

11 July 2024

Submitted via email: speedrule@transport.govt.nz

SUBMISSION TO GOVERNMENT ENTITY ON THE DRAFT LAND TRANSPORT RULE: SETTING OF SPEED LIMITS 2024

Thank you for the opportunity to present this submission on the draft Land Transport Rule: Setting of Speed Limits Rule 2024 (**draft speed rule**).

The Queenstown Lakes District Council (**QLDC**) recommends the draft speed rule takes a best-practice One Network approach to analysis, consultation and setting of speed limits as this framework is better able to deliver a safe and efficient transport network than a road-by-road approach.

QLDC considers that road controlling authorities (**RCAs**) can best deliver a safe and efficient transport network if they can set appropriate speed limits based on the function of a road using the One Network Framework, local road conditions and community needs; and in alignment with extensive evidence on speed limits and road safety. A blanket and binding schedule of speed limits by road category is unlikely to achieve the objective of a safe and efficient road network.

It is QLDC's position that the regulatory impact statement does not contain evidence to justify the approach taken in the draft speed rule and does not provide any means by which to fully fund or resource the intended changes (given the timing of local government long term planning).

Due to the timeframe for the consultation, this submission will be ratified by full Council retrospectively at the next Council meeting.

Thank you again for the opportunity to comment.

Yours sincerely,



Glyn Lewers
Mayor



Mike Theelen
Chief Executive

SUBMISSION TO THE MINISTRY OF TRANSPORT ON THE DRAFT SPEED RULE

1.0 Context of the draft speed rule in relation to QLDC

- 1.1 Queenstown-Lakes District (**QLD**) is a district with an average daily population of 70,205 (visitors and residents) and a peak daily population of 99,220. By 2053 this is forecast to increase to 150,082 and 217,462 respectively¹. The district is experiencing unprecedented growth with its population projected to nearly double over the next 30 years. This growth is placing significant pressure on the district's transport network. Setting appropriate speed limits is one of the tools that QLDC, as the road controlling authority (RCA), can use to help create a safe and efficient transport network for all road users.
- 1.2 The QLD transport network cannot be increased to a size that matches the demands that growth is placing on it because of the geographical limitations of the district's alpine and mountainous environment. By necessity, the network must be used more efficiently, and alternative transport modes encouraged to continue moving an increasing number of people and goods. Better Ways to Go outlines the district's planned approach to achieving significant mode shift². The need for mode shift is also outlined in QLDC's Travel Demand Management Single Stage Business Case (and considered in the Wānaka Master Plan), supported by greater transport efficiency through better planning and delivery. It is in all road user's interests to create a transport network that is safe and conducive to a range of transport modes. Speed management is core to creating a safer environment for all road users that encourages mode shift³.
- 1.3 If mode shift is not achieved, much of the transport network will be in gridlock⁴. By 2028, it is predicted that peak travel periods on SH6A will be regularly gridlocked with car and public transport travel times between Lake Hayes Estate and Queenstown regularly exceeding 60 minutes (compared to 15-20 minutes currently). This projected gridlock will have a significant negative impact on the economic productivity of our district, the liveability of the district for our residents and the visitor experience. Safer speeds are an important intervention to support mode shift⁵. Speed limits must balance their dual role in efficient travel times and creating a safe environment for all types of transport and all ages of road users.
- 1.4 The long-term roadmap to manage transport pressures on the QLD transport network must enable mode shift. QLDC's Spatial Plan⁶ supports and promotes well-functioning urban environments by ensuring that urban development areas are designed in a way that enables good accessibility, reduces travel needs and supports alternative travel options. This was particularly evident in the Te Putahi Ladies Mile Masterplan process. Capacity issues along the state highway corridor and a lack of access to services and employment had resulted in severance issues and a lack of cohesion between two existing communities. The masterplan required careful integrated planning, management and funding of land-use and transport to find the appropriate network solutions that will reduce the reliance on cars and improve access and employment and social facilities.

