



## **WCC REF TR25-26 Queen Margaret College Variable Speed Limit Scope Amendment**

### **Submission Opposing the Proposed Amendment**

**To:** Wellington City Council, Regulatory Processes Committee

**Date:** 28 January 2026

#### **1. Introduction**

The Thorndon Residents' Association (TRA) appreciates the opportunity to provide feedback on the proposed amendments to the variable speed limit signage on Hobson Street and surrounding streets. Our community strongly supports safe speed limits outside schools and the intent of the *Land Transport Rule: Setting of Speed Limits 2024* ("the Rule"). However, we oppose the proposed changes because they **fail to comply with the Rule, reduce pedestrian safety, and undermine the integrity of the original consultation and approval process**.

The proposal, as drafted, is not legally compliant and cannot be adopted in its current form.

#### **2. Summary of TRA Position**

The TRA **opposes** the proposed amendment because:

- The proposed sign location on Hobson Street is **only 60 metres** from the Queen Margaret College (QMC) hall entrance and adjacent pedestrian crossing, only **120 metres** from the school's main gate in Hobson Street, and only **120 metres** from the Pre-School's gate in Fitzherbert Terrace.
- The Rule **requires variable speed limit signs to be placed at least 150 metres from school access points**.
- WCC's own consultation document acknowledges this requirement, yet the proposed location **breaches the Rule**.
- The justification provided ("the bridge prevents installation at the approved location") is not sufficient grounds to shorten the legally required safety zone.
- The proposal would **reduce**, not improve, safety for students, parents, and pedestrians.
- The change undermines the integrity of the 2025 approval (TR86-25), which was based on a compliant and community-supported location.

For these reasons, the TRA requests that the Committee **reject the proposed amendment** and instruct officers to identify a compliant installation method at the originally approved location, otherwise lengthen the safety zone.

### **3. Statutory Non-Compliance**

#### **3.1 Requirement for 150m minimum distance**

The *Land Transport Rule: Setting of Speed Limits 2024* (in force from 30 October 2024) requires councils to implement safe variable speed limits outside school gates **within 150 metres on either side** of school entrances.

This requirement is **mandatory**, not discretionary.

The proposed amended sign location at the northern end of Hobson Street is:

- **60m** from the QMC hall entrance and the adjacent pedestrian crossing
- **120m** from the school's main gate
- **120m** from QMC's Pre-school's gate in Fitzherbert Terrace (no exit).

All distances fall **short of the 150m minimum**.

#### **3.2 Council's own consultation materials acknowledge the requirement**

WCC's consultation document states:

"These signs will need to be installed 150m from the school gate to be in line with the Rule."

Yet the proposed location does not meet this requirement.

A proposal that is **known to be non-compliant** cannot lawfully proceed.

#### **3.3 The Rule does not provide exceptions for engineering constraints**

The officers' justification, that the bridge prevents installation at the originally approved location, does not override statutory requirements.

If engineering constraints exist, the Council must:

- identify alternative compliant installation methods, or
- seek technical solutions (e.g., pole-mounted gantries, cantilevered brackets, foundation alternatives), not
- reduce the safety zone below the legal minimum.

### **4. Safety Impacts**

#### **4.1 Shortening the zone reduces pedestrian protection**

The proposed location places the start of the 30 km/h zone **much closer to the school**, reducing the distance available for drivers to slow down before reaching:

- the QMC hall entrance
- the pedestrian crossing used by students and the public
- the main school gate

This contradicts the stated purpose of the Rule:

**to slow vehicles before they reach school access points, not at the point of conflict or very near to it.**

#### **4.2 Increased risk at a known pedestrian crossing point**

The proposed sign location is merely 60 metres downhill from a pedestrian crossing heavily used by students to cross Hobson Street, and for accessing the school hall.

Placing the 30kph sign at the southern end of the bridge means drivers may still be travelling at 50 km/h when approaching children crossing the road.

This is inconsistent with Waka Kotahi guidance, which emphasises:

- **early speed reduction**
- predictable driver behaviour
- **maximising buffer distance** before pedestrian conflict points

#### **4.3 The proposal contradicts the Council's own “Impact” statement**

The consultation document claims the change:

“Improves pedestrian safety by slowing down vehicle speed around schools...”

However, the proposed location **does the opposite** by reducing the buffer zone and placing the sign closer to the hazard area.

