

**Submission by**

**Hamilton City Council**

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## **DRAFT WAIKATO REGIONAL LAND TRANSPORT PLAN 2021-2051**

**31 March 2021**

### **1.0 SUMMARY OF HCC'S KEY POINTS AND REQUESTS**

- 1.1 HCC believes that a transformational response to achieving mode shift is required, particularly in order to be able to contribute meaningfully to the governments call to action associated with their declaration of a climate emergency on 2 December 2020, and that the Regional Land Transport Plan is not aligned with a transformational shift.
- 1.2 HCC seeks the support of the Waikato Regional Transport Committee to jointly advocate to government for better alignment of GPS 2021 with the increased importance of climate change and also in regard to the opportunity that exists right now for transformational investment in mode shift with the assistance of stimulus funding.
- 1.3 HCC seeks elevation in the priority of mode shift programmes and projects in the Access and Mobility category that are likely to have the biggest impact on climate change.
- 1.4 In support of the importance of mode shift in the Hamilton metro area to achieve any Waikato Regional targets, it is noted that within the City boundary 62% of carbon emissions are from transport compared with 20% across New Zealand, and that Hamilton contributes 32% to the carbon emissions from transport in the Waikato.
- 1.5 To be consistent with the RTC submissions to Waka Kotahi, HCC requests the inclusion of a paragraph in Section 6 - Funding advocating for additional Crown funding relating to transformational mode shift to supplement any normal NLTP partnership funding between HCC and Waka Kotahi.
- 1.6 HCC supports the RLTP's focus on implementing the land use and transport pattern identified through the Hamilton-Waikato Metro Spatial Plan, including the priority development areas and investment in connecting multi modal and rapid transit. It is recognised that these areas will require significant funding in the transport network to enable them to deliver on their potential and seeks that the RLTP explicitly recognises this (regardless of funding source).
- 1.7 HCC note that HCC officers will continue working with WRC on updates and corrections to the projects included in the draft RLTP 2021-2051 to align with Hamilton City Council's emerging 2021-31 Long Term Plan.

## 2.0 INTRODUCTION

- 2.1 Hamilton City Council (HCC) considers that the Regional Land Transport Plan (the Plan) doesn't reflect the increasing importance that government is placing on climate change and the need for transformational mode shift. This is in part a matter of timing, with the review of the Plan commencing prior to the declaration by government of a climate emergency in December 2020.
- 2.2 HCC has been consistent in its views on the need for greater action on climate change through its various submissions, including:
- On 17 February 2020 to Arataki - Waka Kotahi NZ Transport Agency 2021-2031 10 Year view of the Land transport System - [refer here](#)
  - On 15 May 2020 to the Draft Government Policy Statement on Land Transport 2021/22-2030/31 - [refer here](#)
  - On 8 December 2020 - Waka Kothi Investment Proposal 2021-31 - [refer here](#)
- 2.3 In its submission to the Wakai Kotahi Investment Proposal 2021-31, HCC advised that it believed a transformational response to achieving mode shift is required, particularly in order to be able to contribute meaningfully to the governments call to action associated with their declaration of a climate emergency on 2 December 2020, and that their Investment Proposal was not aligned with a transformational shift.
- 2.4 HCC requested the support of Waka Kotahi to jointly advocate to government for better alignment of GPS 2021 with the increased importance of climate change and also in regard to the opportunity that exists right now for transformational investment in mode shift with the assistance of stimulus funding.
- 2.5 Attached is a letter (**Appendix 1**) that the Mayor of Hamilton sent to key Ministers on 22 December 2020 advising of the risk of an opportunity lost for mode shift to walking and cycling.
- 2.6 On 2 March 2021, HCC adopted a set of environment principles to guide project planning and decisions and to make sure possible environmental impacts are considered upfront.
- 2.7 The principles are directly related to improving residents' wellbeing, which is now a key purpose of local government.
- 2.8 The six principles are:
- Restoring and protecting the health and wellbeing of our waterways.
  - Protecting and enhancing our natural taonga, whenua and biodiversity.
  - Embracing the sustainable use of resources.
  - Promoting a circular economy.
  - Transitioning to a low carbon future.
  - Build our resilience to climate change.
- 2.9 An Environment Policy will now be developed based on the principles. Hamiltonians will be invited to provide input into the policy later this year.
- 2.10 Given the context above, HCC offers the following observations and requests for change to the Plan:
- **Observation** - one of the biggest contributions to addressing climate change effects will be mode shift in greater Hamilton. The GPS includes climate change as one of the four GPS

priorities, yet the RLTP has climate change as an underpinning objective, which carries no weighting for activity prioritisation.

