

Date: **Tuesday 9 July 2024**
Time: **12:30pm - Joint Speed Management Plan
Deliberations**
Meeting Room: **Tasman Council Chamber**
Venue: **189 Queen Street, Richmond**
Zoom conference link: <https://us02web.zoom.us/j/88648189483?pwd=6Cl6ayJlbt2V6lAXN9aT0YzEb4CpQH.1>
Meeting ID: 886 4818 9483
Meeting Passcode: 104803

Joint Nelson Tasman Regional Transport Committee

Komiti Te Kawenga Rohe o Nelson Tasman

AGENDA

MEMBERSHIP

	Chairperson	Deputy Chairperson
	Deputy Mayor S Bryant (Tasman District Council)	Mayor N Smith (Nelson City Council)
Members	Cr B Dowler (Tasman District Council)	Deputy Mayor R O'Neill-Stevens (Nelson City Council)
NZTA Waka Kotahi Alternate Members	Ms E Speight Cr C Butler (Tasman District Council)	Cr M Courtney (Nelson City Council)
	Cr J Ellis (Tasman District Council)	Cr J Hodgson (Nelson City Council)

(Quorum 3 members)

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AGENDA

1 OPENING, WELCOME, KARAKIA

2 APOLOGIES AND LEAVE OF ABSENCE

Recommendation

That apologies be accepted.

3 PUBLIC FORUM

Nil

4 DECLARATIONS OF INTEREST

5 LATE ITEMS

6 CONFIRMATION OF [MINUTES](#)

That the minutes of the Joint Nelson Tasman Regional Transport Committee meeting held on Monday, 29 April 2024, be confirmed as a true and correct record of the meeting.

That the minutes of the Extraordinary Joint Nelson Tasman Regional Transport Committee meeting held on Tuesday, 30 April 2024, be confirmed as a true and correct record of the meeting.

That the minutes of the Extraordinary Joint Nelson Tasman Regional Transport Committee meeting held on Monday, 13 May 2024, be confirmed as a true and correct record of the meeting.

That the confidential minutes of the Extraordinary Joint Nelson Tasman Regional Transport Committee meeting held on Monday, 13 May 2024, be confirmed as a true and correct record of the meeting.

7 REPORTS

7.1 Placeholder – late item – joint nelson tasman regional speed management plan deliberations

This report was not finalised when the agenda was compiled and will be distributed separately.

7.2 Approval of Submission on the Draft Setting of Speed Limits Rule 3

8 CONFIDENTIAL SESSION

Nil

9 CLOSING KARAKIA

7 REPORTS

7.2 APPROVAL OF SUBMISSION ON THE DRAFT SETTING OF SPEED LIMITS RULE

Report To:	Joint Nelson Tasman Regional Transport Committee
Meeting Date:	9 July 2024
Report Author:	Bill Rice, Senior Infrastructure Planning Advisor - Transportation
Report Authorisers:	Dwayne Fletcher, Strategic Policy Manager; John Ridd, Group Manager - Service and Strategy
Report Number:	RNTRTC24-07-1

1. Purpose of Report

- 1.1 To approve a submission on the draft Land Transport Rule Setting of Speed Limits 2024 Rule.

2. Report Summary

- 2.1 The Ministry of Transport is seeking feedback on a draft Setting of Speed Limits Rule (the Rule). Consultation closes on 11 July 2024.
- 2.2 The changes in the proposed Rule when compared to the current Setting of Speed Limits Rule (2022) include:
 - requires a Cost Benefit Analysis for speed limit changes;
 - includes provision for the Minister to issue Ministerial Speed Objectives;
 - requires a variable limit of 30km/h at school drop off and pick up times outside all schools except a small number of mainly rural schools;
 - sets a range of speed limits for different road categories; and
 - requires speed limits on interregional connectors, urban connectors, and local urban roads which have been reduced since 2020 to be reversed. This may affect some of the 30km/h limits in Nelson, and the 80km/h limit on SH6 between Hope and Wakefield.

3. Recommendation

That the Joint Nelson Tasman Regional Transport Committee

- 1. receives the Approval of Submission on the Draft Setting of Speed Limits Rule report RNTRTC24-07-1; and**
- 2. approves the Joint Nelson Tasman Regional Transport Committee submission to the Ministry of Transport on the draft Setting of Speed Limit Rule (Attachment 1 to the agenda report); and**
- 3. authorises the Chair and Deputy Chair of the Joint Nelson Tasman Regional Transport Committee to make changes of a minor nature to the submission.**

5. Attachments

1. [↓](#) Submission on the draft Setting of Speed Limits Rule 2024

5

10 July 2024

Te Manatū Waka Ministry of Transport

Wellington

speedrule@transport.govt.nz

Tēnā koe

Nelson-Tasman submission on the draft Setting of Speed Limits Rule 2024

Thank you for the opportunity to submit on the draft Setting of Speed Limits Rule (the Rule). This submission is made by the Nelson Tasman Joint Regional Transport Committee, representing both Nelson City and Tasman District Councils.

