

**Date:** Thursday 8 August 2024  
**Time:** 10.00am  
**Meeting Room:** Reception Lounge  
**Venue:** Auckland Town Hall  
301-305 Queen Street  
Auckland

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## Komiti mō ngā Tūnuku me ngā Rawa Tūāhanga / Transport and Infrastructure Committee

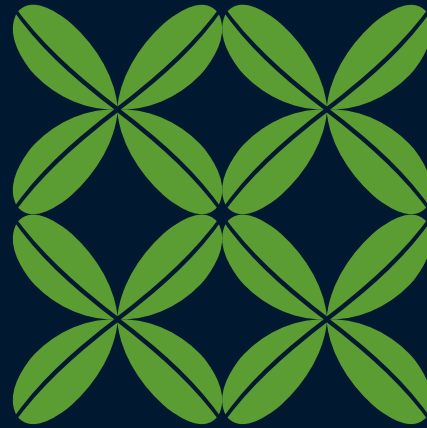
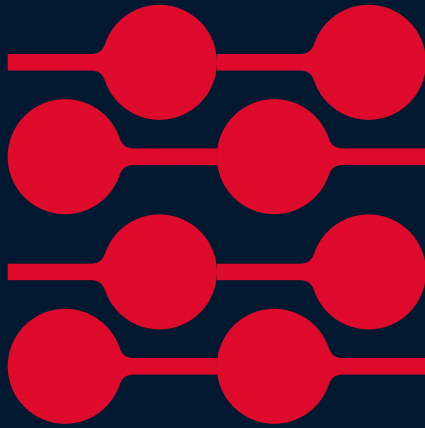
### OPEN ATTACHMENTS

ADDITIONAL ATTACHMENTS  
UNDER SEPARATE COVER

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ITEM	TABLE OF CONTENTS	PAGE
13	<b>Summary of Transport and Infrastructure Committee information memoranda, workshops and briefings (including the forward work programme) - 8 August 2024</b>	
B.	Memorandum: Auckland Council Submission on the Draft Land Transport Rule: Setting of Speed Limits 2024	3
C.	Memorandum: Release of the final Government Policy Statement (GPS) land transport 2024	75
D.	Memorandum: Matariki Block of Line CRL - Successful Integration	85
E.	Information Only: Auckland Council's submission on Draft Land Transport Rule: Setting of Speed Limits 2024	87
F.	Memorandum: Updated city centre targeted rate portfolio	167
G.	Auckland Regional Land Transport Plan 2024-2034	173





**Auckland Council  
Submission on  
the Draft Land  
Transport Rule:  
Setting of Speed  
Limits 2024**



11 July 2024

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## Mihimihi

Ka mihi ake ai ki ngā maunga here kōrero,  
ki ngā pari whakarongo tai,  
ki ngā awa tuku kiri o ōna manawhenua,  
ōna mana ā-iwi taketake mai, tauiwi atu.  
Tāmaki – makau a te rau, murau a te tini,  
wenerau a te mano.  
Kāhore tō rite i te ao.

*I greet the mountains, repository of all that  
has been said of this place,  
there I greet the cliffs that have heard the  
ebb and flow of the tides of time,  
and the rivers that cleansed the forebears  
of all who came those born of this land  
and the newcomers among us all.  
Auckland – beloved of hundreds, famed  
among the multitude, envy of thousands.  
You are unique in the world.*

## Contents

Contents.....	2
Executive Summary.....	4
Introduction .....	8
Summary response to the draft Rule .....	9
Detailed feedback on the proposals .....	12
Proposal 1 – Require cost benefit analysis when consulting on proposed speed limit changes.....	12
Proposal 2 – Strengthen consultation requirements.....	14
Proposal 3 – Require variable speed limits outside school gates.....	15
Proposal 4 – Introduce Ministerial Speed Objective.....	17
Proposal 5 - Changes to speed limit classifications .....	17
Proposal 6 – Update the Director's criteria for assessing speed management plans .....	18
Proposal 7 – Reverse recent speed limit reductions .....	18
Other matters .....	20
Appendix 1: Examples of urban arterial changes and school gate variable speed limit changes .....	22
Appendix 2: Local Board Feedback.....	27
Albert-Eden Local Board .....	29
Aotea / Great Barrier Local Board.....	30
Devonport-Takapuna Local Board .....	31
Franklin Local Board .....	32
Henderson-Massey Local Board .....	33
Hibiscus and Bays Local Board.....	36
Howick Local Board.....	37
Kaipātiki Local Board .....	40
Māngere-Ōtāhuhu Local Board .....	41
Manurewa Local Board .....	42
Maungakiekie-Tāmaki Local Board .....	43
Ōrākei Local Board .....	44
Ōtara-Papatoetoe Local Board .....	46
Papakura Local Board.....	48
Puketāpapa Local Board.....	49

