



SUBMISSION

Submission: Transport Rebuild East Coast (TREC)

To: Waka Kotahi NZ Transport Agency

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**la Ara Aotearoa Transporting New Zealand (Transporting New Zealand)
submission to Waka Kotahi NZ Transport Agency (NZTA) on the Transport
Rebuild East Coast (TREC)**

Background

1. Transporting New Zealand appreciates the opportunity to provide feedback to NZTA on the following three areas that TREC has proposed options on:
 - a. SH2 Devil's Elbow
 - b. SH2/SH5 Eskdale
 - c. Mangahauini Gorge SH35
2. These sections of state highway are key to connecting the communities and the regions of Hawkes Bay and Gisborne. When these links are broken the alternatives routes take much longer, and are much more arduous.
3. We understand the proportion of heavy commercial vehicles in the traffic streams on SH2 and SH5 in these regions to be typically in the order of 15 to 20 percent which is higher than the national average of 10 percent. This shows the importance of maintaining these routes so that goods can get to their respective destinations and keep these communities and economies going.
4. Given the predictions that climate events are likely to increase in terms of both frequency and severity Transporting New Zealand believes careful consideration must be given to improving resilience of the network.
5. Transporting New Zealand also believes that NZTA, as the state highway manager, needs to focus on value for money.
6. Prior to providing specific comments on the proposals for the three areas, as a general comment we are concerned at the lack of quantitative information that has been provided with the proposals in all three areas, particularly in the areas of Devil's Elbow as this has been a known problem and there have been ongoing discussions on this issue over the last decade or so.
7. Transporting New Zealand has regularly raised concerns about the risk of cost overruns with capex investment in our state highway network.
8. There is a concerning lack of quantitative information provided by NZTA during this consultation. Consequently, Transporting New Zealand is concerned it appears there is not only a high risk that the work in these areas will not deliver value for money but furthermore, we do not believe it is reasonable for NZTA to expect that meaningful consultation can be undertaken at this stage.

SH2 Devil's Elbow

9. NZTA is considering a range of ideas from repairs to major works like widening the road (to allow crews to remove slip material without closing the highway) and realigning

sections to avoid areas prone to slips and rockfalls. More specifically it is seeking comments of the following three ideas:

- a) Widening the road on the two approaches by cutting into the hillside or constructing structures (short bridges) over the gullies to make the road straighter and wider.
 - b) Creating new larger drainage channels alongside the road. This would capture and divert stormwater and sediment, helping to prevent further erosion and underslips. This will create more space for road crews to clear slips without having to close the highway.
 - c) A new bridge or upsized culvert to ease the sharp bend at Devil's Elbow corner. This would improve safety and better manage water flows down the gully.
10. Transporting New Zealand does not believe NZTA has provided sufficient information, particularly in terms of the respective costs and levels of increased resilience for each of the improvement areas, for meaningful consultation on the above ideas.
11. Transporting New Zealand is concerned that TREC has not been sufficiently transparent in considering other options, in particular the re-routing of SH2 along the rail line. We acknowledge the capital cost of building a re-routed SH2 along the Rail corridor will be substantial, however it offers the following potential benefits:
- a. The work could proceed un-interrupted and without traffic control – as it is not a functioning transport route
 - b. There is low uncertainty / capital cost risk – as the route is established and at least partly developed.
 - c. Overall the terrain is much less challenging – leading to lower design and build cost risks.
 - d. The geometric characteristics of the rail corridor route are much less demanding therefore there would be benefits to the environment and a lower energy cost to travel the route.
12. Transporting New Zealand believes prior to further considering the Devil's Elbow improvements NZTA should provide a benefit cost analysis, including but not limited to environmental impacts, emissions, improved productivity, safety and resilience of the respective options.

Esk Valley

13. NZTA is considering the following range of improvements:
- a) SH2: Raising SH2 from the Esk River Bridge to Whirinaki Drain, to reduce the frequency and effects of overtopping during flood events. Upgrading Whirinaki Drain Culvert to carry larger water volumes. Replacing Esk River Bridge with a higher bridge to reduce the frequency of overtopping and also allow water to pass underneath easier. Replacing Esk River Bridge with a larger bridge.

- b) SH5:
 - a. Raising part or all of SH5 (from Munns Bridge to SH2) to reduce the frequency and effects of overtopping and part of Hill Road near the intersection of SH5 so it can still be used during flood events; or
 - b. Shifting SH5 to south of the floodplain and constructing it at a higher level.
 - c) SH2 and SH5: Stronger pavement, improved drainage and culverts on both SH2 and SH5.
 - d) SH2/ SH5 intersection safety and resilience:
 - a. Upgrading the intersection to make it safer (possible roundabout or other safer, modern design); or
 - b. Minor resilience improvements to provide slope stabilisation/rockfall protection.
14. As was seen with Cyclone Gabrielle, infrastructure damage in this area can break connections to the Central Plateau as well as to Gisborne, therefore Transporting New Zealand believes it is important that network resilience is improved here.
15. Transporting New Zealand does not believe NZTA has provided sufficient information, particularly in terms of the respective costs and levels of increased resilience for each of the improvement areas, for meaningful consultation on improvements in the Esk Valley study area.
16. In regard the two options referred in part 12d), Transporting New Zealand believes prior to further considering these options, NZTA should provide information on the expected safety benefits as a consequence of upgrading the intersection compared to the benefits of increased resilience from slope stabilisation and rockfall protection.

Mangahauini Gorge SH35

17. NZTA have proposed three options:
- a) Resealing and repairing the current route
 - b) Making changes to the road alignment to avoid areas that are susceptible to slips and damage
 - c) Exploring new route options
18. There is no information on the costs of the options or the period of times each option would require to implement and these factors are critical to selecting a preferred option. With that caveat Transporting New Zealand offers the following comments.
19. Resealing and repairing the current route leaves it vulnerable to the next major weather and does nothing to improve resilience, and therefore that places the investment in resealing and repairing the route at risk.
20. Transporting New Zealand understands that the initial routes NZTA has considered, which avoid the Mangahauini Gorge, cross through land with sections of weak geology and high landslide risks. On that basis, it appears highly questionable whether there

would be additional resilience added to justify the additional capex, which presumably would be significant for building new routes.

21. Given the limited information on the change in risk to resilience with the respective options, and presuming the capital investment associated with changing the road alignment in the Gorge to avoid areas that are susceptible to slips and damage will be considerably more than the reseal and repair option but significantly less than a new route away from the gorge, it appears to Transporting New Zealand that option b) is likely to be the most viable option of the three presented.

About Ia Ara Aotearoa Transporting New Zealand

Ia Ara Aotearoa Transporting New Zealand is a national membership association representing the road freight transport industry. Our members operate urban, rural and inter-regional commercial freight transport services throughout the country.

As the peak body and authoritative voice of the road freight sector, Transporting New Zealand's purpose is creating the environment where trucking operators can drive successful, safe, sustainable businesses. Our strategic priorities are:

- Providing one industry voice for advocacy
- Promoting the road freight transport industry
- Attracting talent and promoting workforce development
- Supporting our members and customers
- Sustainability, safety and responsible emissions reduction

New Zealand's road freight transport industry employs 33,000 people (1.2% of the total workforce), and has a gross annual turnover in the order of \$6 billion. This is part of a wider transport sector that employs 108,000 people and contributes 4.8 percent of New Zealand's GDP. Road freight transport accounts for 93% of the total tonnage of freight moved in New Zealand (MoT National Freight Demands Study 2018).

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