Overview

Nelson City Council and Tasman District Council (Nelson-Tasman) are adjacent unitary councils with a shared transport network. The two Councils recognise this shared network through a Joint Regional Transport Committee (RTC).

Nelson City and the Tasman town of Richmond have grown towards each other to form a continuous urban area. Consistency of speed limits is therefore an important consideration for the two councils. The joint RTC has been charged with developing a joint Nelson Tasman Speed Management Plan.

The Nelson-Tasman region has a combined population of 113,200 and has experienced significant growth in recent years. This has resulted in new residential and rural residential developments in the region.

Our economy is primarily based on primary production and processing, with tourism being a significant secondary economic driver. The Great Taste Trail (one of New Zealand’s “Great Rides”) has some sections of on road cycleways. The trail generated more than \$34M for the local economy in 2022/23.

Our feedback on specific sections or clauses of the draft rule is included in the table on the following pages. Specific feedback on the proposals in the consultation document is included at the end of the table.

Stuart Bryant
**Chair – Joint Nelson Tasman
Regional Transport
Committee**

Nick Smith
Mayor, Nelson City

Tim King
Mayor, Tasman District

Clause	Subject	Comment	Recommendations
3.3	Cost Benefit Analysis	<p>Robust economic assessments of speed limit changes are likely to be complex and costly to complete but still have limitations. The assessment could potentially cost significantly more than the implementation costs of a speed limit change. A simplified methodology is therefore appropriate. Any simplification of assessment methodology however will result in even more limitations.</p> <p>There appear to be significant omissions in the quantitative measures to be included in a cost-benefit analysis. Three have been included, namely:</p> <ul style="list-style-type: none"> • Crash reduction • Travel time • Implementation costs <p>However vehicle operating costs and emissions have been omitted. Vehicle operating costs are very large direct costs to the economy and are directly impacted by speed.</p> <p>A number of qualitative factors which are significantly impacted by speed changes, including amenity, mode shift, and environmental impacts also appear to have been omitted. The monetising and quantifying of these factors to include in an economic assessment is complex. Their omission from a simplified assessment is understandable. However, there is value in considering these factors in the wider assessment of speed changes.</p> <p>The proposed methodology of treating negative impacts as costs is not consistent with NZTA’s Monetised Benefit and Cost Manual. The economic assessments of speed limit changes as proposed will not be consistent with the assessments that other transport projects and activities, and thus will not allow comparison of the effectiveness of speed limit changes compared to other possible interventions.</p> <p>The draft rule also only appears to require a CBA for proposed speed limit reductions. For consistency and transparency of decision-making, if a CBA</p>	<ol style="list-style-type: none"> 1. Consider urban amenity, mode shift, and environment impacts alongside cost benefit analyses. 2. The Agency develop a simplified, consistent methodology for estimating cost-benefit analysis, including: <ul style="list-style-type: none"> • Consistency with the Agency’s <i>Monetised benefit cost manual</i> • Safety, travel time, vehicle operating costs, emissions, and implementation costs • A clear explanation of the limitations of the simplified methodology, which will be used in any reporting • High, medium & low assessments, or a clear sensitivity test 3. Cost Benefit Analyses applies to both increases and decreases in speed limits 4. The NLTF includes enhanced funding for speed limit cost benefit analysis 5. Limit the requirement to have a cost benefit analyses to roads that have an important through function and minimum number of trips per day.

Clause	Subject	Comment	Recommendations
		<p>requirement is retained for the final Rule, it should be required to apply equally to proposals that increases speed.</p> <p>Finally – the benefit of a benefit cost analysis would appear to be low for many roads in our networks. Low volume roads, dead end or short roads with low trip numbers are not likely to have meaningful travel time costs associated with changes. The requirement to do a cost benefit analysis will add costs and complexity to what can be otherwise simple and pragmatic changes to speed limits on these roads.</p>	
3.13	Ministerial Speed Objective	<p>Drivers expect consistency in the application of speed limits. The issuing and implementation of Ministerial Speed Objectives (MSO) which may be issued frequently and or at different times to the GPS may result in comparatively frequent changes of emphasis, and associated inconsistencies across the country.</p> <p>There is a risk that the GPS and a separate Ministerial objective may not be in alignment. This raises the question of which document takes priority.</p> <p>The premise of a MSO appears to not be linked to specific evidence or good practice in the management of road networks. It is not clear on what basis MSO’s may be made, what the scope or content may be, and how they link with other Local Government obligations regarding consultation and engagement with communities. It risks reducing the community’s ability to have input on appropriate speed limits on roads that they live by and use.</p> <p>There are currently a number of existing mechanisms available to the Minister for providing direction such as the development of Rules and or the development of the GPS. We think these should be utilised rather than creating an additional mechanism.</p>	6. That Ministerial objectives be incorporated into the GPS, not the Rule.
12	Transitional Provisions	The draft rule makes no mention of speed limits which have been included in a certified speed management plan prepared under the previous rule, but have not yet been implemented when the new rule has come into force.	7. That speed limits changes that have been certified but not registered, and are consistent with Schedule 4 of the draft