**Item 13**

Rodney Local Board .....	50
Upper Harbour Local Board .....	52
Waiheke Local Board .....	55
Waitākere Ranges Local Board .....	56
Waitematā Local Board .....	57
Whau Local Board .....	61
Appendix 3: WSP Memo on Benefit Cost Analysis of Speed Limit Changes .....	68

**Attachment B**

## Executive Summary

A key focus for Auckland Council is to enable its many communities to thrive, which requires balancing a range of needs. Tāmaki Makaurau / Auckland needs an efficient, safe and accessible transport system that integrates well with its surrounding urban conditions and minimises harm to people and the environment.

Auckland's strategic direction for speed limits and road safety is set out in the Auckland Plan, which recognises that our transport system still creates unacceptable levels of harm. It aims for no deaths and serious injuries (DSI) on Auckland's transport system by 2050. To work toward this goal, Auckland Transport follows the Safe System approach, which builds on a comprehensive body of evidence showing that safe and appropriate speed limits are fundamental to reducing road harm.

The proposed new Land Transport Rule: Setting of Speed Limits 2024 (the draft Rule) moves away from the Safe System approach in an attempt to increase productivity and economic growth through travel time savings. Overall, the draft Rule proposes to increase speed limits across the transport network while limiting provision to address safety concerns and weakening local decision-making and local input to speed management. In this submission we express our concerns with the proposed approach.

On 4 July 2024, the Auckland Council Transport and Infrastructure Committee endorsed the approach of the Auckland Council group submission to the Draft Land Transport Rule: Setting of Speed Limits 2024, that:

- i) **supports** the principle that local councils are best placed to understand local issues and set appropriate speeds, and the government should not be overly prescriptive on Auckland speed matters;
- ii) **opposes** the proposal to require a new and bespoke form of cost-benefit analysis for speed limit changes, noting that Auckland Transport already undertakes cost-benefit analysis for proposed changes to speed limits, but recommends changes to improve the transparency around the calculation benefits and disbenefits;
- iii) **partially supports** strengthening consultation requirements, and recommends changes to reduce administrative costs;
- iv) **opposes** the requirement for variable speed limits outside school gates, but requests flexibility for Auckland Transport to take into account local circumstances;
- v) **opposes** the introduction of a Ministerial Speed Objective, and recommends that ministerial input into speed limit setting should remain part of the Government Policy Statement on Land Transport;
- vi) **opposes** the changes to speed limit classifications, and recommends that local authorities should have flexibility to respond to local conditions and community requests;
- vii) **supports** the update to the Director's criteria for assessing speed management plans;
- viii) **opposes** the reversal of recent speed limit reductions, and recommends that existing speed limits can be retained where community support or special local circumstances are demonstrated.

Auckland Council believes that the centralised setting of speed limits nationally is not flexible enough to address the needs of local communities, all of which face different local conditions. We highlight the importance of our local communities to advocate for the more tailored speed rule setting that suits their unique local conditions. As such, as a general principle, we recommend that the setting of such rules should be devolved to local government as much as possible.

4 Auckland Council

We note that Auckland Transport has undertaken extensive public consultation for previous speed limit changes, including engagement with schools, mana whenua and local boards. The public consultation shows high levels of local support for safe speeds in most circumstances.

Auckland Council is concerned that the approach taken in the draft Rule will compromise safety and lead to an increase in DSI, particularly for vulnerable road users. We recommend that the Safe System approach is retained and applied for speed limit management, as it is based on robust evidence and has consistently achieved substantial and cost-effective DSI savings in many international jurisdictions where it has been implemented.

Auckland Council highlights that for many urban roads, speed limit changes are unlikely to lead to substantial improvements in travel times and economic productivity. Journey times are also influenced by other local factors such as intersection conditions, levels of congestion, geometric constraints on parts of the road, or availability of public transport or active mode infrastructure.

