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The Ministry of Transport Te Manatu Waka
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Submission on Setting of Speed Limits Rule 2024

New Zealand Transport Agency Waka Kotahi, as a Road Controlling Authority (RCA), welcomes the opportunity to provide feedback on the draft Rule, drawing on its significant experience as an RCA undertaking speed management for state highways, and providing advice to others who either develop policy and guidelines or manage speed on their own road networks.

We have identified areas where for practical reasons changes could be considered or clarification provided to make the rule more efficient and more workable.

1. Requirements for cost benefit analysis (CBA) for speed limit change.

A CBA can be a time-consuming and costly task, for example it took several months to complete for SH5. Under the draft Rule, a CBA would be required even for small sections of road such as the edges of townships (where land use may have changed) or for on and off ramps (less than 30 metres). We recommend a minimum threshold length be specified before a CBA applies so a CBA is not required for short lengths. We recommend that a CBA is not required for lengths less than 500 meters as this will allow for short sections at on ramps and off ramps as well as edges of towns where land use has changed nothing that consultation will still be required.

To reduce cost, it is proposed that the new tool for calculating a CBA is embedded in "MegaMaps" so the suitable speeds and CBA are identified/assessed together in a consistent way by all RCAs. This would significantly simplify the process as well as create significant cost savings. Inclusion of vehicle operating costs (a standard value) and financial impacts of crashes (a consistent value) would make the CBA more balanced.

Recommendation: that there is a minimum length of 500 meters before requiring a CBA.

Recommendation: that vehicle operating costs and financial impacts of crashes on the network are also included in the CBA analysis.

Recommendation: the new tool for calculation of CBAs is embedded in MegaMaps.

2. Tighten and clarify consultation requirements.

As drafted, both full public consultation and targeted consultation is required (and captures a broad range of people). This has serious cost and time implications. Consultation should be a tight and efficient process. Clause 3.10 (6) of the draft rule does not include NZTA in the description "nothing in this Rule requires a regional council or territorial authority to consult in accordance with section 83 of the Local Government Act 2002". To avoid confusion, this should also be clarified for NZTA as an RCA.

Recommendation: A more targeted approach for seeking public feedback is developed that allows for an efficient process.

Recommendation: Clause 3.10 (6) 'including NZTA' or 'a road controlling authority' for clarity.

3. Require variable speed limits outside school gates

The Draft has set times for all school speed sign activations and only around a set distance from the school gate. This creates a number of practical problems covered below:

The evidence indicates that longer periods of reduced speed limits, where there is no obvious reason, can lead to driver frustration and non-compliance. Some schools may prefer to choose shorter times, and this is not available under the draft Rule.

Longer lengths of roads subject to VSL speed limits, particularly when there is a cluster of schools, will avoid repeated speeding up and slowing down along shorter stretches. A re-instatement of a 10-20 minute period outside of drop-off and pick-up times if the number of students outside the school gate can justify the variable speed limit being switched on would reduce risk to students, for example, many private schools start early, and students are being dropped off around 7.30 am.

The ability to operate VSLs outside of before and after school defined travel periods in the event of an emergency, for example the approach taken during the Christchurch earthquake, could be allowed for. The draft Rule also refers to speeds being set around the school gate. The risk at a number of schools on the state highway is not around the gate but is at the nearest crossing which could easily be beyond the distance set in the draft. Some flexibility could be allowed for this scenario.

Recommendation: Allow schools to choose operating times within the defined school periods.

Recommendation: Longer lengths are allowed where there are clusters of schools.

Recommendation: Re-instatement of a 10-20 minute period outside of drop-off and pick-up times if the number of students outside the school gate can justify the variable speed limit, at the discretion of the Director.

Recommendation: That the Rule provides for VSLs to operate outside of defined school periods, in emergencies, at the discretion of the Director.

Recommendation: Allow for distances to include major crossings or road patrol / Kea crossings for schools.

4. Changes to speed limits classifications

The One Network Framework (ONF) is an approach that is used by all RCAs to that brings together movement and place elements on a road or street. The draft Rule and ONF have different classifications that, in places, do not align. For example:

- on-ramps and off-ramps, which have speed limits set with very short distances in relation to adjoining roads, should automatically align with/default to the local road or state highway speed limit they are linking to. For example, a ramp will have two speed limits to transition between the faster state highway speed and an adjoining slower local road speed. Under the current draft, the whole ramp would become the higher of the two speeds and does not consider the transition between the two road types. There would be a need to have two classifications for ramps and undertake CBA assessments for extremely short lengths of road - around 30 meters.
- Expressways in the draft Rule currently have multiple classifications and different speeds: specifically, the potential overlap between Class 9 Interregional connections and the Class 10 "expressways" – currently a road could be both because expressways are not classified in the ONF in this way.

Recommendation: Only one classification method is used for determining speed limits, preferably ONF.

Recommendation: If ONF is used as the classification system, an additional classification in ONF for expressways should be considered.

Recommendation: On-ramps and off-ramps should be considered in the same way as schools and new road alignments (Clause 2.6 (4))

5. Reverse recent speed limit reductions

To make the process more efficient so speed changes are not reversed where there is existing public demand, and then consequently public demand or other reasons have them reinstated in the next planning process, it is recommended that:

a. Consideration be given to short speed changes to be retained in 'urban connectors' where local communities have strongly campaigned for reductions. For example, SH30 Lake Rotomā where the local community and local council called for and continue to support the reduction and extension of the 100km/h and 70km/h speed limits to 60km/h through the township.

