

Submission by

Hamilton City Council

DRAFT GOVERNMENT POLICY STATEMENT ON LAND TRANSPORT 2021/22–2030/31 (DRAFT GPS 2021)

15 May 2020

1.0 SUMMARY OF KEY POINTS

- 1.1. Overall HCC supports the content and direction of Draft GPS 2021.
- 1.2. HCC welcomes the acknowledgement of the local government sectors role in transport (paragraph 29) as the largest 'owner' of roads and biggest co-funder in the National Land Transport Programme (NLTP).
- 1.3. HCC note that the COVID-19 situation will have a strong impact on NLTF and Council revenue. While the Strategic Priorities will continue, the GPS may require reviewing as a result the COVID 19 impact to ensure any economic recovery decisions and limited funding is appropriately aligned and able to deliver the Strategic Direction of GPS 2021.
- 1.4. HCC strongly support the Strategic Priorities and in particular Safety and Better Travel Options. HCC is concerned that the amount of funding allocated to the Walking and Cycling Improvements activity class is inadequate and does not align with the strategic direction of the draft GPS, including supporting better travel choices. The current draft proposes allocating approximately 2 percent of funding to walking and cycling. Consideration needs to be given to significantly increasing the share of the transport budget that is allocated to Walking and Cycling Improvements. Without a step change in the way the transport budget allocated, it is unlikely that cities such as Hamilton will be able to achieve significant mode shift without implementation of large-scale and intergenerational projects.
- 1.5. HCC further notes that increasing the Funding Assistance Rates for Walking and Cycling Improvements would both encourage and assist cities to invest in mode shift. HCC asks that the Ministry of Transport and Waka Kotahi NZ Transport Agency give consideration to increasing Funding Assistance Rates for walking and cycling projects and ensure that the GPS funding allocation accounts for this.
- 1.6. HCC support the approach being proposed for large-scale and intergenerational projects, whereby alternative funding sources and financing options should be investigated and that for investments creating value (e.g. rapid transit) that this value should be considered to offset the costs of the transport investment.
- 1.7. HCC support making investments ahead of demand. The Hamilton to Auckland Passenger Rail Start-up service, enhancements to this service, Rapid Rail from Hamilton to Auckland, Mass Transit options and appropriate transit orientated design principles are all examples of this and reflective of the work that Government is doing with the FutureProof partnership.
- 1.8. HCC support implementing the New Zealand Rail Plan to enable reliable and resilient metropolitan rail networks in Auckland and Wellington, but notes no reference is made on enhancing the Hamilton to Auckland Passenger Rail Start-up service or to consider a Waikato-Hamilton Metro rail service. HCC has submitted on this matter to the draft New Zealand Rail Plan as well. HCC would like to see support for inter-regional rail services in GPS 2021.

- 1.9. HCC support the inclusion of Coastal Shipping in the NLTF if it can be demonstrated there is benefit to the Land Transport system.
- 1.10. While HCC is supportive of Government's commitments to the delivery of Auckland Transport Alignment Project (ATAP) and "Let's Get Wellington Moving" (LGWM) it would also like Government to commit to key programmes and projects emerging from the Hamilton to Auckland Corridor initiative, which will shape Hamilton's Urban Form, make shared and active modes more attractive and influence travel demand and transport choice.
- 1.11. HCC is concerned about the removal of the Travel Demand Activity Class and do not believe that all of the activities that are currently delivered via this funding will be accommodated in the proposed methodology of including funding within projects. Consideration needs to be given to a "Behavioural Change" activity class that would include the "soft" measures that are associated with both road safety and TDM.
- 1.12. HCC support the change in the strategic priority from previous "Environment" to "Climate Change" but notes a concern that a single focus on greenhouse gas emissions may come to the detriment of wider environmental considerations and resilience.
- 1.13. It is essential that there are a common set of indicators used nationally across all strategic documents so that there is efficiency and consistency in data gathering and information/results reporting. The work outlined in the Investment Decision-Making Framework released by Waka Kotahi late in 2019 had a wide range of indicators that should be the starting point for how progress will be measured for the implementation of GPS 2021.
- 1.14. HCC request that the Statement Ministerial Expectations on behaviours and actions required from Waka Kotahi (section 3.7) provide stronger emphasis on working in partnership with the local government sector and highlight the level of knowledge and expertise within the local government sector.

