



Submission on Tasman District Council's 2019 Proposed Amendments to the Speed Limits Bylaw 2016

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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 Tasman District Council's *2019 Proposed Amendments to the Speed Limits Bylaw 2016*.
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 continues to advocate that the legal speed limit is based on the road type rather than having the same open road speed limit for all roads. This submission follows our earlier submission on the Speed Survey in June 2019.
5. NMH supports all the proposed speed limit reductions shown in the consultation document. Safe and appropriate speed limits needs to be applied to roads in Tasman. In particular, NMH supports the proposed reductions on rural primary and secondary roads from 100 km/h to 80 km/h. NZTA's Speed management guidelines state that speeds of 100km/h should only be applicable to roads that have good alignment, central and roadside protection and should have a 4 Star KiwiRAP ratings.¹ Speed affects the likelihood and the severity of its consequences. The Ministry of Transport's Safer Journey report² states that there is a 10% probability of death for car drivers in frontal impact collisions travelling at 70km limit compared with 30% probability for car drivers travelling at 95km/h and 50% probability for drivers travelling at 105 km/h.
6. In recent years, Tasman has experienced growth in the rural residential areas. NMH supports the reduction of speeds shown in the consultation document from 100km/h and 80 km/h to 50 km/h. Speed has adverse effects on levels of environmental and noise pollution, safety, and the "liveability" of urban areas³. 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 areas⁴ which has environmental impacts.

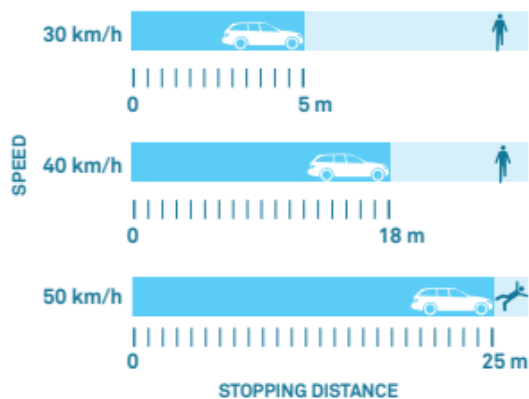
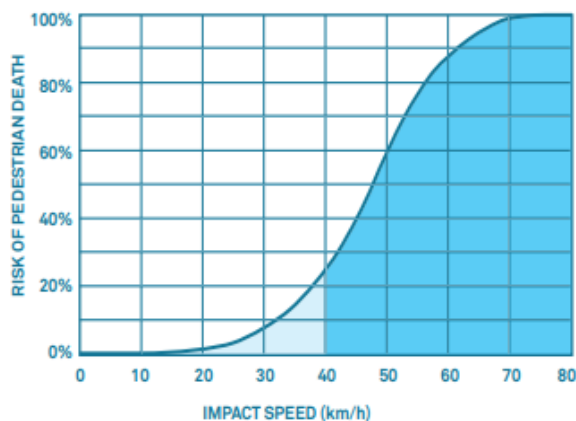
¹ <https://www.nzta.govt.nz/assets/Safety/docs/speed-management-resources/speed-management-toolbox-and-appendices-201611.pdf> pg 21

² <http://www.saferjourneys.govt.nz/assets/Safer-journeys-files/SaferJourneyStrategy.pdf> page 19

³ <http://apps.who.int/iris/bitstream/10665/254760/1/WHO-NMH-NVI-17.7-eng.pdf?ua=1>

⁴ <https://www.nzta.govt.nz/assets/userfiles/transport-data/Traffic%20Calming.pdf>

7. NMH supports the reduction of speed limits in Brightwater, Wakefield and Kaiteriteri where there are a high number of pedestrians. International studies⁵ have shown that most traffic deaths, especially the easily preventable pedestrian deaths, occur on a small percentage of arterial streets. These streets are rendered dangerous by design as the streets are wide and invite speeding, lack safe crossings and have substandard footpaths. When vehicles move at or below 40 km/h, potential conflicts take place at lower speeds, dramatically increasing the chances of survival in the case of a crash⁶.



Global Street Design Guide

Conclusion

8. NMH wishes to highlight the importance making roads safer and more user-friendly for all road users including motorists, pedestrians, cyclists and residents. This could be achieved by designing slower speed environments. NMH thanks the TDC for the opportunity to comment on the *2019 Proposed Amendments to the Speed Limits Bylaw 2016*.
9. NMH would like to appear at the hearing.

Yours sincerely

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⁵ <https://globaldesigningcities.org/wp-content/uploads/guides/global-street-design-guide.pdf>

⁶ [Ibid](#)