

From: [Olivia Kitson](#)
To: [Jo Gould](#); [Anita Waring](#); [Joanna Heard](#)
Cc: [Anna Cleary](#); [Eden Christie](#); [Lucy Young](#); [Iain Feist](#); [Official Correspondence](#)
Subject: CAB-531 RESPONSE
Date: Thursday, 15 February 2024 8:49:05 AM
Attachments: [image004.png](#)
[QC240121 Update on the 100-day commitment to stop blanket speed limit reductions - Cabinet Paper WK comments.docx](#)
[image003.png](#)

Please refer to document 2a in the document schedule.

Mōrena wāhine mā

Thank you for the opportunity to comment on this draft Cabinet paper, particularly given the short amount of time you've had to prepare this. We have provided comments and suggested edits in the attached document. Our main comments are set out below, we are happy to discuss further if you need.

- We note that the paper refers to a proposed requirement for all RCAs to reassess all speed limit changes made in recent years (paragraphs 1 and 7) – this is much broader than has been discussed previously, with reviews limited to specific areas, eg around schools. Requiring all changes to be reviewed would be a significant undertaking, requiring a lot of cost and effort for RCAs and Waka Kotahi. It would be beneficial to be more specific about how far back the Minister expects RCAs to go here – “recent years” or “recently” is quite vague, elsewhere in the paper there is reference to going back as far as the introduction of the 2017 Rule. Alternatively we suggest the paper note that further policy work will consider ways to minimise the work impact of this proposal – for example by considering a specific time period.
- In relation to costs for RCAs, we have looked into potential costs for undertaking a CBA for speed limit changes since 2017 - Most, if not all, RCAs do not have the in house expertise necessary for an informed economic analysis of speed limits. They would need to contract professional services at their typical rates. The total cost would depend on the scale of changes to be reviewed, the availability of data, the need to pay Tom Tom licensing fees for speed data, and analysis. In many cases the changes may be too recent to use post-implementation crash data, so additional modelling would be required to estimate death and serious injury reductions. Given the amount of variables involved, it is not possible to provide an estimate of the average cost per RCA within the time available, but it would be expected to run into the hundreds of thousands of dollars and likely millions of dollars at a national level. We suggest the Cabinet paper note in the Financial Implications section that the proposal to require CBAs for speed limit changes will have cost impacts for RCAs, and officials intend to develop more detailed estimates as part of the regulatory impact statement – this brings us to another question, will a RIS be prepared for the new Rule?

Out of Scope

- We have noted in paragraph 8.6 that there will be some contractual repercussions for raising speed limits to 110km on expressways – I think we have outlined this before, so

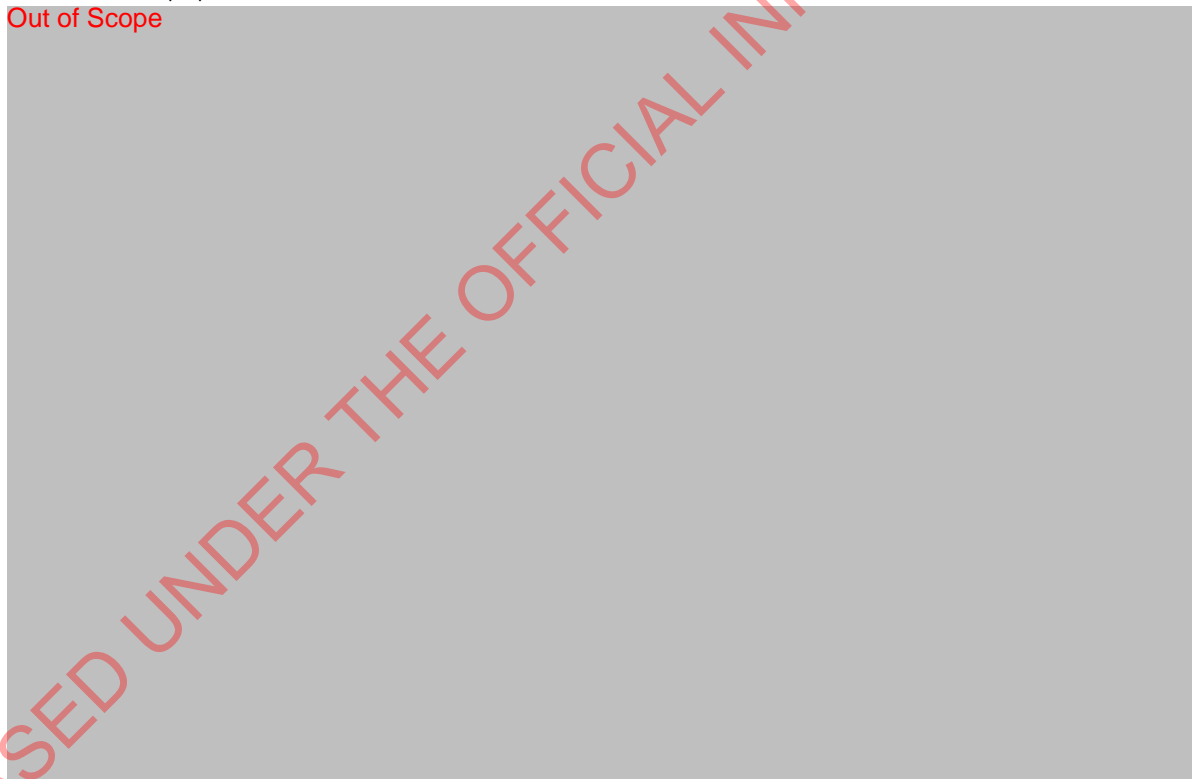
probably just worth keeping in mind, as it will need to be addressed at some stage.

