

From: [Eden Christie](#)
To: [Hugh Mazey](#); [Anna Cleary](#); [Olivia Kitson](#); [Official Correspondence](#)
Cc: [Jo Gould](#); [Joanna Heard](#); [Anita Waring](#); [Andrew Challis](#)
Subject: BRI-3007 RESPONSE
Date: Tuesday, 12 March 2024 2:06:45 PM
Attachments: [image001.png](#)
[12 March Speed briefing appendix.docx](#) Please refer to **document 5a** in the document schedule.
Out of Scope

Kia ora koutou

Thank you for the opportunity to comment on this draft briefing and draft appendix. We have provided feedback in the attached documents, with our substantive comments at the top of the appendix.

Ngā mihi

Eden

Eden Christie

Senior Policy Advisor, Regulatory Policy

Policy and System Planning | System Leadership

Email: eden.christie@nzta.govt.nz

Phone: s 9(2)(a)

Mobile:

Waka Kotahi NZ Transport Agency

44 Bowen Street

Private Bag 6995, Wellington 6141, New Zealand

[Facebook](#) | [Twitter](#) | [LinkedIn](#)

From: Hugh Mazey <H.Mazey@transport.govt.nz>

Sent: Monday, March 11, 2024 2:05 PM

To: Eden Christie <eden.christie@nzta.govt.nz>; Anna Cleary <Anna.Cleary@nzta.govt.nz>; Olivia Kitson <Olivia.Kitson@nzta.govt.nz>; Official Correspondence <Official.Correspondence@nzta.govt.nz>

Cc: Jo Gould <j.gould@transport.govt.nz>; Joanna Heard <j.heard@transport.govt.nz>; Anita Waring <a.waring@transport.govt.nz>; Andrew Challis <a.challis@transport.govt.nz>

Subject: RE: Appendix to approach briefing

Kia ora again koutou

Briefing attached now too

Ngā mihi

Hugh

Hugh Mazey (he / him / Mr)

M: s 9(2)(a) | E: h.mazey@transport.govt.nz | transport.govt.nz



TE MANATŪ WAKA
MINISTRY OF TRANSPORT

Hāpaitia ana ngā tāngata o Aotearoa kia eke
Enabling New Zealanders to flourish

From: Hugh Mazey

Sent: Monday, March 11, 2024 1:01 PM

To: Eden Christie <eden.christie@nzta.govt.nz>; Anna Cleary <Anna.Cleary@nzta.govt.nz>; Olivia Kitson <Olivia.Kitson@nzta.govt.nz>; Official Correspondence NZTA <official.correspondence@nzta.govt.nz>

Cc: Jo Gould <j.Gould@transport.govt.nz>; Joanna Heard <J.Heard@transport.govt.nz>; Anita Waring <A.Waring@transport.govt.nz>; Andrew Challis <A.Challis@transport.govt.nz>

Subject: Appendix to approach briefing

Importance: High

Kia ora koutou,

Thank you for all your work to date!

Attached is the draft appendix to be attached to the briefing which outlines a recommended approach to the matters covered off through the Cabinet paper.

The briefing basically just outlines at a very high level what the table does.

We have had direction this morning that the intent it for permanent 30s outside schools that have already been changed to be made variable.

The table is likely to be shortened still and has not been QA'd yet so please don't worry about QA comments, if comments could focus on substantive issues/suggestions to ensure workability of the proposals that would be excellent.

Could we please have comments back by **1pm tomorrow**, apologies for the tight timeframe!

Nāku noa, nā

Hugh

Hugh Mazey ([he / him / Mr](#))

Kaitohutohu Matua | Senior Adviser

Safety

Te Manatū Waka Ministry of Transport

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



Hāpaitia ana ngā tāngata o Aotearoa kia eke
Enabling New Zealanders to flourish

MINISTRY OF TRANSPORT

Wellington (Head Office) | Ground Floor, 3 Queens Wharf | PO Box 3175 | Wellington 6011 | NEW ZEALAND | Tel: +64 4 439 9000 |

Auckland | NZ Government Auckland Policy Office | 45 Queen Street | PO Box 106238 | Auckland City | Auckland 1143 | NEW ZEALAND | Tel: +64 4 439 9000 |

Disclaimer: This email is only intended to be read by the named recipient. It may contain information which is confidential, proprietary or the subject of legal privilege. If you are not the intended recipient you must delete this email and may not use any information contained in it. Legal privilege is not waived because you have read this email.

Please consider the environment before printing this email.

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

NZTA Substantive Feedback

Out of Scope

Cost benefit analysis

- Undertaking a CBA will be a big change for RCAs. Many of them are not familiar with the Treasury approach, and most RCAs lack the capacity and capability to complete CBAs on their own.
- If the Rule is explicit about what CBA framework to use, we will need to consider providing clear guidance for RCAs and potentially look at other ways to support them to complete assessments e.g. developing a CBA tool.
- One possible solution is to develop a simplified CBA procedure for speed limit changes including injury, travel time, vehicle operating costs and network disruption where this is potentially significant. It would be consistent with the NZTA approach to CBA and simplified over the Treasury CBA. The main difference is that it would not use the Treasury approach of putting disbenefits on the bottom line of the BCR.

Safe and appropriate speeds (SAAS)

- Suggest this section sets out the decisions we want the Minister to make on the approaches outlined as separate options for the Minister. This clear identification will give clarity on preferred options, making drafting easier.

Out of Scope

Schools

Out of Scope

- Electronic variable speed limit signs would involve costs for RCAs e.g. approx. \$70,000 combined cost of purchasing the signs and getting them installed (infrastructure, construction, traffic management etc) (excluding ongoing operation and maintenance costs)

Speed limit reversals local RCAs

- We suggest the appendix make the following risks with the proposals regarding speed limit reversals by local RCAs be made clearer:

Out of Scope

- o Many RCAs have local data demonstrating fewer deaths and serious injuries on local roads where speed limits were reduced. Reversing these speed limits without accompanying improvements in safety infrastructure is likely to increase deaths and serious injuries.

Speed limit reversals on State highways

- The risks and issues noted above in relation to local RCAs also applies for NZTA as RCA for State highways.

Out of Scope

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982