¹ <https://www.qldc.govt.nz/community/population-and-demand>

² [Better Ways to Go](#)

³ World Health Organization. Speed Management: a road safety manual for decision-makers and practitioners, 2nd edition. Global Road Safety Partnership, International Federation of Red Cross and Red Crescent Societies. Geneva 2023

⁴ [Otago Regional Council's Queenstown Public Transport Business Case](#)

⁵ [RR 701: Safety interventions and their contribution to mode shift. Waka Kotahi NZ Transport Agency research report](#)

⁶ <https://www.qldc.govt.nz/your-council/council-documents/queenstown-lakes-spatial-plan/>

- 1.5 The Spatial Plan supports a shift to a low-emissions transport network, as does the district's regenerative tourism plan, *Travel to a Thriving Future*⁷, and QLDC's Climate and Biodiversity Plan⁸. This shift to a low-emissions transport network is supported by the district's communities. Vision Beyond 2050 is a community developed vision for the district that includes the public transport system being the cleanest, greenest, innovative choice for district-wide connectivity; and that active travel is an integral part of an accessible and safe transport network⁹.
- 1.6 An additional factor in creating a safe and efficient transport network in the district is the high number of visitors to the district, both domestic and international. The QLD is Aotearoa New Zealand's premier visitor destination, drawing people from all over the world. Tourism is a foundation of the local economy, accounting for 39% of GDP and 55% of all employment in 2019¹⁰ and contributing significantly to the national GDP. Visitors, many of whom will not be familiar with New Zealand's roads, rely on road transport to travel through the district and beyond. Transport networks need to preserve and enhance the visitor experience, and speed management needs to be mindful of the range of road users and not assume that one size fits all.

2.0 The first priority in setting speed limits must be safety for all road users

- 2.1 QLDC recommends changing the wording of the objective of the speed rule to 'all road users being able to reach their destination safely and quickly'. This makes the first priority being all people reaching their destination safely.
- 2.2 Reduced speed limits were brought into effect based on a strong international and national evidence base that the faster vehicles travel, the more frequent and severe road crashes become, and the greater the level of people being injured or killed^{11 12}. The regulatory impact statement for the draft speed rule does not suggest there has been any change in that evidence.
- 2.3 The draft speed rule requires RCAs to undertake a cost-benefit analysis (**CBA**) on every road, but it does not appear that central government has undertaken a similar analysis to quantify the impact of the draft speed rule on deaths and serious injuries to road users. This will be crucial to inform decision-making and central government is encouraged to undertake a robust impact analysis on the proposed changes. There are also no key performance indicators or targets set for government in relation to road safety. These are needed to monitor the impact of any changes to the speed rules.

⁷ [Regenerative Tourism By 2030 \(queenstownnz.co.nz\)](https://www.queenstownnz.co.nz/regenerative-tourism-by-2030)

⁸ https://www.qldc.govt.nz/media/iw3pqsy1/qldc_climate-and-biodiversity-plan_jun22-web.pdf

⁹ [7a2-qldc-vision-2050-boards-feb19-v2.pdf](#)

¹⁰ Source: Infometrics

¹¹ International Traffic Safety Data and Analysis Group. *Speed and Crash Risk: Research report*. Paris: International Transport Forum, 2018.

¹² World Health Organization. *Global status report on road safety 2023*. WHO: Geneva.

3.0 A systems-based whole-of-network approach to transport is needed in the QLD to achieve economic benefits and to enable people to get where they want to go safely and quickly

- 3.1 QLDC agrees that New Zealanders want to reach their destination safely and quickly but does not agree that this will be achieved through a road-by-road approach to analysis and consultation, or by a reliance on speed as the main determinant of efficiency.
- 3.2 QLDC does not support the disaggregation of a network approach it will not contribute towards a coherent approach to speed management and improved efficiency. Road-by-road analysis and consultation could exacerbate speed limit changes that are not intuitive to the road user or speed limits that are not appropriate to the road's function. Rather than speed being an end in itself, it is one component in a systems-based approach that includes design and function to optimise travel times and safety across travel modes. Reliance on speed limits to improve travel time is overly simplistic due to the constraints of congestion and lack of capacity in the network. A key aspect of a whole-of-network approach is to provide coherence and legibility to the transport network and allow travel to move more seamlessly.
- 3.3 To avoid unnecessary cost and burden on ratepayers, it is important that the next version of the speed limit rules delivers enduring change and consistency to avoid reversals under successive governments. Long-standing change is best enabled by speed rules that follow best practice and evidence-based research. Use of tools such as the One Network Framework which provides 'safe and appropriate speeds' provides a useful tool to drive consistency across the network. The One Network Framework also balances competing needs by focusing on the network's functional importance for moving people and goods across travel modes¹³.
- 3.4 The One Network Framework also allows RCAs to balance competing user needs from the network and to match speed limits to road function rather than to road status. This is relevant in the QLD where the state highway network is also the main collector and arterial network for the district's towns. An example is Frankton Road (SH6A) which is the main arterial route into the centre of Queenstown.
- 3.5 A requirement for consultation on a road-by-road basis will also limit the ability of the community to make informed decisions. The way a road is used is dependent on its role in a network plan and this wider context needs to be considered during consultation. An example of this is where a road corridor prioritises the traffic function over the place function, using the One Network Framework. There may be instances where road-by-road analysis and consultation is needed, but this should not be the required default approach across the whole network.

