

13 May 2025

speedmanagement@NZTA.govt.nz

Copy: Hon Chris Bishop, Minister of Transport

Copy: Hon Simeon Brown, Minister of Health

Subject: Speed limit consultation on 16 Urban Connectors

Tēnā koutou

Te Whare Piki Ora o Māhutonga – the Royal Australasian College of Surgeons (RACS) is the leading advocate for surgical standards, professionalism and surgical education in Aotearoa New Zealand and Australia. The RACS Aotearoa New Zealand Trauma Committee is committed to preventing and mitigating the effects of fatalities and traumatic injury from road crashes. 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. Advocacy to reduce road trauma, improve road safety, and prevent and mitigate trauma-related injury are critical roles for RACS.

Road trauma has an ongoing and devastating impact on people, whānau, communities, clinicians, ACC, the health and welfare systems, and our society. Despite significant investment in road safety and trauma care, although the road death toll has been decreasing in Aotearoa, it was still higher in 2023 than ten years previously.¹

Road speed limit decisions, including the proposed reversal of speed limit reductions on the 16 designated sections of state highway categorised as Urban Connectors, should be based on cost benefit analysis showing the offset between social, economic, and fiscal costs of additional fatalities and traumatic injuries, and the intended productivity and other economic benefits from higher speeds. 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. We have provided this submission to assist with the analysis.

In the absence of transparent and publicly available cost benefit analysis in each case, the speed reviews on the 16 designated Urban Connectors will not include adequate Cost Benefit Disclosure Statements, and thus must not proceed.

RACS submission

RACS submits the proposed reversal of speed limits on the 16 designated Urban Connectors under consideration would be unsafe. The New Zealand Transport Authority (NZTA) cannot make a decision to reverse these speed limit reductions until adequate Cost Benefit Disclosure Statements are available. The current speed limits for the 16 designated Urban Connectors should remain in place beyond 1 July 2025.

¹ https://www.ehinz.ac.nz/assets/Surveillance-reports/Released_2024/2024-transport-injury-mortality-final.pdf

Land Transport Rule: Setting of Speed Limits 2024 (the Rule)

The NZTA website advises the speed review process for the 16 sections of state highway categorised as Urban Connectors must meet fully the requirements of the Rule for a future speed review.² This differentiates the 16 Urban Connector reviews from your previous consultations on speed limit reversals as the 16 specific reviews will require consideration of technical, safety, cost, and economic data, and require a Cost Benefit Disclosure Statement, alongside the local road user and community feedback.

Accordingly, to support the reviews, based on our specialist role within the healthcare system, we have provided technical advice on the impacts and costs driven by road trauma and on the benefits of reducing these. Further, we encourage the identification and robust analysis of better data to support future decisions on speed limits.

Context

Recent statistics³ paint a concerning picture of road safety in Aotearoa New Zealand:

- 342 fatalities in road crashes in 2023, an 8% decrease from 371 in 2022, but overall an increase on 10 years earlier
- a further decrease to 289 fatalities in 2024
- in the first 3 months of 2025 fatalities have returned to 2023 levels
- additionally, tens of thousands of people suffer injuries in road crashes each year, with approximately 40,000 hospital admissions annually including severe injuries such as traumatic brain injuries, spinal cord injuries, and amputations
- 50% of major trauma in Aotearoa New Zealand is transport related.⁴

Despite the introduction of numerous road safety initiatives, road trauma continues to be a significant public health and societal issue. It places a significant burden on the healthcare system, particularly in trauma care and rehabilitation, and causes immeasurable emotional distress to whānau and communities affected by these preventable tragedies.

The burden on emergency departments, emergency medicine specialists, trauma surgeons, nurses, and allied health services has a direct impact on the ability of the wider healthcare system to provide timely (within recommended guidelines) non-trauma and non-emergency related services due to the finite availability of health care resources.

Fatalities and traumatic injuries at different speeds

There is clear evidence of the correlation between speed and severity of trauma in road accidents, and a growing consensus regarding the importance of road safety, including lower speed limits designed to eliminate road fatalities and serious injuries.⁵ Research consistently shows the chance of a crash being fatal increases exponentially with increasing speed. The correlation between speed and severity of injuries is also well-established.

Refer Attachment.

Figure 2.6: Relationships between a motorised vehicle collision speed and probability of a fatality for different crash configuration.⁶

² [NZTA New Consultation on urban connectors](#)

³ [Ministry of Transport - Statistics and Insights - Road deaths, May 2025](#)

⁴ Trauma National Clinical Network 2025 – Annual Trauma Report -2023 to 2024

⁵ Wakeman et al 2024 Speeding towards danger_NZMJ_2 Aug 2024

⁶ [Austroads Guide to Road Safety Part 3: Safe Speed](#)

The roads in Aotearoa New Zealand are known for their challenging conditions, including winding roads, blind spots, and limited passing lanes. Crashes are more likely to occur at higher speeds as the stopping distance is longer, motorists have less time to react to changing conditions and are more likely to lose control of their vehicle. There is a high and increasing risk for motorcyclists.

Reverting to the higher speed limits on the Urban Connectors would only amplify the risks and dangers. It is imperative that we prioritise the safety of all road users by keeping speed limits at a level appropriate for the risk for these specific roads.

The impact of risks and vulnerabilities from increasing road speeds is also likely to be disproportionately greater for some communities. For example, rural communities often face unique challenges, with less safe infrastructure for pedestrians, children, older people and disabled people. In general, the severity of injuries is higher for road users who are not travelling in motor vehicles. It is essential to ensure our roads are fit for safe travel and the well-being of our diverse communities.

