



Waka Kotahi NZ Transport Agency  
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Wellington

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ATTN:  
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## **UPPER HUTT CITY COUNCIL'S SUBMISSION ON THE INTERIM SPEED MANAGEMENT PLAN FOR STATE HIGHWAY 2**

Dear Waka Kotahi,

On behalf of Upper Hutt City Council, please see our feedback regarding the proposed Interim Speed Management Plan and SH2 Ngauranga to Featherston safety improvements programme:

### **Executive Summary**

1. Upper Hutt City Council [Council] broadly supports the intention of the proposed speed reductions of the Interim Speed Management Plan [ISMP] as an interim measure, until such time as SH2 is sufficiently upgraded to meet both the current and future demands of the transport network.
2. Council is concerned that the ISMP is not considering the impacts on the local road network, the risk of changed behaviours having unintended consequences, and the lack of addressing the serious risks posed to pedestrians and cyclists in using SH2.
3. Council supports 4-laning SH2, with a grade separated interchange at Silverstream SH2/Fergusson Drive constructed to align with the development of the replacement Silverstream Bridge.
4. Council supports the introduction of traffic lights at Moonshine Hill Road as a necessary and life-saving measure until such time as a better intersection design as part of 4-laning SH2 'River Road' can be developed.
5. Council reluctantly acknowledges the need for an interim speed reduction of 100 km/h to 80 km/h between Te Marua and Kaitoke, until such time as the road is sufficiently upgraded to 4-lanes at a future date, recognising that this section of SH2 has not been appropriately invested in to cater to 100 km/h.
6. Council requests the inclusion of an interim speed reduction from 80 km/h to 60 km/h along Main Road North (SH2), from Beechwood Lane to the existing Te Marua 80km speed change, until such time as the road is sufficiently upgraded.

7. Council requests that Waka Kotahi improves the Marchant Road intersection as well as providing advance warning signs, to both cater for future growth and address the safety concerns of the current suboptimal intersection.
8. Council supports the reduction of speeds at Brown Owl from 70 km/h to 50 km/h as part of the ISMP, accompanied by improvements to the Akatārawa Road intersection to cater for future growth.
9. Council has concerns over the speed reductions of 100 km/h to 60 km/h in the northbound approach to Moonshine Hill Road, and instead suggests 80 km/h is more appropriate.
10. Council supports the reduction of the speed limit over Remutaka Hill Road from 100 km/hr, but not to 60 km/h, which Council considers an unacceptable speed limit for this section of road. Council instead suggests the lowest acceptable speed limit should be 80 km/h and accompanied by continued safety improvement interventions.
11. Council would like to work further with Waka Kotahi to find long lasting solutions that will provide for a safe, accessible, efficient, sustainable, and resilient transport network in and through Upper Hutt, solutions that encourage multi-modal shift and are viewed in an integrated manner rather than in isolation.

### **Waka Kotahi Proposal**

The proposed Interim Speed Management Plan (ISMP) suggests four speed changes for State Highway 2 (SH2) within Upper Hutt. These are:

1. Moonshine Hill Road intersection (Northbound only 100 km/h – 60km/h)
2. Brown Owl (70 km/h – 50 km/h)
3. Te Marua to Kaitoke (100 km/h – 80 km/h)
4. Remutaka Hill (100 km/h – 60 km/h)

The ISMP is also accompanied by proposed safety measures on SH2:

1. New traffic signals at Moonshine Hill Road
2. New side and median barriers on SH2 from Whakatiki Street – Fergusson Drive (North)
3. Improved safety barriers over the Remutaka Hill Road

### **Who we are**

Upper Hutt City Council [Council] is responsible for the largest geographical district in the Greater Wellington region. This district includes substantial rural, residential, and commercial-industrial areas, providing homes, jobs, and recreation for many residents and visitors to the region. The current population of Upper Hutt is over 47,000, with a forecast projected growth of 24,286 people by 2051, requiring an additional 10,458 new dwellings.

With successive Governments' moves to consolidate and centralise services over the years, Upper Hutt has become increasingly dependent on SH2 as a link to essential services. These include hospitals and maternity services, police services, courthouse, and even for such simple activities as driver testing and licensing. Even a fundamental service such as ambulances often need to come from Lower Hutt. These services are not practical (or even in some cases legal) to access remotely, nor in many cases are they services that are

practical to access via walking or cycling. Passenger transport is also not an option for many of these services, particularly in the case of the police and health which need rapid responses.

