

From: Jo Gould <J.Gould@transport.govt.nz>
Sent: Tuesday, 20 February 2024 3:02 pm
To: Anna Cleary; Olivia Kitson; Eden Christie; Lucy Young; Iain Feist
Cc: Joanna Heard; Anita Waring; Hugh Mazey; Mieke Welvaert; Andrew Challis
Subject: Speed Rule discussion yesterday
Attachments: **Out of Scope** Speed issues for discussion with NZTA 19 Feb 24.docx

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Kia ora kōtou

Thanks so much for your contributions at the meeting on the new setting of speed limits rule yesterday.

Please find attached the documents we went through. It was rightly pointed out that we need to include the development of guidance in the timeline doc – as NZTA will lead on this, if you can suggest an indicative timeframe I'll add that in. Ideally, we would need new guidance ready to go as soon as the new Rule is in force. If this isn't possible, what's a realistic timeframe for its development?

For the issues document, I've updated this to include the MOT contact leading work in the issues (this may change a little once Hugh is back later this week, as he hasn't had a chance to input into this yet). NZTA is down to lead on the possible amendments to the rule in light of operational feedback from RCAs.

In terms of next steps, we will be working our way through the list of issues over the next few weeks. If there is any operational input you can contribute to these issues, please contact the MOT lead. I mentioned a few things yesterday (eg the number/scope of speed limit changes that have been made since the 2017 rule came into force that would be subject to potential reversal under the new regime). It might also be useful to indicate a NZTA lead for each issue, so we have a point of contact if questions arise as we are working through the issues.

Hope that all makes sense – if not, sing out.

Ngā mihi, Jo

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



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Topic	Issue/ Possible Approach	MOT Lead
Purpose	<p>[DRAFT] The new Rule will require an amended overall purpose/objective, for example, to:</p> <ul style="list-style-type: none"> a. introduce a targeted approach to setting speed limits, focusing on areas with high safety concerns and public acceptability; and b. require RCAs, when setting speed limits, to consider safety, economic considerations (including travel time impacts) and the views of road users and the community; and <p>Out of Scope</p>	
Require cost benefit analysis using consistent criteria	<p><i>Ensuring a stronger economic focus by requiring cost benefit analysis using consistent criteria to be undertaken when setting speed limits</i></p> <ul style="list-style-type: none"> • methodology, relevance to the process (see below) • Minister is clearly interested in travel time implications of any proposed speed limit change. Benefits include reductions in crashes and casualties. What about other economic impacts (greenhouse gas emissions, fuel consumption, pollution, noise, etc)? • How are the costs and benefits defined in the Rule? What guidance will be provided to RCAs? CBA tool? • How do we treat increased travel time? As a cost, or a disbenefit? This is relevant if RCAs are doing a benefit cost ratio.¹ • Will the CBA cover individual roads/areas/the complete package of speed limit changes that are being proposed? 	Jo/Mieke

¹ This article provides a useful illustration of the two different approaches, based on the (flawed) Wellington City Council cost benefit analysis: <https://tailrisk.co.nz/documents/speedlimitreductions.pdf>. With road safety benefits estimated to be \$529M, costs of increased travel time estimated to be \$327M and Council costs of \$44.8M, using a “conventional” BCR calculation results in a ratio of 1.4 ($\$529/(\$327 + \$44.8)$). The Council calculated the BCR by deducting the travel time costs from the road safety benefits to provide a net benefit number, and dividing this by the Council costs (which would work out to be $(\$529 - \$327)/\$44.8 = 4.5$). The WCC approach seems to align with the Waka Kotahi monetised benefits and costs manual (where costs are limited to expenditure on planning and investigation, delivery, maintenance, operation and renewal, while all the negative impacts are treated as disbenefits and essentially deducted from any positive benefits), but is inconsistent with the Treasury approach.

Safety considerations	Does the new Rule need to set out a definition of what is a safe and appropriate speed? Currently, this is left to the general guidance and information developed and maintained by NZTA. Given the pivotal role SAAS play in setting speed limits, the Rule could set the parameters/broad criteria for SAAS.	Jo
Out of scope		
Weight of decision making	Do we specify weight given to CBA, safety, consultation feedback? Should the Rule just mandate that these factors must be considered by the RCA/RTC when setting speed limits?	Anita
Targeted approach	<p><i>Ensuring a targeted approach to any speed limit reductions is taken, focusing on areas with high safety concerns and public acceptability</i></p> <ul style="list-style-type: none"> How do we define and identify roads/areas of high safety concern in the new rule? Does the Rule require RCAs (etc) to identify these areas (according to criteria set out in the Rule) and proactively address them? 	Hugh

Out of scope

	<p>Or will this be left up to RCAs (etc) to determine, taking in account anything in the GPS or any Government road safety strategy?</p> <p>(The current rule enables (but does not mandate) a targeted approach by requiring RCAs (etc) to have regard to the road safety aspects of the GPS on land transport, any Government road safety strategy and NZTA guidance. Do we want to retain this flexibility?)</p>	
<p>Out of Scope</p>		
Reverse certain urban speed limit reductions	<p><i>Requiring speed limits that have been reduced in urban areas since the introduction of the Land Transport: Setting of Speed Limits Rule 2017 to be reversed, except where the reduced speed limits are:</i></p> <ul style="list-style-type: none"> <i>a. outside school gates</i> <i>b. on main streets in town centres</i> <i>c. in targeted areas where there is strong evidence to support the reduced speed.</i> <p>The expectation, outlined in Accelerate NZ, is that this will result in many local roads that have had their speed limits reduced to 30 km/h will be restored to 50 km/h.</p>	Hugh

	<ul style="list-style-type: none"> what amounts to “strong evidence to support the reduced speed” – consider safety, economic considerations (including impact on travel times), views of road users/the community, impact on mean operating speed, any infrastructure changes to support the lower speeds? Anything else? Or a by exception process, where all speed limits revert back to what they were before the change? Defaults unless specific criteria applies? what is the vehicle for reversing these changes? Are we reverting to default speed limits in some instances, or an abridged plan/amendment process? And the timeframe for RCAs to review/reverse? <p>(See table below for current 30 km/h Speed Limit Zones in the National Speed Limit Register)</p>	
Reverse speed limit reductions on State highways	<p><i>State highways that have had speed limits reduced since the introduction of the Land Transport: Setting of Speed Limits Rule 2017 to be reversed, retaining only targeted reductions where there is strong evidence to support the reduced speed</i></p> <p>The expectation, outlined in Accelerate NZ, is that this will result in many state highways that have had their speed limits reduced to 80 km/h will be restored to 100km/h.</p> <ul style="list-style-type: none"> Issues as outlined above 	Hugh
Out of Scope		
110 km/h expressways	<p><i>Enabling expressways to have 110 km/h from inception where they are engineered to safely have this speed limit and reviewing existing expressways to ensure they are set at the highest speed limit they are engineered to safely hold (where possible)</i></p> <p>Is a Crown Entities Act direction from the Minister a more efficient way to target some of the proposed policy direction i.e. the review of expressways (or wording to be defined) with a view to raising them to 110km/h</p>	Jo
Out of scope		

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