



**Nelson Tasman Climate Forum Submission:  
Setting of Speed Limits Rule 2024**

**This submission has been compiled by the NTCF Submissions Group**

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## Nelson Tasman Climate Forum – Who we are

The Nelson Tasman Climate Forum (NTCF) is a community-based organisation with 150 members who have been active in the Nelson Tasman region for several years focussed on three goals:

- 1) Rapidly reducing our regions' greenhouse gas emissions
- 2) Adapting to the likely adverse effects of climate change
- 3) Responding to climate change in a way that recognises the rights of all living organisms and provides for a just, equitable and resilient society.

NTCF members bring a breadth and depth of expertise and experience, including scientific research and practice, social science, the health sector, monitoring and evaluation, education, environmental management, community engagement, communications and more. We have a deep understanding of the interlinked crises of climate change and biodiversity loss that result from past and ongoing degradation of the natural environment.

We work in our local communities to educate and empower people to take positive action on climate change, for example through the innovative behaviour change programme, Take The Jump. We get our hands dirty in planting programmes on public and private land, we trap pests and predators, we provide services such as The Repair Café to reduce waste and teach resilience, and provide resources for schools, businesses and families to help the broader community to think globally and act locally. We work closely with both Nelson City Council and Tasman District Council to support their mahi in protecting, restoring and enhancing the natural and built environments that we are privileged to call home.

## Proposed Setting of Speed Limits Rule 2024

We object to this proposal, as it is flawed in its analysis, dangerous to people and property, and unnecessarily contributes to global heating.

The proposal document identifies that the Land Transport Act sets out seven matters the Minister must have regard to when making a rule. Its treatment of these seven matters is woeful: the words “difficult to quantify” are used on five occasions.

One of these matters is:

- Whether a proposed rule:
  - assists economic development
  - improves access and mobility
  - protects and promotes public health
  - ensures environmental sustainability.

The discussion document’s treatment of items 3 & 4 is particularly woeful. Road safety is considered under land transport safety (the second matter that needs to be considered). Public health then is other than about road safety and certainty extends beyond noise pollution (mentioned only, but no consideration of particulate air pollution). Environmental sustainability is hardly just about Government policy on the ETS.

Land transport emissions are one of NZ’s biggest sources of emissions and reducing these needs to be a priority across all aspects of road transport.

In relation to speed: “For any roads shifted from 80 km/h to 100 km/h, Waka Kotahi’s model predicts an average increase of 5 percent to 10 percent of emissions”; “The OECD has done work which shows a reduction from 110 to 90 kilometres per hour reduces emissions by 23 percent. It makes a huge difference how fast you go.”

(<https://www.rnz.co.nz/national/programmes/morningreport/audio/2018913843/loweri-ng-speed-limits-helps-to-reduce-emissions>).

In relation to public health, please consider this excerpt from a submission by the Nelson Transport Climate Forum Transport Group to the Nelson Tasman Regional Land Transport Plan 2024-34.

‘Designing and managing our regional land transport system needs also to take into account its wider impacts in and beyond our region. For example, approximately 260 premature deaths annually can be attributed to air pollution in Nelson Tasman, approximately 200 (75%) of them from inhalation of fine particulates (PM2.5) and nitrogen dioxide pollution from motor vehicles<sup>1</sup>.

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<sup>1</sup> Kingstone, S. 2024. Te Taihū Localities HNA data environmental health. Te Whatu Ora Te Taihū. <https://www.canva.com/design/DAFlRd7FAoc/LfdbTtwqYyHvbTtYjYSu1Q/view?website#2:title-page-2>.

Further, applying the 1000 ton rule <sup>2</sup> (Pearce & Parncutt 2023), current Nelson Tasman annual emissions (about 1 million tonnes CO<sub>2</sub>e) will result in about 320 mainly poorer future persons around the globe prematurely dying over the next century. Assuming approximately 20% of Nelson Tasman emissions are from road transport (from Stats NZ data), this represents approximately 60 further premature deaths globally over the next century from our annual transport emissions.

Thus, Nelson Tasman had 4 road fatalities in 2023 <sup>3</sup>; but road transport emissions are responsible annually for nearly 200 further premature deaths here, and there is ongoing premature mortality beyond our region.<sup>7</sup>

In addition, the Setting of Speed Limits Rule 2024 will have little or no impact on productivity as planned. If you are serious about productivity increases, then we need to promote public and active transport, and disincentivize the use of private vehicles. That will speed the flow of trucks and trades people, and increase safety, without having to raise speed limits.

### **Proposal one – require cost benefit analysis for speed limit changes**

We do not support this proposal, which seems to be intended as a deterrent for councils to implement evidence-based speed limits. The data are very clear on the health benefits of lower speed limits, both in direct injury and death and in air pollution-related sickness and death. In addition lower costs for road maintenance adds further to the list of economic benefits. Requiring cost-benefit analysis for a strongly evidence-based measure adds quite unnecessary costs to financially strained councils.

### **Proposal two – strengthen consultation requirements**

We support this proposal. It is important to recognise that pedestrians and cyclists are road users as much as drivers.

We ask that the proposed requirement to consult local communities specifically reference ‘including non-vehicular road users such as cyclists and pedestrians’.

### **Proposal three – variable speed limits outside school gates**

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<sup>2</sup> Pearce, J.M. & R. Parncutt 2023. Quantifying global greenhouse gas emissions in human deaths to guide energy policy. *Energies* 16(16): 6074. <https://www.mdpi.com/1996-1073/16/16/6074>.

<sup>3</sup> Te Manatū Waka Ministry of Transport 2024: <https://www.transport.govt.nz/statistics-and-insights/safety-road-deaths/sheet/provisional-road-deaths>

We are opposed to this proposal. Children and adults use school buildings outside school hours. They should feel safe at all times.

#### **Proposal four – introduce a Ministerial speed objective**

We do not support this proposal. There is no qualification of its parameters, such as the need to have strong regard to evidence from road traffic experts.

#### **Proposal five – schedule of speed limits classifications**

We do not support this proposal. A standardized speed limit of 50 km/h is too fast for urban and suburban areas and will turn ‘Safe Streets’ into ‘Unsafe Streets’, decreasing walking and cycling and increasing traffic congestion.

New Zealand is seriously lagging in installing cycleways. A street with a speed limit of 30 km/h is one on which many cyclists would feel a degree of safety; a 50 km/h street would deter many. In particular, parents would likely judge it unsafe for children to cycle to school. This proposed change is a slap in the face for cyclists, and therefore very short-sighted in view of traffic congestion problems.

In a world dangerously approaching tipping points for uncontrollable climate change, we should forego the few minutes saved by driving at 100 km/h and lower speeds to 80 km/h in order to lower carbon emissions, fuel use, road mortality and injuries, and road maintenance costs.

At times two of the writers of this submission need to walk or cycle on Motueka Valley Highway – a two-lane, very curvy road, much of it currently with a 100 km/hour speed limit. It is anxiety-provoking to be passed by logging trucks at high speed.

#### **Proposal six – new criteria for speed management plans**

We do not support this proposal because we don’t support the requirement for cost-benefit analysis, the speed limit classifications, the requirement for schools, or a ministerial speed objective.

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

We strongly object to this proposal. Our Tasman District Council has consulted the community on speed limit changes. It is arrogant of this government to override all the work done to make our roads safer, our air cleaner and all the other benefits that come from lowering speed limits.