



Waka Kotahi

Submission on Land

Transport Rule: Setting of

Speed Limits around schools

2021

25 June 2021

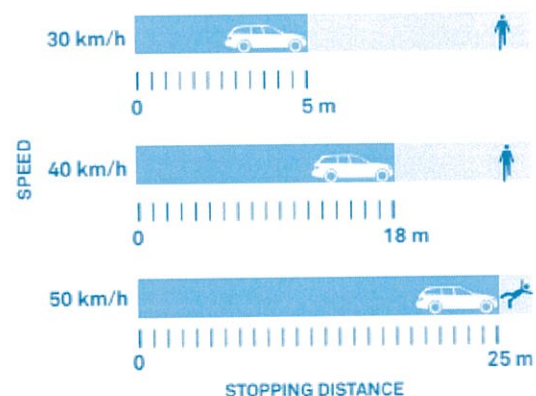
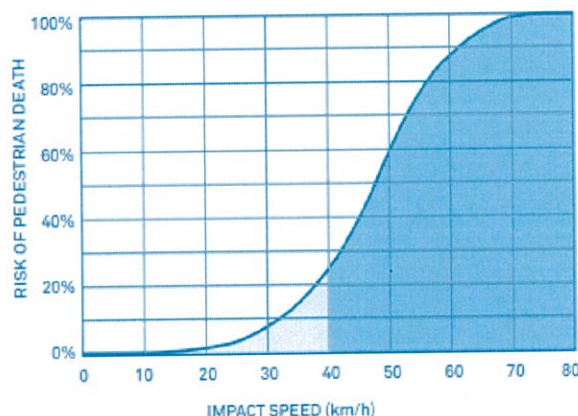
For more information please contact:
Jane Murray
NMDHB Public Health Service
Email: jane.murray@nmdhb.govt.nz
Phone: (03) 543 7805

Introduction

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Waka Kotahi's *Setting of Speed Limits* consultation.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.
3. This submission sets out particular matters of interest and concern to NMH including around safety.

General Comments

4. NMH supports the proposal to reduce speed limits of urban schools to 30 km/h and rural schools to a maximum of 60 km/h. Safe and appropriate speed limits needs to be applied to roads surrounding schools and other roads with high pedestrian use.¹ Speed affects the likelihood and the severity of consequences following a vehicle-vehicle or vehicle=pedestrian collision. Speed of cars, alongside volume, have other adverse effects including increasing levels of environmental and noise pollution, reducing pedestrians safety, and adversely impacting the. "liveability" of urban areas². Lower vehicle speeds and volumes lead to reduced noise, vibration and emissions in the environment. Residents in neighbourhoods with good street environments tend to walk and cycle more than comparable households in other areas³ which has positive benefits for individual health and for the environment.
5. When vehicles move at or below 40 km/h, potential collisions take place at lower speeds, dramatically increasing the chances of survival in the case of a crash⁴.



Global Street Design Guide

¹ <https://www.nzta.govt.nz/assets/Safety/docs/speed-management-resources/speed-management-toolbox-and-appendices-201611.pdf> pg 21

² <http://apps.who.int/iris/bitstream/10665/254760/1/WHO-NMH-NVI-17.7-eng.pdf?ua=1>

³ <https://www.nzta.govt.nz/assets/userfiles/transport-data/Traffic%20Calming.pdf>

⁴ *Ibid*

6.

7. NMH supports the proposals to reduce speed limits around schools. Walking and cycling rates have declined considerably for school trips since 1989.⁵ For children, using active transport to and from school is an important way to get some physical activity each day. With the high child obesity rate in New Zealand, walking and cycling to school are relatively easy ways to increase physical activity in children. Research has also shown that most children that walk and cycle to school will maintain this behaviour as they get older, therefore it is important to establish early habits for active commute.⁶ Moreover there are well established cognitive and learning benefits to walking and cycling to school.^{7,8}

Specific Comments

Question 1: Do you support the timeframes for introducing safer speed limits around schools?

8. The time frame given for the proposed changes is 40% of school set speed limits by June 2024, and all roads by December 2029. Given that the reason of these changes is to ensure safer travel of children, NMH strongly recommends that the changes are implemented as soon as possible, and altered to December 2022 for 40% of schools and the remainder by December 2023.

Question 2: Do you support the proposal that Road Controlling Authorities (RCAs) would designate rural areas? If not, why not?

9. NMH does not hold a view on RCAs designating rural areas, However NMH strongly supports the requirement for RCAs to consult with rural school communities.

10. NMH notes that designated rural schools may have higher speed limits. The consultation document states that RCAs will be encouraged to consider speed management treatments in the broader area around a school. NMH supports this but recommends that RCAs are required to install speed management treatments.

⁵ <https://www.transport.govt.nz/assets/Import/Documents/RaisingtheProfileWalkingCyclinginNZ.pdf>

⁶ Centre for Physical Activity and Nutrition Research(n.d) *What Influences whether children walk or cycle to school*. Deakin University

⁷ Hillman, C. (2009)*The effect of acute treadmill walking on cognitive control and academic achievement in preadolescent children* Neuroscience Volume 159, Issue 3,

⁸ South Australian Department of Planning, Transport and Infrastructure (2016) *Walking, riding or driving to school: what influences parents' decision making?*

https://www.dpti.sa.gov.au/_data/assets/pdf_file/0020/513506/Walking_riding_or_driving_to_school-what_influences_parents_decision_making-Focus_group_discussion_report.pdf

Question 4: When setting variable speed limits around schools, do you support RCAs having the ability to determine school travel time periods (whilst having regard to guidance from Waka Kotahi)? If not, why not

11. NMH recommends that permanent speed limits are implemented rather than variable speed limits.

12. The NZ Post Primary Teacher's Association and the Education Review Office have recommended that schools become community hubs.⁹ Whilst the majority of pedestrian movements occur during school travel periods, schools are locations that are frequented by a wide range of groups outside of the 9am and 3pm school travel periods. Therefore NMH recommends that permanent speed limits become the default. This could be done at a national level so that there is consistency, and road users can easily understand expectations.

13. NMH notes that there is a caveat stating that Road Controlling Authorities (RCAs) can set the speed limit at 40km/h if required. NMH strongly recommends that there are strict conditions added to Clause (5.2)(3-4) to ensure

- a. RCAs fully consult with the school community;
- b. that safety mechanisms are put in place at school entrances and nearby intersections to keep pedestrians safe from harm.

Conclusion

14. NMH wishes to highlight the importance of making roads safer by designing slower speed environments. NMH thanks the Waka Kotahi for the opportunity to comment on the *Setting of Speed Limits Consultation 2021*.

Yours sincerely



Lexie O'Shea
Chief Executive
Lexie.OShea@nmdhb.govt.nz

⁹ [ERO report supports PPTA call for schools as community hubs | PPTA](#)