Before the Expert Panel

*under:* the Fast-track Approvals Act 2024

*in the matter of:* an application for resource consents, approvals and a notice of requirement to alter a designation, to construct a four-lane, median divided highway to replace existing State Highway 2 corridor between Te Puna and Ōmokoroa, known as 'Takitimu North Link - Stage 2'

*applicant:* **NZ Transport Agency Waka Kotahi**
*Requiring Authority and Applicant*

# Joint Statement of Evidence of **James Hughes** and **Roy Johnston** for NZ Transport Agency Waka Kotahi

Dated: 16 February 2026

Reference: Rebecca Tompkins ([redacted])
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**JOINT STATEMENT OF EVIDENCE OF JAMES HUGHES AND ROY JOHNSTON FOR NZ TRANSPORT AGENCY WAKA KOTAHI**

1 My full name is James Robert Hughes. I am the Lead Advisor, Safety, Office of the Chief Engineer; NZ Transport Agency (*NZTA*). I have held this role since 2018. I have worked for NZTA (and its predecessor, Transit New Zealand), for 19 years.

2 I hold a BSC Civil Engineering (UK 1979), and I am a member of the Engineering Council (UK 1989) and the Institute of Civil Engineers (UK 1989).

3 I joined NZTA in 2007 as National Design Engineer. In that role, I was involved as a Geometric and Safety subject matter expert (*SME*) for the original Roads of National Significance projects including all sections of the Waikato Expressway, Kapiti Expressway, Tauranga Eastern Motorway, as well as Waterview Tunnel (SH20/16), Puhoi to Warkworth Motorway; SH16/18 Hobsonville Motorway. An extension of my role was to be part of the safety audit team for a number of the above projects and provide first-hand knowledge of the issues raised to our project teams.

4 In my current role as Lead Advisor, Safety I am the co-owner of the Safe System Audit Guidelines for Transport Projects (2022). I spent 12 years between 2007 to 2020 as the NZ representative on the Austroads Road Design Task Force and during that time was co-author of the Guide to Road Design. I have been a member of the Austroads Network Task Force for 4 years.

5 My full name is Roy David Johnston. I am a Principal Safety Engineer, System & Safety Performance, System Design; NZ Transport Agency (*NZTA)* where my purpose is to provide technical transport and safety advice both regionally and nationally. My main focus areas are Otago/Southland and supporting the wider South Island safety team.

6 I hold a BCom in Accounting (2000), and Diploma of Civil Engineering (Level 6) and NZCE (Civil).

7 I joined Transit in 2006 as a Project/Safety Engineer. In 2008 when NZTA was created I moved into a Safety Engineer role. 2010 – 2019 I was a Senior Safety Engineer, 2019 Principal Safety Engineer and from late 2019 to late 2025 I was the Team Lead – Safety Engineers, South Island. With a restructure I have moved back to a technical role as Principal Safety Engineer.

8 Across my time at NZTA I have been involved as the safety SME in numerous capital projects and safety programmes. At a regional level this has included contributing to safety audits and acceptance of designs prior to construction to ensure safety outcomes are

achieved. I have also assisted with the development of national safety programmes such as the Road to Zero and Safe Infrastructure Programme. As part of this work, I have supported regional safety teams to develop scopes, resolve design issues and manage safety concerns raised in audits.

## CODE OF CONDUCT

9 Although this matter is not before the Environment Court, we confirm that we have read the Code of Conduct for expert witnesses as contained in section 9 of the Environment Court Practice Note 2023. We agree to comply with that Code. Our qualifications as an expert are set out above. We are satisfied that the matters which we address in this statement of evidence are within our area of expertise. We have not omitted to consider material facts known to us that might alter or detract from the opinions we express.

## SCOPE OF EVIDENCE

10 Our evidence has been prepared to support NZTA's response to the request for information issued by the Panel dated 29 January 2026 (*RFI5*). Our evidence provides an overview of:

10.1 How NZTA regulates and manages the state highway network from a safety perspective, including safety processes and procedures followed by NZTA to ensure interfaces between new state highway projects and the existing state highway network operate safely; and

10.2 How these processes and procedures have and will continue to be followed in relation to the tie-in of the Takitimu North Link Stage 2 Project (*Project*) to existing SH2 south of the Waipapa Stream Bridge.

### NZTA's safety processes and procedures

#### *Safe System audits*

11 As manager of New Zealand's state highway network, NZTA follows Safe System auditing procedures, including for capital improvement projects like the Takitimu North Link Stage 2 project.

12 As set out in the 2022 Safe System audit guidelines,[1] a Safe System audit is a formal, robust technical assessment of transport safety risks associated with transport improvement and renewal projects that:

[1] The current version of the Safe System Audit Guidelines is dated 2022. The prior version, under which the original audit for the Project was completed was dated 2013.

12.1 is completed by independent and qualified audit teams;

12.2 considers the safety of all people; and

12.3 is completed by applying Safe System principles while seeking to ensure that the transport network will operate as safely as practicable by eliminating fatal and serious injury crash potential.