### **What we say – General Overview of SH2**

State Highway 2 is first and foremost an intercity transport corridor. As well as connecting the Wellington Region with the Wairarapa and Hawkes Bay/Gisborne regions, it is also a critical link between the cities within the Wellington Region allowing them to share goods, services, employees, and other resources. For both Upper Hutt and Lower Hutt, SH2 together with SH58 provide the critical link to SH1 and access to the rest of New Zealand.

SH2 is therefore critical to the continued wellbeing of Upper Hutt and its community. Upper Hutt and Lower Hutt have a population base exceeding 160,000. With the Wairarapa included, this represents a population exceeding 210,000 along its route. This is of comparable size to Wellington City, and more than half the population of Christchurch, New Zealand's second largest city. By comparison, the population of Porirua, Kapiti and Horowhenua is 154,000, and this has been supported by significant capital upgrades to SH1.

Council has a long involvement with SH2. In the 1980's the Council paid to construct River Road as a vehicle bypass to remove traffic from local streets, and then handed it over to the National Roads Board as a State Highway to replace Fergusson Drive (one of many examples of Council trying to address national underfunding on this route). This resulted in an immediate and continued drop in crashes in the Upper Hutt area, and more particularly in a significant drop in pedestrian and cycle crashes (approximately 50% each year since it opened). As a result of increased demand on the highway in recent years and the resulting inability of the highway network to cope with the current level of demand, Council has noticed a significant increase of traffic on local roads. The annual growth rate for traffic on some local roads parallel to the state highway is increasing by 4-5% per year, more than twice the rate of the adjacent highway. Examples are also being observed of 'rat running' occurring at known congestion points on SH2, such as along McLeod Street to avoid the Gibbons Street – Whakatiki Street southbound queues. Both are a particular concern to Council as they are driving heavy traffic into areas where it will be interacting with local traffic including pedestrians and cyclists. This significantly undermines the pursuit of achieving mode shift, as active transportation is far less likely to be pursued in areas where the perceived risk is high or increasing. If heavy vehicles or traffic travelling at speed are attempting to bypass the State Highway through local roads, infrastructure investments and other promotional activities to encourage uptake of walking and cycling in main urban areas will become substantially less effective. This significantly undermines the pursuit of climate change objectives, sustainability objectives and active transportation. Furthermore, the resulting increase in traffic on local roads is also affecting the efficiency and reliability of buses on key commuter routes, making them a less desirable option.

Council is therefore disappointed that the latest proposals by Waka Kotahi represent a continued pattern of neglect and underinvestment in this essential transport corridor serving a large population. Council is both surprised and disappointed that the proposal does not include any significant planned capital spend or any other indication that Waka Kotahi is planning to address current deficiencies or expected future demand on this key link. Whilst significant projects have recently been enacted for SH1 and SH58, conversely, we have

not seen any significant spend proposed for some years to improve the safety, traffic-flow, or levels of service for SH2.

Council feels strongly that there is a need to explore other, better ways to deliver roading improvements on the Featherston to Ngauranga route. Issues around accessibility, congestion, resilience, and the inability to traverse key sections of SH2 in a timely manner are all issues of growing concern and frustration to commuter and business users alike.

### **What we say – ISMP Proposal Specific**

Council recognises the need for safety improvements along SH2, with particular concern over the section that runs from Silverstream through to Brown Owl [River Road]. Council therefore recognises that the lower speeds proposed will likely result in fewer deaths and serious injuries [DSI] within the sections where the speeds are being reduced. However, Council has concerns over the implications and unintended consequences of some of the proposed changes, as well as the level of change and how long the intended changes will remain in effect. Council is concerned that the ISMP lacks consideration of the issues of both current and future road capacity, as well as the increased risks that an increasingly congested SH2 will negatively impact the local road network within Upper Hutt.

Important context for Upper Hutt City Council submission on the ISMP for SH2, is work already undertaken by NZTA with regards to the state highway network and the Hutt Corridor.

In 2010, NZTA developed a long-term strategic plan to address significant congestion and safety issues along the SH2 - Hutt Corridor (Upper Hutt to Ngauranga) for the 20-year period from 2009 – 2029. This plan was called the State Highway 2 Hutt Corridor (Upper Hutt to Ngauranga) Strategic Study [Hutt Corridor Study]. It was identified in the Hutt Corridor Study (2010), that sections of the state highway were already operating at or over capacity in several locations, resulting in regular congestion, with an expectation that traffic volumes and congestion would increase over the term covered by the 20-year strategic outlook period.

