

File No: 18/0324  
Document No: 28874123  
Enquiries to: Nigel King



2 April 2024

Ministry of Transport  
PO Box 3175, Wellington

Email: GPS@transport.govt.nz

Dear Sir/Madam

**Waikato Regional Council Submission to Draft Government Policy Statement on Land Transport 2024-2034**

Thank you for the opportunity to submit on the Draft Government Policy Statement on Land Transport 2024-2034. Please find attached the Waikato Regional Council's (the Council's) submission regarding this. The submission was formally endorsed by Submissions Subcommittee under delegated authority on **26 March 2024**.

Should you have any queries regarding the content of this document please contact Nigel King, Team Leader – Transport Policy and Programmes, directly on (07) 8590850 or by email Nigel.King@waikatoregion.govt.nz.

Regards,

A handwritten signature in blue ink, appearing to read 'Pamela R. Storey'.

Pamela Storey  
Waikato Regional Council Chair

A handwritten signature in blue ink, appearing to read 'Chris McLay'.

Chris McLay  
Chief Executive

## Submission from Waikato Regional Council on the Draft Government Policy Statement on Land Transport 2024-2034

### Introduction

This submission reflects the position of Waikato Regional Council (the Council) as a key partner in the preparation of the Regional Land Transport Plan (RLTP), the regional provider of public transport services, and as an advocate for its communities in respect of other transport matters relating to growth and economic development, climate change and resilience, and road safety. The Council also advocates for investment in infrastructure that supports public transport generally, and specifically as a partner in Future Proof and the Hamilton to Auckland Corridor Partnership.

### System reform

1. Waikato Regional Council **welcomes** the system reform signalled in the draft GPS, in particular:
  - requiring future Government Policy Statements on land transport to adopt a 10-year investment plan, bringing it into alignment with local government Long Term Plans;
  - reform of, and new approaches to, the funding of land transport; and
  - the move to streamline the business case process.
2. The current legislative requirement of six-year plans and mid-term reviews for Regional Land Transport Plans (RLTPs) locks us into a short-term planning cycle, driven by the focus on short-term funding outcomes that have the potential to change with every successive government. This inevitably works against the longer-term strategic outcomes both government and local government are trying to achieve for integrated land use and transport planning.
3. There is major misalignment of the GPS with Road Controlling Authority Activity Management Plans, with Council's Long Term Plan developments, and with development of RLTPs. This has led to an unfortunate situation with the latest iteration of RLTPs being prepared under the previous government's draft GPS and statutory consultation processes now being adversely affected by the late arrival of the current government's draft GPS. Regional Transport Committees are also awaiting Waka Kotahi NZ Transport Agency's updated State Highway Investment Programme. Regional councils are having to reschedule RTC hearings and deliberations with elected members in order to consider this vital component of the RLTP for subsequent inclusion in the National Land Transport Programme.
4. Ideally, the GPS should be received well in advance of flow-on regional planning and funding plans to ensure the process works how it should. A strategic long-term approach to transport planning that joins up central and local government decision-making is needed to address the strategic transport priorities identified in the draft GPS, as well as climate adaptation, emissions reduction and decarbonisation.
5. Beyond this, the Council considers a strategic longer-term vision and approach for land transport in New Zealand is missing from the draft GPS. This calls for consensus across the political divide as it is in the best interests of the country to commit to a longer-term view on transport priorities. We note that as part of the signalled reform, a National Infrastructure Agency with a 30-year planning horizon is proposed. An integrated 30-year infrastructure and investment plan for transport would be beneficial.

### Recommendations:

- a) *The LTMA is amended to incorporate the requirement for the GPS to adopt a 10-year investment plan for the GPS, AND is amended in such a way as to better align the key stages of the planning and funding cycle for land transport to ensure we are able to better meet desired national and regional outcomes. This should include a requirement for the GPS to be delivered well in advance*



*of RLTP development (we note that Taituara – Local Government Professionals Aotearoa is advocating for future GPSs to be adopted at least 15 months before the start of the financial year that they apply to).*

- b) Amendments to the LTMA should also strengthen integrated land use and planning connections between the LTMA and RM reform.*
- c) There is commitment for a longer-term vision for land transport in New Zealand beyond the 10-year GPS view outlined above. We note that reform is likely to include the establishment of a National Infrastructure Agency with a 30-year planning horizon. This longer-term outlook is welcomed, but must be integrated with land use planning, in particular, consideration should be given as to how this would interact with any spatial planning strategies across other sector areas. This is important to ensure agreed national and regional priorities.*

#### **Future funding**

6. A long-term and more sustainable funding system for investing in land transport is essential. The Waikato Regional Council and its regional transport partners are increasingly concerned at the ever-growing level of investment required to meet the local funding share contribution to funding the regional land transport system. The main area of income for local government is, of course, rates and we are seeing double figure rates rises across the country. There are limited revenue streams for local government to access to meet this expectation. Yet the level of funding in the draft GPS requires a significant investment of around \$1.5 billion per year from local government, which represents a significant portion of local government's expenditure. The Council therefore **supports** a fresh look at funding through the future funding project signalled in the GPS.