2.0 BACKGROUND

- 2.1 Hamilton City Council (HCC) supports the overall long-term direction and intent of the Draft Government Policy Statement on Land Transport 2021/22-2030/31 (draft GPS 2021), which is strongly and strategically aligned to Hamilton City's key transport plan - Access Hamilton.
- 2.2 HCC understands that draft GPS 2021 is the first stage of Government's development of the GPS, and that a revised GPS 2021 may be released by the Ministry of Transport towards the end of the year – especially as the impacts of COVID-19 are better understood.
- 2.3 The partnership with central government on a number of matters, including funding, is critical to achieve the outcomes sought for the Waikato sub-region. In particular, HCC is appreciative of the role central government and its agencies have played in the Hamilton to Auckland Corridor initiative.
- 2.4 HCC would like to see funding support either in the NLTP or through other Crown investments to deliver some of the key projects arising out of the emerging Waikato/Hamilton Metro-Spatial Plan and the Mass Transit Plan.

Specific Comments on the Draft GPS 2021 Consultation Document

3.0 Section 2: Strategic Direction

3.1 Section 2.1 The Strategic Priorities for GPS 2021

- 3.1.1 Alignment between the strategic priorities and the Ministry of Transport's Transport Outcomes Framework is critical, as this recognises that transport planning and investments have long lead times and that investment needs to be guided by a long-term strategic approach. The consistent guidelines for RLTP 2021 development around the country will be using this framework as the foundation of RLTP strategic frameworks.

3.1.2 HCC support the 4 Strategic priorities outlined in draft GPS 2021 subject to the points made in this submission.

3.1.3 HCC support the need to ensure that all major projects are well aligned with the strategic direction set out the draft GPS 2021 and the strategic issues identified in the associated RTLPs.

3.2 Section 2.2 Strategic Priority: Safety

3.2.1 HCC strongly support the Government in the move towards a Vision Zero approach to road safety included in Road to Zero.

3.2.2 HCC adopted Vision Zero in June 2017. Strong leadership at a national level makes it easier for Hamilton, the Waikato Region and other regions to progress on transport safety issues, to save more lives sooner, and reduce costs while doing so.

3.2.3 Vision Zero is a proven approach being applied by many jurisdictions globally, is customer-focused and human centered, and identifying this as a Strategic Priority in GPS 2021 will help build trust across New Zealand communities that people's safety is at the heart of what we do.

3.2.4 HCC make the following comments on the 'How to deliver these outcomes' section (page 17):

- HCC support the focus on increased access to safer travel modes in the main metropolitan centres, including Hamilton.
- The identification of infrastructure safety treatments is being provided by the Waka Kotahi 'Safety Pipeline tool', which is useful, but the Standard Safety Interventions are very rural network focused and the process for funding approval is still taking too long. The process also doesn't accommodate the development and approval of packages of work which move outside vehicle safety to incorporate accessibility for those walking and cycling.
- Enhancing the safety and accessibility of footpaths, bike lanes and cycleways needs to include the creation of these facilities – not just enhancing the existing facilities.

3.2.5 HCC support the proposed approach in the 'How progress will be measured' section (page 17) of linking to the indicators proposed in Road to Zero and the New Zealand Rail Plan. It is essential that there are a common set of indicators used nationally across all strategic documents so that there is efficiency and consistency in data gathering and information/results reporting. The work outlined in the Investment Decision-Making Framework released by Waka Kotahi late in 2019 had a good range of indicators that reflected the wider health benefits of safety by enabling healthy and accessible communities that go beyond reduced deaths and serious injuries.

3.3 Section 2.3 Strategic Priority: Better Travel Options

3.3.1 HCC support the change in language (Paragraph 44) toward 'livable cities and towns, people friendly places, healthy environments, improved wellbeing'. This encourages land use and transport planning as an integrated process, a shift toward movement and place functionality in both planning and design considerations.

