

HAMILTON CITY COUNCIL SUBMISSION

Draft Government Policy Statement on Land Transport 2024

Ministry of Transport



15 September 2023



**Hamilton
City Council**
Te kaunihera o Kirikiriroa

Improving the Wellbeing of Hamiltonians

Hamilton City Council is focused on improving the wellbeing of Hamiltonians through delivering to our five priorities of shaping:

- **A city that's easy to live in**
- **A city where our people thrive**
- **A central city where our people love to be**
- **A fun city with lots to do**
- **A green city**

The topic of this submission is aligned to the priority **A city that's easy to live in.**

Council Approval and Reference

This submission was approved by the Chair of Hamilton City Council's Infrastructure and Transport Committee on 15 September 2023.

Hamilton City Council Reference D-4828775 - Submission # 747.

Key Messages

1. We support the overall direction and intent of the **Draft Government Policy Statement on Land Transport 2024 (Draft GPS 2024)**.
2. We support the strategic directions of 'Maintaining and Operating the System' and 'Increasing Resilience'. Ensuring that our existing assets are well maintained, safe and meet the needs of current and future needs of our road users (of all types) are the most basic of activities that are needed to ensure that people can get to where they need to on a daily basis. The storm events earlier this year and ongoing challenges with affording the basics have highlighted the need for this focus moving forward.
3. We consider that the Draft GPS 2024 is currently a missed opportunity to strengthen our response to climate change. The Indicative Strategic Priorities Engagement Paper released by Te Manatuu Waka Ministry of Transport in early 2023 had proposed to elevate emissions reduction to become the overarching focus for GPS 2024. We understand any shift to support recovery and strengthening the resilience of the entire transport system but note that it will be very challenging to meet any emission reduction targets without significant funding support from government.
4. We support the need to have additional funding mechanisms available for the upcoming GPS and in particular support:
 - a. The proposed staged approach to increases fuel excise duty (FED) and Road user charges (RUC) and supplementary funding from direct Crown funding instead of a significant increase in this area.
 - b. Hypothecation of the traffic infringement fee revenue to the national land transport fund (NLTF) to directly support Road to Zero safety programme.
 - c. Crown grants including \$500 m from CERF which will be directed to Walking and Cycling activity and which Hamilton City has benefited from in this current LTP period.
 - d. Review to determine how land transport should be funded in the future called 'Future of the Revenue System' which will be necessary as revenue from road users from current sources will reduce into the future.
5. We support the inter-regional public transport activity class which allows for investment in existing and new inter-regional services such as our Te Huia service. We would like the upper limit of funding to be adequate to enable the continuation of the existing inter-regional rail services, including replacement of any rolling stock.
6. We are **opposed to the Road to Zero activity class being dismantled and incorporated into the State Highway and Local Road improvement programmes**. We note that the findings in the GPS 2018 Evaluation Report (released in February 2023) identified that "*budget allocations to activity classes are a key change mechanism*" and specifically that "*The continuity of direction in GPS 2021 will continue to build system momentum and should enhance visibility of the contribution of the GPS towards intended outcomes.*" Our **Access Hamilton** transport strategy ([refer here](#)) supports Vision Zero and the need to have a safe transport system to support and enable genuine travel choice and inclusivity for everyone to meet their needs and thrive.
7. We are looking forward to seeing the outcome of the work planned to develop a comprehensive framework for funding, financing, and integrating decision-making processes for Mass Rapid Transit projects (including the Hamilton-Waikato Metro Rapid Transit network) with this new policy expected after GPS 2024 is adopted.
8. We support the strategic priority for sustainable urban and regional development and the role that Hamilton City will play in achieving VKT reduction within the Tier 1 group for Hamilton (which includes Waikato Regional Council, Hamilton City Council, Waikato District Council and Waipā District Council).

Introduction

- Hamilton City Council welcomes the opportunity to make a submission to the Ministry of Transport on the **Draft Government Policy Statement on Land Transport 2024 (Draft GPS 2024)**.
- Although we support the overall direction and intent of the Draft GPS 2024, we do have a number of specific issues/concerns, which are outlined in more detail in the following sections.

