



la Ara Aotearoa Transporting New Zealand

submission to:

Waka Kotahi NZ Transport Agency

on:

Improvements to Brougham St SH76

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la Ara Aotearoa Transporting New Zealand (Transporting New Zealand) submission to Waka Kotahi NZ Transport Agency on: Improvements to Brougham St SH76

1. Representation

- 1.1 la Ara Aotearoa Transporting New Zealand (Transporting New Zealand) provides unified national representation for the trucking industry. It is the peak body and authoritative voice of New Zealand's road freight transport industry which employs 32,868 people (2.0% of the workforce), and has a gross annual turnover in the order of \$6 billion.
- 1.2 Transporting New Zealand members are predominately involved in the operation of commercial freight transport services both urban and inter-regional. These services are entirely based on the deployment of trucks both as single units for urban delivery and as multi-unit combinations that may have one or more trailers supporting rural or inter-regional transport
- 1.3 According to Ministry of Transport research (National Freight Demands Study 2018) road freight transport accounts for 93% of the total tonnage of freight moved in New Zealand

2. Introduction

- 2.1 Transporting New Zealand provides sector leadership and believes we all need to operate in an environment where the following must be managed and co-exist:
 - The safety and wellbeing of our drivers and other road users; our drivers are our most valuable asset
 - The impacts of transport on our environment
 - The transport of goods by road is economically feasible and viable and it contributes the best way it can to benefit our economy.
 - 2.2 Transporting New Zealand welcomes the opportunity to comment on Waka Kotahi NZ Transport Agency's (Waka Kotahi) proposed improvements to Brougham St SH76 and is generally supportive of the intended improvements.
 - 2.3 Transporting New Zealand and its members have had ongoing discussions with Waka Kotahi on the proposed changes along SH74 Brougham Street. The changes will have a major impact on our members, many of who who use this route several times a day, taking goods to and from Port Lyttelton. Our concerns voiced earlier with the proposed changes are reiterated in this submission.
3. Specific comments on proposed feedback is below. For convenience of the reader we have repeated Waka Kotahi's question prior to our response.
- 3.1 ***What are your thoughts about the proposed plan for State Highway 76? Is there anything you think we need to know before we finalise our designs and begin Construction?***

Generally we agree and support the changes to improve safety and productivity in getting goods to and from Port Lyttelton. The efficient and safe movement of freight on this particular route is a priority given it is the main route to Port Lyttelton.

3.2 ***What are your thoughts about the proposed walking and cycle improvements? Is there anything you think we need to know before we begin construction?***

We agree with the intent to improve the safety of pedestrians and cyclists. We accept an overbridge (Simeon-Collins) is a cheaper solution than tunnelling however, we are concerned that if not correctly designed, a significant number of pedestrians and cyclist may elect not to use it and this will have the perverse outcome of putting some road users at increased risk.

We are also concerned that introducing an overhead structure creates an inherent choke point for the size of loads moving down this route and we urge Waka Kotahi to make the structure a height that is acceptable to the New Zealand Heavy Haulage Association.

We recommend the Land Transport Road User Rule be amended to obligate cyclists and pedestrians to use the facilities designed for them. Truck drivers regularly see cyclists using the road despite there being an adjacent cycleway available which limits the effectiveness of the investment in these safety improvements.

3.3 ***What are your thoughts about the proposed T2Lanes? Is there anything you think we need to know before we begin construction?***

We support the use of T2 lanes with parking allowed during off-peak periods.

3.4 ***What are your thoughts about the proposed intersection upgrades? Is there anything you think we need to know before we begin construction?***

Generally we support the changes, particularly those that turn some of the minor side streets into cul de sacs, which helps turn the road into a more arterial route with less interruptions.

However, we are concerned that Waka Kotahi does not have a good appreciation of the adverse impacts on environment and safety outcomes if the signal phasing across multiple blocks is poor. Therefore, our support for the changes is on the proviso that the lights are phased to optimise traffic flow.

3.5 ***We're reviewing the Speed Limit along this stretch of road. What do you think about the current 60km/h speed limit on this road?***

We support the current speed limit of 60km/h as the changes proposed provide improved safety requirement for pedestrians, cyclist, and motorists.

Notwithstanding, we are mindful that across the network Waka Kotahi appears to have a current obsession with lowering speed limits. We believe that given the nature of the traffic using this route, there are relatively well-defined peaks at various times of day and respective days of week. Given traffic volumes have such a significant impact on driver behaviour and the actual speed, we recommend that

variable speed limits be applied. We believe that is the best way to optimise productivity, safety and compliance on the route.

4. Other comments

- 4.1 As discussed earlier, our preference to better manage the risk to cyclists would have been to build a cycleway adjacent to the rail corridor and create true separation between the modes. We are concerned that there is a not insignificant amount of investment required for these changes to Brougham St. and in the longer term there will considerable regret cost given this is a sub-optimal approach.
- 4.2 We have several concerns with Waka Kotahi's intention to plant trees on this and other routes. While we accept plants can add to the beautification of the route our concerns are:
- The trees become a choke point to the size of loads that can travel along the route
 - The trees introduce an ongoing maintenance cost, and when such maintenance is undertaken this invariably is hazardous and creates congestion on the route. Therefore, this will introduce a new risk for the safety of both the workers undertaking the maintenance and road users travelling through those work sites
 - The trees will obstruct the visibility of drivers of other road users and as a consequence that reduces their reaction time to respond in an emergency
 - The trees, particularly larger ones, are an inherent hazard. We understand there have been several cases where people have suffered serious injury due to collision with trees and had the trees not been there, the outcome would have been significantly different.
- 4.3 The physical changes proposed to the route will impact the businesses along the route. While those effected business are not predominantly our members, we urge Waka Kotahi to rigorously consider the impacts, particularly but not limited to, the economic impacts on those businesses.