3.3.2 The Better Travel Option priority is to "provide people with better travel options to access places for earning, learning and participating in society" – but misses out access to essential services such as Health. Essential services are being increasingly focused in major cities and there is a need therefore to *Continue investing in specialised mobility services to support accessibility, such as 'Total Mobility'* and greater recognition and funding of community-based transport providers such as Health Shuttle services, particularly in rural areas who have to travel to centres for essential services. In Urban areas an increasing focus on ensuring all users (including those using mobility aids) have high levels of safety and accessibility within the transport network will be required to ensure they are able to access essential services.

3.3.3 HCC note that there needs to be a step change in funding and deliberate action to ensure that the benefits are able to be realised. There cannot just be an incremental increase on previous

funding/activities if we are going to achieve well connected networks for people who walk and bike - networks that link key destinations and therefore enable active modes to be considered a real alternative to using the car must be achieved. Implementation of large-scale and intergenerational projects and increased financial support may be required in order to achieve this.

3.3.4 HCC make the following comments on the 'How to deliver these outcomes' section (page 19):

- Support the “optimise and maintain existing infrastructure” focus as this strongly correlates to the intervention hierarchy used by Access Hamilton since its adoption in 2010.
- Support the focus on the implementation of Mode Shift Plans in the main centres including Hamilton and the partnering opportunity with Waka Kotahi to accelerate mode shift. The Mode Shift Plans need to be delivered and supported as a business case which will make delivery faster and simpler and not treated on a project by project basis.
- Shaping urban form, making shared and active modes more attractive and influencing travel demand and transport choice are core activities that local government has been struggling to achieve due to funding constraints and increasingly difficult and protracted funding approval processes.
- HCC is appreciative of the partnership approach to the Hamilton to Auckland Corridor initiative which will build on the good work that the City has undertaken to plan its land use and urban form. The Waikato-Hamilton Metro Spatial Plan in particular arising out of the Corridor initiative will enhance urban form across the sub-region of Hamilton City and the Waikato and Waipa districts.
- While HCC is supportive of Government’s commitments to the delivery of Auckland Transport Alignment Project (ATAP) and “Let’s Get Wellington Moving” (LGWM), it would also like Government to commit to key programmes and projects emerging from the Hamilton to Auckland Corridor initiative, which will shape Hamilton’s Urban Form, make shared and active modes more attractive and influence travel demand and transport choice.
- HCC support implementing the New Zealand Rail Plan to enable reliable and resilient metropolitan rail networks in Auckland and Wellington, but notes no reference is made on enhancing the Hamilton to Auckland Passenger Rail Start-up service or to consider a Waikato-Hamilton Metro rail service. HCC has submitted on this matter to the draft New Zealand Rail Plan as well. HCC would like to see support for inter-regional rail services in GPS 2021.

3.3.5 HCC make the following comments on the “How progress will be measured” section (page 19):

- Request clarification between rapid/mass transit public services and localised public transport services for measuring “access to frequent public transport services”.
- The work outlined in the Investment Decision-Making Framework released by Waka Kotahi late in 2019 had a good range of indicators that should be the starting point for this section.

3.4 Section 2.4 Strategic Priority: Improving Freight Connections

3.4.1 HCC support inclusion of rail as a key component of achieving the freight task in New Zealand. The efficient movement of freight is vital to our economic success. The upper North Island’s road and transport network connects Auckland, Hamilton and Tauranga and carries the majority of New Zealand’s people and goods.

3.4.2 The country’s highest traffic volumes are found in and around these cities, and the road and rail freight routes between Tauranga and Auckland (via Hamilton) form the country’s most significant freight corridor.

3.4.3 The majority of the freight task is carried on roads rather than rail, however the Waikato and Bay of Plenty have the most densely used section of the national rail network, accounting for about one-third of rail traffic, with a focus on the Port of Tauranga.

3.4.4 It is estimated that growth of throughput processed by the Port of Tauranga could add up to 75 percent to rail freight movements over the next 30 years.