Specific Comments on the Draft GPS 2024 Consultation Document

Section 3: Strategic Priorities

- Alignment between the six 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 2024 development around the country will continue to use this framework as the foundation of RLTP strategic frameworks.
- We support the strategic directions for 'Maintaining and Operating the System' and 'Increasing Resilience'. Ensuring that our existing assets are well maintained, safe and meet the needs of current and future needs of our road users (of all types) are the most basic of activities that are needed to ensure that people can get to where they need to on a daily basis. The storm events earlier this year and ongoing challenges with affording the basics have highlighted the need for this focus moving forward.
- However, we believe that the maintenance and resilience that are required now have come at the cost of historic underinvestment in emissions reduction, and we are concerned that the legacy left behind by this Draft GPS 2024 will be the same. The Draft GPS 2024 does not address the cycle of unacceptably high transport emissions and worsening climate impacts, and the consequent need to invest more and more to maintain networks and build resilience.
- The recent events in the North Island have shown us that now is not the time to be shying away from emissions reduction action. If we do, we will continue to see similar and worsening impacts into the future that we will always be building resilience against. Instead, we must address the root cause of the problem to address the level of greenhouse gases currently emitted by the transport sector by adequately funding the Emissions Reduction Plan (ERP).
- We need a radical shift in transport to address these emissions and we consider that the current Draft GPS 2024 is a critical missed opportunity to achieve this. The Indicative Strategic Priorities Engagement Paper released by the Ministry of Transport in early 2023 had proposed to **elevate emissions reduction to become the overarching focus for GPS 2024**.
- We support the ERP and that reducing transport emissions is critical for reaching New Zealand's net zero emissions target by 2050. However, the Draft GPS 2024 only supports the ERP to a limited extent as the funding envelopes identified will fall well short of achieving both the overall emissions budgets as set in the ERP, the targets for transport related emissions, and ultimately the net zero emissions targets for Aotearoa New Zealand.
- Our specific comments for each of the strategic priorities are outlined below.

Maintaining and Operating the System

- We support "*maintaining and operating the system...at a level that meets the current and future needs of users.*" We agree that maintenance and renewal of the network must include effective ways to 'build back better' (ref Section 5: Statement of Ministerial Expectations), so the transport system is optimised to support future expectations.

19. We support decisions being based on the needs and contribution within the wider network, rather than necessarily replacing 'like-for-like'. We support that this could mean resilience and safety improvements, or creating additional space for a bus lane or active transport as part of maintenance and renewals. We must ensure that any and all opportunities to improve resilience and enable low-carbon transport options are implemented when delivering against this strategic priority.
20. We support the use of lower-carbon materials, embedding circular economy principles and making use of nature-based solutions as highlighted in this strategic priority.

Increasing Resilience

21. We agree that the strategic priorities work together to improve resilience, and that maintenance and renewal programmes, for example, will recognise the impacts of climate change, with appropriate drainage upgrades and mitigation measures put in place to manage risks.
22. We would like to see increased temperatures highlighted as a hazard in this section. This is particularly important for the largest cities who are expected to make the biggest contribution to reducing transport emissions through things like VKT reduction programmes (and any other programmes that will increase active transport mode share). For these programmes, we need to ensure that the solutions we put in place will be usable in the future climate, such as ensuring cycleways and walkways are sufficiently shaded so that residents can comfortably use them in the hotter summer months. Therefore, building resilience to increased temperatures must be considered under this strategic priority (alongside the other hazards identified such as flooding and rising sea levels).
23. We support the objective to build capability at the local government level as currently there are varied levels of understanding climate adaptation requirements both within organisations themselves, and between organisations who need to partner on transport solutions (for example, city and regional councils).
24. We support the use of hazard mapping and climate scenario analysis to inform investments, but this must be applied to current assets in the network, not just new investments.

Transitioning to a Lower Carbon Transport System

25. We need a radical shift in transport to address emissions from this sector and consider that the Draft GPS 2024 is a critical missed opportunity to achieve this.
26. We support the ERP outcomes and are currently working with our partners to develop a VKT reduction programme that will identify investments that make it easier for people to move using public transport and active modes. We are very concerned that there is insufficient funding identified in the Draft GPS 2024 for implementing these programmes at the scale and pace required to meet the VKT reduction targets, transport emissions targets, and overall emissions budgets set in the ERP.
27. While we agree that not every individual investment within the National Land Transport Programme (NLTP) should be expected to reduce emissions (as outlined on page 24 of the Draft GPS 2024), both embodied and operational emissions reduction (along with adaptation to climate change) must still be part of the analysis for these investments. That is, all investments should have emissions and adaptation impacts outlined regardless of the main focus of the investment, so that the true cost of the investment is made clear. This will enable all parties involved in the investment decision to drive the most sustainable outcomes. Furthermore, those investments that can deliver emissions reduction (and adaptation to climate change) in addition to their main focus (e.g., safety improvements) should be prioritised.

