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29th April 2022

Draft NZGTTM Feedback 2022
Waka Kotahi NZ Transport Agency

Via email: ttm.consult@nzta.govt.nz

Submission on *Draft New Zealand guide to temporary traffic management*

The Electricity Networks Association (ENA) appreciates the opportunity to make a submission to Waka Kotahi on the *Draft New Zealand guide to temporary traffic management* (the guidelines). The ENA represents the 27 electricity distribution businesses (EDBs) in New Zealand (see appendix B) which provide local and regional electricity networks.

ENA is supportive of the more modern, risk-based approach to temporary traffic management that is laid out in the guidelines. ENA believes that this less prescriptive approach aligns well with the discharge of duties of, and obligations on, PCBUs under the Health and Safety at Work Act 2015. Please see our full response in the provided template in appendix A.

ENA's main submission point is that the guidelines could do more to recognise the typical use of the road corridor by utility providers – i.e. short duration, small-scale, routine maintenance, and repair activities. This would ensure that the administrative burden imposed by the guidelines for this type of work is proportionate to the risks.

Please contact ENA if you'd like to discuss our submission. The contact is Richard Le Gros (richard@electricity.org.nz, 04 555 0075) in the first instance.

Yours sincerely,

Graeme Peters
Chief Executive
Electricity Networks Association

Draft New Zealand guide to temporary traffic management

Document review template

March 2022

Have your say - how to use this template

If you have specific feedback on any of the text in the draft New Zealand guide to temporary traffic management (NZGTTM), please use this document review template.

Please read the draft NZGTTM before you submit your feedback.

You can find the draft guide at nzta.govt.nz/NZGTTM

You can explore these sections:

- Introduction – national legislation, strategy
- The temporary traffic management system – risk management, planning processes, peer reviews, capability and training
- The toolbox – design principles, equipment
- Supporting material – examples, glossary, practice note guide

You can share feedback until early April 2022.

We will review all feedback received and revise the guidance before finalising the guide for release.

You can submit your feedback via:

Email:
ttm.consult@nzta.govt.nz

Please put 'Feedback – draft NZGTTM 2022' in the email subject line.

Post:
Draft NZGTTM Feedback 2022
Waka Kotahi NZ Transport Agency
PO Box 5084
Wellington 6140
New Zealand

Find out more at nzta.govt.nz/NZGTTM

Document review template

Record your contact details and feedback here

Draft New Zealand guide to temporary traffic management	
Date of feedback / comment	29/04/22
Your name / organisation	Richard Le Gros, Electricity Networks Association
Your email / contact details	richard@electricity.org.nz

Record your feedback here

#	Section / page	Comment
1	1.1 Risk Management for TTM, pages 3 - 9	ENA supports the less prescriptive, risk-based approach to Temporary Traffic Management (TTM) proposed by the new guidelines. We consider that this is a suitable, modern way of strengthening the implementation of the Health and Safety at Work Act, and ensuring efficient and safe TTM practices. ENA suggests that the guidelines set out a step for a site visit undertaken by both the lead contractor and sub-contractor ahead of a project being undertaken, where appropriate, as part of the TMP development process. This would ensure that controls are well understood and appropriate to manage the risk on the day.
2	1.1.2 TTM PCBU responsibilities model – page 3	ENA supports clarification that the Contracting PCBU (client) should consider safety in design principles.
3	1.1.8 Risk Management Process – page 10	As per our first comment above, ENA supports the risk assessment approach set out in the guidelines. ENA suggests that consideration is given to improving the guidelines by providing additional clarity around process to ensure that functions and roles are well understood and implemented consistently by parties across the TTM value chain. ENA also recommends that the new guidelines are implemented through a phased approach to ensure that competencies are

		developed. There is an opportunity for RCAs across New Zealand to learn from the implementation of RCAs in larger city centres. We also suggest that significant support and guidance is provided to parties across the TTM value chain to ensure consistent implementation.
4	1.6 Emergency response – page 30	ENA appreciates and supports the clarification provided in the guidelines around the process for emergency works.
5	There is a need for a utility specific focus in the guidelines – to ensure that the TMP process is clear and achieves intended outcomes	It is important that the guidelines adequately recognise all parties that carry out work in the road corridor, and the nature of their activities. There is insufficient recognition in this current version of the guidelines of the BaU asset management activities that utility providers – including electricity distribution businesses – carry out in the road corridor on a day-to-day basis. The guidelines need to better reflect the use of the road corridor by utility providers to carry out small scale but frequent works to maintain their assets. A process map or similar tool, showing typical utility applications of the guidelines, would aid best practice.
6	There is a need for the guidelines to better support frequent, short-duration and routine activities undertaken in the road corridor	ENA supports the proposed design, planning and review process for high volume, high risk roads, but believes that applying this process to all situations will increase administrative effort and cost for utility operators without a proportionate reduction in risk. A utility operator typically undertakes shorter duration assignments and may go to multiple sites over the course of a week or even a day. ENA suggestions to improve efficiency are: a. Provision be made for the planning process and documentation to be tailored for the type of road or volume of traffic. b. Remove the RCA peer review component to align better with lead contractor responsibility for risk assessment.
7	Supporting Material 1. 6 Practice Note Guide – page 16, NZ Guide to TTM	ENA supports the use of Practice Notes where risks and mitigations for specific and standardised activities are repeated regularly.

		ENA recommends that further clarity be provided in the guidelines around the practice note process, in terms of roles and responsibilities set out in the PCBUs responsibilities model. ENA also suggests that more clarity around the relationship between the Global CAR process and that set out by the new TTM guidelines be provided – in particular where any overlap or conflict arises.
8	Alignment with the National Code of Practice for Utility Operators' Access to Transport Corridors (the Code)	ENA recommends that the Code is kept in close alignment with these guidelines. In particular, definitions, roles and responsibilities, etc should be aligned across both documents, or reference made in the Code to the definitions in the guidelines.

Appendix B – ENA Members

The Electricity Networks Association makes this submission along with the support of its members, listed below.

Alpine Energy
Aurora Energy
Buller Electricity
Centralines
Counties Energy
Eastland Network
Electra
EA Networks
Horizon Energy Distribution
MainPower NZ
Marlborough Lines
Nelson Electricity
Network Tasman
Network Waitaki
Northpower
Orion New Zealand
Powerco
PowerNet
Scanpower
The Lines Company
Top Energy
Unison Networks
Vector
Waipa Networks
WEL Networks
Wellington Electricity Lines
Westpower