*Recommendation:*

- d) That the challenges of funding and finance for local government are addressed as part of the reform and new approaches to funding the land transport system are investigated.*

#### **Strategic priorities – economic growth and productivity and RONS**

7. The draft GPS is explicit that the top priority for the government is economic growth and productivity, and accordingly the draft GPS has been built around this. The Council **supports** this strategic priority but not at the expense of other strategic priorities as discussed further in this submission below. The Waikato region's strategic transport corridors play a vital role in facilitating growth and economic development as the primary conduit between the Ports of Auckland and Port of Tauranga, and via the nationally significant inland ports at Ruakura and Horotiu (Northgate).
8. The Council **acknowledges and supports** the Roads of National Significance signalled in the draft GPS, including:
  - *Cambridge to Piarere and Tauriko West State Highway 29* – the extension of the Waikato Expressway from Cambridge to Piarere and prioritisation of the SH1/29 corridor has been a long-standing priority for the Waikato region. There will be national economic growth and productivity and safety benefits in delivering these projects; and
  - *Hamilton Southern Links* – signalled as a project that will unlock housing growth in the draft GPS. The project is supported as a critical component to getting the right network in place for this high growth area and has recently been subject to a form and function review. In addition to unlocking housing growth through the local road component, the wider state highway component of Southern Links will also act as a catalyst to unlock industrial and commercial development around the Hamilton Airport, thus further contributing to economic growth and productivity and a resilient and safer transport network.



9. The draft GPS lists the RONS projects and locations and also references a number of other projects the government wants to progress in this GPS period, including a number of Roads of Regional Significance. It would be helpful to understand what roads might be considered regionally significant as well as the draft GPS outlining what constitutes a RONS. The RONS are significant investments and so should clearly align with local government integrated and spatial planning, particularly those identified in the draft GPS as unlocking housing growth.

#### **Strategic priorities – Increased maintenance and resilience**

10. The Council **supports** and welcomes the strategic policy focus on increased maintenance and resilience. This is a key issue for the Waikato region and resilience of our region's strategic transport networks has been the dominant theme coming through submissions on the draft Waikato RLTP.
11. However, the Council recognises that resilience is a much broader issue than fixing potholes. The draft Waikato RLTP prioritises focus on climate adaptation and building of community resilience (both social and economic objectives). The impacts of climate change are adversely affecting the resilience of our regional transport networks, most notably in the Coromandel Peninsula. The severe weather events of 2023 resulted in significant and months-long road closures and this has had a huge economic impact, both regionally and nationally. The draft GPS should also focus on funding proactive resilience projects that will reduce the ongoing vulnerability of the transport network. This would enable Road Controlling Authorities and Waka Kotahi/NZ Transport Agency to proactively plan and fund broader resilience activities ahead of adverse weather events to reduce potential damage, maintain connectivity along lifeline routes, and ultimately reduce the costs of repairing the damage.

#### *Recommendations:*

- e) *The GPS provides a stronger focus on broader resilience priorities and outcomes so that proactive projects can be funded to get ahead of resilience issues.*

#### **Strategic priorities – absence of climate change/emissions reduction strategic priority**

12. There has been a significant change in focus from the previous government's draft GPS strategic priorities. Of **most concern** to the Waikato Regional Council is the **omission of any reference to climate change / emissions reductions as a strategic priority for the draft GPS**. The draft GPS simply defers any policy direction on this until a second Emissions Reduction Plan (ERP) is produced down-track.
13. Given the heavy focus in the draft GPS on maintenance and resilience, it is difficult to understand why the actual cause of these priority issues is not identified as a strategic priority for the government under the GPS. It is the effects of climate change, driven in part by transport emissions, that is causing the significant weather events that have recently been running havoc over our land transport networks. The Council sees this as a worrying and significant omission.
14. The transport sector is the country's second biggest source of greenhouse gas emissions. Decarbonising transport is therefore a key lever for reaching our emissions reductions targets and mitigating the impacts of climate change. The draft Waikato RLTP has been built around the climate/change emissions reduction previous draft GPS strategic priority. Submitters to the draft Waikato RLTP clearly see the link between climate change and resilience and maintenance issues.
15. Given transport's emissions profile, its potential to contribute to net zero by 2050 and New Zealand's obligations to meet international targets, the Council cannot see how omitting this strategic priority from the draft GPS can be justified.