A key assumption included in the Hutt Corridor Study was that the Grenada - Gracefield link road (better known as Petone-Grenada and the Cross Valley Link) would be online within a 10-year period, alleviating some of the existing pressure on the network. To date, these link roads have not eventuated, and congestion didn't decline as forecast.

Under the enabling legislation of the time that NZTA carried out this work, primary functions for NZTA included 'Promoting an affordable, integrated, safe, responsive and sustainable land transport system', with Priority 2 specifically to 'Improve road safety'. It is within this context that the Hutt Corridor Study strategic review was undertaken. (The functions providing for a safe land transport system are synonymous with the drivers behind the 'Road to Zero' and Interim Speed Management Plan objectives.) The findings of the Hutt Corridor Strategic Plan concluded that there were significant issues with the existing state highway and identified a need to upgrade sections of the road to meet (the then) current and future needs of road users. Consequently,

consideration should be given to revisit the findings of the Hutt Corridor Study to allow for better strategic planning along SH2 that can both address the current issues and provide an optimal long-term outcome.

### **Silverstream to Whakatiki Street**

The section of SH2 River Road from Whakatiki Street to Silverstream was identified as being at or near capacity in 2010, noting significant crashes that had occurred along this section. Since the Hutt Corridor Study was written, central median barriers have been installed reducing the likelihood of cross-median crashes. Therefore, the extension of central median barriers north of Whakatiki Street is welcomed as part of the safety improvements planned that accompany the ISMP.

Intersection safety improvements since the 2010 Hutt Corridor Study, such as the closing of the right-hand turn into Moonshine Road and traffic lights at the Whakatiki Street intersection, have likely resulted in DSI, reductions at these intersections. However, to date, safety improvements at the Moonshine Hill Road intersection (the primary entrance into Riverstone Terraces) have been insufficient to create any significant improvements in DSI at this intersection. Consequently, the installation of traffic lights at the Moonshine Hill Road intersection is welcomed as a temporary safety improvement to this intersection until such time as SH2 River Road is suitably and appropriately upgraded.

However, the current proposed speed limit reduction from 100 km/h to 60 km/h Northbound at the proposed Moonshine Hill Road intersection is a sub-optimal proposal. Council recognises the need for a localised speed reduction in the approach to this intersection. However, given this section of River Road has a passing lane at 100 km/h in the Northbound approach to this intersection, a speed limit reduction to 60 km/h is unlikely to be observed by drivers, and may result in unintended behaviour changes that result in drivers turning off at Silverstream to use Fergusson Drive to reach central Upper Hutt, rather than the optimal route of SH2. Council is concerned that such a change in behaviour would undermine the pursuit of achieving mode shift, as active transportation is far less likely to be pursued in areas where the perceived risk is high or increasing. Fergusson Drive is already experiencing elevated levels of traffic, and if heavy vehicles or traffic travelling at speed attempt to bypass the State Highway through local roads, infrastructure investments and other promotional activities to encourage uptake of walking and cycling in main urban areas will become less effective. Consequently, Council is concerned that a speed limit reduction to 60 km/h in this stretch could encourage behaviour changes that significantly undermine the pursuit of climate change objectives, sustainability objectives and active transportation. Furthermore, the intersection at Whakatiki Street where traffic lights have been installed have demonstrated that an 80 km/h speed on approach is sufficient to achieve intended safety improvements. Consequently, Council does not support the reduction from 100 km/h to 60 km/h for this section of SH2, and instead suggests a speed reduction to 80 km/h for the Moonshine Hill Road intersection northbound approach.

It must therefore be noted that the expectation of the Hutt Corridor Study was that the length of Whakatiki Street to Silverstream would require upgrading to 4-lanes. This is relatively straightforward from Moonshine Hill Road south, although it is noted that the 4-laning should be accompanied (or at least shortly followed) by

grade-separating the Fergusson Drive intersection at Silverstream, to avoid the existing intersection restricting the upgraded route capacity. Council therefore advocates for the 4-laning of SH2 and the grade-separation of the Silverstream SH2/Fergusson Drive intersection to improve safety and provide a long-term solution to addressing the current issues along River Road. Furthermore, it must be noted that the Silverstream Bridge must be replaced and significantly upgraded in a few years' time to cater for the increased growth of Upper Hutt and the subsequent consequential increase in traffic. Therefore, the most sensible option is to ensure that the 4-laning of River Road, the grade-separation of the SH2/Fergusson Drive intersection, and the construction of a new Silverstream Bridge be aligned to ensure the best optimal outcome that considers safety, resilience, sustainability, and future proofing that section of the State Highway network. This would provide efficiencies in consenting, project delivery, and cost savings that would be unable to be achieved should the projects be delivered in isolation or in drawn out stages.