Page 13 introduces a key feature of Access Hamilton, which is the intervention hierarchy. The second highest priority approach following Integrated planning is managing demand, which includes mode shift. This priority is not reflected in the RLTP weightings.

- **Request** - elevate the priority of mode shift programmes and projects in the Access and Mobility category that are likely to have the biggest impact on climate change. These programmes and projects are anchored in the Access and Mobility objective, which has the lowest weighting (25% - assigned prior to the declared climate change emergency) of the three main objectives (the others being Strategic Corridors and Economic Development and Road Safety) noting that the underpinning objective of climate change has not been given a weighting for prioritisation purposes.

In particular, HCC would like to see elevation of projects, which are part of the transformational 20 Minute City proposal including Eastern Pathways (current priority #56/78), Biking and Micro Mobility (currently #58/70) and the Central City (Ferrybank) Walking and Cycling Bridge (#65/70). It is noted that further progress on the Business Cases for these projects has provided greater clarity on the Investment Profiles for these projects which will also support their elevation in the Significant Transport Activities rankings.

- **Observation** - HCC in its submission to the draft GPS expressed concern in regard to the amount of funding allocated to Walking and Cycling Improvements and expressed a view that it did not align with the strategic direction of the GPS. In particular, HCC indicated that without a step change in the way the transport budget was allocated, cities such as Hamilton would be unlikely to achieve significant mode shift.

Both the Regional Connections Committee and the Regional Land Transport Committee have made submissions to Waka Kotahi Investment Proposal 2021-31 pointing out that while a stated priority is to improve public transport outcomes, the funding to support this isn't provided in the GPS.

The Regional Transport Committee, in its submission to the Waka Kotahi Investment Proposal 2021-31, supported the HCC request to *"advocate to government for better alignment of GPS 2021 with the increased importance of climate change and for transformational investment in mode shift with the assistance of stimulus funding"*.

- **Request** - to be consistent with the RTC submissions to Waka Kotahi, HCC requests the inclusion of a paragraph in Section 6 - Funding advocating for additional Crown funding relating to transformational mode shift to supplement any normal NLTP partnership funding between HCC and Waka Kotahi.

HCC understands that while these mode shift projects may have low priority in the Regional Significant Transport Activity table (Appendix 7), they may be high in the list of projects associated with the Walking and Cycling Activity or Public Transport Infrastructure funding class for the Waikato Region. However, the low regional ranking assigned, driven by the 25% weighting, is sending the wrong message from the Waikato to national decision-makers about the importance we place on achieving mode shift.

Hamilton City Arterial Corridors play a strategically important function as part of the wider strategic regional network (page 24 summary). Objective 2 for Strategic Corridors (page 52) indicates a planned transport response that supports liveable urban areas and future growth areas with a priority being to provide multi-modal transport solutions to support housing and growth in the Hamilton-Waikato metropolitan area.

New transport Corridors include multi-modal solutions in scope, but the importance of

mode shift is not recognised for the role they play in protecting existing strategic corridors and allowing them to function in the existing built environment.

HCC is progressing two significant programmes to address this which are Eastern Pathways and Biking and Micro-mobility. HCC requests that these projects be treated as projects associated with strategic corridors and that they be listed as Priorities for Objective 2 under Strategic Corridors and be prioritised accordingly. This request is reinforced under the case for investment (page 55), which states that for the Greater Hamilton Strategic Corridors, investment in multi-modal transport outcomes is required to support the future urban form envisaged in the Hamilton-Waikato Metro Spatial Plan.

- 2.11 It is recognised that the RLTP 2021 is an amalgamation of the programmes that have been developed by each of the Road Controlling Authorities within the Waikato Region to reflect their community needs, alongside the Public Transport Services provided by the Waikato Regional Council.
- 2.12 HCC also support the approach taken in the development of the RLTP 2021, noting that it also supports important projects outside the Waikato, for example supporting rail improvements in Auckland to make it faster and easier to move freight and passengers by train to and from Auckland.