4.0 Road controlling authorities need the ability to set appropriate speed limits based on their local context and community needs

- 4.1 QLDC recommends that RCAs are enabled to set appropriate speed limits that best achieves the objective of a safe and efficient transport network while meeting community needs. QLDC does not agree that setting a binding schedule of speed limits by road category will deliver a safer and more efficient road network. RCAs should be able to determine the right tool to use at the right location to achieve the goal of moving all people more safely, reliably, and quickly towards their destination, including the appropriate speed limit. To achieve this, QLDC recommends that the schedule of speed limits is not binding, that it uses the One Network road classification, and outlines a graduated range of speeds that includes both the current and

¹³ [One Network Framework \(ONF\) - Classification Guidance - 17 November 2022 \(nzta.govt.nz\)](https://www.nzta.govt.nz/one-network-framework/classification-guidance/)

proposed speed limits and can align with evidence on speed and road safety. Using a range will allow speed limits to be set at a safe level, but also allow them to be set higher where it is safe to do so.

- 4.2 The proposed schedule of speed limits replaces 'blanket' speed limits with another set of blanket speed limits that may not be appropriate to a road or road network. It forces RCAs to apply a speed limit that may not be suitable or safe for that road. International evidence is conclusive that 100km/hour rural and 50km/hour urban speed limits are not safe and appropriate speeds for many New Zealand roads. Speeds above the safe and appropriate speed are involved in around 71% of crashes that cause injury in New Zealand¹⁴. Lower speed limits reduce the likelihood of crashes and mean that when human error occurs, the impact on serious injuries and deaths is reduced¹⁵ ¹⁶. These crashes not only have a human and economic cost, but they have a significant impact on travel time and network efficiency due to road closures.
- 4.3 Road infrastructure has a long lifespan of 50+ years if maintained, which means that not all the road network was built to current safety standards. Retrofitting safety improvements such as widening or roadside barriers still leaves a large part of the network that is unsafe for high speeds. RCAs need the ability to set speed limits that match the level of safety built into road infrastructure for all users of the network, including heavy vehicles/freight. In the QLD, winter driving conditions also have a significant impact on safe speed limits.
- 4.4 Use of the One Network Framework classification system in the schedule would give recognition to the wider role of roads and streets. Roads in an urban setting are much more than an efficiency corridor for cars, they contribute to the form, function and liveability of neighbourhoods and communities. This context is not captured by the proposed categorisation in the draft schedules.

5.0 The requirement for cost-benefit analysis for speed limit changes needs to be robust and able to inform decision-making

- 5.1 QLDC does not support the requirement for a CBA to be undertaken for each individual road when consulting on changes to speed limits. This will be costly and resource intensive and it is difficult to understand how the information can be used to inform decision making. An individual road should not be considered in isolation from the wider transport network as it is a well-functioning network that delivers economic benefits. It is also difficult to justify the additional costs imposed on RCAs to undertake a CBA for each and every speed limit that they wish to implement when the draft speed rule determines that all roads of the same classification must have the same speed limit, no matter how different they are. It also adds a disproportionate administrative burden to RCAs in large rural areas.
- 5.2 To be robust and inform decision-making, CBAs must consider a broader range of impacts than safety, travel time and implementation costs. A CBA should include the broad range of impacts on social, economic, environmental and cultural wellbeing of communities in line with Treasury's recommended wellbeing approach to CBAs¹⁷. CBA requirements should also align with those in the current NZTA economic

¹⁴ [Job, R.F.S and Brodie, C. \(2022\). Understanding the role of Speeding and Speed in Serious Crash Trauma: A Case Study of New Zealand. Journal of Road Safety, 33\(1\), 5-25.](#)

¹⁵ [World Bank. Guide for Safe Streets - Managing Traffic Speeds to Save Lives and Improve Liveability, 2024](#)

¹⁶ [Saving Lives Beyond 2020: The Next Steps Recommendations of the Academic Expert Group for the 3rd Global Ministerial Conference on Road Safety \(2019\)](#)

¹⁷ [A wellbeing approach to cost benefit analysis | The Treasury New Zealand](#)

evaluation manual to avoid inconsistencies and include vehicle operating costs due to the interrelationship of speed and fuel consumption¹⁸.

