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Christchurch City Council submission on the draft *Land Transport Rule: Setting of Speed Limits 2024*

Introduction

1. Christchurch City Council (the Council) thanks the Ministry of Transport (the Ministry) for the opportunity to provide comment on the draft *Land Transport Rule: Setting of Speed Limits 2024*.
2. The Council's strategic priorities include putting people at the centre of developing our city and district and prioritising wellbeing, accessibility and connection. Creating a healthy, liveable and vibrant city includes setting safe and appropriate speed limits across our network that achieve the right movement in the right places.
3. Our residents also have clearly articulated views about what's important to them in this regard. These views canvas a wide spectrum. This includes those that strongly support speed reduction (particularly on local residential streets and around schools and community facilities); and those that oppose reduced speeds (notably on busier roads).
4. The Council welcomes some of the proposals presented in this consultation process, such as, the alignment of consultation requirements across all Road Controlling Authorities (RCAs). Safety around schools is a shared priority for the Council and our communities. While we welcome the continued focus on safe speeds in school zones, our submission provides some practical suggestions that could assist with achieving better safety and operational outcomes. These relate to a need for greater flexibility in the proposed Rule to reflect the different needs of schools with regard to timing and the extent of reduced speed zones. While supportive of some elements in the proposal there are however, elements of concern raised in our submission.
5. An overarching concern relates to the implications that these proposed changes have for reducing the Council's ability to work with our communities to tailor speeds to the local roading environment and meet community needs. A particular issue for the Council is the potential for un-winding changes that have been made with strong community support. This is of specific relevance for area-based speed reductions that have been put in place around schools and in residential neighbourhoods in Christchurch.
6. Additional points raised for consideration relate to:
 - A broad urban street classification that does not allow for differentiation of the full range of urban street types and their distinct uses and speed management requirements
 - Additional compliance and unplanned infrastructure costs for RCAs
 - A challenging implementation timeline for RCAs; and

- A lack of accompanying evidence made available in support of the proposed speed limit changes.
7. The Council also notes the lack of clarity around the timing and pace of future reversal processes (beyond the initial set of proposed speed limit reversals) if the directions in the draft Rule are progressed. We request that due consideration is given to the ability of our community to influence local decision-making and that the demonstration of public support is a key consideration in any proposed speed limit reversals on local and rural roads in our district.

Submission

Proposal 1 - require cost-benefit analysis for speed limit changes

8. The Council supports the proposal to require a cost-benefit analysis for speed limit changes in principle, but has some suggested amendments on the proposed approach. Namely: that analysis is required on a road-by-road basis.
9. Benefits and impacts from speed limit changes often occur over a wider network area than just a single road and changes proposed can be area-based (such as, around key activity centres).
10. The Council requests that if this proposal is introduced, greater flexibility is provided (at street and/or area or network level) based on the nature of any proposed change(s). Focusing cost-benefit analysis requirements at individual street level if a number of streets in close proximity were part of the same proposal could result in consultation fatigue and confusion for communities and businesses. It also imposes additional compliance costs on RCAs.
11. The Council also notes that while mixed community views on speed limit changes do occur, there are broader benefits reported by our communities than those proposed in the cost-benefit analysis framework. For example, anecdotal feedback from residents on neighbourhood streets where speed reductions have been implemented have reported a greater than expected sense of community, connectivity and safety.
12. We further note that this proposal anticipates that NZTA-Waka Kotahi will issue guidance on how to undertake a cost-benefit analysis. The Council is concerned that this guidance may be inconsistent with the Council's decision-making obligations under Part 6 of the Local Government Act 2002. The requirements and guidance should avoid being overly prescriptive in terms of the decision-making and consultation processes; the Council is well-versed on how to engage with its communities appropriately and is best placed to understand how to analyse the costs and benefits in its district.
13. The proposal also requires negative impacts to be treated as costs instead of disbenefits in cost-benefit analysis. This approach will lead to speed limit project benefit cost ratios being calculated in a different way to other transport projects. The Council requests a consistent methodology for calculating benefit-cost ratios across all transport investments to maintain consistency across benefit-cost ratios, reduce complexity, and reduce administrative costs.

Proposal 2 – strengthen consultation requirements

14. The Council supports the proposed alignment of RCA consultation requirements. It is important that communities are given opportunities to provide feedback on proposals to alter speed limits and access information on how their views were considered in the decision-making process. We support NZTA-Waka Kotahi being required to follow the same consultation requirements as other RCAs.