### **3.0 DRAFT RLTP 2021 EXECUTIVE SUMMARY**

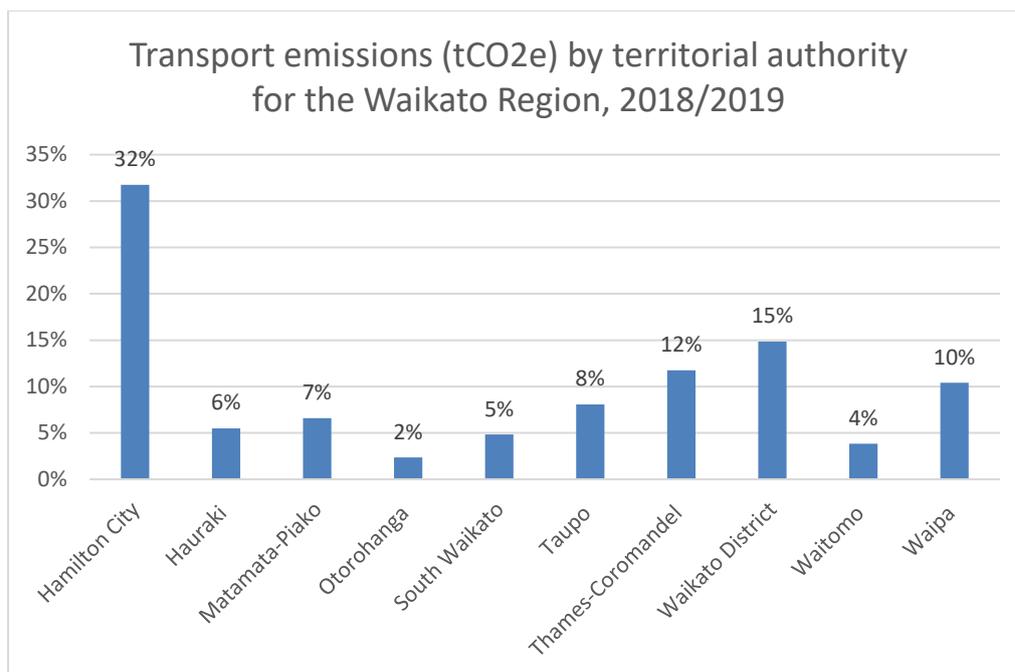
- 3.1 The 2021 RLTP Executive Summary is a useful 'at a glance' reference document.
- 3.2 HCC requests the following minor changes to the Programme Implementation column (Page 7):
  - Economic Development and Strategic Corridors. Recommend removing the Low-Cost Low Risk packages from this priority line and including them under 'Safety' and 'Access and Mobility' priorities instead as these are where the key benefits from the Low-Cost Low Risk programmes will be delivered.
  - Underpinning Objectives - Programme Implementation - Transport Modelling. Note that these activities will include the development of a Hamilton Traffic Model as part of the rebuild of the Waikato Regional Transport Model.
- 3.3 HCC also notes that on Map 1 10 Year priorities for the Waikato Region - the Hamilton-Waikato Metro Spatial Area should include improve safety outcomes in the list.

### **4.0 SECTION 1 - INTRODUCING THE DRAFT RLTP 2021**

- 4.1 HCC is concerned that the Key Achievements table (commencing on page 12 and continued onto Page 13) undersells the significance of the transport investment in Peacock by referring to the work as 'enabling work'. The Peacocke transport project is the largest project that HCC has undertaken and probably the largest project undertaken by a local authority outside Auckland, with a substantive local share investment. It is also a key first step in the Southern Links programme.
- 4.2 HCC support and agree with the list of Strategic Regional Planning drivers (page 16), and in particular:
  - Hamilton to Auckland (H2A) Corridor Plan.
  - Hamilton-Waikato Metro Spatial Plan.
  - Hamilton-Waikato Mode Shift Plan.
- 4.3 Under the heading Hamilton to Auckland (H2A) Corridor plan on page 16, references are made to the Plan's vision to support sustainable growth and to increase connectivity between

Hamilton and Auckland. It should also pick up the priority development areas, particularly Ruakura where the Eastern Transport Corridor will be significant transport infrastructure required to unlock the full potential of this high priority development area.

