

Out of scope

Programme Manager, Transport Services
Waka Kotahi NZ Transport Agency
Majestic Centre (Level 5)
100 Willis St
Wellington 6140

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By email: WNOR@nzta.govt.nz and Out of scope@nzta.govt.nz

Dear Waka Kotahi NZ Transport Agency /

Submission on Waka Kotahi NZ Transport Agency Consultation on NZTA3.B – Future of SH59 post opening of Te Aranui o Te Rangihaeata (Transmission Gully)

Thank you for meeting with Council on 23 February 2023 where we discussed Waka Kotahi NZ Transport Agency proposals as part of your *Consultation on NZTA3.B – Future of SH59 post opening of Te Aranui o Te Rangihaeata (Transmission Gully)*.

Our Mayor and Councillors provided a strong and united view that, to give effect to your vision, outcomes and the climate crisis, it is critical that Waka Kotahi takes this opportunity to implement an all-of-transport road corridor reallocation trial, on this section of State Highway (SH) 59 now, not at some time in the future when demand will have already increased and four laning may be a necessity due to traffic volumes that have been allowed to increase. One of our Councillors expressed the view that to do anything else was an abdication of responsibility.

Responding to the consultation document for your *Consultation on NZTA3.B – Future of SH59 post opening of Te Aranui o Te Rangihaeata (Transmission Gully)* Council responds as follows:

1. General:

- (a) There is a significant focus on *motorised traffic*. Waka Kotahi should be focussing on **all road users** e.g. *“better servicing for both vehicles on side roads and pedestrians waiting to cross with a reduced wait time”* but no mention of cyclists who will also be using the very same intersection as motorised users.
- (b) How do the consulted parties, and the public, comment on the Safe System / Road Safety Audit review if the report is not available? The Safe System / Road Safety Audit assessment should be available as part of the consultation material.
- (c) What is the scope of the Safe System / Road Safety Audit review? Does the Safe System / Road Safety Audit review include the assessment of safe levels of service for non-vehicular users? Will the Safe System / Road Safety Audit include an assessment of *555 incident reporting?
- (d) Council notes that Condition NZTA3.B states *“including the following matters”* so that does not limit Waka Kotahi’s consultation to just those 11 matters listed. Waka Kotahi are silent on other

matters that they have known about, pertaining to this length of SH59, since the original Environment Court decision of 2000.

- (e) Council is supportive of Waka Kotahi's proposed *Strategic Plan* (for the full SH59 corridor) but this work should **not** be delayed and Waka Kotahi should fully fund this work (including PCC's contribution).
 - (f) Council understands that the statement "*Waka Kotahi and Porirua City Council to prepare a strategic plan for the full SH59 corridor which will consider future growth projects*" implies that such a *Strategic Plan* (for the full SH59 corridor) is some time away (possibly years by the statement "*We will be doing further strategic work to investigate this road over the next few years*") but under proposal (e) "*Waka Kotahi and Porirua City Council will consider the strategic plan for the full SH59 corridor when reviewing the safe system assessment*" implies that the *Strategic Plan* (for the full SH59 corridor) will be ready along with the Safe System / Road Safety Audit which is expected in late March 2023.
 - (g) When is Waka Kotahi's proposed *Strategic Plan* (for the full SH59 corridor) expected to be completed?
 - (h) Will there be public input and/or consultation to the proposed *Strategic Plan* (for the full SH59 corridor)?
2. Traffic Signals:
- (a) Council is supportive of signal optimisation that discourages use of SH59 as an interregional vehicular transport route whilst better servicing side road users and pedestrians.
 - (b) Council is concerned at 'Red light Running' behaviour along this section of SH59 and requests that the Safe System / Road Safety Audit considers the consequences of such behaviour if appropriate enforcement is not undertaken.
3. Future Growth:
- (a) Future Growth needs should not be limited to the future movement of people. It also needs to accommodate movement of goods and services.
 - (b) Future growth should not be a precursor to maximising the passage of private motor cars and trucks at the expense of active and public transport modes of traffic. Restricting the accommodation of possible future demand for passage by private motor cars and trucks can be influenced now by restricting such capacity such that alternative modes of transport are encouraged, and accommodated for, **now**.
4. Pou:
- (a) Council is concerned at the lack of recognition of Ngāti Toa in the consultation document and request that pou are incorporated into the corridor to acknowledge iwi and significant sites. Such acknowledgement should be via direct consultation with Ngāti Toa and for Council to be informed during the consultation process.
5. Proposals:
- (a) *Ownership and control of Paremata Road, Mana Esplanade and St Andrews Road:*
 - i. Council is supportive of Waka Kotahi retaining State Highway (SH) 59 (formerly SH1) as state highway and continuing to provide inter-regional resilience should SH1 Transmission Gully Motorway (TGM) close for any event.
 - (b) *Options relating to the future of the original Paremata Bridge:*
 - i. Whilst Council is generally supportive of Waka Kotahi's proposal to retain the original Paremata Bridge Council does not support the delay in initiating investigations of the structural adequacy of the bridge nor its possible impacts on the health of the Pāuatahanui Arm of the Porirua Harbour (as the region's only large estuarine wetland).
 - (c) *The continuation of four laning of St Andrews Road between Acheron Road and James Street:*
 - i. Referring to the second (2nd) paragraph above the safety of all road users along SH59 within Porirua City is a priority for Council. As such, the safety of the space allocation across SH59 needs to be reviewed urgently and modified, as necessary, to meet minimum standards or industry best practice. This could include:
 - Two (2) vehicular lanes and two (2) shared path lanes
 - Two (2) vehicular lanes and two (2) parking 'lanes' that can't be used as a through lanes
 - Widening of the footpaths and using appropriate technology (such as, for example, Smartstud® LED road marker) to provide three (3) lanes, in a 2+1 tidal flow