- 3.4.5 For the Waikato Region, protecting the North Island Main Trunk (NIMT) and East Coast Main Trunk (ECMT) for interregional freight movement is a priority. The growth of Auckland and level of passenger train movements on the NIMT will progressively create a conflict with freight operations, so ongoing investment in rail's resilience, capacity and efficiency is critically important to be able to respond to the current and projected freight task.
- 3.4.6 HCC also notes that it is important to support inland ports such as Ruakura in the City and Northgate at Horotiu including road and rail investment.
- 3.4.7 HCC support the inclusion of Coastal Shipping in the NLTF if it can be demonstrated there is benefit to the Land Transport system. HCC notes that Government's intent in including Coastal Shipping is to embed mode neutrality and choice for freight transporters, and that the initial three years of funding will include relevant research to see what future support for the sector may help achieve Government's aims.
- 3.4.8 Waikato roads carry large freight volumes compared to our population and trucks are significantly over-represented in serious and fatal road crashes. Ensuring that there are appropriate improvements to the key routes unable to be serviced by rail will be crucial to ensuring we achieve Road to Zero targets.
- 3.4.9 It is important that there is transparency over rails contribution to the NLTF in comparison to what it draws out of the fund over time. The level of contributing funding for rail was not known at the time of preparing draft GPS 2021. It is proposed that rail track user charges will be implemented and be included in the NLTF as a contribution to the costs of rail and there is an indication in Appendix 1 that Crown funding is also expected to contribute towards these costs. Until this is known it is difficult to comment whether the level of NLTF funding for rail will be detrimental to the other outcomes sought from GPS 2021.

3.5 Section 2.5 Strategic Priority: Climate Change

- 3.5.1 HCC support the change in the strategic priority from previous "Environment" to "Climate Change" but notes a concern that a single focus on greenhouse gas emissions may come to the detriment of wider environmental considerations and resilience.
- 3.5.2 HCC request that consideration also be given to the other negative impacts on the environment that result from the transport activity e.g. stormwater quality, and reflects the increasing costs associated with ensuring the impact of transport on the water quality is avoided, remedied or mitigated. In the Waikato there is a responsibility to "enhance" rather than mitigate as a result of River legislation.
- 3.5.3 HCC request that the scope of this strategic priority be widened to accommodate the changes needed to the network to ensure it is resilient to the changes that will result from Climate Change e.g. rising sea level impacts on coastal roads or alternatively Resilience could be a new strategic priority.
- 3.5.4 HCC note the overlap of this strategic priority with the priority of better travel options and the common need for modal shift, including having inter-regional and metro rail options.
- 3.5.5 HCC looks forward to being involved in the prioritisation of actions resulting from the development of the National Climate Risk Change Assessment (NCCRA).

3.6 Section 2.6 Indicators for How Progress will be Measured

- 3.6.1 HCC welcomes the inclusion of the indicators that will be used to measure progress on the implementation of GPS 2021 and note that these may be updated when the investment strategy is finalised.
- 3.6.2 HCC request that the proposed indicators build upon work that has already been commenced by Waka Kotahi in their Investment Decision-Making Framework as this will enable more efficient and consistent reporting to be completed by the sector.

3.6.3 HCC notes the following specific comments in regard to the proposed indicators:

- Indicator 2.F – the number of dedicated road policing staff is an important indicator for achieving a safer land transport network and an increase in these numbers would be supported. We note that in the New Activity Classes Road to Zero information in paragraph 118 that there is an indication that the intention is just to maintain current numbers.
- Indicator 3.H – instead of the percentage of people who can access, it will be important that we are actually able to identify those that cannot access essential services and then look to reduce those numbers.
- Indicators 4.I – as noted previously, HCC requests clarification between rapid/mass transit public services and localised public transport services for measuring “access to frequent public transport services”.
- Indicator 6.N – reliable freight routes are important for ensuring the economic benefits are able to be maximised. HCC suggests that the number of affected travel hours that priority routes are unavailable should utilise the One Network Road Classification (or One Network Framework when that is fully implemented) to identify these routes and that this should only relate to “unplanned” events e.g. weather or crashes.

4.0 SECTION 3 INVESTMENT IN LAND TRANSPORT

4.1 Section 3.1 Funding Land Transport

4.1.1 HCC support the approach being proposed for large-scale and intergenerational projects, whereby alternative funding sources and financing options should be investigated and that for investments creating value (e.g. rapid transit) that this value should be considered to offset the costs of the transport investment.

4.1.2 HCC note that it is already working closely with Government looking at alternative funding and financing options for some of its larger growth programmes.