- 4.4 On page 17, Table 1 GPS - HCC is not sure where the key areas for focus for regions is sourced from, but HCC requests that addressing climate change (both looking at reducing effects of climate change and addressing results of climate change through resilience funding) be added.
- 4.5 The vision for land transport in the Waikato Region (page 18) of *“an integrated, safe and resilient transport system that delivers on the well-beings of our diverse Waikato communities”* is supported by HCC.
- 4.6 HCC notes that the vision and objectives for the land transport system have been refined from the 2018 RLTP.
- 4.7 HCC support the priority transport problems in the RLTP 2021 (page 18) which propose to be addressed through a range of implementation measures:
  - Strategic corridors and Economic development - ensuring our strategic inter and intra-regional corridors are fit for purpose and are efficient, particularly in the context of growth pressures in the Hamilton-Waikato metro spatial area, the Hamilton to Auckland Corridor and in the wider upper North Island.
  - Road Safety - tackling our complex road safety problem to ensure we have a safe and accessible transport system where no-one is killed or seriously injured on our region’s roads.
  - Access and Mobility - providing better transport options for our people, in our urban and rural communities.
- 4.8 HCC is concerned that the weightings of the Strategic Objectives remained unchanged from the 2018 RLTP, especially in light of the climate emergency that was announced in December 2020 and believe that the underpinning objective for climate change needed to be elevated to a priority transport problem and have a weighting order to effect the change that is needed moving forward.
- 4.9 HCC suggests that the existing method for prioritising significant transport activities (Appendix 5) provides a mechanism to recognise the elevated importance of Climate Change through the “Fourth Order - Regional Preference/RTC Discretion” step.
- 4.10 It is recognised that the timeframes for the delivery of the draft RLTP 2021 have not allowed more in-depth coverage of climate change, but HCC request that the RTC continue to monitor this rapidly changing focus area and to incorporate this into the development of the 2024 RLTP, which will require a more in-depth review as part of the six-yearly review process set out in the LTMA.
- 4.11 HCC notes that in Figure 6 page 19 the headline target for Access and Mobility will be reviewed as part of the development of the Regional Public Transport Plan.
- 4.12 HCC supports the inclusion of a headline target for climate change in Figure 6 (page 19) but would note that the target minimum reduction of 25% by 2030 from 2018/19 levels seems low compared with targets being set by other RLTPs throughout the country and requests that an evidence-based emissions reduction target be established. This headline target should reflect the emissions reduction required by 2030 in line with the global 1.5°C goal.
- 4.13 Hamilton will be key to achieving any emissions reduction target for transport, given that the urban environment presents the greatest opportunity for mode shift. Hamilton contributes 32% to the carbon emissions from transport in the Waikato Region, as shown in the graph below.