Proposal 3 – require variable speed limits outside school gates

15. The Council is highly supportive of slow speed zones surrounding schools in general. However, we have some suggested amendments concerning the practical workability of the proposed Rule change.
16. For example, we note from our work in this area to date, that school opening times can vary considerably from one school to another. Some schools also operate split campuses and offer other off-site and after hours activities necessitating a wide range of times where it would be optimal for lower speed limits to operate. To manage this variation across schools we suggest that there is less prescription codified into the Rule to enable RCAs to work with schools to set changes based on individual operating hours and needs.
17. We would also like to see RCAs provided with more flexibility to decide where low speed zones for schools can start and finish. In practice, this would involve enabling a greater ability for RCAs to make pragmatic decisions around school gate adjacency if required. For example, in some areas of Christchurch City such as, Papanui and Merivale, there are a number of schools located within a short distance of each other. For example: Casebrook Intermediate and Marian College both have entrances onto Northcote Road. Applying a 300 metres distance outside of each school, would leave a distance of 300 metres between the two schools where there would be no reduced limit between schools. St Bedes is also located approximately 300 metres in the other direction.
18. More flexibility around where the introduction of school zones are introduced would therefore be helpful to manage this scenario. If implemented as currently drafted, it could easily create confusion for drivers where they would effectively enter a 30km speed zone, exit it into a 50km/h zone and re-enter another 30km/h school speed zone all in close proximity.
19. The Council notes also that the change to variable speed limits alongside the much reduced area around schools does not take into account safety requirements in all school travel scenarios. For example, children travelling to school on foot, scooter or bicycle¹ on surrounding streets and movement around schools during the school day.
20. The Council's preference is to have the flexibility to assess the best solution for each school in consultation with them. Considerations would include: the risk profile of the streets surrounding the school, the way the students travel to and from school; school co-location; and the way a school operates both during the school day and after hours.
21. *See also comments on proposal 7 concerning the implementation requirements and costs.*

Proposal 4 – introduce Ministerial Speed Objective

22. Proposed rule 3.13 allows the Minister to issue a speed directive as to the pace, scale and focus of the speed management changes. The Council requests that such a directive allows sufficient time for the Council to meet its consultation obligations, or its decision-making obligations under Part 6 of the Local Government Act 2022. It is recommended that limits be put in this section so that the directive cannot be inconsistent with the Council's Local Government Act obligations and sufficient time is factored in to enable consultation and decision-making processes.

¹ Findings from the Council's Life in Christchurch Survey 2022 showed that 38% of children are dropped off by car; 19% walk, 14% catch the bus; 13% bike.

Proposal 5 – changes to speed limit classifications

23. The Council has a range of general comments and suggested amendments for consideration with regard to the proposed speed classifications for roading classes. These relate to the:
- lack of recognition of the diversity of requirements for the wide-range of local roads encompassed in the urban streets road class
 - absence of an accompanying regulatory impact analysis or evidence in support of the proposed changes; and
 - reduced regulatory flexibility.

Urban road street class

24. The proposed urban street class encompasses a broad range of residential and neighbourhood streets with different forms and functions. The Council notes that NZTA's One Network Framework (ONF) has not been adopted as a framework for the updated draft Rule. The ONF provides a more granular breakdown of urban roads, based on both movement and place-making.
25. One size does not fit all on urban streets. For example, a suburban residential cul-de-sac and a main street outside shops and businesses would both fit into this category. We strongly support providing RCAs with more flexibility to identify speed limits, taking into account road design, usage, the wider environment and community feedback.
26. The Council requests that in recognition of the diversity of urban street function that either:
1. An updated speed limit range of 30-50 km/h is updated for urban streets road class; and
 2. An updated speed limit range of 30-40 km/h for urban streets with significant levels of pedestrian and/or cycling activity road class; or
 3. Additional speed limit differentiation is made using the ONF urban street family classification (local streets, activity streets, main streets; and city hubs).

Absence of regulatory impact evidence for proposed changes

27. The Council notes the general uplift in speed limits across all road classes in the draft Rule. We are concerned at the absence of regulatory impact analysis or evidence in support of these proposed changes. As a general principle, the Council takes an evidence-based and data-driven approach to managing speed limits and accompanying safe infrastructure on our network. This includes, consideration of safety and broader economic and amenity impacts alongside feedback from our communities.
28. Evidence from our own experience as an RCA shows that reduced speed limits do result in improved safety outcomes. For example:
- Christchurch City Council introduced a 30km/h zone in our central city in March 2016, and later extended the area this zone covered in January 2019. A 2022 review of the impact of shifting from 50km/h speed limits to 30km speed limits in 2016 found that expected injury crashes reduced by 35% after the introduction of the 30km speed zone. The expected rate of injuries also reduced by 46% after speeds were reduced. In the extended areas speeds were reduced from 50km/h to 30 km/h and injury crashes reduced by 57% while injuries fell by 64%.²
 - In 2018-2019 speed limits were reduced in Christchurch suburbs: Addington West, Sumner and Papanui West. Analyses found that expected injuries were at least 40-80% less, compared with neighbouring unchanged suburbs.³
29. The Council has also quantified positive economic impacts from implementing packages of improvements in