Clause	Subject	Comment	Recommendations
		<p>Feedback from the Ministry of Transport indicates that “<i>The intent of the draft Rule is that any speed limit change that has not been registered when the new Rule comes into force will need to be reconsidered under the new Rule.</i>” This is not stated anywhere in the draft rule or consultation document.</p> <p>Neither the draft rule nor the feedback from the Ministry provides clarification of what “reconsideration of such a speed limit would entail”.</p> <p>If a proposed speed limit change is consistent with the speed limits in Schedule 4 of the Draft Speed Rule, then reconsideration which could include cost benefit analysis and re-consultation seem an unnecessary waste of money, time and energy, both for the RCA, and of the community. We have just completed a very comprehensive consultation process on our Joint Speed Management Plan (because this was required by the current rule) and have tried to make our final proposed speed limit changes following consultation consistent with the draft Speed Rule (except as outlined below). We are very conscious of the extra time and cost and frustration our community will feel if we reconsult on these. Given they align with the government direction, we ask that you enable these to proceed.</p>	<p>rule, are exempt from requiring repeat consultation and economic analysis.</p>
13	Rural Residential roads	<p>Table 2 of Schedule 4 specifies lower speed limits for “peri-urban” roads, which are described as “Roads that primarily provide access from residential property on the urban fringe...” There are several rural residential roads in Tasman, which are similar to peri-urban roads, but are not on the urban fringe. There is no classification in the current rule which caters for these roads.</p>	<p>8. That “on the urban fringe” be deleted from the description of Peri-urban roads, so that rural residential roads not adjacent to an urban area are included.</p>
13	Changed Land Use	<p>Speed limits are often reduced when the land use adjacent to an existing road changes. For example, the land use adjacent to McShane Road in Richmond has changed from rural to residential. A benefit cost assessment</p>	<p>9. That speed limit changes due to land use changes be exempt from the requirement to carry out an economic assessment.</p>

Clause	Subject	Comment	Recommendations
		based on historic crash rates in that situation will not reflect the reality of the change, and does not seem a good investment.	
4.3	Range of Speed Limits	<p>Having speed limits with 10km/h increments from 10km/h to 110km/h (11 different limits) available to RCAs is likely to result in frequent changes in speed limit. The change in roadside development or road environment that justifies a 10km/h difference in speed limit is unlikely to be obvious to many drivers.</p> <p>This combination of frequent speed limit changes, and changes in roadside environment not being readily discernible is likely to result in many drivers not knowing what speed limit is applicable on any section of road.</p>	10. That the range of speed limits be rationalised, with 20km/h increments for the most part. Consider 10km/h increments only with strong justification.
3.8	Agency may set deadlines	In setting deadlines for the review of a speed management plan the Agency is to have regard to a number of factors. There is no requirement for the Agency to have regard to the timeframes, mandatory requirements, or workloads of local authorities.	11. That the Agency have regard to the timeframes, and mandatory requirements of TLAs. In particular, avoid a deadline for the review of a speed management plan within 9 months of the adoption of TLA’s Long Term Plans
1.4	School Travel Times	<p>We acknowledge there may be advantages in using standard national school travel times including:</p> <ul style="list-style-type: none"> • that drivers will understand what times variable speed limits apply outside any school they pass anywhere in the country. This reduces the need for expensive electronic signs to inform drivers of the applicable limit at any particular time. • It reduces speeds outside of schools for a longer period, which caters for pupils arriving early or leaving late for sport or other activities before or after school <p>However, there are disadvantages including:</p>	<p>12. Prepare a benefit cost assessment of standard school travel times. Specifically, whether more targeted and shorter timeframes for the lower speed limit, managed using electronic variable signs, are preferable in some cases to longer lower speed limit periods managed through static signs. This trade off may mean it is better for the RCA to incur the cost of an electronic variable sign for the benefit of the motoring public.</p> <p>13. Provide enhanced financial assistance rate for electronic variable signs</p>