Safety

28. We supported the Government's move towards a Vision Zero approach to road safety included in Road to Zero. We 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. Vision Zero is a proven approach being applied by many jurisdictions globally, is customer-focused and human centred, and helps build trust across New Zealand communities that people's safety is at the heart of what we do.
29. We are **opposed to Vision Zero being dropped as a fundamental principle, priority and primary outcome for road safety in the Draft GPS 2024**. Moving from *"A safe transport system, free of death and serious injury"* (GPS 2018) and *"Developing a transport system where no-one is killed or seriously injured"* (GPS 2021) to *"Transport is made substantially safer for all"* is a huge step backward for New Zealand's commitment to the Stockholm Declaration, which calls for the global target to reduce road traffic deaths and injuries by 50 percent by 2030. We are also concerned that the safety performance measures in the Road to Zero Strategy are no longer referred to in the Draft GPS 2024 (Table 1, page 36). These are significant departures from the previous GPS, and it is concerning to us that they not referred to in the "Appendix 2: Changes from GPS 2021 through to GPS 2024".

Sustainable Urban and Regional Development

30. We support the primary objective of this strategic priority that people can readily and reliably access social, cultural, and economic opportunities through a variety of transport options, and that developing resilience and productivity is achieved through effective transport networks that provide a range of low-emission transport options and low congestion. This strategic priority supports the **Hamilton Urban Growth Strategy (HUGS - [refer here](#))** and the **Hamilton - Waikato Metro Spatial Plan (MSP - [refer here](#))** implementation. We are, however, concerned with the **lack of reference to movement and place functionality and the removal of reference to "liveable cities and towns, people friendly places, healthy environments, improved wellbeing"** as referenced in GPS 2021, which is critical to sustainable urban development.

Integrated Freight System

31. We support the primary objective of this strategic priority that well-designed and operated transport corridors and hubs that provide efficient, reliable, resilient, multi-modal, and low carbon connections support productive economic activity. We support the strong references in the Draft GPS 2024 to investment in rail and coastal shipping. This strategic priority also supports the Hamilton Urban Growth Strategy (HUGS) and the Waikato Metro Spatial Plan (MSP) implementation.

Strategic Investment Programme

32. As eight of the 14 projects included in the strategic investment programme are focussed on roading upgrades, it will be critical to ensure that embodied emissions and nature-based solutions are key considerations in their delivery.
33. We would also like to see an assessment of if/how the projects identified in the Strategic Investment Programme are delivering against the ERP and the transport targets set by central government through this document (i.e., whether they contribute to or contradict progress towards 41 percent reduction in transport emissions by 2035?).

Section 4: Investment in Land Transport

34. We acknowledge the substantial increase in the funds available to the NLTF proposed in the Draft GPS 2024.
35. We acknowledge that the NLTF is to ensure the ongoing operation and maintenance of the transport system and that additional Crown investment provides specific funds for targeted programmes, for example the Climate Emergency Response Fund (CERF) for emissions and climate adaptation. Hamilton City Council notes however, that the CERF funding identified by the Crown to date falls significantly short of what will be required to meet the Government ERP emissions and vehicle kilometres travelled (VKT) targets. This shortfall should be acknowledged and addressed in the final GPS 2024.
36. In addition, the 34 percent increase in funding (\$15.5bn to \$20.8bn, as outlined on page 41 of the Draft GPS 2024) cannot just be spent on 'quality roading system', 'optimising' the transport system and supporting recovery. We encourage the Ministry of Transport to explicitly state where and how this money will be spent on reducing emissions in line with the emissions reduction strategic priority. Without focusing on this priority to the same extent as the others (as a minimum, noting that we request it is elevated), we will never be able to build resilience (because the natural hazards that we are needing to prepare for and repair from, will continue to get worse if we do not reduce emissions).
37. We support the increases in Fuel Excise Duty and Road User Charges proposed in the Draft GPS 2024.
38. We support the hypothecation of traffic infringement fee revenue to the NLTF to support safety investments through the Road to Zero programme.
39. However, **we are opposed to the removal of the Road to Zero activity class introduced through GPS 2021** and replacing it with a lesser Safety Activity Class that does not include any funding for safety infrastructure or speed management, with this funding dispersed into the broad State Highway and Local Road Improvements activity classes. The sole purpose of the Road to Zero activity class was to enable transparency and ensure Government's safety commitments were adequately funded and delivered. This transparency and therefore commitment to the Road to Zero targets will be lost with the removal of this activity class, which in our view is unacceptable.
40. The reversal of the intent of the Road to Zero Activity class does not align with the recent evaluation of the GPS 2018 findings (Government Policy Statement on Land Transport (GPS) 2018 Evaluation; February 2023 - refer [evaluation document](#)), which includes "*Budget allocations to activity classes are a key change mechanism*", "*investments are showing movement towards their intended results, particularly in the changes in the mix of investments towards safety, access, mode shift, public transport and active modes*", and most importantly "***The continuity of direction in GPS 2021 will continue to build system momentum and should enhance visibility of the contribution of the GPS towards intended outcomes***" (page 65).
41. It is inconceivable how reversing the dedicated activity class for Road to Zero outcomes can advance those outcomes. The removal of "*% of state highway and local road networks modified to align with a safe and appropriate speed*" and "*% of urban network with speed limit of 40 km/h or below*" as GPS performance indicators (GPS 2021, Table 1, page 24), and the Government's recent significant reduction in commitment to speed management delivery on state highways also highlights the reduced commitment to the Road to Zero activity class outcomes, and are not supporting the sector in addressing road safety.
42. We support the additional funding streams supplementing the RLTP, such as the Climate Emergency Response Fund (CERF) but ask for greater longer term funding certainty to enable better planning and delivery than the current process provides. The fuel excise duties and road user charges that fund and enable 10-year planning for the NLTP are no less certain than the Emissions Trading Scheme that funds the CERF allocations. Therefore, at least some funding certainty should be able to be provided for these additional funding streams to enable effective resource planning, particularly considering the very specific targets they are intended to address.