## 5.0 SECTION 3 - TRANSPORT ISSUES FOR THE WAIKATO REGION IN THE NEXT 3-10 YEARS

5.1 Page 37- Rail Corridor issues - HCC would like to add:

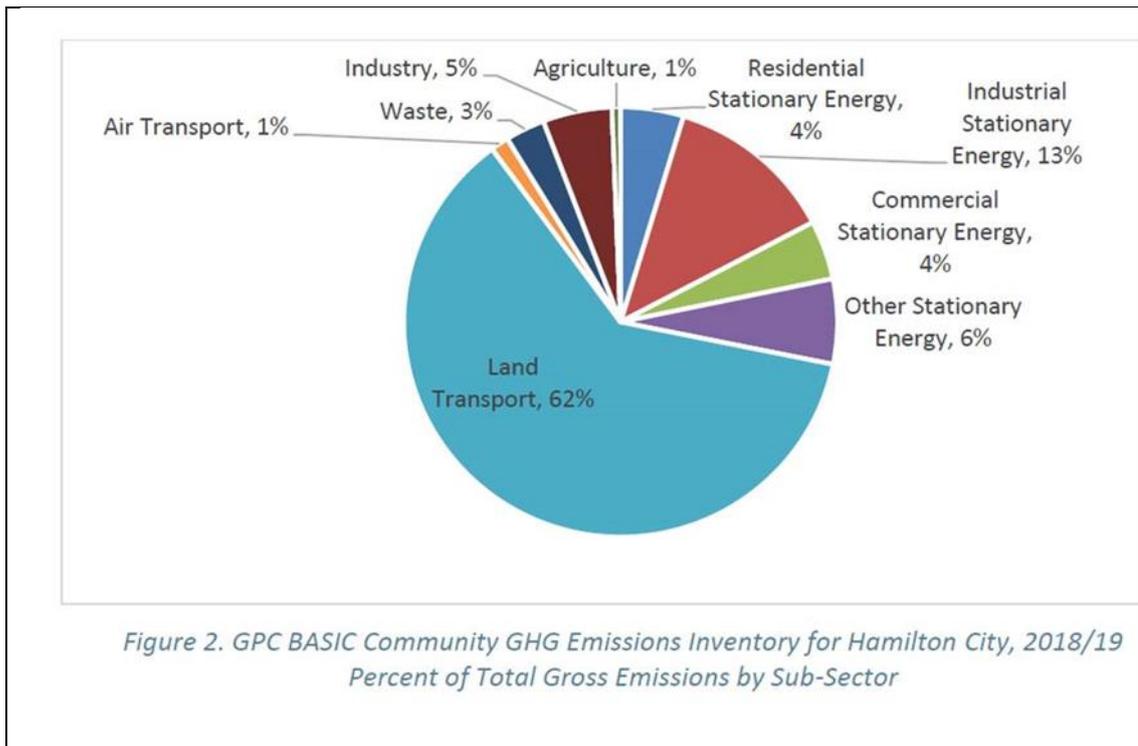
5.2 *“congestion and constraints in the Hamilton-Waikato Metro Spatial Plan area including lack of electrification and double tracking”.*

5.3 On page 37 there is a statement that says the region needs to ensure that land use decisions do not compromise the important role our strategic road networks play for freight. HCC would like an addition to this that says:

5.4 *“... but ensuring that the transport corridors enable the land use decisions made by the region and its stakeholders”.*

5.5 On page 46 there is a pie chart that indicates 20% of New Zealand’s carbon emissions are from Transport. Cutting transport emissions is clearly one of the more significant contributions that the Waikato can make.

5.6 HCC, in collaboration with WRC, has completed an assessment on a city boundary basis and determined that 62% of carbon emissions are from transport within the boundary of Hamilton. We have a significantly higher transport contribution which is mainly due to diesel emissions 52% and then petrol 43%. The pie chart below illustrates the percent of total gross emissions by sub-sector for Hamilton City.



- 5.7 In the HCC submission to Arataki, HCC requested recognition of Hamilton as a focus area for transforming urban mobility under the section on ‘Tackling Climate Change’, given that the Arataki summary identified the Waikato as having the second highest carbon emission profile in the country, with NIWA reports identifying Hamilton’s transport infrastructure as a significant contributor.
- 5.8 HCC notes that mode shift is an appropriate response to reducing emissions and the associated impact on climate change. HCC supports any initiatives that increase mode shift by providing better travel options and through targeted improvements to public transport access and priority on the network, including the state highway network.

## 6.0 SECTION 4 - REGIONAL POLICY FRAMEWORK

- 6.1 HCC is in support of the Regional Policy Framework and the summary of the RLTP 10 Year Priorities.
- 6.2 Priorities for Objective 1 (page 52) - HCC requests that the Ruakura Eastern Transport Corridor and the Northern River Crossing be added to the description of Strategic corridors around the greater Hamilton Area.
- 6.3 Policies for Objective 2 (page 53) - HCC requests that P10 be amended slightly to read “ensure regionally significant *multi-modal* corridors are protected and developed to serve the future development and transport needs of the region”.
- 6.4 Key implementation measure M5 could be expanded to specifically reference completion of the Ruakura Eastern Transport Corridor.
- 6.5 HCC requests that Key Implementation measure M26 (page 60) be deleted as the actions included in this measure are already covered in M 25 (page 60) and M41 (page 62).
- 6.6 HCC, in its submission to Waka Kotahi, also requested the development of a national plan setting out detailed local government transport targets that will need to be achieved to meet climate change goals set by government. HCC is pleased to see Implementation Measure M42 (page 62) which aligns with this request.

## 7.0 SECTION 5 - REGIONAL PROGRAMME OF TRANSPORT ACTIVITIES

7.1 Page 69, Figure 20 and 21 pie charts are misleading, with Figure 21 based on number of activities, without regard to cost. An indication of the split after the high state highway and local road maintenance would be useful.