configuration, at peak times but reverts to two (2) lanes and a shared path lane at other times

- The purchasing of property to appropriately accommodate four (4) lanes plus footpaths

For clarity, if Waka Kotahi do not wish to investigate, and implement within an appropriate timeframe, the use of appropriate technology such as, for example, *Smartstud® LED road marker*, to accommodate tidal flow plus kerbside parking within the reallocated road corridor then Council is supportive of forgoing kerbside parking to provide two (2) traffic lanes and two (2) shared use active/bus lanes, plus footpaths, within the existing road corridor as a trial to be implemented **now** (i.e. ideally within the current financial year but no later than 31 December 2023).

- ii. Council understands that the 2000 Environment Court decision to allow for sub-standard 4-laning was on the premise that TGM would be operating from 2006 (i.e. it was a short term solution only). The safe, long term, allocation of road users across its width needs to be investigated **now**.
 - iii. If no change is to occur, as proposed, then:
 - Better enforcement of the clearways needs to occur along with improved signage and/or markings so that inappropriate use of the non-operating clearway lane does not occur (e.g. Smart Stud technology along the Clearway Lanes)
 - Footpath user safety in relation to HCV's using the kerbside lane has to be investigated and remedial actions undertaken as necessary.
 - iv. The trialling of an alternative corridor allocation model along this section of SH59 would allow Waka Kotahi to be contributing to, and supporting, the 40% VKT regional reduction target **now**. Influencing the future habits of SH59 users **now** is requested and supported.
- (d) *Measures (to the extent that they are legally available) to restrict or discourage heavy vehicle movements through the Paremata Road, Mana Esplanade and St Andrews Road:*
- i. Council is supportive of Waka Kotahi's proposal **not** to prohibit Heavy Commercial Vehicles (HCV's) along this section of SH59 as SH59 is an approved inter/intra-regional heavy vehicle route, including for Over Dimensional loads, it provides inter/intra-regional resilience and numerous businesses within this length of SH59 are serviced by HCV's.
 - ii. Council will be supportive of measures by Waka Kotahi to encourage HCV's not to use this section of SH59 for through traffic only purposes.
 - iii. Council requests Waka Kotahi to provide regular updates to interested parties on HCV usage along this section of SH59 for monitoring purposes (e.g. monthly data updated every two (2) months).
- (e) *Other measures required to ensure an adequate level of service for the traffic volumes and traffic type expected to use the Paremata Road, Mana Esplanade and St Andrews Road:*
- i. Whilst Council is supportive of not making changes without the appropriate information, and need, Council is disappointed that those aspects of the Safe System / Road Safety Audit that were not dependent on post-TGM traffic volumes were not undertaken well in advance of this consultation so such data was available to be considered as part of this consultation (e.g. space allocation across the road reserve as discussed in 4(c) above).
 - ii. Plimmerton RAB vegetation restricts driver sight lines to pedestrians crossing SH59.
- (f) *Provision of arrangements for cyclists:*
- i. In conjunction with the review of safe corridor allocation within the road reserve Council does not support Waka Kotahi's proposal without the appropriate justification.
 - ii. Whilst walking and cycling facilities adjacent to the west of Mana Esplanade (Te Araroa) and the East of Mana Esplanade (Camborne Walkway) do exist this does not mean that the current SH59 is safe for cyclists and they are a permitted user of SH59.
 - iii. Active mode assessment should also consider wayfinding as well as safety along all routes.
 - iv. The current facilities are suitable for leisure use only and not for recreational and/or inter-regional use.
 - v. Council's Climate Strategy champions a fit-for-purpose 'Third (3rd) Transport Network' and, irrespective of Waka Kotahi's possible desire otherwise, such a 'Third (3rd) Transport Network' requires SH59 to be active mode transport friendly and accommodating (i.e. incorporated in to the SH59 road corridor or fund an alternative route external to the SH59 corridor).
 - vi. Such a 'Third (3rd) Transport Network' needs to connect to existing networks north and south (e.g. the Ara Tawa trail).