### **Whakatiki Street to Brown Owl**

The extension of safety barriers north of Whakatiki Street is welcomed as part of the safety improvements planned that accompany the ISMP. Since the Hutt Corridor Study was written, central median barriers have been installed south of Whakatiki Street reducing the likelihood of cross-median crashes. Therefore, the extension of central median barriers north of Whakatiki Street is welcomed as part of the safety improvements planned that accompany the ISMP. However, the downside of these barriers is the further separation of the recreational Hutt River area and the Hutt River Trail / Remutaka Cycle Trail from the city area. Currently, SH2 acts as a significant barrier for sizeable portions of Upper Hutt to be able to safely access the Hutt River recreational areas and safe cycling opportunities provided along the Hutt River Trail. Local pedestrians and cyclists have the sub-optimal opportunities to cross River Road to access these recreational areas. This is an undesirable situation which is already putting these users at risk. The installation of wire barriers along this section could significantly increase the risk to those non-vehicle users attempting to access the recreational area from the city side (and vice versa). Consequently, to ensure safety, accessibility, and encouragement of multi-modal shift, the provision of accessible, separated over/under passes linking the two sides of the State Highway in this section are a solution long envisaged by Council. The separation of pedestrians and cyclists from having to cross the State Highway is a desirable outcome, particularly if multi-modal shift is to be encouraged and Vehicle Kilometres Travelled [VKT] reduced. Therefore, Council is supportive of exploring the provision of better connectedness at Masefield Street, Gibbons Street, and/or at the Totara Park intersections as optimal long-term outcomes. Concepts such as over/ under passes should be designed with the future 4-laning of SH2 in mind. Council is open to working in partnership with Waka Kotahi to explore solutions that provide better connectivity outcomes.

The Hutt Corridor Study highlighted that sections between Totara Park Road and Gibbons Street and between Gibbons Street and Whakatiki Street were identified as having moderately low crash rates but both reaching capacity in the weekday commuter peak periods within 10 years. It was concluded in the study that these sub-sections would require upgrading to 4-lanes within the timeframe of the Study. It should be noted that the 10-year period expired in 2019, and therefore investigation work into upgrading of this subsection needs to be actioned with some urgency. The congestion southbound from Gibbons Street to Whakatiki Street is one

section where congestion and queues building up from the Whakatiki Street traffic lights has resulted in driver behaviour change, specifically that of 'rat-running'. Heavy traffic and traffic moving at speed is being observed along McCleod Street, as drivers are attempting to find perceived short cuts to avoid the SH2 traffic build-up. This type of rat-running potentially significantly increases risks to users of the local roads, particularly pedestrians and cyclists, undermining investment in mode-shift and carbon reduction initiatives.

North of Moonshine Hill Road, it is more complicated to upgrade the route to 4-lanes. The existing Moonshine Bridge and the approach embankments coupled with the natural topography at this location place a significant restriction on the Hutt River floodway, and Greater Wellington Regional Council (GWRC) Flood Protection staff had previously indicated a strong preference for this bridge (and approaches) to be replaced with a bridge that does not restrict the floodway. Consequently, given the safety issues and flood protection issues involved with the current curved design Moonshine Bridge, a new bridge needs to be considered as part of the wider 'Road to Zero' SH2 improvements.

### **Brown Owl**

The proposed speed limit reduction from 70 km/h to 50 km/h along Fergusson Drive through Brown Owl is welcomed through this section of SH2. The area has residential properties on both sides of the state highway, with bus stops servicing both sides of the corridor. Reduction of the speed along this section of SH2 would likely result in safety improvements to the maintenance of berms as well as benefits to all road corridor users. However, there are some risks and unintended consequences that must be highlighted:

