

4 July 2025

Aotearoa New Zealand Trauma Committee

Royal Australasian College of Surgeons (RACS)

Online submissions to New Zealand Transport Authority (NZTA)

Level 3, 8 Kent Terrace
Wellington 6011, New Zealand
PO Box 7451, Newtown,
Wellington 6242, New Zealand
T: +64 4 3858247
E: college.nz@surgeons.org
www.surgeons.org

THE PROPOSED 110KM/H SPEED LIMIT ON SH1 TRANSMISSION GULLY

As Surgeons and trauma specialists, we are exposed daily to the results of road trauma. Supporting improved trauma care, quality trauma data collection, and trauma research, and advocacy to reduce road trauma, improve road safety, and prevent and mitigate trauma-related injury, are critical roles for RACS.

RACS is committed to supporting initiatives focused on reducing road trauma, preventing deaths, and enhancing the quality of life for those impacted by road crashes. Only with due recognition of the burden of injury associated with road-related trauma can we expect to achieve generational and long-lasting change.

Road trauma has an ongoing and devastating impact on people, whānau, communities, clinicians, ACC, the health and welfare systems, and our society. We are concerned that despite significant investment in road safety and trauma care, the latest data shows 292 fatalities in 2024, the same number as in 2014.¹

The higher speed limit of 110km/h for Transmission Gully would have a mix of benefits and impacts. While the potential increase in speed limit may facilitate better traffic flow, the paramount concern must be the safety of all road users. Caution must be exercised when considering increases in any road speed limits in New Zealand.

We recognise the opening of Transmission Gully in 2022 has significantly enhanced regional resilience, providing a safe, modern, reliable route to and from Wellington. The New Zealand Transport Authority (NZTA) review of the performance of the road since its opening highlighted its design standards and subsequent low crash numbers, which are commendable. The area has been designed with high safety standards. Yet road user behaviour at increased speeds on expressways must be examined rigorously as higher speeds can increase the volume and severity of any accidents that occur.

Historical examples of speed limit changes in the United States and Aotearoa New Zealand provide valuable insights into the impact of speed on road safety outcomes. In the USA the repeal of federal speed limit controls on interstates in 1995 led to an increase in road fatalities on these highways by 4–9%. This stark contrast with the 16% reduction in road fatalities following the federal government's decision to lower interstate speed limits in 1974 underscores the critical role that speed limits play in ensuring road safety. Similarly, the decision in Aotearoa New Zealand to reduce open road speed limit from 60 mph to 50 mph (80km/h) in 1973 resulted in a significant decline in road fatalities by 37%. These statistics demonstrate the positive correlation between lower speed limits and improved road safety outcomes. A report by NZTA² recently showed a 133% increase in deaths and serious injury on the 110kph Cambridge Waikato Expressway.

NZTA estimates the cost of serious crash at \$923,000 and a single road fatality at \$4.9m.³ This is a preventable burden that can be minimised by adherence to existing road safety standards, including ensuring the use of seat belts and age-appropriate child restraints.

¹ [Safety — Road deaths | Ministry of Transport](#)- updated on 2 July 2025 12.01pm

² March 2024 WSP economic assessment of speed limit changes (including Cambridge Waikato Expressway). NZTA report released by OIA by University of Auckland.

³ NZTA CAS system. Monetised Benefits and Costs Manual (v1.7.2, Nov 2024)



It is also important to note that while advances in trauma care and injury control measures increase the likelihood of surviving serious crashes, the long-term non-fatal impacts on health loss, disability, and economic productivity, following serious crashes impose high costs to individuals, their families, the health system, ACC, and society.

While the potential increase in speed limits may facilitate better traffic flow, the paramount concern must be the safety of all road users. Caution must be exercised when considering increases in road speeds in New Zealand.

We urge that safety enhancements are prioritised in this decision-making process. Road speed limits should be focused on reducing crash risk and minimizing force of impact – lower speed has a significant contribution to this aim. The goal should be to establish speed limits that are safe for all road users while also considering the need for efficient travel.

Increasing the speed limit on SH1 Transmission Gully must be conditional on maintaining:

- ongoing compliance with the current Roads of National Significance design standards for a 110km/h road, including side barriers and off-road protection
- the current 90km/h speed limit for heavy vehicles and towing vehicles
- two lanes in each direction so other road users should be able to pass safely.

We recommend a review of all serious injuries and fatalities including external audit at two and four years with an acknowledged preparedness to reverse the 110km/h speed limit if deaths and serious injuries have increased.

THE PROPOSED 110KM/H SPEED LIMIT ON SH1 RAUMATI SOUTH

Our initial comments above in relation to Transmission Gully apply also to Raumati Straights.

The NZTA consultation document indicates the intention to use this current consultation process to finalise a decision on the appropriate speed limit for the Raumati Straights more quickly, ahead of possible safety improvements on this section of road.

We have been advised:

- the shoulder on the Raumati Straights section of SH1, especially when travelling north, is less than the width of a car
- the shoulder on both sides of the road will need widening to meet the Roads of National Significance design standards for a 110km/h road
- given the poor ground and existing barriers, it may be complicated and expensive to meet those design standards, including for side barriers and off-road protection.

The cost benefit analysis and the economic case for a 110km/h speed limit on SH1 Raumati South may differ significantly from the case for Transmission Gully.

The current consultation may give NZTA some useful information on the views of the community and other interested parties such as Trauma Surgeons. However, sourcing views in the absence of sufficient data to estimate likely impacts in a robust way defeats the intentions of the consultation process. Therefore, this process is inadequate to meet the requirements of the Land transport Rule: Setting of Speed Limits 2024.

The Trauma Committee **opposes** the proposed 110km/h speed limit on SH1 Raumati South until further consultation following completion of the safety improvements required to meet the Roads of National Significance design standards for a 110km/h road.

Chris Wakeman

Chair, Aotearoa New Zealand Trauma Committee