- (g) *Alteration of footpath widths:*
- i. Refer to 4(c) above.
 - ii. Council supports Waka Kotahi taking appropriate remedial action/s related to footpaths arising from the Safe System / Road Safety Audit but Council does not support Waka Kotahi's proposal to just "**review any safe system assessment recommendations related to footpaths**".
 - iii. Left hand HCV lane use, northbound, from Steyne Ave is especially intimidating. Whilst this may be a matter of HCV's attempting to get in to the left hand lane prior to navigating the Plimmerton RAB intersection the safety consequence of the available footpath width in this area combined with primary school aged children moving to/from Plimmerton School needs to be reviewed as part of the Safe System / Road Safety Audit.
 - iv. Footpath user Safe System / Road Safety Audit assessment needs to take account of the fact that footpath issues are compounded at intersections, where the available footpath width is often at its narrowest due to traffic signal poles etc, but this is where the greatest concentration of users is.
- (h) *Removal of traffic lights:*
- i. Council is supportive of Waka Kotahi's proposal not to remove any traffic lights as they provide safe and controlled access to all users accessing residential and recreational areas, facilities and amenities along Paremata Road, Mana Esplanade and St Andrews Road.
 - ii. Council requests that signal optimisation is regularly reviewed and reported to it (including for one-off and/or infrequent events such as non-regular use of Ngāti Toa Doman).
 - iii. Council supports Waka Kotahi taking appropriate remedial action/s related to traffic signalised intersections arising from the Safe System / Road Safety Audit but Council does not support Waka Kotahi's proposal to just "**review any safe system assessment recommendations related to traffic signalised intersections**".
- (i) *Changes to the operation of the clearways or High Occupancy Vehicle lanes:*
- i. Refer to 4(c), (f) & (g) above.
 - ii. Whilst Council agrees that it is necessary to retain the available alignment for future movement of people, the clearways are clearly not operating as well as they could due to the lack of enforcement, which puts other road users at risk. Council is aware that the kerbside lanes are often used as the 'fast lane', as drivers attempt to undertake those ahead of them, irrespective of whether or not the clearways are operating. Additionally HCV's are using the kerbside lanes which brings them very close to footpaths users, which includes young children on bikes and caregivers with buggys/prams/strollers etc. who are constrained by the seemingly inadequate width of the footpaths. Council requests that a review of the operations of this length of SH59 is undertaken now and appropriate enforcement implemented ASAP without delay.
 - iii. Without sufficient supporting information Council cannot agree that the retention of current risk to road users is necessarily acceptable. Whilst the proposals may not increase risk this does not mean that current risk is acceptable or meets minimum standards and/or industry best practice.
 - iv. Left hand HCV lane use, northbound, from Steyne Ave is especially intimidating. Whilst this may be a matter of HCV's attempting to get in to the left hand lane prior to navigating the Plimmerton RAB intersection the safety consequence of the available footpath width in this area combined with primary school aged children moving to/from Plimmerton School needs to be reviewed as part of the Safe System / Road Safety Audit.
- (j) *Alteration of arrangements in relation to capacity:*
- i. Refer to 4(c), (e), (f) & (g) above.
 - ii. Whilst Council agrees that it is necessary to retain the available alignment for future movement of people Council requests that a review of the capacity of this length of SH59 is **not** delayed and should be undertaken **now**.
- (k) *Any changes to be sought to any NZTA designation in relation to those matters:*
- i. Council cannot support this proposal while matters raised above remain an issue.
6. Council has the following, additional, matters/issues of concern and requests that Waka Kotahi addresses these matters as part of this consultation process:
- (a) How often is theoretical peak capacity of 1,400 veh/hr exceeded along this section of SH59 (thus 'necessitating' 4 lanes as opposed to requiring 4-lanes due to Annual Average Daily Traffic (AADT) because Council understands that SH58 over Haywards Hill potentially warrants 4-Laning based on AADT but Waka Kotahi are not 4-Laning SH58)?

Thank you for the opportunity to submit on your proposals.

Ngā mihi

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Chief Executive
Kaiwhakahaere Matua

Cc: Out of scope@nzta.govt.nz

Proactively released