7.2 On page 70, Map 4 Contribution of Regionally Significant Activities to Objectives - the following changes are required to the Hamilton City insert to more accurately reflect the programme of activities:

- Delete - Hamilton Ring Road 4 laning Hukanui to Gordonton - this is unfunded in the Hamilton City Council Long Term Plan.
- Add - Hamilton Biking and Micro-mobility Programme (contributing to Access and Mobility).
- Add - Road Safety Improvements (contributing to safety).
- Add - Ruakura Eastern Transport Corridor (contributing to economic development).
- Change - Hamilton Ring Road Wairere/Cobham interchange to 'black' to indicate it is an existing commitment.
- Change - SH1 Hamilton to Cambridge Cycle connection to 'black' to indicate it is an existing commitment.

7.3 Table 4 Page 71 - HCC requests the following changes:

- Strategic Corridors - Hamilton Growth. Ruakura Eastern Transport corridor should be added along with Biking and Micro-mobility strategic corridors and Wairere Drive 4 laning, - Hukanui to Gordonton should be deleted.
- Climate Change - add Eastern Pathways and Biking and Micro-mobility.

## 8.0 SECTION 6 - FUNDING

8.1 Table 6 Other Sources of Revenue (page 77) - HCC considers that developer contributions are part of local share funding. Supplementary funding may arise through financial contributions or mitigation works.

8.2 Provincial Growth Fund - HCC request that the description of 'Ruakura Spine Road' be changed to 'Ruakura Spine Road (Stage 1 connection to Expressway)'.

8.3 HCC note that Figure 22 - 10 Year Forecast activity class will need to be updated following updates of projects and funding included in Appendix 6.

## 9.0 APPENDIX 6 AND 7

9.1 HCC note that there have been a number of changes to the Hamilton City programmes and projects included in the draft RLTP 2021 in both Appendix 6 - Transport Activity Class tables and Appendix 7 - Significant Transport Activities table.

9.2 While some changes are specifically included within this submission, it is noted that HCC officers will continue working with WRC staff on updates and corrections to the projects included in the draft RLTP 2021 to align with Hamilton City Council's emerging 2021-31 Long Term Plan.

9.3 HCC note that the Ruakura Eastern Transport Corridor is included in the Significant Transport Activities table (Appendix 7, page 126), but not included in Table 5 New and Improved Infrastructure for Local Roads.

9.4 HCC requests that Appendix 7 be reformatted to reflect projects with Activity Class tables

(similar to Appendix 6) so that there is greater visibility of the programmes/projects within each of the Activity areas and there is better reflection of the relative priority of each of the programmes/projects in the Significant Activities.

## 10.0 FURTHER INFORMATION AND HEARINGS

- 10.1 Should the Waikato Regional Council require clarification of Hamilton City Council's submission, or additional information, please contact **Robyn Denton** (Network Operations and Use Team Leader, City Transportation) on 07 838 6910 or 021 971 127, email [robyn.denton@hcc.govt.nz](mailto:robyn.denton@hcc.govt.nz) in the first instance.
- 10.2 Hamilton City Council **would like to speak** in support of this submission at the hearings scheduled for Friday 16 April and Monday 19 April 2021.

Yours faithfully



**Richard Briggs**  
**CHIEF EXECUTIVE**

## Appendix 1



OFFICE OF THE MAYOR  
HAMILTON

22 December 2020

Hon. Michael Wood, Minister of Transport  
Hon. David Parker, Minister for the Environment  
Hon. James Shaw, Minister for Climate Change  
Hon. Grant Robertson, Minister of Finance

Dear Ministers

### Land Transport Policy and Programme Investment

## The risk of an opportunity lost

Recent shifts in government transport policy and the role it plays in addressing the critical need to look after our environment have been welcomed by Hamilton City Council. The climate change emergency declaration is a clear signal to all New Zealanders that we require strong, effective and committed action, with immediacy, if we are to ensure a sustainable future for all.

Against this backdrop, we are concerned the Waka Kotahi Investment Proposal 2021-31 for the state highway network is a missed opportunity for government and councils to work together to create transformation change with tangible and early benefits for our people.

