

**From:** [BDC Lgoima](#)  
**To:** [REDACTED]  
**Subject:** Official Information Request for New Government Speed Setting Rule Ref: OIA 153/24  
**Date:** Wednesday, 4 December 2024 10:35:44 am  
**Attachments:** [240711 Submission from CE Setting of Speed Limits Rule 2024.pdf](#)

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Dear [REDACTED]

We refer to your official information request dated 3 December for information regarding the new Government speed setting rule.

The information you have requested is below and attached:

- Any costs modelled or actualised necessary to meet new requirements under the Government's new Land Transport Rule: Setting of Speed Limits 2024  
**We have requested external advice to determine what action is needed to comply with the new rule. The agreed fees for this work is \$26,500**
- Any crashes, deaths and serious injuries modelled as a result of speed limit changes to meet requirements under the Government's new Land Transport Rule: Setting of Speed Limits 2024  
**BDC has not made any changes relating to the new rule, so no such information is available**
- Any crashes, deaths and serious injuries modelled from changing to the previous speed rule - Land Transport Rule: Setting of Speed Limits 2022  
**BDC has not undertaken any modelling**
- Any submission your organisation prepared for the consultation on the draft Land Transport Rule: Setting of Speed Limits 2024, and any feedback otherwise given to the Ministry of Transport, Waka Kotahi, the Minister of Transport or his office on the Rule or the new approach to setting speed limits.  
**BDC's submission on the draft LT Rule is attached**

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz) or freephone 0800 802 602.

If you wish to discuss this decision with us, please feel free to contact the Buller District Council by return email to [lgoima@bdc.govt.nz](mailto:lgoima@bdc.govt.nz).

Please note that it is our policy to proactively release our responses to official information requests where possible. Our response to your request may be published at <https://bullerdc.govt.nz/district-council/your-council/request-for-official-information/responses-to-lgoima-requests/> with your personal information removed.

Kind regards

Anthony Blom | Group Manager Infrastructure Services  
Email [Anthony.Blom@bdc.govt.nz](mailto:Anthony.Blom@bdc.govt.nz)

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11 July 2024

The Honourable Simeon Brown  
The Minister of Transport  
Ministry of Transport  
P O Box 3175  
Wellington 6140

Via email: [speedrule@transport.govt.nz](mailto:speedrule@transport.govt.nz)

Dear Sir,

**Land Transport Rule: Setting of Speed Limits Rule 2024 (the draft Speed Rule) for public consultation**

Please find attached on behalf of Council, its submission on the proposed rule.

Yours faithfully,



**Simon Pickford,**  
Chief Executive

## Buller District Council Submission

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

Do you have any comments on the above proposals?

*While in principle consideration of the costs and benefits is important and supported, use of Cost Benefit Analysis for each and every road is unduly onerous.*

*For instance, if their anomalies in existing posted speeds, (example being where an urban area has a posted speed limit of 100 kph and it should be 50 kph), the CBA should not be needed. Other examples are a change of a District Plan environmental zone or through intensification of development an area.*

*Requiring consultation road by road is also not supported in all cases. There should be an allowance for speed zones for community areas such as a township.*

*Not requiring CBAs around schools is supported.*

*If retained the list of where CBAs are not required should be expanded.*

*Simplified Procedures (similar to what NZTA Waka Kotahi use for other road projects) also need to be provided to reduce administration costs for Road Controlling authorities (RCA's).*

### 2 Questions – Proposal 2 – strengthen consultation requirements.

Do you have any comments on the above proposals?

*The West Coast South Island has commenced and followed this process for the draft Regional Speed Management Plan.*

*This is with the exception of CBA which is currently not required and for which Council has some concerns as per the comments under Proposal 1.*

*Given that there are Regional Transport Committees SH SMP's should be integrated and considered at the same time as other RCA SMP's in each Region. This will help achieve intra and inter regional consistency across all roads. Some of the submissions on the West Coast Regional Speed Management Plan include requests to changes on the State Highways.*

### 3 Questions – Proposal 3 – require variable speed limits outside school gates.

Do you have any comments on the above proposals?

*Agree with Variable Speed Limits (VSO) around schools on school days. Feedback on the draft West Coast Regional Speed Management Plan confirmed majority support for speed limits to be reduced only during drop off*

*and pick up times. It is noted that schools do act as community hubs with various activities such as sports and social events in school halls occurring outside normal school times which won't be covered by the VSL's. It would be useful to have the flexibility to have permanent speed restrictions or speed restrictions for other time periods where the school grounds are frequently used by children outside of normal school hours. However, reducing the risk through VSL on school days is still considered a positive step and based on Council's own consultation has community support.*

*Default variable speed limit times and including these in the Road Code is supported. This will achieve national consistency so no matter where you are the same variable speed limit times apply. There will be no excuse for not knowing when the VSLs apply.*

*Use of static variable speed limit speed limit signs is supported. While studies indicate electronic VSLs can be more effective, there is the issue of ownership and maintenance. Some RCAs may not have the resources to maintain electronic VSL's. Possibly there is an option of requiring Schools to operate and maintain the electronic VSL's however they may also not have the resources to do so and maintaining traffic signs is not their core function. Other factors such as traffic volumes and level of congestion around the school gates needs to be taken into account.*