- **Out of Scope**



- We consider that while there may not be direct financial implications from this particular proposal, there may be some financial implications further down the line, depending on what the new rule requires of the Director and the Agency (more resourcing will likely be needed, eg economic analysis expertise, support for the Director with any new requirements with certification). We have suggested some additional commentary on this in the paper.

Out of Scope



Ngā mihi

Olivia

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From: Jo Gould <J.Gould@transport.govt.nz>

Sent: Wednesday, February 14, 2024 11:07 AM

To: Anna Cleary <Anna.Cleary@nzta.govt.nz>; Olivia Kitson <Olivia.Kitson@nzta.govt.nz>; Eden Christie <eden.christie@nzta.govt.nz>; Lucy Young <Lucy.Young@nzta.govt.nz>; Iain Feist <Iain.Feist@nzta.govt.nz>; DONALDSON, Bronwyn <Bronwyn.Donaldson@police.govt.nz>

Cc: Anita Waring <A.Waring@transport.govt.nz>; Joanna Heard <J.Heard@transport.govt.nz>

Subject: RE: Urgent Cabinet paper for comment by 9am Thur: policy direction for new Setting of Speed Limits Rule

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Kia ora koutou

Please find attached the draft paper. For comment as soon as you can please, but by 9 am tomorrow at the latest so we can finalise the paper and get it through our sign-out process. The paper aligns closely with the briefing, so should hold no surprises!

Thanks so much. And apologies for the short turnaround.

Ngā mihi, Jo

From: Jo Gould

Sent: Tuesday, February 13, 2024 10:54 AM

To: Anna Cleary <Anna.Cleary@nzta.govt.nz>; Olivia Kitson <Olivia.Kitson@nzta.govt.nz>; Eden Christie <eden.christie@nzta.govt.nz>; Lucy Young <Lucy.Young@nzta.govt.nz>; Iain Feist <Iain.Feist@nzta.govt.nz>; DONALDSON, Bronwyn <Bronwyn.Donaldson@police.govt.nz>

Cc: Anita Waring <A.Waring@transport.govt.nz>; Joanna Heard <J.Heard@transport.govt.nz>

Subject: Urgent Cabinet paper coming your way tomorrow: policy direction for new Setting of Speed Limits Rule

Kia ora koutou

Just a heads up that the Minister has asked us to prepare an urgent paper informing Cabinet of the key changes the Minister plans to make in the new Setting of Speed Limits rule. This will reflect the content of the attached briefing that our Waka Kotahi colleagues saw last week. We are also looping you in Bronwyn, as we know Police also has an interest in these issues.

Anita is drafting the Cabinet paper today, and we hope to send it out tomorrow for comment.

We have to get this over to our Minister's Office on Thursday (aiming for the new Cabinet Economic Policy Committee on 28 Feb), so will need any comments back pronto.

Thanks in advance, Jo

Jo Gould ([she / her](#))

M: [s 9\(2\)\(a\)](#) | E: j.Gould@transport.govt.nz | transport.govt.nz

My normal working hours are 7:30 am – 3 pm



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