² Viastrada (June 2022) *Christchurch Central City CBD – 30km/h speed limit safety review update*

³ Safe Speeds Neighbourhoods Submission – Dr Glen Koorey, Via Strada Ltd, 2 June 2023

consultation with local communities and businesses around local centres. This includes: new anchor tenants coupled with pedestrian and amenity improvements alongside 30-40 km/h speed reductions. As an example, an analysis in 2023 following a package of enhancements along these lines above made to the Woolston Village in Christchurch from 2016 onwards, resulted in significant increases in annual card-holder spend, average transaction value; and a reduction in vacant units. Similarly, the Riccarton key activity centre in Christchurch has experienced an 8% increase in retail spending over the past 5 years following a similar area-wide upgrade.⁴

Reduced regulatory flexibility

30. We note the change in approach in this draft Rule for speed limit classifications is now prescribed in the Rule rather than through a devolved direction to the NZTA Director to prepare evidence-based guidance for RCAs. We caution against this change in regulatory design, as it significantly reduces the flexibility available to make changes over time to speed limit thresholds if new or alternative best practice is adopted.

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

31. The Council supports this proposal in principle, in particular, the role of the Director being one of simply checking the completion of required steps and not having a role to re-evaluate the decisions of the RCA.
32. Related comments about the proposed cost-benefit analysis requirement and Ministerial Speed Objective alignment are included in other sections of the Council’s submission.

Proposal 7 – reverse recent speed limit reductions

33. Under this proposal the Council will be required to reverse all speed limit reductions on local streets with widespread 30km/h speed limits around schools and on arterial roads (urban connectors) that have been made since 1 January 2020.
34. The Council notes that there is provision in the proposal to reverse speed limits on rural State highways which states that existing speed limits can be retained if “NZTA (as RCA) can demonstrate public support for the lower speed limit on all or part of the route”. The Council has similarly undertaken extensive public consultation with local and school communities on speed reductions. For example, the implementation of a slow speed neighbourhood in the Opawa suburb in Christchurch generated 90% support in submissions received.
35. The Council requests that the demonstration of public support clause is also included as a consideration in speed limit reversals on local roads.
36. The Council seeks clarification as to the reason why the 1 January 2020 date has been proposed. We submit that if proposal 7 is retained, the effective date for the reversal to apply to should be changed from 1 January 2020 to 13 April 2022 which is the date the current Speed Limits Rule 2022 took effect.
37. In addition, the consultation document details two separate deadlines for ‘all roads to meet the new variable speed limits outside schools [by] 31 December 2027’ (pg. 9) and then states: ‘the streets surrounding the school will need to reverse to their previous speed limit...by 1 July 2025’ (pg. 12).
38. The 1 July 2025 deadline presents some challenges for the following reasons:
- **Unplanned cost:** while the timelines to complete this submission do not enable a full cost impact assessment of the draft Rule change, it is anticipated that there will be additional costs for signage

⁴ Sourced from Commercial Centre Assessments undertaken for Christchurch City Council in July 2023

changes (in particular, to implement variable speeds around schools safely and effectively) and for road engineering required to suit higher speed limits on roads where limits are reversed that are unlikely to have been provisioned for by RCAs.

- **Whole-of-system considerations:** Related proposed initiatives, such as the implementation of the enhanced enforcement and safety camera programme are important complementary measures to ensure safety on our roads if speed limits are increased. The Council supports an integrated, whole-of-system approach to the implementation of speed management and enforcement changes. We would welcome an update on plans to implement this work to align our own planning against.

39. Given the potential cost implications for the Council we request that if implemented:

- the 31 December 2027 deadline is confirmed for reversing speeds around schools and extended to all changes progressed under this proposal; or
- a 3-year transitional period is included for Councils to both plan and budget for these changes via
- funding provisioned through the 2024 GPS Land Transport to support RCAs to implement these changes.

Other matters

40. We see value in retaining the Speed Management Committee to provide independent oversight of NZTA-Waka Kotahi and ensure clear separation of its roles as regulator and RCA. We also see the Committee has an important role in providing feedback on state highway speed management plans.

41. While we support the intention to achieve greater consistency in setting speeds across the region, we think this can be achieved through collaboration between local councils and does not require Regional Speed Management Plans to be developed.

Conclusion

42. The Council thanks the Ministry of Transport for the opportunity to comment on the draft Land Transport Rule: Setting of Speed Limits 2024. Getting speed management right is important to our Council, our local businesses and our communities. We look forward to our submission points being given due consideration.

For any clarification on points within this submission please contact Lynette Ellis, Head of Transport and Waste Management, lynette.ellis@ccc.govt.nz

Yours faithfully,



Phil Mauger
Mayor of Christchurch