4.2 Section 3.2: Principles for Investing

4.2.1 HCC support the methods outlined for seeking value for money in our activities and in particular;

- Effectiveness is strongly correlated with the hierarchy of interventions (paragraph 91) which Hamilton City adopted in its 2010 Access Hamilton Strategy and which remains a core principle in the refresh strategy.
- Efficiency including an assessment of the “whole of life costs” is strongly supported – often the “value engineering” process used to manage project costs result in short-term savings but long-term costs. This will be particularly important for arrangements that arise out of alternative funding and financing arrangements where assets are expected to be delivered to Council for ongoing operation and maintenance.
- While a business case approach is supported, there is ongoing concern about the efficiency of the current transport business case process. A business case needs to be fit for purpose and more strongly related to the value of the proposed project. There is still too much time and money being spent on this process for many transport decisions that don’t require the same level of analysis as large complex projects.
- Making the most of our existing land transport network is strongly correlated with the hierarchy of interventions (paragraph 91), which HCC adopted in its 2010 Access Hamilton Strategy and which remains a core principle in the refresh strategy.
- HCC strongly support the role of policies and behavior change programmes – “soft” methods to support travel demand management (TDM). While we support TDM being developed as part of transport planning and business case processes, then funded from the most appropriate activity

class, this only allows for TDM to be associated with physical projects.

- HCC strongly advocate for continuation of a fund for non-project related “soft” education and promotional activities e.g. workplace travel advisors promoting walking, cycling, public transport and car sharing are not able to be tied to physical projects but are great methods for reducing single occupant vehicle usage.
- Innovation can increase the net benefits from land transport investment and use
- HCC support Waka Kotahi investing from the fund to support innovation.
- Sometimes lead investments will be appropriate
- HCC strongly support making investments ahead of demand. The Hamilton to Auckland Passenger Rail Start-up service, enhancements to this service, Rapid Rail from Hamilton to Auckland, Mass Transit options and appropriate transit orientated design principles are all examples of this and reflective of the work that Government is doing with the FutureProof partnership.
- The early introduction of public transport services to newly urbanising areas to help establish multi-modal travel patterns in a community from day one is another example of where lead investments are important to achieve the Outcomes that GPS 2021 is seeking. There is however, a cost to this and the current fare-box recovery requirements need to be flexible enough to accommodate the likelihood of decreased financial performance of the services in this area in the shorter term - noting that the whole of life benefits from the investment will in the longer-term outweigh these deficits in the short-term. Demand Services are also appropriate in this situation and are being developed.

4.3 Section 3.3: Dedicated Funding for Delivering Transport Priorities

- 4.3.1 HCC notes that GPS 2021 specifically states (paragraph 106) ‘that there will be no increase to FED (Fuel Excise Duty) and RUC (Road User Charges) in the first three years of this GPS’. While it is appreciated that this degree of certainty will be useful for the freight industry (for RUC in particular), given the COVID-19 implications are not fully understood this will need reconsideration in finalisation of GPS 2021. There is a strong likelihood of decreased travel moving forward and therefore less income - HCC therefore believe that all options for gathering revenue (including fuel tax changes or regional fuel taxes) should be kept open at the strategic level of the GPS 2021.
- 4.3.2 The ability for all Council’s to co-fund projects to achieve the outcomes Government expects from GPS 2021 will be challenging given COVID-19. Government will need to consider in finalising GPS 2021 short, medium and long-term impacts on council funding streams and their ability to co-invest. The variable impacts across metropolitan councils, provincial councils, rural councils, unitary councils and regional councils will vary and will need consideration.

4.4 Section 3.4 Activity Class Framework

- 4.4.1 HCC support the proposed signals that the 11 activity classes provide towards the achievement of the strategic direction signaled in draft GSP 2021. As signaled in paragraph 114, key to achieving this will be the need to ensure that Waka Kotahi has systems that can consider projects that may require investment across the activity classes. The current processes continue to be cumbersome and narrow in focus and do not facilitate the wider investment that is often needed for projects to achieve better travel options that are safe – particularly in the urban setting e.g. the Standard Safety Intervention toolkit has minimal provision for walking and cycling safety improvements and is very vehicle safety orientated. It is essential that projects requiring funding across different activity classes are supported, and that the process for obtaining funding is simple.
- 4.4.2 HCC also request that there is not only the ability to have programmes or packages of work to be funded from different activity classes, but also potentially from different Approved Organisations. This will align with the consistent prioritisation method proposed to be used by regions across New Zealand

as they develop their RLTP Programme and assist in the delivery of key programmes such as Speed Management Plans at a regional level.