16. The Waikato region is committed to transitioning to a low carbon transport system by reducing transport emissions and this has been embedded in the regional policy framework for the draft Waikato RLTP. Regardless of the work to come down-track on ERP2 (which is required urgently to confirm the government's policy direction in this space), this sends the wrong signal to our communities about the importance of climate change and emissions reduction. It is a glaring hole in the draft GPS not to have a climate change/ emissions reduction strategic priority.

*Recommendations:*

*f) Include a climate change/emissions reduction strategic priority in the final GPS.*

#### **Strategic priorities – absence of a strategic priority to support accessibility**

17. The narrower focus on economic growth and productivity in this draft GPS unfortunately has resulted in **the GPS being silent on key priorities that will improve transport outcomes for people and communities** - in terms of their access to, and use of, the transport system. The draft GPS fails to recognise the vital role transport plays in enabling broader social outcomes and wellbeing. Having accessible, affordable, equitable and reliable travel options is fundamental to the ability of people to participate in society. This has not been recognised in the draft GPS.
18. Public transport is a key enabler of social outcomes and provides opportunities for individuals and families to reduce their transport costs. In the Waikato many people rely on public transport networks to access employment, healthcare, education, and social and leisure opportunities. There is no strategic priority to improve accessibility to the transport system and to ensure equity for the transport disadvantaged (the latter, a statutory requirement under the LTMA). We should be focused on trying to maintain people's independence by providing appropriate transport options as there is an economic cost if we do not. This is particularly relevant taking a longer-term policy view when considering our rapidly ageing populations, particularly in the more rural areas of our region.

*Recommendations:*

*g) Include a strategic priority in the final GPS that is targeted to accessibility of the transport system for people and communities to balance against the heavy bias in the draft GPS towards vehicles and economic development and productivity outcomes.*

#### **Public transport (PT) investment**

19. The importance of PT to the government's economic growth and productivity strategic priorities has been undercooked in this draft GPS. A good PT network sits at the heart of economic growth and productivity as well as supporting and enabling other important social outcomes, such as access to employment, healthcare, education and improving social connections. If PT and other multi-modal transport solutions are underfunded, then more people will use private vehicles, creating more congestion (and therefore loss of productivity) and safety issues.
20. The Council is **concerned at the reduction in PT funding**. Cost increases for service delivery and infrastructure improvements coupled with additional activities such as inter-regional rail now being funded from this activity class will likely mean limited money to improve services and trial new services across the region. Furthermore, the requirement to increase fare box and third-party revenue is concerning. The focus on user pays and fare box recovery targets could impact patronage and disproportionately impact on people who are already transport disadvantaged. In fact, reduced services could result.
21. The recent introduction of a third frequent service in Hamilton has led to much higher patronage (than what was being experienced on the routes that were disestablished), leading to potential for



a higher proportion of farebox recovery. This represents higher value and more efficient use of money for every dollar spent by local and central government.

22. The Council is also most concerned that PT is directly targeted to Auckland and Wellington in the draft GPS. It does not recognise, and is not future focussed, on other regions that are experiencing rapid growth, such as the Hamilton Waikato metro spatial area, and the northern part of the region that is effectively taking the spill-over from Auckland's growth. In the Waikato region a lot of collaborative work is being undertaken for the wider Hamilton metro spatial area, including Waikato Metro Spatial Plan Bus Rapid Transit projects. The Council would like to see these projects prioritised alongside Auckland and Wellington PT projects. We need to be future proofing rapid transit PT corridors.
23. We also call your attention to the fact that the draft GPS is silent on investment in national ticketing for PT, which is considered a critically important strategic investment.
24. Similarly, the draft GPS does not reference the Total Mobility Scheme, which is an important service for our disabled communities.

*Recommendations:*

- h) Public transport should be funded at the top upper funding range to recognise the important contribution of PT to the Government's economic development and productivity priorities.*
- i) The GPS should recognise the important social benefits that PT provides and factor this into farebox recovery policy.*
- j) The GPS should explicitly recognise major public transport projects in the Hamilton-Waikato Metro Spatial Area and broaden its investment focus beyond Auckland and Wellington.*
- k) The GPS should explicitly acknowledge ongoing investment commitment to support the national ticketing system.*
- l) The GPS should explicitly acknowledge ongoing investment to support the Total Mobility Scheme.*

**Removal of multi-modal improvements funding**

25. The Council is **concerned** that amongst other policy decisions, such as reducing funding for PT and walking and cycling, this will limit mode shift which will be detrimental to achieving emissions reductions. The multi-modal approach is critical for Metro Spatial Plan implementation and unlocking economic benefits in the Waikato region. The removal of multi-modal improvements funding is **not supported** by the Waikato Regional Council.