*Modern vehicles now have sign recognition systems where drivers are warned in the vehicle when speed limits change. Noting that if the default warning times are adopted across the country, then software can be included that only activates the warning system during the default warning times and days. It is noted that older vehicles do not have this technology.*

*What is not supported is only having the VSL's just at the school gates. Given that the proposed Rule indicates 50 kph for all urban streets unless the Exceptions apply (Proposal 5) this does not recognise that not all children are dropped off and picked up at the school gates. There are also children that walk or cycle to school.*

*While making this point, at least if the signs are only required at school gates and other access points into schools, this is a start as these are potentially the highest risk areas. And the Road Code does require motorists to slow down if there are pedestrians or cyclists around. And to slow down further to 20 kph for school buses.*

*Recommend use of static VSL's on main roads unless there is strong evidence, (traffic volumes, crash data and assessments) that indicate electronic flashing VSL's will be more effective, or RCA prefers to install these signs. While as per Proposal 1 support CBA's not being required, there may still be a case to refer to actual crash data or even cases or near misses.*

*Agree larger signs on rural main roads.*

*In summary use static VSL's on all roads surrounding schools, that is retain school zones.*

## 4 Questions – Proposal 4– introduce a Ministerial Speed Objective

Do you have any comments on the above proposals?

*It is assumed that Objectives will be established after considering advice from stakeholders and the public.*

*Also, additional funding will need to be provided if what is proposed is more than what is allowed for under current National Land Transport Programme funding allocations.*

## 5 Questions – Proposal 5 – changes to speed limit classifications

Do you have any comments on the above proposals?

*Proposals are sound. The Road Code requires road users to take into account traffic conditions and road conditions. Notwithstanding this, if common sense shows certain streets and roads are unsafe at higher speeds, then it is appropriate to include speed reductions to save lives.*

*A minor amendment to Table of speed limit classifications is requested.*

Class of road	Description	Current guidance	Proposed speed limit
Urban streets	Residential and neighbourhood streets, and streets that provide access to and support businesses, shops, on-street activity and services. <b>Allowing for lower speeds on short streets and cul-de-sacs would be more in line with mean operating speeds on these streets and also New Zealand Standard 4404 Code of Practice for Land Development and Subdivision.</b>	30 – 40 km/h	<b>30</b> – 50 km/hr.

*Minor amendments are requested to the Exceptions Table.*

Class of road	Description	Proposed speed limit
Unconventional, low-volume or low speed road types	Parking areas, beach access points, riverbeds, cultural and recreational reserve or similar. <b>‘Similar’ to include Share the Road locations such as Pedestrian and Cycle Trails that in places share the road with Motorised Vehicles.</b>	10 – 30 km/h
Mountainous or hill corridors	Roads where the alignment is tortuous. <b>(Includes areas where the roads are narrow, or where there is low visibility, or there are step drop-offs)</b>	<b>40</b> – 80 km/h
<b>School Variable Speed Zones</b>	<b>Category 1 and Category 2 Schools</b>	<b>30 – 60 km/h</b>



## 6 Questions – Proposal 6 – update the Director’s criteria for assessing speed management plans for certification.

Do you have any comments on the above proposals?

*With the exception of the Proposal 1 relating to CBA and comments on Proposal 4 the rest is acceptable.*

## 7 Questions – Proposal 7 reverse recent speed limit reductions

Do you have any comments on the above proposals?

- **local streets with widespread 30km/h speed limits surrounding a school.**

*As per comments and reasons on Proposal 3 reversing of speed limits around schools is not accepted. Retaining VSL’s around schools should be allowed for the reason stated.*

- **arterial roads (urban connectors) and Rural State highways**

*While there is minimum impact on the South Island West Coast as for state highways the process of blanket reductions did not occur, time frames for reversals may be too short, especially if through consultation there was support for the reduced speed limits. If there was support for the proposed changes from the communities, it would seem inappropriate to reverse these changes.*

*When consideration is being made for reversing speed limits reductions the new proposed speed limits must be taken into account, including Council’s minor requested changes to the Speed limit table and the Exceptions table of classifications.*

## 8 Questions – Other Matters

Do you have any comments on the other matters outlined above?

### Speed Management Committee

*This committee or similar should be retained as the mix of experience and knowledge will provide added value to the process.*

### Regional Speed Management Plans

*The West Coast South Island is developing a Regional Speed Management Plan now. The work of the Regional Transport Committees adds value across many aspects of the transport sector. The RTC includes elected members from each RCA.*

*Creating a RSMP will help create consistency across the region.*

### Higher speed limits on certain roads

*Provided the roads are built, maintained, and managed to safely accommodate the increased speeds this is supported. However, the faster you go the bigger the mess, that is the likelihood of serious injury or death. As well as needing to build the roads with safety systems to accommodate these speeds, the vehicles that can use these roads must also prevent injury and death if for any reason vehicles travelling at the higher speeds get out control and crash.*

## Submission Ends

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