We have an opportunity now to present a strong and decisive public sector approach to cut transport emissions, drive progress toward carbon-neutrality and set a standard as a call to action for the private sector.

**Hamilton City Council can deliver a formal pilot scheme to progress carbon neutrality. We can partner with government and address climate change through a transformative transportation approach, right now. Successful implementation of this initiative will provide a proven model for nationwide delivery.**

Hamilton City Council is ready, willing and able to turn policy into action. We're already making progress. But we need a government funding approach which is more responsive and agile, more attuned to our environmental needs and one which better reflects the urgency expressed through the government's recent announcements.

Council believes the Investment Proposal in its current form will not contribute significantly to tackling climate change, despite this being one of the 4 Strategic Priorities of GPS 2021. We recognise, and hope, the Investment Proposal may have been constructed differently if its timing followed the governments declaration of a climate emergency.

But opportunities do not have to be lost.

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## Hamilton can deliver early wins

Government has indicated that it requires the public sector to achieve carbon neutrality by 2025. The public sector will underpin a national transformation by 2050. Cutting emissions from transport is clearly one of the more significant steps to achieving the 2050 goals.

Recent work by Council indicates 62% of our city's carbon emissions are from land transport and of these 83% are generated from our roading network. The climate emergency declaration emphasises bold action is required. Significant transport investment is critical.

Hamilton offers a high-growth metro with a unique opportunity to deliver a paradigm shift in how we interact with our transport system. We have been actively and consistently presenting these views for some time. We believe the opportunity to work with government through our already-developed stimulus mode shift programme still exists and can be confirmed alongside our 2021-31 Long Term Plan development. If the opportunity is not seized now, it may be lost for another three years until the next Long-Term Plan.

## A radical shift – and it's ready to go

In the past 18 months Hamilton has worked with our Future Proof partners and government ministers and agencies on the Hamilton to Auckland Corridor study and, more specifically, the Hamilton-Waikato Metro Spatial Plan. One of the key transformational moves identified in the Hamilton-Waikato Metro Spatial Plan is:

*"A radical transport shift - a multi-modal transport network connecting the metro area and facilitating a radical shift to using public transport through the establishment of a rapid and frequent public transport network shaped around where and how communities will grow".*

During COVID-19, the Future Proof partners presented to government an initiative called the Hamilton Mode Shift Programme; 20 Minute City as a transformational shovel ready stimulus project.

This is a transformational programme of initiatives to achieve mode shift, which is ready to be rolled out and provides an opportunity to make a difference by transformation rather than by taking an incremental approach which never gets ahead of the problem.

We have window of time to partner with government and its agencies to deliver this programme now, giving effect to the aspirations of government, our Council and our communities.

Hamilton, and government, can provide an international example of how we can tackle our generation's greatest challenge. We can show what happens when central and local government partner with a commitment to urgent and effective action. We welcome the opportunity to discuss how this could be achieved together.

Yours sincerely



Paula Southgate  
**Mayor of Hamilton**

## For reference: a consistent approach to partnership

In recent times Hamilton has had the opportunity to submit to key transport policy documents. In February 2020, we submitted to Arataki; Waka Kotahi 2021-2031 10-Year view of the land transport system. Our key submission points were:

- Council welcomed the recognition of the Hamilton to Auckland Corridor project, the emerging Hamilton-Waikato Metro Spatial Plan and the importance of Hamilton as a major metropolitan area.
- Council welcomed the opportunity to work with Waka Kotahi to develop a Mode Shift Plan for Hamilton (which is now complete).
- Council requested Waka Kotahi to recognise Hamilton as a focus area for transforming urban mobility under the section on “tackling climate change”, given that the Arataki summary identified the Waikato as having the second highest carbon emission profile in the country, with NIWA reports identifying Hamilton’s transport infrastructure as a significant contributor.

In May 2020, we submitted to the Draft GPS 2021. Our key submission points were:

- We requested 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.
- Council expressed concern that the amount of funding signalled in the draft GPS for walking and cycling was inadequate and did not align with the strategic direction of the draft GPS.
- We noted that increasing the funding assistance rates for walking and cycling improvements would both encourage and assist cities in mode shift.
- We further noted that without a step-change in the way the transport budget is allocated, it is unlikely that cities such as Hamilton will be able to achieve significant mode shift.