

ACRS Submission on Urban Connector Speed Limits



About the Australasian College of Road Safety

The Australasian College of Road Safety was established in 1988 and is the region's peak organisation for road safety professionals and members of the public who are focused on saving lives and serious injuries on our roads.

The College Patron is Her Excellency the Honourable Sam Mostyn AC, Governor-General of the Commonwealth of Australia.

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Introduction

The Australasian College of Road Safety is the region's peak membership association for road safety with a vision of eliminating death and serious injury on the road. Our members include experts from all areas of road safety including policy makers, health and transport professionals, academics, community organisations, researchers, federal, state and local government agencies, private companies and members of the public. The purpose of the College is to support our members in their efforts to eliminate serious road trauma through knowledge sharing, professional development, networking and advocacy. Our objectives include the promotion of road safety as a critical organisational objective within government, business and the community; the promotion and advocacy of policies and practices that support harm elimination; the improvement of relative safety outcomes for vulnerable demographic and user groups within the community; the promotion of post-crash policies and practices; and the promotion of a collegiate climate amongst all those with responsibilities for and working in road safety.

The College believes that we should prevent all fatal and serious injuries on our roads; the road traffic system must be made safe for all road users; system designers should aim to prevent human error and mitigate its consequences; life and health are not exchangeable for other benefits in society; and that all College policy positions must be evidence based.

Speed limits stir many opinions and many worry that they'll be slowed down or lose productivity with lower speed limits. In fact, where lower speed limits have been implemented, overall travel times usually stay about the same. This is because most people are already travelling slower due to intersections or cornering, and the lower speed limit just gives a clearer message to those driving too fast for the conditions.

Road crashes cost the country in productivity, approximately \$10B per year (or 4% of the GDP). One of the worst things we can do for productivity is kill and seriously harm our young people who have a lifetime of societal contribution and productivity ahead of them – road crashes are the leading cause of death of New Zealand's young people.

NZ Transport Agency Waka Kotahi (NZTA) have requested feedback on 16 sections of State highway categorised by Urban Connector. ACRS are providing this feedback acknowledging the privacy requirement in the consultation document.

ACRS response to proposed Urban Connector Speed Limits

Overall

ACRS includes 800 experts from all areas of road safety including policy makers, health and transport professionals, academics, community organisations, researchers, national and local government agencies, private companies and members of the public. The response provided is in line with accepted speed management policy position of the organisation, which is included at Appendix A.

On all 16 Sections of the Urban Connector being consulted on ([here](#)), it is the ACRS position that the lower speed limits proposed more align with the ACRS' policy position on setting speed limits which are safe and appropriate while matching the function of the road. These lower speed limits, on Urban Connector routes, also have the advantage of promoting safer walking and cycling. Evidence and sound development work was carried out to propose the original lower speed limits, based on the evidence available, we believe the lower speed limits that resulted from this analysis should remain.

While this consultation is for 16 sections of Urban Connector, other sections of State highway will have auto reversal under the Speed Limit Rule 2024. In the sections below, we have made commentary on how the consultation on speed limit changes is carried out, and the impact of the approach on the homogeneity of speed limits in New Zealand.

Consultation Scope

The proposed consultation does not include all state highway sections having speed limit changes, nor does it follow Local Government Act consultation requirements.

Auto-reversing speed limits under the rule goes against the Principles of Consultation in the Local Government Act (Section 82). We believe that all roads having speed limit changes made should have consultation with the affected and interested parties (such as ACRS).

The 2024 Setting of Speed Limits rule consultation also failed to consider the quantum of professional input. The consultation assessment equated professional body submissions with individual submissions. Therefore, we believe that using the Setting of Speed Limit schedules alone does not adequately consider advanced professional knowledge. The setting of new speed limits should not therefore rely on the schedules within the Setting of Speed Limit rule and should target professional bodies for consultation and expert advice.

Furthermore, when carrying out consultation, NZTA need to provide *“reasonable access to relevant information in a manner and format that is appropriate to the preferences and needs of those persons”*. Those with an interest in each speed limit change should be provided the following information from any speed limit change:

- 1) The expected change of Death and Serious Injury risk
- 2) The anticipated travel time difference
- 3) The cost of making the change

Homogeneity of Speed Limits

The current process of auto reversing speed limits since 2020 on some routes, consulting on others and leaving those before 2020 will result in speed limits that are not self-explaining to road users. Speed limits for various road types will differ around the country leading to confusion, a lack of compliance, and ultimately less safe driver behaviour. This lack of understanding of speed limits, due to different speed limit setting outcomes around the country, can increase speed differential between motorists and increase crash risk.

It is recommended that speed limits be considered in the context of the One Network Framework, Safe System approach and making the roads self-explaining. A nationally consistent approach to setting speed limits is needed, as opposed to the inconsistency emerging from various regional engagement exercises, with a motoring public that has not been adequately informed of the risks and trade-offs of different speed limits.

Conclusion

The ACRS NZ Chapter supports the 16 Urban Connector sections having their 2020 speed limits reinstated to match the function of the road, based on earlier analyses.

However, we disagree with the scope of consultation and the inconsistency of speed limits that are likely to emerge from the existing process, as described above.

ACRS appreciates the opportunity to comment on the proposed changes and contribute to improved road safety in New Zealand. Please contact us should you require any further information.



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Appendix A – ACRS Policy Position on Speed Management

[ACRS-Policy-Position-Statement_Speed-Management.pdf](#)