1. Traffic that would currently use SH2 may attempt to bypass the Brown Owl section of SH2 by rat-running perceived short-cuts through Timberlea and Maoribank, increasing the level of risk to other road users on these local roads. Given traffic calming measures are already in place through Timberlea, there is an expectation from the local community that traffic through this area is unlikely to be travelling at speed. The risk of rat-running through these areas would therefore pose a particularly high increase in risk to children currently using these quieter local roads.
2. Pedestrians, cyclists, and other non-vehicle road users who currently do not attempt to cross SH2 through Brown Owl may attempt to cross SH2 more frequently at lower speed thresholds, potentially increasing the likelihood of a serious accident. Priority should be given to provision of safe crossing opportunities, preferably separating the needs of cyclists, pedestrians, and mobility impaired users to having to cross the State Highway. Likewise, there is opportunity for Waka Kotahi to formally construct separated cycling infrastructure in this area to further improve the safety for encouraging mode-shift.
3. There has been no provision made for any improvements at the Akatārawa Road intersection with SH2. This is an increasingly congested intersection, with expectations that it will worsen with increased growth in the area. This intersection will be subject to increasing traffic demand into the future, with a key strategic growth area having been identified at the end of Gillespies Road off Akatārawa Road. Waka Kotahi should be reconsidering treatments at this intersection to ensure that it is fit for purpose to meet current and future needs.

### **Brown Owl to Kaitoke**

Council reluctantly acknowledges the need for an interim speed reduction of 100 km/h to 80 km/h between Te Marua and Kaitoke, until such time as the road is sufficiently upgraded to 4-lanes at a future date, recognising that this section of SH2 has not been appropriately invested in to cater to 100 km/h. Council requests that Waka Kotahi consider lowering the existing speed limit of SH2 both directions for the section from Beechwood Lane northwards through to the existing 80 km/h speed reduction in Te Marua. Currently, the speed limit is 80 km/h on the stretch from Brown Owl through to Te Marua. However, there is a section of where there the Remutaka Cycle Trail shares road corridor with SH2, and where foot traffic either shares the road corridor on pavements or crosses the road corridor between the Golf Club/Speedway side and the Plateau Road/Te Marua shops side which has public transport provisions. Furthermore, this area already has existing residential development fronting SH2, with more properties soon to be developed adjacent to this section of State Highway. With the Plateau School on the Plateau Road side of the State Highway, there will be a likely increase in non-vehicle users attempting to walk adjacent to or cross SH2 in this locality. Consequently, Council would support inclusion into the ISMP of a lowered speed limit through this short section from the current 80 km/h to 60 km/h, for the length of the existing Te Marua 80 km/h speed change to the Main Road North turnoff into Beechwood Lane.

Council still has concerns over the current design of the Marchant Road intersection for providing safe access to and from SH2. Council requests that Waka Kotahi does not push the responsibility for upgrading this intersection on to hypothetical future developers, given that the intersection is already dangerous for current users. Turning into Marchant Road when approaching from the Remutaka Hill in the southbound lane is of serious concern, as the approach is on a corner of sub-optimal visibility, with limited opportunities for vehicles heading south to pass before the road is narrowed at the crossing of the Pākuratahi River. Consequently, reduction of speed from 100 km/h to 80 km/h is unlikely to result in any serious safety improvement at this intersection, given the poor design of the existing intersection. Council therefore requests that Waka Kotahi upgrade the Marchant Road intersection to sufficiently cater for increased future growth as well as to improve the safety of the current suboptimal intersection.

### **Remutaka Hill Road**

Council recognises that the current speed of 100 km/h is not suitable for the Remutaka Hill Road. However, a speed reduction to 60 km/h is not supported by Council. Improvements to Remutaka Hill Road over the last 20 years have resulted in a significantly safer road, and more barriers to reduce cross-median crashes or the likelihood of vehicles falling down the slopes is supported by Council. However, 60 km/h is an unrealistic expectation on drivers to observe when the road has low levels of traffic. Furthermore, the passing lanes which are provided to allow for the safe passing of slow vehicles would be rendered insufficient at a 60 km/h speed limit. The result would be that compliance with a 60 km/h limit would likely be difficult to achieve, and frustrations of motorists using the road at the lower speed could result in more incidents of reckless driving. Consequently, an 80 km/h speed limit would be the lowest appropriate speed limit for this road that would be supported by Council.