4.4.3 HCC makes the following comments in regard to the proposed new activity classes:

- Road to Zero
 - HCC is supportive of the greater focus provided to road safety activities that is provided by the proposed new activity class for “Road to Zero”.
 - HCC notes that \$1.2 billion additional investment in local roads is estimated as part of the Road to Zero interventions and that this is therefore included in this new activity class.
 - HCC is concerned that the road safety promotional activity will be such a small amount in this new activity class that it will easily be lost in the future – in a way that is similar to what is being proposed for the TDM activity.
 - HCC therefore request that consideration be given to a “behavioural change” activity class that would include the “soft” measures that are associated with both road safety and TDM. It is often hard to separate these activities in reality because one of the key reasons why people are not using sustainable modes of travel is often related to safety perceptions and concerns.
- Rail network
 - HCC notes that the previous “Transitional Rail” activity class projects will now be funded from the Public Transport Infrastructure activity class.
 - The Transitional Rail activities were funded at up to 100 percent from the NLTF and HCC requests that a continuation of this approach is taken in any Investment Framework.
- Public transport services and public transport infrastructure
 - HCC supports the proposed separation between the infrastructure and the services, and then for each of these activities classes to have expenditure reporting lines for existing and new. This provides an improved level of transparency on the investment proposed into these activities.
- Coastal Shipping
 - HCC support the inclusion of Coastal Shipping in the NLTF if it can be demonstrated there is benefit to the Land Transport system. HCC notes that the initial three years of funding will include relevant research to see what future support for the sector may help achieve Government’s aims.

4.4.4 HCC strongly supports greater focus on TDM opportunities to support and enhance the achievement of project outcomes, but requests reconsideration of the proposed removal of a dedicated Travel Demand Management activity class.

4.4.5 As noted previously, HCC support TDM being funded as part of an infrastructure project, but there also needs to continue to be a fund for non-project related education and promotional activities. HCC believes that TDM will get lost in the proposed change and therefore argue the need for it to remain as an activity reporting line or merged with road safety promotion to create a “behavioural change” activity class as noted above.

4.4.6 HCC supports the proposed 5 percent increase in local road maintenance and is also supportive of the proposed increase in funding for state highway maintenance. In recent years there has been a steady decline in the levels of service (including safety) be delivered via the maintenance activity and this will need to be addressed if the Road to Zero targets are to be achieved.

4.4.7 HCC notes the following specific comments in relation to Table 3: Activity classes and proposed funding ranges:

- The way the information for the activity classes been bundled together makes it hard to assess

whether there is funding proposed in the expenditure reporting lines e.g. the Road to Zero activity class has four expenditure reporting lines (safety infrastructure, road policing, automated enforcement and road safety promotion) and it is possible that road safety promotion may not be appropriately funded.

4.5 Section 3.5 Delivering Government Commitments

- 4.5.1 While HCC is supportive of Government's commitments to the delivery of Auckland Transport Alignment Project (ATAP) and "Let's Get Wellington Moving" (LGWM), it would also like Government to commit to key programmes and projects emerging from the Hamilton to Auckland Corridor initiative, which will shape Hamilton's Urban Form, make shared and active modes more attractive and influence travel demand and transport choice.
- 4.5.2 HCC is concerned that investment to deliver on the Government commitments to two major metropolitan centres will be detrimental to other parts of New Zealand, including the Waikato and Tauranga metropolitan centres which also have high growth pressures.

4.6 Section 3.6 Crown Funding for Land Transport

- 4.6.1 The New Zealand Upgrade Programme announced in December 2019 included projects that were aimed at *"speed up travel times, ease congestion and make our roads safer"* (paragraph 13 and 139).
- 4.6.2 Hamilton would like to see consideration for additional Crown Funding for Waikato Land Transport Projects. The \$6.8 billion investment announced in December 2019 had very little Waikato investment.