Auckland Council is concerned that the draft Rule would impose significant additional costs on Auckland Transport, at a time when funding pressures limit the ability to deliver the network Aucklanders want and expect, which includes the delivery of safety improvements. Auckland Transport estimates implementation costs of between \$7 million and \$21 million, with further additional costs expected. If no additional funding is made available to Auckland Transport to implement the proposed changes, the additional cost would mostly fall on Auckland ratepayers.

The below table shows a summary of the positions Auckland Council has taken in response to the seven proposals as per the consultation material, as well as recommendations that aim to suggest alternative solutions or improvements to the proposals.

Auckland Council position	Recommendation
<b>Proposal 1 – Require cost benefit analysis (CBA) for speed limit changes</b>	
<b>Oppose the proposal to require a new and bespoke form of cost-benefit analysis for speed limit changes, noting that Auckland Transport already undertakes cost-benefit analysis for proposed changes to speed limits, but recommend changes to improve the transparency around the calculation benefits and disbenefits.</b>	<p>Recommend that government avoid using different methodologies for the Cost Benefit Analysis as inconsistencies and potential confusion would arise as different projects with speed limit implications are progressed through the different appraisal processes.</p> <p>We suggest that the existing NZTA standard economic analysis for project funding be applied to Speed rule applications.</p> <p>Transparency could be better achieved by a requirement for consultation to specifically include quantified benefits, disbenefits, and costs each stated separately. This avoids the potential aggregation of project delivery costs with social costs and/or travel time costs.</p> <p>We recommend that the CBA process allow the grouping of contiguous roads within one analysis.</p> <p>We suggest that the CBA process includes consideration of the congestion and travel time impact of induced driving demand created by higher speed limits that prevent children from being allowed to travel independently to school.</p> <p>We recommend a more proactive approach to safety that allows speed limit changes to be exempt from CBA when they are made in</p>



	<p>response to community requests and for low traffic volume roads and rural roads. This will broaden the focus on crash history and enable RCAs to consider local conditions and community needs when considering safety impacts.</p> <p>We support the exemption of the requirement to undertake a CBA when proposing speed limits for new roads. As no previous data will be available to inform an analysis, it makes sense to set a new appropriate speed limit for a new road.</p> <p>We support the ability to set school gate variable speed limit changes without cost benefit analysis and consultation. These are minor speed limit changes widely understood by local communities and schools without presenting CBA.</p> <p>If CBA requirements are maintained as proposed, for consistency, they should also be applied to the speed limit changes included in Proposal 7.</p>
<b>Proposal 2 – Strengthen consultation requirements</b>	
<b>Partially support strengthening consultation requirements, and recommend changes to reduce administrative costs.</b>	<p>We recommend that the consultation requirement be revised to allow a single analysis for a group of contiguous roads where the same speed limit is proposed.</p> <p>We support the exemption from consultation requirements for variable speed limits at school gates.</p>
<b>Proposal 3 – Require variable speed limits outside school gates</b>	
<b>Oppose the requirement for variable speed limits outside school gates, but request flexibility for Auckland Transport to take into account local circumstances.</b>	<p>We recommend that RCAs retain discretion on implementing permanent or variable speed limits and the distances where speed limits apply outside schools, subject to engagement with local communities and schools.</p> <p>We suggest considering the safety and travel time impacts of more children being driven to school rather than travelling independently because parents perceive the higher speed limits to be unsafe.</p> <p>We support the proposed standard operating times for variable speed limits at school gates.</p> <p>We recommend that government funding is provided to RCAs to cover costs of electronic variable signs in priority locations where they are most needed.</p>
<b>Proposal 4 – Introduce a Ministerial Speed Objective</b>	
<b>Oppose the introduction of a Ministerial Speed Objective, and recommend that ministerial input into speed limit setting should remain part of the Government Policy Statement on Land Transport.</b>	<p>We recommend that Ministerial input into speed limit setting objectives should remain part of the GPS and not be a standalone directive. This would make it subject to consultation as part of the GPS and would avoid potential misalignment between the Ministerial Speed Objective and GPS.</p>
<b>Proposal 5 – Changes to speed limit classifications</b>	
<b>Oppose the changes to speed limit classifications, and recommend that local</b>	<p>We recommend that local authorities should have the flexibility to respond to local conditions and community requests. Road safety research supports 30 km/h as the maximum appropriate speed for</p>