- 5.3 Access to nationally consistent data on actual travel speeds (not changes in speed limit), crashes, road injuries and total cost to the country is required for accurate CBAs and for monitoring and evaluation of speed limits and road safety. QLDC is concerned that RCAs' access to this data is being undermined and recommends that NZTA continues to be required to develop and maintain guidance on the use of mean operating speed for setting speed limits¹⁹ and provide timely crash data through its Crash Analysis System.

6.0 Variable speed limits around schools should require electronic signage on the main road and not have blanket rules on distance and time

- 6.1 The priority in setting speed limits around schools must be the safety of children and young people and creating a safe environment for them to move through. Children and young people travel to school by walking, cycling or scootering and the wider road environment needs to protect children and encourage these travel modes. Encouraging travel by these modes is necessary to reduce congestion from pick up and drop off in private cars.
- 6.2 QLDC recommends that the 300m distance around a school gate where reduced speed limits apply is set as a minimum distance instead of a fixed distance. There needs to be greater flexibility to reflect the needs and locality of individual schools. The location of a school often means that the lower speed limit needs to be applied over a greater distance to adequately protect children on their journey to school.
- 6.3 QLDC is not opposed to variable speed limits around schools provided that flexible, sensible implementation is provided for that aligns with the current best practice guidance detailed in Traffic Note 37²⁰. QLDC trialled the use of static speed limit signs around schools and their effectiveness is inconclusive²¹. Where variable speed limits are in place, electronic variable speed limit signs are needed so drivers know the speed limit when they are driving past without checking the time, when the school term is, or if it is a teacher-only day. The high number of international visitors to the district make this even more important as they cannot be expected to know local school times.
- 6.4 The times and distances for variable speed limits should be determined by the RCA in conjunction with individual schools, as every school is different and blanket rules are not appropriate. Further, the QLD is home to a multitude of events which attract volumes of traffic that are several times the usual daily levels. Network management, including around schools, should not be hampered by limitations on certain areas at certain times and should be up to the RCA to manage traffic safely and efficiently. The proposed Government Policy Statement on Land Transport aimed to reduce traffic management costs, and the proposed changes around schools, and increase to speeds generally, is likely to result in increased costs.

¹⁸ [Rowland, T and McLeod, D. \(2017\) Time and fuel effects of different travel speeds. NZ Transport Agency research report 582.](#)

¹⁹ Rule 3.14(a) of current 2022 Rule

²⁰ [Traffic note 37 revision 2: 40km/h variable speed limits in school zones - guidelines \(nzta.govt.nz\)](#)

²¹ Abley (2024) Static variable 30 km/h school zone sign trial: updated analysis and evaluation

7.0 Full funding assistance will be required if the draft speed rule is introduced

- 7.1 The changes proposed in the draft speed rule will need a dedicated technical resource and budget. As the local government long-term planning cycle is complete, budget has not been allocated nor is it available for the proposed changes. Funding is required to cover the additional costs of responding to the significant changes outlined in the draft speed rule, including staff time, new or repeated community consultation, cost-benefit analyses, and public education. The cost of the original changes to speed limits was borne by ratepayers and making changes so soon needs to be well justified.

Recommendations:

- R.1. Change the wording of the objective of the speed rule to 'all road users being able to reach their destination safely and quickly' to make safety the first priority.
- R.2. Central government undertake robust impact analysis to quantify the impact of the draft speed rule on deaths and serious injuries to road users.
- R.3. Set key performance indicators or central government targets for road safety.
- R.4. Retain a network approach to speed management using the One Network Framework, including for cost-benefit analysis and community consultation.
- R.5. Enable RCAs to set appropriate speed limits that best achieves the objective of a safe and efficient transport network while meeting community needs and with community input.
- R.6. Amend the schedule of speed limits to be non-binding, based on the road categorisations in the One Network Framework, and to outline a graduated range of speeds for road categories that allows for alignment with evidence on speed and road safety.
- R.7. Require CBAs to be undertaken at a network level rather than on a road-by-road basis and align requirements with those in the current NZTA economic evaluation manual.
- R.9. Ensure RCAs can access nationally consistent data and that NZTA is required to develop and maintain guidance on the use of mean operating speed for setting speed limits and provide timely crash data through its Crash Analysis System.
- R.10. Enable RCAs, in conjunction with schools, to determine the settings for variable speed limits around schools in alignment with Traffic Note 37 (including the use of electronic signage).
- R.11. Provide additional funding for required changes as they will not be able to be met through council budgets.