### **5. Procedural Concerns**

#### **5.1 The original 2025 approval (TR86-25) was compliant and community-supported**

The originally approved location—mid-span on the Hobson Street bridge—was:

- compliant with the 150m requirement
- supported by the community
- consistent with the intent of the Rule

The current proposal seeks to overturn that decision **without adequate justification or consultation**.

#### **5.2 Engineering constraints should have been identified before the 2025 approval**

If officers now claim the bridge cannot support signage, this raises questions about:

- the adequacy of the original engineering assessment
- the robustness of the 2025 approval process
- whether alternative engineering solutions were properly explored

The community should not bear the consequences of internal process failures.

#### **5.3 The consultation is misleading**

The consultation asks for feedback on sign locations “near your place of residence”, but also states that signs “will need to be installed 150m from the school gate”.

The proposed location does not meet this requirement, meaning:

- the consultation presents an option that cannot legally be adopted
- submitters are being asked to comment on a non-compliant proposal
- the process risks being procedurally flawed
- the Council is applying the rule inconsistently

#### **5.4 Why wasn't the Association alerted sooner?**

We are concerned about the lack of early engagement. Keeping the community, including well-known contact points like the Residents' Association and QMC, out of the loop leads to drawn-out processes like this and fuels distrust. Obvious flaws and workable alternatives could have been identified months ago had an officer spoken with our community before cementing untested logic into a public consultation document. In short the consultation is asking for feedback on something that is non-compliant.

### **6. Practical Alternatives Exist**

The TRA urges the Committee to require WCC officers to consult with the Association and other key stakeholders, and to explore compliant alternatives, including:

- engineering solutions enabling installation at the originally approved bridge location
- alternative mounting systems (e.g., cantilevered poles, bridge-side foundations, lightweight LED units)
- relocating the sign further north to meet the 150m requirement
- using existing infrastructure (e.g., lighting poles) where structurally suitable

Other councils have successfully installed variable speed signage in constrained environments.

Wellington has an opportunity to do the same.

## 7. Conclusion and Requested Decision

The Thorndon Residents' Association respectfully requests that the Regulatory Processes Committee:

1. **Reject the proposed amendment** to shorten the northern end of the Hobson Street / Fitzherbert Terrace variable speed limit zone.
2. **Direct officers to identify a compliant installation method** that, as a minimum meets the statutory requirement.
3. **Reaffirm the intent of the 2024 Rule** to maximise safety for students and other pedestrians.
4. **Ensure future proposals are developed in close engagement with the community to ensure they are fully compliant before launching any formal consultations (like this)**, to maintain public confidence in Council processes, help restore trust in the corporation's competence, and in the CEO's role as the **local roads controlling authority**.

The Thorndon Residents' Association supports safe speeds outside schools.

The TRA cannot support a proposal that is

- **non-compliant**,
- **unsafe, and**
- **procedurally flawed**.



m: [027 224 3041](tel:0272243041)  
 e: [contact@thorndon.org.nz](mailto:contact@thorndon.org.nz)  
 w: [thorndon.org.nz](http://thorndon.org.nz)

## Appendix One – photos with comments



**60m** from the end of the Hobson St bridge to the front door of the College's hall, the pedestrian crossing, and the intersection with Fitzherbert Tce (pre-school entrance is out of view). The College's main front gate is beside the red car; a mere **120m** distant.



Motorists pop over the arch of the Hobson Street bridge from Tinakori Road, and ample move at pace downhill through this narrow street. A children's playground is also tucked behind the trees; in front of the angle-parked cars. The proposed amended 30kph sign location for the VSL is too near to this entrance to the school.

**Location:** Hobson street – Outside 89 and 90 Hobson Street



**Location:** Hobson street – Outside 89 and 90 Hobson Street



*Time periods, sign location, size, and placement shown on the images are indicative only.*

These *indicative* illustrations in the consultation document contain significant inconsistencies that undermine their reliability.

In the top image, the right-hand signpost is shown on the bridge itself, adjacent to the dark grey car. In the lower image, the same signpost appears in a completely different location, near a silver car, south of the bridge and well past the entrance to Katherine Mansfield Memorial Park; notably closer to the school.

Such discrepancies can materially affect how readers interpret the proposal. When a regulatory change depends on precise spatial context, inconsistent imagery creates ambiguity that is both avoidable and inappropriate for a robust public consultation. The Association believes that clear, accurate, and internally consistent documentation is essential to ensure the public can meaningfully evaluate what is being proposed.

Regardless of these errors, the Association considers that the proposed signage locations would be too close to the school if they were installed at this end of the bridge.