Recommendation: Urban connectors, where there is public support, can retain short sections.

b. Consideration could be given to retaining speed limits on urban connectors where the amended speed limit is already within the range of speeds allowed in the draft Rule. For example, an urban connector with a previously posted 70km/h limit which has been reduced to 60km/h would be reversed. However, as the proposed urban connector classification range is 50km/h to 80km/h, we would offer that the 60km/h is retained.

Recommendation: where the speed is already within the new recommended speed classification range, that these can be retained.

c. For some inter-regional connectors, parts of speed changes may be publicly supported. For example, on State Highway 57 the short section at the retirement village has been lowered to 80km/h and is very well supported. It would be appropriate to retain this section even if there is no broader public acceptance of the whole 80km/h change.

Recommendation: that small retentions are allowed to cater for situations like this.

d. The reversals could allow for the limit changes to occur at an appropriate change of environment (as is required under the rule - cl 4.8). This is particularly important for rural settlements and urban fringes to avoid speed changes that are abrupt and unpredictable. This will be particularly true where speeds were adjusted because of changes in the environment e.g., expansion of a town.

Recommendation: that RCAs have some discretion around the actual threshold of the reversal so they can meet cl 4.8.

e. Across all RCAs, speed changes may have been associated with infrastructure changes e.g., intersection changes, cycleways. Reversing these may require the infrastructure to be amended, otherwise the speed would be unsafe given the environment.

Recommendation: RCAs can note where significant infrastructure changes have occurred and seek to have the speed limit retained around the infrastructure or, allowed time to make appropriate changes to the infrastructure to allow for the increased speed.

f. There will be a need for NZTA to align all the speed changes with other RCAs and it is unlikely that there will be time to co-ordinate technical reviews, engagement with other RCAs and consultation (where required) in the timeframe set out.

Recommendation: that there is an extended timeframe to engage with other RCAs so speed changes are aligned across various networks.

g. State highways have in the order of 300 administrative corrections that removed the ambiguities contained in the bylaws during the National Speed Limit Register (NSLR) data migration process and ensured the bylaw records aligned with the actual sign locations. Most of these are less than 100m and should not be considered as

'amended speed limits'. If not, this would be a significant burden for what we consider to be an unintended outcome of the NSLR data migration process.

Recommendation: that administrative changes that were undertaken as part of the creation of the NSLR are not considered speed changes for reversal.

h. The timeline to reconsult on speed changes that are to be kept and then submitted to the Director of Land Transport by the beginning of March is extremely tight. It would require consultation before December this year and given the Rule may only be approved and in place by the end of September, there is very little time to assess changes and then consult.

Recommendation: The timeline for speeds that are to be reconsulted is extended.

i. NZTA notes that the new speed reversals are to be uploaded into the NSLR by the RCA. It be more efficient if the Regulator / Geospatial team could upload these as a bulk in the pre-production platform. This would be extremely beneficial for all RCAs and save significant costs across all RCAs.

Recommendation: that speed changes for all RCAs is managed centrally.

j. The timeframe from the Director certifying any speed changes (1 May 2025) and these being implemented (1 July 2025) is extremely short for works to be scheduled for all RCAs. Most RCAs will be using the same pool of contractors. It is unlikely that *all* speed changes will be implemented across the country in just two months. If RCAs are unable to make the changes in time, it is likely that the speed record will not align with the signage, and speeds in these areas will therefore not be enforceable. Additionally, police will not know what areas are enforceable or not, possibly leading to general confusion as to any speed's enforceability. Additionally, the cost for all RCAs to make all these changes over such a short period of time is likely to result in significant price escalation.

Recommendation: the time to implement speed changes is reconsidered.

Speed Management Committee

With the Speed Management Panel, The Speed Management Committee and the Directors own review, NZTA's proposals are assessed three times.

Recommendation: NZTA would welcome discussion on an alternative process that would be more efficient and only have one point of review.

Regional speed management plans (RSMP)

The experience under the current rule is that there will be misalignment on timings for the various RCAs and Regional Transport Committees leading to RCAs opting to deliver their own plans unless RSMPs are optional.

Recommendation: RSMPs are optional.

Speed Management Plans

It is not clear in the draft Rule what constitutes a plan, for example if NZTA were to do regional planning and this is then considered a plan, the requirement for a review every three years would be onerous.

Recommendation: What constitutes a speed management plan is defined.

Higher speed limits on certain roads

NZTA notes there aren't any roads in New Zealand that are constructed for 120km/h speed limit and the cost to upgrade or build for 120km/h is likely to be considerable. This is because roads at these speeds would need to be straighter and flatter with wider shoulders to provide an acceptable level of safety and visibility, resulting in greater land take.

Impact on RCAs

The cost to change signage will be significant. We anticipate that across all RCAs there may be several thousand changes to signs required, as one speed change may result in numerous sign changes and location changes (both removal of signs and new signs).

Recommendation: RCAs are funded to develop and implement speed reversals and speed management plans.



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PROACTIVELY RELEASED