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## **SH2 Ngauranga to Featherston Waka Kotahi Project Team**

Jamie Rowe – Ngauranga to Featherston Speed Project Manager

David Cross – Ngauranga to Upper Hutt Safety Improvements Project Manager

Caleb Owczarek – Upper Hutt to Featherston Safety Improvements Project Manager

Sent via email: *SH2HuttValley@nzta.govt.nz*

## **SH2 Ngauranga to Featherston speed and safety improvement discovery**

Dear team,

Thank you for giving la Ara Aotearoa Transporting New Zealand (Transporting New Zealand) the opportunity to provide feedback on Waka Kotahi NZ Transport Agency (Waka Kotahi) early thinking on improving SH2 Ngauranga to Featherston. We appreciate you are at the feasibility design stage and that you are not consulting with the general public. As discussed, our comments are focussed on what we believe you should incorporate in your feasibility assessment, as opposed to any technical detail on what we heard during the briefing.

Firstly, we request that the feasibility assessment does not lose sight of the primary purpose of roads. Transport externalities, such as safety, are very much second order compared to the primary purpose of a road which is to enable mobility and move freight, the latter being key to a thriving economy. We are concerned that Waka Kotahi's new focus on Road to Zero is resulting in a selective myopic focus on transport externalities, in particular safety, and that is overwhelming sound decision making on the primary purpose of the asset.

Notwithstanding our point above, we agree and support Waka Kotahi considering transport externalities and we expect the feasibility study to consider them. However, we request that all transport externalities are taken into account. During your briefing I was surprised and alarmed over your uncertainty when I queried whether Waka Kotahi would take into consideration the impact on climate. There will be adverse impacts on greenhouse gas emissions and other harmful emissions associated with the consequential disruption to vehicle flows if new signals and raised platforms are introduced.

Generally, we are concerned that Waka Kotahi's carte blanche approach to lowering speed limits across the network is inconsistent with good risk management practice. The Health and Safety at Work (General Risk and Workplace Management) Regulations 2016 refer to a hierarchy of risk control measures. In essence, in order of the most preferred methodology these are: elimination, then minimisation (substitution, isolation, or applying engineering controls), then administration. We agree with your initial thinking on closures at the Cornish and Hebden intersections, as that eliminates the risk. However, lowering speed limits is an administrative level risk control which is essentially the weakest and least effective approach. It appears to us that Waka Kotahi has become ideologically obsessed with Road to Zero. Its philosophical approach, which is ultimately to slow down and disrupt traffic flows on major lengths of state highway, is a concern to us and could set a worrying precedent.

We contend that installing more signals and a plethora of raised platforms is, in effect, introducing new hazards and the feasibility study should consider the consequential perverse outcomes. Our view is that the risks would be better managed by proper engineering design, for example, a grade separated crossing at Melling. If Waka Kotahi continue with the approach of taking the least effective risk mitigations, then it will continue to avoid providing proper engineering solutions, and ironically, that will prevent it achieving Vision Zero.

We do not support safety at any cost and we believe that approach places considerable risk to public money. Decision making using public money must come from an evidence base and more often than not, the evidentiary rigour is sadly lacking with Waka Kotahi proposals from both a road safety for all road users, and economic benefits and disbenefits perspectives.

We urge Waka Kotahi to ensure its feasibility study provides a balanced case on a range of options, including doing nothing, and the impacts of its proposals on all parties, and in particular, provide quality data on the economic and social benefits and disbenefits. This would enable much more meaningful discussion on the return on investment, the opportunity costs, the winners and losers and the risks associated with the proposal. We believe Waka Kotahi has a fundamental responsibility to not only our members, but to the wider New Zealand public, to bring more transparency to the way it considers changes.

If you have any questions on this, please feel free to contact me.

Yours sincerely



**Dom Kalasih**  
*Manager Policy & Safety*