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**Ministry of Transport**

3 Queens Wharf,  
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Wellington 6011

Email address: [speedrule@transport.govt.nz](mailto:speedrule@transport.govt.nz)

Dear Sir/Madam

**Submission on Land Transport Rule: Setting of Speed Limits Rule 2024**

Thank you for the opportunity to submit on the Government's draft Land Transport Rule: Setting of Speed Limits 2024. The combined submission from Buller, Grey and Westland District Councils, and West Coast Regional Council is below.

Our contact details for service are:

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Yours faithfully

Darryl Lew  
**Chief Executive**

# West Coast Regional Council Submission on the draft Setting of Speed Limits Rule 2024

The West Coast Regional Council (WCRC or the Council) appreciates the opportunity to submit on the Government's draft Rule. In the spirit of the Regional Speed Management Plan (Plan) that was developed for the sake of efficiency and consistency, West Coast Regional Council officials have coordinated with the three District Councils to review the Rule and place a combined submission on behalf of the West Coast.

This submission addresses the technical aspects of the new Rule and has been approved by the West Coast Regional Transport Committee. The Committee has representatives from Buller, Westland, and Grey District Councils, WCRC and NZTA. DOC also sits on the Committee in an advisory, non-voting capacity. This submission is addressing the Rule at a higher, regional level. The District Councils will also potentially provide their own submissions to address more particular issues in their areas.

## Submission

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

1. Requiring a cost-benefit analysis (CBA) for each change is placing an unreasonable administrative load on Councils for what is a relatively minor change to the roads that councils, not central government, have authority over.
2. Even a simple CBA based on fixed speed limits and the NZTA cost-benefit guidebook is a significant amount of work. This is well beyond the capacity and capabilities of all but the largest councils.
  - a. Most councils will be forced to engage with external contractors to develop CBAs. This is not an efficient use of ratepayer money.
3. It is likely that this will deter most councils from making safety improvements on their roads, even if there is overwhelming public support.
4. Low levels of safety on our transport network already places significant strain on public finances.
  - a. Beyond deaths and serious injuries, reducing safety on our roads has other hidden effects such as parents not being able to allow children to cycle to school.
5. The new Rule removes the capacity to account for these secondary effects when developing a CBA. This is inconsistent with the NZTA cost-benefit manual, and all prior information on CBA development.

### *Proposal 2 – strengthen consultation requirements*

6. Breaking down the requirement to consult road by road, and making the requirement 4 weeks is neither efficient nor effective.
  - a. Again, it should be noted that local councils are RCAs and the limits in question fall within our purview.

7. It is extremely wasteful for Councils that elected to go further than the bare minimum requirements with their Plans. It overrides the will of local residents, their elected officials, costs more, wastes huge amounts of time spent on this by officials, and will have worse safety outcomes.

*Proposal 3 – require variable speed limits outside school gates*

8. The proposal does not account for the safety of children that walk or cycle to school once they are beyond 300m away from the school gates.
9. Schools do not necessarily abide by the hours stated in the new Rule.
10. Many schools on the West Coast have already expressed high levels of support, and now expect (or are enjoying) improved safety for their students.
  - a. Some of this work has already commenced. This means that Councils will now have to spend more money on getting worse safety outcomes.
11. Changing the Traffic Control Devices Rule to allow for static signs will save money but have poor safety outcomes.
  - a. Studies have already shown that flashing signs are the most effective means of slowing traffic other than traffic calming. A fixed sign with extremely small text will have little to no impact on mean speeds, and only serve to enable police enforcement.

*Proposal 4 – introduce a Ministerial Speed Objective*

12. Given the level of central-government overreach that this Rule already provides, *Proposal 4* seems to suggest full Ministerial control of all national speed limits. This is unconstitutional.

*Proposal 5 – changes to speed limit classifications*

13. These changes are contrary to all available data and international best-practice.
14. Deaths and serious injuries on our road network are high per-km compared to other countries. This proposal will not improve safety.

*Proposal 6 – update the Director’s criteria for assessing speed management plans for certification*

15. The breadth and depth of requirements being placed on councils to undertake relatively minor changes are disproportionate and unreasonable.

*Proposal 7 – reverse recent speed limit reductions*

16. This Rule will have a huge impact on other councils who proposed further-reaching speed reductions, and will have substantial impacts on our ability to review speed limits in the future.
17. The West Coast’s Regional Plan was relatively conservative in its approach, mainly adhering to the minimum requirements to lower limits around schools.
  - a. These are a mixture of fixed and variable speed zones, dependent on their location and use.

18. However, it also included a handful of roads that are regularly raised by local residents as a cause for concern, were more appropriate at a lower speed, or have high levels of near misses /crashes.
19. The timeframes to reverse current work may also be too short for operations teams.

*Other comments*

20. We propose returning to the original Setting of Speed Limits Rule, or the legislation it replaced, as both allowed for Councils to decide and set the speed limits that are most appropriate for their local area.

This ends our submission.