<p>authorities should have flexibility to respond to local conditions and community requests.</p>	<p>cars and vulnerable road users to mix, and this is being widely and successfully implemented in European and other cities.</p> <p>We support the inclusion of urban and rural intersection speed zones as this allows high risk urban intersections to be addressed without needing to impact the subsequent entire road corridor.</p> <p>We recommend the provision for 30 km/h speed limits in town centres and activity streets, by adjusting the table to allow for 30 km/h speed limits in areas with significant levels of pedestrian and/or cycling activity.</p> <p>We recommend the provision for 30 km/h and 40 km/h speed limits for urban streets and 40 km/h speed limits for rural villages to allow for the ability to meet local community demand for safety.</p>
<p><b>Proposal 6 – Update Director’s criteria for assessing speed management plans</b></p>	
<p>Support the update to the Director’s criteria for assessing speed management plans.</p>	<p>We support this as it is primarily a technical amendment to align the Director’s decision-making criteria with the new requirements.</p>
<p><b>Proposal 7 – Reverse recent speed limit reductions</b></p>	
<p>Oppose the reversal of recent speed limit reductions, and recommend that existing speed limits can be retained where community support or special local circumstances are demonstrated.</p>	<p>We recommend that speed limits introduced since 1 January 2020 remain in place.</p> <p>If speed limit reversals are to proceed, we recommend that:</p> <ol style="list-style-type: none"> <li>1. speed limit reversals should be subject to similar CBA and consultation requirements as speed limit reductions,</li> <li>2. existing speed limits can be retained where community support or special local circumstances are demonstrated,</li> <li>3. Intermediate speed limits between the historical and the reduced speed limit (since 1 January 2020) be considered, including for rural roads, where community sentiment supports an intermediate speed,</li> <li>4. Central Government cover the additional costs and allow an additional 18 months for implementation,</li> <li>5. all proposed reversals need to be subject to a sense checking, rule compliance checking and safety review process to ensure they are compatible with the current land use and the tables in schedule 1 and 4 of the draft Rule,</li> <li>6. clarification is provided for what is meant by ‘because there is a school in the area’ in the definition of “Specified Road” in Clause 12.1 (1) (a).</li> </ol>

## Introduction

1. Auckland Council would like to thank the Ministry of Transport for the opportunity to submit on the draft Land Transport Rule: Setting of Speed Limits 2024 (draft Rule).
2. This submission has been endorsed by Auckland Council’s Transport and Infrastructure Committee at their meeting on 4 July 2024 and approved by a delegated sub-committee. It was prepared with input from Elected Members, Auckland Council and Auckland Transport staff.
3. Throughout this submission, ‘Auckland Council’ refers to the Auckland Council group, including Auckland Council and Auckland Transport (AT). AT have provided technical input to the submission and have informed their Board of the key positions outlined in this submission.
4. Auckland Council has 21 Local Boards, representing Auckland’s diverse urban and rural communities and providing a conduit for local knowledge. Input from many Local Boards is included in Appendix 2.
5. This submission starts by setting out the strategic context that setting speed limits sits within, and then addresses the overall response to the draft Rule that reflects the most significant concerns and operational considerations for Auckland Council, including implications for road safety in Auckland, public acceptability of speed limits and speed management, and concerns related to additional costs that would be imposed on Auckland Transport, which is Auckland’s road controlling authority (RCA).
6. After outlining the strategic context, the submission addresses each of the proposals of the draft Rule, outlining Auckland Council’s response and recommendation on each proposal. Where possible, the responses are provided for the three areas listed below, as requested in the consultation document.
  - Implementation or compliance issues
  - Costs associated with implementation
  - Unintended impacts.
7. The submission also addresses additional matters of the draft Rule that are not explicitly part of the proposals.
8. Appendix 1 includes maps showing examples of urban arterial changes, where previous speed limits are no longer considered appropriate. Appendix 2 includes feedback to the draft Rule from Auckland Council’s Local Boards. Appendix 3 is a memo showing work undertaken to show the impacts of the Cost Benefit Analysis methodology proposed in the draft Rule.











































































































































































































































































































































































































































































































































































































































































