13 A safety audit is only one component of a Safe System approach. It does not replace design reviews, quality control checks, or peer reviews. It is not an assessment of overall project quality, nor is it a compliance check against standards or specifications (these require separate reviews). A safety audit also does not involve redesigning the project. In practice, a safety engineer is assigned to each project team as a SME to provide guidance and direction when required on safety aspects of that project. The Safe System audit process is shown in Figure 4 below.[2] Key components of the process include:

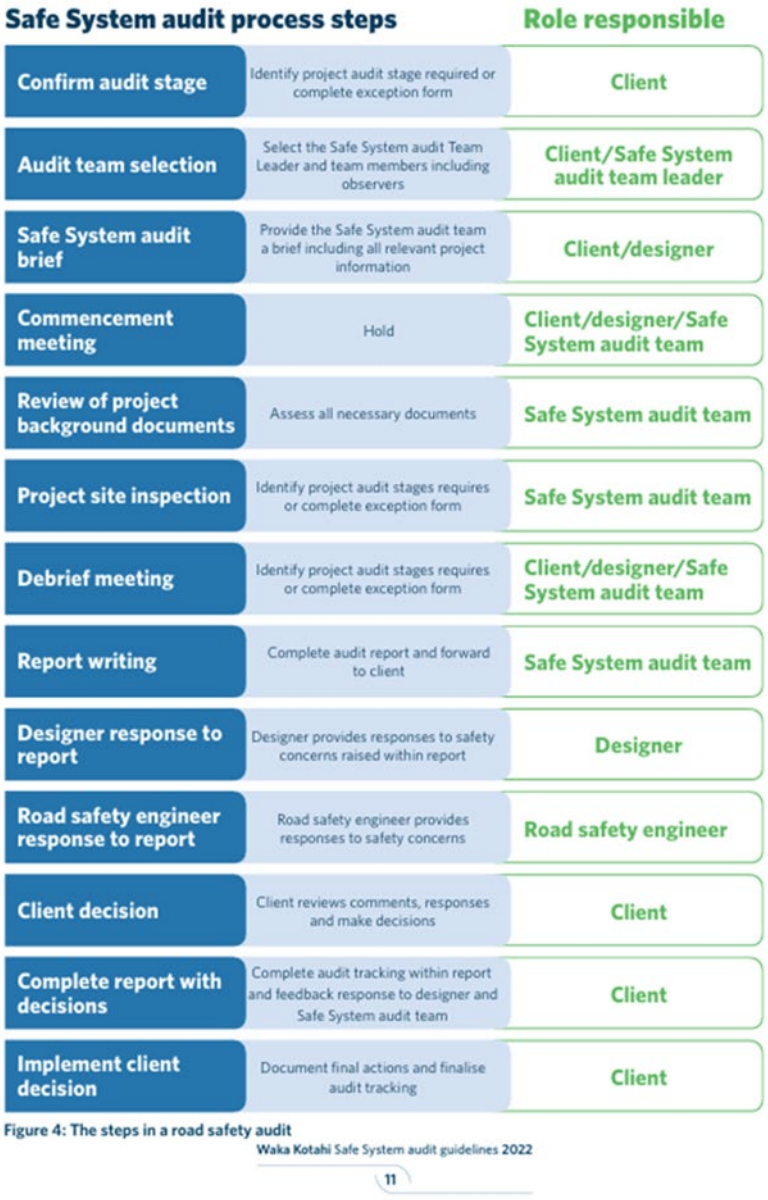
13.1 Safety audit team identified, undertakes audit and provides report to the NZTA project team (the 'client' in this case);

13.2 The project team asks the designer for designer responses;

13.3 The project team gets NZTA's Regional Safety Engineer to provide comments on the safety issues raised and the designer response; and

13.4 The project team considers the information provided through the safety audit and by the Regional Safety Engineer and makes a decision regarding what, if any, action to take.

[2] 2022 Safe System Audit Guidelines, page 11.



| Safe System audit process steps | | Role responsible |
|---|---|---|
| Confirm audit stage | Identify project audit stage required or complete exception form | Client |
| Audit team selection | Select the Safe System audit Team Leader and team members including observers | Client/Safe System audit team leader |
| Safe System audit brief | Provide the Safe System audit team a brief including all relevant project information | Client/designer |
| Commencement meeting | Hold | Client/designer/Safe System audit team |
| Review of project background documents | Assess all necessary documents | Safe System audit team |
| Project site inspection | Identify project audit stages requires or complete exception form | Safe System audit team |
| Debrief meeting | Identify project audit stages requires or complete exception form | Client/designer/Safe System audit team |
| Report writing | Complete audit report and forward to client | Safe System audit team |
| Designer response to report | Designer provides responses to safety concerns raised within report | Designer |
| Road safety engineer response to report | Road safety engineer provides responses to safety concerns | Road safety engineer |
| Client decision | Client reviews comments, responses and make decisions | Client |
| Complete report with decisions | Complete audit tracking within report and feedback response to designer and Safe System audit team | Client |
| Implement client decision | Document final actions and finalise audit tracking | Client |

Figure 4: The steps in a road safety audit

Waka Kotahi Safe System audit guidelines 2022

11

14 Safe System audits are undertaken at the key stages of a project's development and implementation. Audits are usually undertaken of the scheme/concept design, the preliminary design and the detailed design as well as at pre-opening and/or post-construction.[3] The process is therefore iterative. When there is an audit at an earlier stage such as preliminary design (as was the case for this Project), it is normal practice to accept findings in part or whole (as was the case for this Project) and refer them for resolution during the next design stage such as detailed design (as is the case for this Project, as discussed below).