The signal to the community from Government reversing speed limit reductions is it is acceptable to drive faster. Government actions speak loudly, with devastating impacts.

We do understand the desire to improve travel times and the need for efficient transportation to drive economic growth. However, the effect of reducing speeds on travel times is commonly over-estimated. We firmly believe the long-term consequences of reversing the speed limit reductions outweigh any short-term travel time benefits.

Road trauma drives significant social costs

We know NZTA monetises costs and benefits to compare options for matters such as setting speed limits and infrastructure investments⁷, using the following unit values for crash costs:

- \$12.5 million per fatality (Value of a Statistical Life)
- \$660,000 per serious injury
- \$68,000 per minor injury.

For road trauma these calculations include costs of reduced individual productivity, medical resources (ambulance, emergency departments, hospitalisations, post-discharge support), ACC injury claims, legal system resources (investigations, court, imprisonment), vehicle loss and repairs; and the intention to incorporate comparable data as it becomes available.

RACS would like to see better collaboration, research, and targeted interventions to reduce the societal and economic impacts of road trauma. We need a more comprehensive approach to data collection, including routine linkage of data from the emergency response and pre-hospital retrieval, through acute and rehabilitation care; long-term monitoring of outcomes for road trauma survivors; and locating relevant data, including microdata in the Integrated Data Infrastructure.

We need to track wider and longitudinal costs including:

- for survivors – the cost of psychological and social support services to aid in the recovery process; welfare support; impact on educational achievement and income
- for whānau of survivors - counselling services and mental health support to address the psychological toll of road trauma, economic impacts of providing care
- for hospitals - the impact on emergency department wait-times and clearance times, and displacement of people on surgical waiting lists
- for the justice system – the impact on capacity of courts and availability of fixtures.

⁷ <https://www.nzta.govt.nz/resources/monetised-benefits-and-costs-manual/>; v1.7.2 8 Nov 2024

Our Commitment to Road Safety

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.

RACS submits the proposed reversal of speed limits on the 16 designated Urban Connectors under consideration would be unsafe. The New Zealand Transport Authority (NZTA) cannot make a decision to reverse these speed limit reductions until adequate Cost Benefit Disclosure Statements are available. The current speed limits for the 16 designated Urban Connectors should remain in place beyond 1 July 2025.

We are available to provide any additional information or support that may be required to address this matter effectively.

Nāku noa, nā

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RACS represents more than 8300 surgeons and 1300 surgical Trainees and Specialist International Medical Graduates across Aotearoa New Zealand and Australia. We are the accredited training provider in nine surgical specialities. Surgeons are also required by RACS and Te Kaunihera Rata o Aotearoa - Medical Council of Aotearoa, to continue with surgical education and review of their practice throughout their surgical careers.

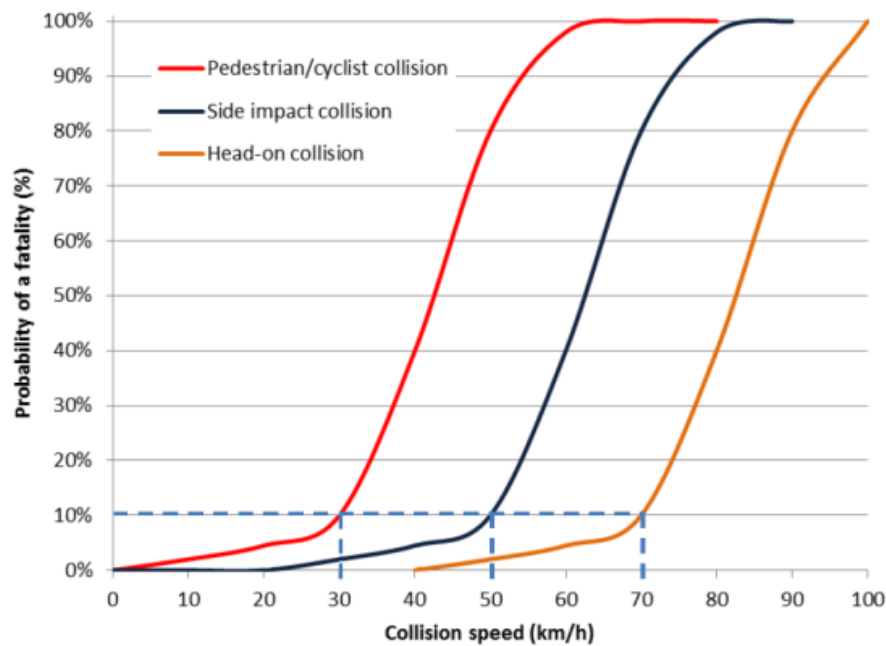
Austrroads Guide to Road Safety Part 3: Safe Speed.

Figure 2.6: Relationships between a motorised vehicle collision speed and probability of a fatality for different crash configuration.

2.1.3 Safe System speeds

The Wramborg curves (Wramborg 2005) have been adopted internationally to illustrate 'survivable' thresholds against impact speeds as shown in Figure 2.6. A 10% threshold for fatal outcomes was used as the basis for establishing a Safe System performance threshold. There is nothing to say that a threshold less than 10% would be inappropriate, however given the initial illustrative purpose of the curves, the 10% appears to have been universally adopted.

Figure 2.6: Relationships between a motorised vehicle collision speed and probability of a fatality for different crash configurations



Source: Jurewicz et al. (2015a) and based on Wramborg (2005)