4.7 Section 3.7 Statement of Ministerial Expectations

- 4.7.1 Section 3.7 sets out a Statement of Ministerial Expectations highlighting important behaviours or actions of Waka Kotahi to give effect to GPS 2021. Amongst other things the Minister expects that Waka Kotahi will play a more proactive role in accelerating mode shift across New Zealand, have a greater role in long-term integrated planning for the sector and to work closely with local government in developing and implementing the NLTP to give effect to the GPS.
- 4.7.2 HCC appreciates the transparency created by the inclusion of the Statement of Ministerial Expectations.
- 4.7.3 While HCC welcomes this increased focus from Waka Kotahi, it needs to be recognised that a partnership approach will be required to meet these expectations and consideration will need to be given to improving local leadership of Waka Kotahi and to recognising the level of knowledge and expertise within the local government sector both at an elected member level and a staff level. It is local government that has the direct links into the community and the responsibility for managing and delivering a large portion of the GPS 2021 outcomes that also need to contribute to improving the wellbeing of our community.
- 4.7.4 HCC specifically notes the leading role that it has taken in testing new innovative approaches to transport solutions, especially in the collection and management of land transport data and road safety initiatives. While HCC has worked closely with Waka Kotahi, HCC has been in a better position to progress early trials and initiatives on new and innovative data management and road safety improvements e.g. raised safety platforms.
- 4.7.5 There are already areas within local government that have high levels of knowledge and expertise and there is a need to ensure that Waka Kotahi is able (and expected) to utilise these skills in a partnership approach and not be expected to have all the expertise in-house.
- 4.7.6 HCC also notes and supports the emphasis provided in the Ministerial Expectations to Waka Kotahi increasing core capability and supports an increase in their capacity to undertake the work, including improved local leadership.

5.0 ANSWERS TO THE SPECIFIC QUESTIONS ASKED IN THE CONSULTATION DOCUMENT

5.1 Please note blue text taken directly from the consultation document.

5.2 Strategic Direction (Section 2/pages 13-25 of the draft GPS 2021)

The Government is prioritising investment in four areas of the land transport system over the next ten years – these are referred to as strategic priorities and are listed below. The four strategic priorities will contribute to achieving the five outcomes of the [Transport Outcomes Framework](#).

1. Do you agree these should be the strategic priorities for investment in land transport?

i. Safety

Yes.

ii. Better travel options

Yes.

iii. Improving Freight Connections

Yes.

iv. Climate Change

Yes.

2. Do you have any comments on the strategic direction section of the GPS?

- There is clear correlation that shows how GPS 2021 is being informed by the Ministry of Transport Outcomes Framework, which seeks a transport system that improves wellbeing and livability and places the GPS on a long-term strategic footing.
- Support the four new strategic priorities for land transport investment being Safety, Better Travel Options, Improve Freight Connections and Climate Change’.
- Support removing “value for money” as a strategic priority and making it a principle relevant for all investments.
- Note specific comments included in Paragraph 3 of the submission above relating to the Strategic Direction and the strategic priorities proposed in land transport.

5.3 Principles for Investing (Section 3/pages 29-30 of the draft GPS 2021)

The government provides a dedicated fund National Land Transport Fund (NLTF) to support its investments in the land transport system. The draft GPS guides how the NLTF, and funds from local government, will be invested in the land transport system to progress the four strategic priorities.

The draft GPS provides three Principles for Investing (that describe value for money) for the Waka Kotahi NZ Transport Agency (Waka Kotahi) and local government to apply to their decision-making about whether to fund land transport projects through the NLTF. These are:

- Alignment:** investments that align with the strategic direction of the GPS
- Effectiveness:** the extent to which a proposal for funding achieves the strategic priorities of the GPS
- Efficiency:** investments that are both at the best cost and achieve the best possible outcome for the total cost of ownership.

3. Do you understand the value for money principles in the draft GPS?

Yes

No

4. Do you have any other comments to make on the Principles for Investing?

Note specific comments included in Paragraph 4.2 of the submission above relating to the Principles for Investing.

5.4 Activity Classes (Section 3.4/pages 32-35 of the draft GPS 2021)

The draft GPS allocates money from the NLTF to eleven activity classes. Activity classes signal how Waka Kotahi and local government should balance investment in the land transport system. The funding ranges have been calculated in a way that assumes sufficient funding for maintenance of the network and continuing existing services before implementing the GPS strategic direction.