*Recommendations:*

- m) Reinstate the ability to invest in multi-modal activities under the state highway and local road improvements activity classes in the GPS.*

**Rail investment**

26. The Council **supports** the government's intention to continue to invest in the national rail freight network to support the overall objective of economic growth and productivity, with a particular focus on the most productive parts of the existing rail network between Auckland, Hamilton and Tauranga.
27. The Council would however, **like to see a broader view around the role inter-regional passenger rail can play** in supporting housing growth, economic development, and other accessibility outcomes. The draft GPS focuses investment on the metro rail network in Auckland and Wellington. Ongoing investment in the Te Huia Waikato to Auckland passenger rail service as a long-term rapid transit link that would support high growth areas in North Waikato and South Auckland should also be explicitly recognised in the GPS. Rail is an essential component in the transport network in the context of this growth. The Waikato also aspires to see inter-regional passenger rail extended,

particularly through to Tauranga in the long-term but there appears to be little funding opportunities in the draft GPS for this.

28. The Council is concerned it will become more difficult to sustainably fund inter-regional passenger rail. This could have funding implications for Te Huia. Waikato Regional Council is doing what it can to move towards a situation where we might be able to transition to lower funding from central government, including investigating other funding partners. However, it is the Council's view that we cannot afford to lose the momentum gained through the establishment of Te Huia and the many benefits this service brings (in helping to reduce congestion, providing transport alternatives in this Hamilton to Auckland growth corridor and providing for community needs). Inter-regional passenger rail should be explicitly provided for in the GPS.

*Recommendations:*

- n) Reinstate the inter-regional public transport activity class to explicitly recognise and provide for the future funding of inter-regional passenger rail in the GPS.*

### **Strategic priorities – safety**

29. The Council **supports a number of proposals** identified in the draft GPS to improve road safety, including increased road policing and enforcement, drug testing, safe roading infrastructure, investing in safer drivers (see recommendation below on this), and requiring safer vehicles. Investment in nationally consistent and coordinated road safety promotion focused on behavioural change is supported. The facilitation by Waka Kotahi/NZ Transport Agency of contributions from ACC into investments that promote road safety is also supported.
30. The signal to do away with 'blanket' speed limit reductions, and now reinforced with the recent announcement to amend the Land Transport Rule: Setting of Speed Limits 2022 to reverse speed limit reductions is, however, **very concerning** to the Waikato Regional Council. Speed or driving too fast for the conditions continues to be a significant contributor in fatal and serious crashes in the Waikato and accounts for 24% of high severity crashes in the region. Speed management is a key priority for the region and as such, is reflected in the draft RLTP.
31. In addition, the evidence is telling us that speed limit reductions and other safety interventions are working in urban environments. We have found that economic productivity has not been adversely affected by speed management reductions. New subdivisions are now being designed to support lower speed limits, so higher speed limits would be inappropriate and not fit for purpose.
32. Safe roading infrastructure comes at a cost to Road Controlling Authorities. Electronic variable speed limit signs are expensive and fixed signs don't always work. It is the view of the Waikato Regional Council that the draft GPS should not be limiting the toolbox for RCAs. Both the reduction of speed limits and low-cost safety interventions can work well and represent value for money, one of the Government's strategic priorities in the draft GPS.
33. The Council would like to see a number of policy options available to road controlling authorities to improve road safety outcomes for their communities in line with well-established international best practice.

*Recommendations:*

- o) Ensure there is recognition in the final GPS of the Safe System approach to addressing the strategic safety priority.*
- p) Recognise the role RCAs play as territorial authorities in representing the needs of local communities. This includes removing the proposed requirement under the new Setting of Speed Limits rule to come out later in the year for variable speed limits around schools at pick-up and*



*drop-off times only. This will ignore the community work that has been undertaken to provide safer speeds around schools, most of which are located on residential roads (not major arterials and state highways), and many of which have had 40km/hr speeds in place for many years, supported by local communities.*

#### **City and regional deals**

34. We note under the Statement of Ministerial Expectation the Government is considering how city and regional deals between central and local government can provide an opportunity to integrate long-term strategy and planning across the transport system.
35. This Council would hope the significant coordination and investment that has already been undertaken by FutureProof partners in the Waikato Region planning for the future needs of the Hamilton-Waikato metro spatial area is recognised, and we would welcome further engagement with Government on this topic.

#### **Submitter details**

Waikato Regional Council  
Private Bag 3038  
Waikato Mail Centre  
Hamilton 3240

Contact person:  
Nigel King  
Team Leader – Transport Policy and Programmes,  
Email: [Nigel.King@waikatoregion.govt.nz](mailto:Nigel.King@waikatoregion.govt.nz)  
Phone: (07) 8590850