### **Concerns over impact on the local road network**

Council has general concerns over the impact of the proposed ISMP on the local road network. Currently, Fergusson Drive is experiencing volumes of traffic that have far exceeded the design of the road, resulting in accentuated degradation of the road and the need for an increased level of maintenance. There are also increasingly less opportunities for the reallocation of space to address multi modal demands within this corridor. Council therefore has concerns over the sufficiency of the local road network to cope with increased traffic, particularly as driver behaviour adapts to the changed journey times, speeds, and congestion along SH2. Rat-running is already occurring through McLeod Street, where traffic that should be using River Road is attempting to take perceived short-cuts through the local road network. Two specific concerns regarding the proposed ISMP are:

1. The reduction to 60kmh for northbound traffic at Moonshine Hill Road may result in more traffic opting to drive north along Fergusson Drive instead of via SH2 to reach their desired destination.
2. The drop in speed to 50kmh through Brown Owl may result in traffic bypassing SH2 and using local roads in Timberlea and Maoribank, effectively rat-running through residential areas and potentially increasing the risk to these neighbourhoods, particularly where children are using roads that they are used to having lower traffic volumes. The section of road along Moeraki Road and Norana Road has been identified as currently having medium high personal risk.

Consequently, Council asks that changes to SH2 be holistically viewed in conjunction with the wider transport network, and not in isolation.

### **Mode-shift, safety, and accessibility**

There is a need for separation of pedestrians and cyclist from having to interact with the state highway. Even at the proposed reduced speeds, the risk to pedestrians and cyclists is still very high. Reducing speed limits in general may result in the unintended consequence that non-vehicle users may perceive a lower risk and attempt to cross SH2 given the traffic will likely be travelling at lower speeds. Council therefore requests working in partnership with Waka Kotahi to address these issues, and that Waka Kotahi provides safe, long-term accessible solutions to reduce this risk.

### **Closing statement**

In conclusion, Upper Hutt City Council strongly supports the concept of improvements to SH2.

However, we do not see a simple 'reduction in speed limits' as a solution that meets the future needs of this road and all its users. There needs to be a comprehensive review of the solutions necessary to solve the underlying issues and to ensure that this highway is fit for purpose in the future. Therefore, we do not accept the current proposal as a viable remedy or long-term solution to address the underlying problems associated with SH2 and would ask Waka Kotahi to present a more integrated set of solutions to address the underlying problems.

Council broadly supports the intention of the proposed speed reductions of the ISMP as an interim measure until such time as SH2 is sufficiently upgraded to meet both the current and future demands of the road. Council supports the introduction of traffic lights at Moonshine Hill Road as a necessary and life saving measure until such time as a better intersection can be designed as part of 4-laning River Road. Council reluctantly acknowledges the need for an interim speed reduction of 100 km/h to 80 km/h between Te Marua and Kaitoke, until such time as the road is sufficiently upgraded to 4-lanes at a future date, recognising that this section of SH2 has not been appropriately invested in to cater to 100 km/h. Council requests that Waka Kotahi improves the Marchant Road intersection and provides advance warning signs of the intersection. Council requests inclusion of a speed reduction from 80 km/h to 60 km/h along Main Road North from Beechwood Lane to the existing Te Marua 80km speed change, until such time as the road is sufficiently upgraded. Council supports the reduction of speeds at Brown Owl from 70 km/h to 50 km/h as part of the ISMP, accompanied by improvements to the Akatārawa Road intersection to cater for future growth. Council has concerns over the speed reductions of 100 km/h to 60 km/h in the northbound approach to Moonshine Hill Road, and instead suggests 80 km/h is more appropriate. Council does not support the reduction of the speed limit over Remutaka Hill Road to 60 km/h, and instead suggests the lowest acceptable speed limit should be 80 km/h accompanied by continued safety improvements.

Council has serious concerns that the ISMP is not considering the impacts on the local road network, the risks of changed behaviours having unintended consequences, and the lack of addressing the serious risks to pedestrians and cyclists in their interaction with SH2. Consequently, Council would like to work further with Waka Kotahi to find long lasting solutions that will provide for a safe, accessible, efficient, sustainable, and resilient transport network in and through Upper Hutt, that encourages multi-modal shift and is viewed in an integrated manner rather than in isolation.

It is the view of Upper Hutt City Council that the proposed Interim Speed Management Plan does not sufficiently address the longstanding issues associated with decades of underinvestment into State Highway Two, and that planning should commence immediately for permanent solutions to address the continued underinvestment and negligence that has led to the current situation.

Yours sincerely,



Wayne Guppy

**Mayor**

**Upper Hutt City Council**



Peter Kelly, ONZM

**Te Tumu Whakarae | Chief Executive**

**Upper Hutt City Council**