Clause	Subject	Comment	Recommendations
		<ul style="list-style-type: none"> • It results in the variable limits applying for quite long periods (a total of 3 hours per day) in order to cater for the range of possible school start and finish times. • It fails to cater for those times when schools do something different (e.g. an early finish) <p>Schools in Nelson/ Tasman have the following range of start and finish times:</p> <ul style="list-style-type: none"> • Start: 8:40 – 9:00am • Finish: 2:45 – 3:15pm <p>These times would support morning times of 8:05 to 9:05, and afternoon times of 2:40 to 3:35.</p> <p>It is not clear if the benefits of having a standardised school time outweigh the travel time costs of extended variable limits.</p>	<p>14. Allow use of variable speed limits at times other than the standard times when pupils are likely to be entering or leaving the school (e.g sports days, or days when the school finishes early)</p>
5.2	Category 2 schools	<p>This clause gives RCAs the ability to designate category 2 schools, which can have a higher variable speed limit, but provides no guidance as to the criteria to be considered in such a designation.</p> <p>A Category 2 designation is appropriate where higher speeds are safe outside the school. It is likely to include factors such as the absence of pupils walking and cycling to school, and adequate, safe, off street parking.</p>	<p>15. Provide guidance regarding the safety criteria to be considered in designating a category 2 school, including factors such as off street parking and the numbers of pupils walking or cycling to school</p>
5.3	Deadline for new limits around schools	<p>Support deadline of 31 December 2027</p>	<p>Retain deadline</p>
13	Schedule 4 Limits for different	<p>This section appears to use many classification names from the One Network Framework (ONF). However, some classifications (Activity streets, Local streets, and Main streets) have not been included, and others (Urban</p>	<p>16. Either adopt the ONF classification in total (preferred) or develop a separate classification system for speed limits.</p>

Clause	Subject	Comment	Recommendations
	classes of roads	streets, Expressways) have been added. This hybrid classification system may lead to confusion.	
13	Schedule 4 Limits for different classes of roads	<p>Low volume urban streets with no footpaths under the proposed rule are required to have a speed limit of 50km/h unless there is significant pedestrian or cyclist activity. In many of our regions urban areas we have older roads typically on hillsides that require all users to share the road space. They are typically narrow have a tight alignment with limited forward visibility and often with parked cars reducing the width to a single lane, however they would not be considered to have high pedestrian or cyclist activity.</p> <p>Historically Nelson has reduced the speed to a safer limit of 30km/h and often labelled them as a ‘home zone’ to set the expectation that it is a shared space.</p>	17. Include a new category or exception of 30km/h in lower volume ‘home zones’ when the urban road has no footpath either side if there is local community acceptance.
13	Schedule 4 Limits for different classes of roads	Commercial areas that have a mix of retail, hospitality and commerce land uses have benefited from the increased amenity a 30km/h zone has provided in our region. Under the proposed rule these commercial areas could be reduced to 40km/h however that would introduce an inconsistency with those areas that already have the slower 30km/h limit.	18. Enable urban commercial zones with a significant level of pedestrian and cycling activity to have a speed limit range from 30-50km/h if there is wide community acceptance.
3.2	Consistent speed on adjoining roads	It’s not clear if this clause refers to a continuous road which crosses an RCA boundary, or to roads which intersect with another road at a boundary or a short cul-de-sac off a main road.	19. Clarify

Response to Consultation Document Proposals

The sections below address the questions asked in the consultation document.

Proposal 1 – require cost benefit analysis

See comments above.

Proposal 2 – strengthen consultation

See comments above.

Proposal 3 – variable speed limits outside school gates

In addition to comments above:

The proposed variable limits outside school gates gives no consideration of the journey to school – unless you live within 150m of the school gate. It reinforces the concept that children should be driven to school and dropped off in the safe area close to the school.

It is also likely to have limited effect in the objective of reducing harm and trauma to children.

In the last 10 years, 84% of crashes involving a child under the age of 15 that was travelling by walking or cycling occurred away from the school gate in the Nelson and Tasman area.

Proposal 4- Ministerial Speed Objectives

See comments above.

Proposal 5 – Changes to speed limit classifications

In addition to comments above, recommend the following:

- Add an exception for rural roads with heavily used on road cycleways, such as the Great Rides. The on road sections of these cycleways are often not consistent with the typically off road nature of these cycleways. High vehicle speeds adjacent to the cycleways increases risk to the riders. Nelson Tasman's Great Taste Trail includes a number of sections where the trail is on rural roads with speed limits of 80 and 100km/h. Speed limits on these roads should take into account the presence of cyclists, and the risk due to factors such as narrow roads and limited forward visibility.