Local councils' funds can still be used for projects outside of the eleven classes, but the allocations of money from the NLTF in the draft GPS should achieve the desired outcomes of the draft GPS.

The draft GPS includes three new activity classes. These are:

- i. **Road to Zero**, which will target interventions that are key to achieving the target reductions in road deaths and serious injuries sought through the [Road to Zero strategy](#).
 - ii. **Rail network**, to implement the draft [New Zealand Rail Plan](#) by funding the NLTF share of approved activities from the Rail Network Investment Programme.
 - iii. **Coastal shipping**, to give freight operators more choice for how they transport their freight, and improve the competitiveness and environmental sustainability of the domestic coastal shipping sector.
5. Do you agree that funding to support Road to Zero activities (such as safety infrastructure, road policing, and road safety promotion) should come from a single activity class?
- Yes
 No
 I don't know

Refer points in 4.2.1 and 4.4.5 above. The preference would be to have Road Safety Promotion combined with Travel Demand Management in a separate 'Behaviour Change' activity class.

6. Do you agree that the GPS should fund maintenance and renewal of the rail freight network?
- Yes
 No
 I don't know
7. Do you agree that the GPS should fund coastal shipping?
- Yes
 No
 I don't know

The activity classes are set in a way that balances delivering the strategic priorities and maintaining the existing network. The funding allocations in the draft GPS are expected to utilise expected revenue. Allocating more funding to an activity class would require a decrease in funding for a different activity class, or additional revenue (i.e. increases to [fuel excise duties and/or road user charges](#)).

8. Considering the information above, would you support increasing or decreasing the funding levels for any activity classes? *Please add an 'x' to indicate your views on either decreasing; retaining; or increasing the allocations in the draft GPS.*

| Activity Class | Decrease GPS Allocation | Retain GPS Allocation | Increase GPS Allocation |
|-------------------------------------|-------------------------|-----------------------|-------------------------|
| 1. Road to Zero | | | x |
| 2. Public transport services | | | x |
| 3. Public transport infrastructure | | | x |
| 4. Walking and cycling improvements | | | x |
| 5. Local road improvements | x | | |

| Activity Class | Decrease GPS Allocation | Retain GPS Allocation | Increase GPS Allocation |
|-------------------------------|-------------------------|-----------------------|-------------------------|
| 6. State highway improvements | x | | |
| 7. State highway maintenance | | x | |
| 8. Local road maintenance | | x | |
| 9. Investment management | | x | |
| 10. Coastal shipping | x | | |
| 11. Rail network | | x | |

Note: HCC strongly support the Strategic Priorities and in particular Safety and Better Travel Options but note that there needs to be a step change in funding and deliberate action to ensure that the benefits are able to be realised. Implementation of large-scale and intergenerational projects and increased financial support may be required in order to achieve this.

HCC supports the proposed 5 percent increase in local road maintenance and is also supportive of the proposed increase in funding for state highway maintenance. In recent years there has been a steady decline in the levels of service (including safety) be delivered via the maintenance activity and this will need to be addressed if the Road to Zero targets are to be achieved.

9. Increasing fuel excise duty (and equivalent road user charges) by one per cent a litre generates around \$50 million in revenue each year for the NLTF. The draft GPS does not propose an increase to fuel excise duty or road user charges for the next three years.

Would you support an increase to provide more funding to invest in any of the above activity classes?

- Yes
 No
 I don't know

10. Do you have any other comments on the activity classes in the draft GPS 2021?

Note specific comments included in Paragraph 4.4 of the submission above relating to the activity classes.

5.5 General

11. Do any of your responses contain commercially sensitive information?

No.

6.0 FURTHER INFORMATION AND OPPORTUNITY TO DISCUSS SUBMISSION POINTS

- 6.1 Should the Ministry of Transport require clarification of the above submission points, or additional information, please contact Robyn Denton (Operations Team Leader, City Transportation) on 07 838 6910 or 021 971 127, email robyn.denton@hcc.govt.nz in the first instance.
- 6.2 Hamilton City Council would welcome the opportunity to meet with representatives from the Ministry of Transport to discuss the content of our submission in more detail.

Yours faithfully



Richard Briggs
CHIEF EXECUTIVE