

3 July 2024

Te Manatū Waka Ministry of Transport

PO Box 3175

Wellington 6011

By email to: speedrule@transport.govt.nz

Otago Southland Combined Regional Transport Committees submission on Land Transport Rule – Setting of Speed Limits Rule 2024.

1. The Otago Southland Regional Transport Committees (RTCs) thank the Ministry for the opportunity to make a submission on the Setting of Speed Limits Rule 2024.

Background and context

2. The RTCs comprise the authorised organisations who plan transport activities in the Otago and Southland regions. The members are representatives of the five territorial local authorities in Otago, three territorial authorities in Southland, the Otago Regional Council, Southland Regional Council (Environment Southland), and the New Zealand Transport Agency (NZTA). The purpose of the committee is to set the direction for transport investment in the regions in a combined Regional Land Transport Plan and monitor the implementation of the Plan to meet the needs of Otago and Southland communities.
3. All members actively participate in the committee: Queenstown Lakes, Central Otago, Clutha, Waitaki Southland, and Gore District Councils, Dunedin and Invercargill City Councils, Otago and Southland Regional Councils and NZTA.
4. We note that member organisations may also make individual submissions, but no attempt has been made to reflect individual member organisations responses.

General Comment

5. The use of speed management is a well acknowledged component of road safety responses around the world. When speed management is aligned with other safety interventions and acceptance by the surrounding communities the highest safety outcomes can be achieved. There are components of the draft rule as proposed that do not fit with the safe system approach that are likely to ensure these safety outcomes will not be delivered.
6. The major impediment to a successful outcome for this rule change is to ensure that the speed limits implemented are done with the agreement of the communities that the speed limits most directly effect. They must not be imposed or appear to be unreasonable to achieve community acceptance. The current proposal will require Road Controlling Authorities particularly in the local road sector to undo proposed or implemented speed limit changes that

have been consulted on and have substantial community support. This undermines the credibility of both the RCA and the likely support for any proposed future changes.

7. The need for a uniform and easily understandable speed setting rule that will allow community desires and outcomes to be achieved and deliver significant safety benefits is acknowledged. However, the current proposal is too prescriptive in some areas.
8. The use of the term RCA and Council in the draft rule appears to be inconsistent. The term RCA should apply when referring to Road Controlling Authorities and the term Council where the term refers to a Regional Council. The rule should also acknowledge the dual roles of NZTA. The role of an RCA and an administrator and approver of plans. Within this submission the term RCA includes the Road Controlling Authority of NZTA.

Specific Comment

Proposal 1 – require cost benefit analysis for speed limit changes.

9. The requirement for cost benefit analysis is acknowledged but not supported.
 - The proposed methodology is inconsistent with the CBA using the Monetised Cost Benefit Manual used for all other transport funding projects. The methodology proposed appears to significantly disadvantage low-cost speed interventions at the expense of travel time savings that are very unlikely to be achieved or are negligible. It is important to understand that time savings are only significant over long distances, in urban areas savings from higher speed limits are hard to achieve due to stop start nature of the journey. Arterial roads within urban environments, reduced speed limits would have no appreciable effect during times of congestion, in this case, safer speeds for the environment are prioritised.

We recommend the CBA used in the rule be consistent with the current NZTA CBA process.

- The proposed CBA process and requirement for proposals to be on a road-by-road basis will result in significant costs to the local Roads sector where speed changes are proposed.

We recommend specific funding be made available to assist the sector in accessing or re-accessing their speed management plans to conform with the new rule particularly in the coming NLTP period where funding is already restricted and Long-Term Plans have been confirmed with this cost implication unknown to them.

Proposal 2 – Strengthen Consultation Requirements.

10. All RCAs should be required to follow the same consultation requirements and both state highway and local road speed change consultation should have the same requirements. The additional consultation requirements of the proposed rule and the requirements for each individual road to be consulted on presents particular challenges for the Territorial Authority sector and will make consultation on state highway local road interaction points more complex. The additional requirements will add significantly to the costs of any speed limit change

proposal and may lead the RCA to just abandon what would be high safety outcome changes due to cost.

We recommend the consultation requirements be reviewed and the requirement for consultation on each individual road proposal be removed.

Proposal 3 – Require Variable Speed Limits Outside School Gates.

11. The proposal is supported in principle. We do question whether the views of the schools or the education sector have been taken into account in developing the rule. Whatever the final outcome the need for clear signals to road users on the speed limit applying and the reasoning as part of an education plan need to be in place for the speed limits to be effective.

We believe that the rule including prescriptive implementation requirements around the type and extent of speed limit reductions may lead to unintended consequences. Schools are all located on differing road types with differing traffic patterns and densities with the roads serving different purposes so adopting a single prescriptive approach is sure to result in unintended consequences and lack of community support.

We recommend the single prescriptive approach be changed to allow the RCA to assess the school environment, road type and use and implement an appropriate intervention for the site.

Proposal 4 – Introduce a Ministerial Speed Objective.

12. The need for a uniform and easily understandable speed setting rule that will allow community desires and outcomes to be achieved and deliver significant safety benefits is acknowledged. However, the current proposal is too prescriptive in some areas. Having a Ministerial Objective sets a precedent that at best could be seen as introducing the perception of political interference in the way an RCA interacts and responds to their community. If such an objective is required, then the Government Policy Statement on land transport or the expected Road Safety Strategy is where the Governments views should be reflected.

We recommend removal of the ministerial speed objective and the inclusion of such a statement in either the Government Policy Statement on Land Transport or the Road Safety Strategy.

Proposal 5 – Changes to Speed Limits Classifications

13. We encourage where possible, corridors be considered in their entirety when addressing speed limits to reduce situations where there are fluctuations in speed due to fragmented decision making. This will ensure a consistent approach for road users across the region and limit inconsistencies within and between districts. Road definitions should all be referenced to the One Network Framework (ONF) that has been adopted across the country by both state highway and local road authorities.

Proposal 7 – Reverse Recent Speed Limit Reductions

14. We do not support the requirement to reverse recent speed limit reductions and particularly the differentiation between state highway and local road requirements. Where speed limit reductions have been implemented or proposed with community support the RCA should be given the opportunity to retain the status quo. That is leave the speed limit as change or continue with the implementation of the new proposed limits that have been consulted on and have community support.

The risks in requiring reversal of these speed limits include,

- The significant costs associated with these reversals in new signage and remarking roads, this does not align with the value for money or efficiency values set out in the GPS 2024.
- loss of community and public confidence as speed limits change after public acceptance has already been gained and community desires have been heard.

The requirement for reductions to meet a specified time frame will be difficult for many RCAs to achieve. Some of these speed limit changes have been made under the old Bylaw process and the rule does not take this into account.

We recommend the requirement to reverse speed limit reductions since 2020 be reviewed to take into account the risks and comments in this submission.

Conclusion

The combined Otago Southland Regional Transport Committees requests due consideration be given to the matters raised in this submission. We welcome any feedback the Ministry can provide and look forward to a substantially redrafted rule being implemented.

Thank you once again for the opportunity to make a submission on the draft rule. Should you require any further information please contact Russell Hawkes Lead Transport Planner Environment Southland on 021 970 997 or russell.hawkes@es.govt.nz.

Yours faithfully



Cr Jeremy McPhail,

Chair

Southland Regional Transport Committee



Cr Kate Wilson,

Chair

Otago Regional Transport Committee