43. It is encouraging for Hamilton City Council and our Future Proof partners to see recognition of the Hamilton-Waikato Metro Spatial Transport Programme in the Draft GPS 2024. This is an acknowledgement of our collaboration with our partners and comprehensive technical work into the development of a rapid transit, and other supporting transport networks in the metro area. The integrated transport and land use thinking that has gone into developing our recommended programme is both supported by the government's emissions reduction programme and Future Proof partner funding. Our work has been endorsed by each partner and recently the Board of Waka Kotahi. This programme now forms the core of our strategic transport thinking and is supplemented by our own refreshed transport strategy, **Access Hamilton / Ara Kootuitui Kirikiriroa**.
44. Subsequently, and with reference to page 54 of the Draft GPS 2024, we are disappointed that the Hamilton-Waikato Metro Spatial Plan (MSP) and associated Metro Rapid Transit network is not referenced specifically as is the case for the five Auckland MRT and Let's Get Wellington Moving. We ask that the Hamilton-Waikato Metro Spatial Plan (MSP) is separately listed rather than bundled up generically under 'New metropolitan rapid transit programmes' as it is currently. Elevating our programme in its own right will show its recent progression and reflect the importance the region and city see in the direction it gives our transport and land use thinking.
45. Additionally, the Draft GPS 24 is correct in stating that *"mass transit projects are likely to require additional Crown funding"* and as such, both Hamilton City Council and our Future Proof partners would encourage greater certainty for the funding of the ongoing programme, which are critical to achieving the ERP emission and VKT reduction targets, from traditional and other Crown sources into the next and future 3-year funding cycles.

Section 5: Statement of Ministerial Expectations

46. The explicit reference to time and disruption costs (page 59) should mention that this is an example of an indirect cost which needs to be considered alongside other costs and benefits. The current text: *"This can include the direct financial costs of improvements, as well as the time and disruption costs for road users and for those who live and work alongside the corridor"* should also have *"alongside accounting for all indirect costs such as project whole of life greenhouse gas impact and climate adaptation"* for better balance. Without this clarification to include all costs and benefits, prioritisation of projects could overly favour greenfield development where there are few existing users.
47. It should also be made clearer how the concept of 'value for money' in this context, takes into account that acting now to reduce emissions and adapt to climate change will be cheaper (and easier) sooner rather than later.

Further Information and Opportunity to Discuss our Submission

48. Should the Ministry of Transport require clarification of the submission from Hamilton City Council, or additional information, please contact **Glenn Bunting** (Urban Transport Policy and Planning Manager - City Transportation) on **021 962 829**, email glenn.bunting@hcc.govt.nz in the first instance.
49. Hamilton City Council representatives would welcome the opportunity to discuss the content of this submission in more detail with the Ministry of Transport.

Yours faithfully



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