[3] 2022 Safe System Audit Guidelines, page 8.

15 The safety audit is provided for review by the SME for the project, who considers the findings, and any recommendations made and provides a report to the NZTA project team. The safety audit will highlight and rank safety issues, and make recommendations to reflect the severity of the safety risk identified, at a high level. It will not suggest specific solutions, nor would it be appropriate for it to do so. The project team must 'own' any solutions and consider budgetary constraints as part of that process. To close out the audit, the NZTA project team then reviews the safety audit report, designer response and safety engineer comments and decides what action to take to manage the safety issue raised in the safety audit.

***How safety audit recommendations are incorporated into detailed design***

16 NZTA's internal processes and steps for making a decision after a safety audit is completed are similar across all phases of project development. The process operates via a team, not an individual and involves:

16.1 NZTA considering the results of each of the audit's findings, the importance assigned to each finding and its alignment with the Safe System principles. For each finding, the project manager must document the decision-making process in all the decisions ultimately reached within a decision tracking form. In doing so, the project manager may seek input from the design team and specialist advisors as needed. Any contentious or outstanding issues should be identified by the project manager for discussion with the wider design and safety team during an interactive completion meeting.

16.2 Any complicated issues or safety concerns that cannot be resolved between the project manager and safety engineer are then escalated to the Lead Safety Advisor (James) and potentially to the appropriate decision-making level within NZTA for resolution or direction to the project team. Escalation of issues could be to internal groups such the Chief Engineer's Advisory Group, the Value Outcomes and Scope committee and/or the departures process if needed. One or all three of these teams will then consider the matter to inform decisions to achieve a safe system outcome, and a decision will be made in line with NZTA's delegation policy. Following those processes, the project team will implement the decision.

17 We note that NZTA's management of the safety of the state highway network does not stop once construction of a project has been completed. It never ends. NZTA continuously monitors the operational safety of the state highway network and in particular regularly checks parts of the network that have been considered through the safety audit process. If, in practice, there are any

issues or concerns with the way the network is operating and/or with the safety solutions that have been implemented, NZTA will take appropriate steps to manage those issues.

**Options to address the Project's tie-in to existing SH2 south of the Waipapa Stream Bridge**

18 We have read the safety audit completed in 2021 and the technical note by Phil Harrison of Flow dated 28 January 2026. We note Mr Harrison's opinion that *"a safe system solution would need to widen the bridge and its approaches to enable the provision of a median barrier, and safe shoulders suitable for walking and cycling with roadside barriers on each approach."*[4]

19 While widening the bridge is a possible action, in our opinion there are other options which could be considered to manage the issue raised in the 2021 safety audit. These options include:

19.1 changing the merge point to ensure vehicles have moved from 2 lanes to 1 lane prior to the approach to the bridge; and/or

19.2 adding signs and markings such as no passing lines, shoulder markings and cyclist warning signs for the narrow bridge; and/or

19.3 adding median and side safety barriers up to the bridge so that vehicles cannot overtake.

20 The need to manage the transition between existing and new infrastructure is not unusual across the state highway network. As with normal project management and safety audit processes, NZTA is considering the issue relating to the Project's tie-in with existing SH2 and is committed to resolving the situation during the detailed design phase.

21 To date, for this Project, NZTA has been following our normal project development process which includes safety audits at agreed stages for design and construction. An issue with the transition between the Project and the existing SH2 south of the Waipapa Bridge was identified in the preliminary specimen design safety audit. This issue has been referred to the design team to consider during the design phase. As noted earlier in our evidence, in the situation for this Project, where we have a preliminary design audit, it is normal practice to accept findings in part or whole and refer them for resolution during the next design stages (eg specimen design and detailed design), as has happened in this case.

[4] Para v, page 3.

22 We understand the Project design team is in the process of considering various options (including the options outlined above), to manage the transition between the Project and the existing state highway as safely as practicable, through a development to the specimen design. We understand that an updated specimen design is currently going through a safety audit process. At subsequent design phases, the Project tie-in with the existing network will be subject to further Safe System audits, which will follow the decision-making steps and possible escalation pathways outlined above, as necessary.

23 In our view, the safety audit process and NZTA's safety related procedures are working as expected for this Project. NZTA will continue to develop designs following NZTA design standards and policies to deliver the desired outcomes for the Project and the wider network.

24 NZTA is focused on building a safe system and infrastructure that is safe for all users. It has procedures in place to ensure that road safety is appropriately considered in project development and final design decisions.

**James Hughes**
**Roy Johnston**
16 February 2026