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Draft NZGTTM Feedback 2022  
Waka Kotahi NZ Transport Agency  
PO Box 5084  
Wellington 6140  
New Zealand  
[ttm.consult@nzta.govt.nz](mailto:ttm.consult@nzta.govt.nz)

## **Timaru District Council submission on the draft New Zealand guide to temporary traffic management (NZGTTM)**

### **Introduction**

1. The Timaru District Council thanks Waka Kotahi for the opportunity to provide comment on the draft New Zealand guide to temporary traffic management (NZGTTM).
2. This submission is made by the Timaru District Council, 2 King George Place, Timaru. The contact person is Suzy Ratahi, Land Transport Manager, Timaru District Council. Suzy can be contacted on (03) 687 7200.
3. The Timaru District Council (TDC) is a local authority, serving over 46,000 people in South Canterbury. The main centre is Timaru, with other smaller settlements of Geraldine, Pleasant Point and Temuka.
4. The Timaru District is a sub-regional centre in Canterbury with a strong primary and industrial base that provides a significant contribution to the Canterbury economy. The District has its own international port, Primeport Timaru, and a regional airport with scheduled passenger services.
5. The Land Transport Unit within TDC is responsible for the provision, operations, maintenance and development of roads in the Timaru District, except for roads that are part of the main State Highway network. We recognise that our road network is essential to the resilience and connectivity of the Timaru District and the community we serve.
6. As an RCA we are also responsible for approving and monitoring temporary traffic management across the District, for both private and publicly commissioned works. Many of our staff are highly trained and experienced traffic management professionals.
7. Timaru District Council is also represented on the Regional Transport Committee.



## General

8. We support the adoption and further development of a risk based approach to traffic management.
9. We are cognisant that the NZGTTM will constitute a significant change for the sector which is still grappling with inconsistencies in the implementation of COPTTM. We stress that the introduction of the Guide will need to be supported by a robust training framework and achieve buy in and adoption throughout all RCAs. Failing this, we are concerned that NZGTTM could introduce further inconsistencies in traffic management across networks, such as different traffic management measures used for the same types of operations. This conflicts with the safety goals RCAs are striving toward under the Road to Zero Strategy.
10. The NZGTTM consultation period is scheduled to conclude before several Waka Kotahi webinars on the NZGTTM are held. These webinars are likely to prompt engagement from industry and support us to make our submissions – hosting these after the consultation period has closed is not in the interest of fairness or transparency and we recommend Waka Kotahi extend the consultation timeframes.

## Roles, responsibilities and training needs

11. Again we support the forming of a risk based approach but stress the need for Waka Kotahi to provide industry with risk assessment training. While tier 1/larger contractors have the resourcing to adopt NZGTTM, smaller contractors do not share the same traffic management capabilities and will need extra support. The current risk training offering in New Zealand will not meet the needs of industry in adapting to NZGTTM, we strongly suggest Waka Kotahi develop a risk training framework and toolkit tailored to the needs of the sector. In alignment with this, we further recommend Waka Kotahi collaborate with Worksafe on educational material to ensure general expectations around traffic management are clear.
12. NZGTTM does not make it clear where the responsibility sits for shutdown of work sites that do not comply with their traffic management plans. We suggest Waka Kotahi develop a shutdown procedure including clarification of the responsibilities of RCAs and Worksafe in carrying this out.
13. Under the NZGTTM temporary speed limits and road closures are still to be considered and approved by RCAs. Again a clear procedure is needed to understand the roles and responsibilities of RCAs, WorkSafe and PCBUs in carrying out these functions, however we consider that RCAs holding approval powers may result in a more consistent application of temporary speed limits. We recommend that Waka Kotahi drive updates to Submitica/RAMM to enable real time reporting on where temporary speed limits are



approved - this will assist RCAs with monitoring temporary speed limits on their networks.

14. We also suggest Waka Kotahi conduct a review of road closure legislation, with a goal to ensure this provides for a timely response to the need for road closure. The current road closure advertising requirements sometimes mean that planned works are delayed to enable public notification. The legislation needs to be updated to reflect the current environment, where variable message boards and channels such as social media can notify the public much more efficiently than traditional forms of advertising.
15. We further recommend that a RCA group is set up to champion temporary traffic management and develop systems to manage speed limits, road closures, signage, and peer review TMPs. The aim of this group would be to achieve more consistent application of traffic management within regions, improving public awareness and safety.
16. Establishing a peer review process under NZGTTM will be new for RCAs and industry, it would be helpful if Waka Kotahi could provide a framework for implementing this.

### Resourcing

17. We request clarification from Waka Kotahi on the Worksafe resourcing available to respond in a timely manner to traffic management concerns. This function is currently carried out by RCAs who have a local presence, if the responsibility is to shift then Worksafe will require the capacity to respond.
18. A partial solution could be the development of a mobile App for reporting traffic management concerns to Worksafe and the relevant contractor PCBU. This would enable real time monitoring and support more efficient administration.
19. We note the adoption of NZGTTM will increase traffic management costs for the sector and request that Waka Kotahi consider this within RCA funding allocations through the upcoming 2024-2027 NLTP.

### Transition

20. We stress the shift in thinking that will be required for the sector to transition from COPTTM to NZGTTM. We strongly recommend that Waka Kotahi devise a transition process for NZGTTM which considers an appropriate timeframe, funding and training requirements, review of Council bylaws and a review of contract requirements.



## Conclusion

21. Timaru District Council would again like to thank Waka Kotahi for the opportunity to respond to this proposal. We reiterate our support for transition to a risk based approach to traffic management and recognise the alignment this has to the wider Road to Zero safety goals of the sector.
22. We also emphasise the significant change this presents to current practice, and the need for a robust transition process and buy in from RCAs. Without this, the risk is inconsistency in traffic management and poorer safety outcomes for road users and contractors alike. Waka Kotahi, RCAs and contractors all possess PCBU duties across works on our road network, and the NZGTTM framework needs to recognise this.
23. Success of the changes proposed through NZGTTM will depend on partnership across the sector, robust training support, adequate resourcing and futureproofed systems of practice that make the most of available technology.

