the proposal to change speeds in areas that have already been consulted on with the public will see a drastic increase in the likelihood of a fatal or serious crash. *This proposed Rule will result in death and serious injury that would not have otherwise occurred.*

In the urban environment, the relationship between the speed limit and travel time is tenuous at best. In fact, most contemporary research shows that travel time for motor vehicles in urban areas stays fairly consistent while alternative modes of transport, such as the bicycle, have more reliable travel times at shorter distances, outpacing the car. Details vary, but the expert consensus is clear: multimodal transport systems perform better than car-dominated systems. Therefore, promoting alternative modes of transport such as cycling, walking, and public

transportation within the urban environment will achieve the goal of this rule by net removing vehicles from the road, improving travel time reliability for everyone.

Instead, this Rule reduces barriers to driving, and in conjunction with the draft Government Policy Statement on Land Transport, decreases access to alternative modes which are more economical. Aotearoa New Zealand already suffers from substantive car-dependent transport planning, which results in worse travel time reliability than some cities in Europe which have a higher population than us. The proposed Rule will result in more people driving which will result in worse congestion – which can only lead to worse economic output as stagnant cars on unproductive roads will lead to lost revenue and productivity, especially if the Government's goal is to reduce the barriers for freight being moved via trucks on the road. There is no reason to go ahead with this.

In addition to direct increased risk through collisions, increased speed will result in greater noise pollution, which has been linked to [increased cortisol production \(stress\)](#) which has a negative impact on the nervous system. Increased speed also requires more forceful braking which releases more microparticulate matter. This is in addition to [existing air pollution from combustion](#) which kills thousands of New Zealanders annually.

As such, the only conclusion that can be drawn is that the Rule will result in further injury and death on our transport system and lower travel time reliability.

We do not support the proposed Rule, and it should not go ahead in its current form.

Kind regards

Bike Waikato Committee