

To whom it may concern,

As the roading asset managers of 9 local authorities in the Waikato region, we are writing to you to express our serious concerns over the **draft New Zealand Guide to Temporary Traffic Management (NZGTTM)**.

Our feedback is as follows:

1. Consultation Process

- 1.1. The TTM industry hasn't seen a change of this magnitude in many years. Consultation and communication from Waka Kotahi to local government has been poor, and the submission period is insufficient to address the many and valid concerns.
- 1.2. There is also a lack of information on the transition process and timeframes. This puts councils in a difficult position of needing to make significant changes to their TTM approach with no current indication of timeframes or processes.
- 1.3. The lack of meaningful engagement by the Agency has raised concerns from the road controlling authorities that the Agency has failed to follow their own published guidelines on the procedure for consultation <https://www.nzta.govt.nz/about-us/consultations/>
- 1.4. We are aware that similar concerns are being expressed by RCA's across the country and would expect that the Agency make all responses available.

2. Need for Change

- 1.1. Waka Kotahi have stated that they have introduced NZGTTM in response to changes in health and safety guidance on risk assessment from Worksafe, and it is our understanding that this document will replace the existing Code of Practice for Temporary Traffic Management. At this time the Agency have provided no evidence that they have undertaken a review of CoPTTM to establish that it is unfit for use as a guide for the design of temporary traffic management works or that the current CoPTTM system of training is unfit for purpose.

**Question – Will Waka Kotahi provide the business case and Agency briefing to the project team for the development of NZGTTM for review by an external body?**

**Will the Agency confirm the suitability of the use of CoPTTM for the design of temporary traffic management systems, and if not provide a review with written details of the issues that they have identified with the document that make it unfit for use.**

3. Legislation alignment.

- 3.1. The draft NZGTTM refers to the WorkSafe's road and roadside worker health and safety good practice guide which was consulted on last year. WorkSafe have since removed all traces of the consultation document from their public facing website. **Please provide access to this Worksafe guide for reference.**
- 3.2. The draft NZGTTM legislation introduction refers to the Local Govt Act 2002 general purpose and then the section on Bylaw making powers. However, the more specific Local Govt Act 1974 Part 21 and section 353 sets out Council's specific responsibilities, and while this is quite dated it still seems more relevant to the NZGTTM and removes the indication that somehow it is going to be mandated with a bylaw. **Is it Waka Kotahi's intention that all local authorities make new bylaws to manage Temporary Traffic**

**Management (TTM)? If this is the case, then it may lead to multiple interpretations of the NZGTTM and the variation of standards for temporary traffic management across the country leading to increased risk for road users and workers.**

- 3.3. There are concerns around how the new document aligns with relevant legislation.

**Question: Have Waka Kotahi completed a legal review, especially relating to how the new guide aligns to relevant current legislation, and can that information be shared for review?**

#### 4. Consistency in Temporary Traffic Management

4.1. The new guide is more subjective; therefore it is possible that consistency of TTM will decrease.

4.2. There are concerns over how the new guide will affect the type and look of TTM around the region and country. Drivers may well see different TTM from site to site even for common road maintenance tasks like line marking or sealing, depending on the company and staff that are working on it. This may put drivers, roadworkers and the public at increased risk.

**Question: How will the new guide ensure consistency in traffic management, especially for the travelling public? How will any inconsistencies be identified and addressed?**

#### 5. Transition to the new guide

5.1. Implementing a whole new guide will be costly as internal processes and contracts will need changing and staff require additional training. This will add pressure to an already stretched workforce, which ultimately is a risk to safety in itself.

5.2. There is a lack of detail about the transition process such as how long it will take, what role Waka Kotahi will play, costs etc.

**Question: What is the expected transition period for this process and what are the steps within that transition?**

**What other documents are expected to require review to support the NZGTTM and when will this occur?**

#### 6. Resourcing

6.1. The new guide places much more responsibility on risk makers to manage risk. "If you create the risk, you manage the risk" This is a laudable requirement. The NZGTTM does however appear to be written for the person who already has a significant appreciation of traffic management, risk assessment, road management terminology and road system design and this will suit the professionals and big operators looking after highways and the larger local road networks. However, a significant portion of local government TTM approvals are to small contractors, who will not have this expertise nor an ability to spend a great deal of time to become risk assessors and managers. They will therefore have to rely on commercial traffic management suppliers to assess risks and provide this service more so than occurs presently. Many small contractors under COPTTM have done enough training to run the majority of their operations satisfactorily in house. There is a risk here that smaller operators will no longer be able to manage TTM and that

professional TTM companies will also not have the resources to pick up this extra workload.

6.2. The system already experiences bottlenecks now in the preparation and processing of Traffic Management Plans (TMPs). This will only be exacerbated by a system change where most current people in the industry will require new training.

**Question: How will industry resource this change, both during the transition period and afterwards?**

## 7. Training

7.1. There is concern the Transport Agency may be stepping aside from its historical role as leader in training assurance and standards and delegating to multiple firms across country with individual requirements/syllabuses. This will lead to inconsistency and increase risk.

**Question: How will training providers be supported to create common training materials and programmes, and how will this new training regime affect training costs and career pathways?**

**Who will maintain a central register of currently trained and certified personnel, and how will the level of training across the country be maintained?**

## 8. Costs

8.1. It is acknowledged that cost should not be a barrier to doing the right thing and ensuring the public and road workers are protected but TM costs are very likely to increase significantly for Contractors, Utilities, Event organisers and Road Controlling Authorities (RCAs) both initially while a system change is introduced and longer term as the costs of the more rigorous processes are embedded.

**Question: Have Waka Kotahi costed the implementation of the new system and future costs under the new system and considered how those costs will be funded? Can you provide copies of this review or indications from your trials of the system?**

At this time, and until the questions above have been answered to our satisfaction, we regret that we cannot support or endorse this document or its adoption.

Thank you for your time, we look forward to receiving your response.

Regards

Hamilton City Council – Gordon Naidoo



Hauraki District Council – Lukas DeHaast



Matamata Piako District Council - Mike Van Grootel



Otorohanga District Council - Andreas Senger



South Waikato District Council – Chris Clarke



Taupo District Council – Denis Lewis



Thames Coromandel District Council – Ed Varley



Waikato District Council – Ross Bayer



Waipa District Council – Bryan Hudson

