

**From:** [Hugh Mazey](#)  
**To:** [Olivia Kitson](#); [Jo Gould](#); [Anita Waring](#); [Joanna Heard](#); [Andrew Challis](#)  
**Cc:** [Anna Cleary](#); [Amy Moorhead](#); [Eden Christie](#); [Iain Feist](#)  
**Subject:** RE: Proposed amendments to Speed Rule re technical requirements for 110 and 120km/h speed limits  
**Date:** Friday, 20 September 2024 4:10:37 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Kia ora e hoa,

Confirming receipt, thanks for sending this through!

Ngā mihi

Hugh

**Hugh Mazey** (he / him / Mr)

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



**TE MANATŪ WAKA**  
MINISTRY OF TRANSPORT

Hāpaitia ana ngā tāngata o Aotearoa kia eke  
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**From:** Olivia Kitson <[Olivia.Kitson@nzta.govt.nz](mailto:Olivia.Kitson@nzta.govt.nz)>

**Sent:** Friday, September 20, 2024 3:37 PM

**To:** Hugh Mazey <[H.Mazey@transport.govt.nz](mailto:H.Mazey@transport.govt.nz)>; Jo Gould <[J.Gould@transport.govt.nz](mailto:J.Gould@transport.govt.nz)>; Anita Waring <[A.Waring@transport.govt.nz](mailto:A.Waring@transport.govt.nz)>; Joanna Heard <[J.Heard@transport.govt.nz](mailto:J.Heard@transport.govt.nz)>; Andrew Challis <[A.Challis@transport.govt.nz](mailto:A.Challis@transport.govt.nz)>

**Cc:** Anna Cleary <[Anna.Cleary@nzta.govt.nz](mailto:Anna.Cleary@nzta.govt.nz)>; Amy Moorhead <[Amy.Moorhead@nzta.govt.nz](mailto:Amy.Moorhead@nzta.govt.nz)>; Eden Christie <[eden.christie@nzta.govt.nz](mailto:eden.christie@nzta.govt.nz)>; Iain Feist <[Iain.Feist@nzta.govt.nz](mailto:Iain.Feist@nzta.govt.nz)>

**Subject:** Proposed amendments to Speed Rule re technical requirements for 110 and 120km/h speed limits

Kia ora koutou

Apologies for the delay on this! We have tested the proposed amended wording for the new Speed Rule as discussed, to check whether it is workable, on the basis that NZTA is the only RCA that will have the ability to set speed limits of 110 or 120km/h under the new Rule. Apologies for the long email – the short answer is the Agency as RCA has proposed some changes to the proposed amendments to clause 4.3, which is explained further below. Please let us know if you have any further questions or comments!

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*Rationale:*

The requirement in the current Rule for the Director to be satisfied that the road can be managed and operated to safely support 110km/h is extremely onerous, because it is only true at a particular point in time, and cannot be guaranteed in the future, there are too many factors affecting this which are beyond the scope of control for the Agency as RCA. This would continue to be the case if the Agency was required to be satisfied of this instead of the Director.

Under the current Rule, meeting these current requirements for the current 110km/h speed limits has extended the speed limit setting process by 4-5 months and cost tens of thousands of dollars for each review. For example, the review of the Kāpiti Expressway required a report of over 170 pages and engagement with engagement with emergency services, maintenance contractors, and Temporary Traffic Management providers. I understand that the Speed Management Panel considers technical and operational information associated with 110 km/h speed limit proposals from a speed management standpoint, rather than revisiting technical information submitted, and that this is reflected in their advice to the Director.

Amending this requirement to requiring the Agency to be satisfied the road will be maintained to the standard necessary would be more workable, as the Agency as RCA has existing maintenance standards for 110 km/h speed limits that it must be satisfied are going to be met and would develop maintenance standards for 120 km/h speed limits.

Ngā mihi  
Olivia

**Olivia Kitson** (she/her)

**Principal Policy Advisor, Regulatory Policy**

Policy and System Planning | Te Tuāpae System Leadership

Email: [olivia.kitson@nzta.govt.nz](mailto:olivia.kitson@nzta.govt.nz)

Phone: s 9(2)(a)

Mobile:

**Waka Kotahi** NZ Transport Agency

44 Bowen Street

Private Bag 6995, Wellington 6141, New Zealand

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[www.nzta.govt.nz](http://www.nzta.govt.nz)

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