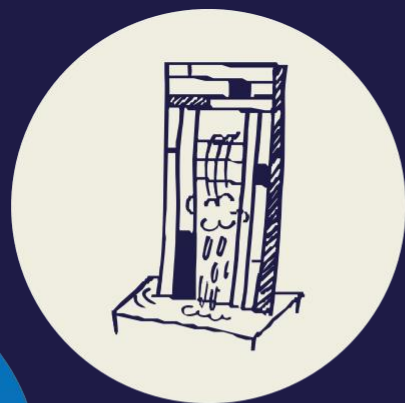


# **HAMILTON CITY COUNCIL – STAFF SUBMISSION**

## **DRAFT GOVERNMENT POLICY STATEMENT ON LAND TRANSPORT 2024 – 34 (MARCH 2024 CONSULTATION DRAFT)**

**Ministry of Transport**



**2 April 2024**



**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 staff submission is aligned to all five priorities.

## Council Approval and Reference

This staff submission was approved by Hamilton City Council's Chief Executive on 2 April 2024.

Submission # 759.

It should be noted that the following submission is from staff at Hamilton City Council and does not therefore necessarily represent the views of the Council itself.

## Key Messages and Recommendations

1. Hamilton City Council staff welcome the opportunity to make a submission to the **Draft Government Policy Statement on Land Transport 2024–34 (March 2024 Consultation Draft)**.
2. We acknowledge the effort the Coalition Government has taken in developing Draft GPS 2024.
3. We support the intent to establish a National Infrastructure Agency and the intent for them to develop a 30-year Plan for transport infrastructure for New Zealand.
4. We support changes to the Land Transport Management Act to require all future GPS for land transport to adopt a 10-year Investment Plan.
5. We request that the Hamilton/Waikato inland rail ports at Ruakura and Horotiu be acknowledged for the role they play in moving rail freight in the Auckland-Hamilton-Tauranga triangle.
6. We support the inclusion of Cambridge to Piarere and Hamilton Southern Links as Roads of National Significance.
7. We request that the Ruakura Eastern Transport Corridor project in Hamilton be recognised as another project that should progress in the GPS 2024–34 period, given its criticality to the success of the nationally significant Ruakura Inland Port.
8. We request that there remains a focus on supporting public transport outside Auckland and Wellington, particularly for Tier 1 growth areas such as the Hamilton-Waikato Metro Spatial Area.
9. We request that the final GPS 2024 provides for investment in strategic walking and cycling networks where they support urban growth, economic development, and public transport efficiency.

## Introduction

10. Hamilton City Council staff welcome the opportunity to make a submission to the **Draft Government Policy Statement on Land Transport 2024–34 (March 2024 Consultation Draft)** – referred to as Draft GPS 2024 throughout this submission.
11. We acknowledge the effort the Coalition Government has taken in developing Draft GPS 2024.
12. Hamilton City Council has a considerable interest and influence in transportation issues at the local, regional, and national level – as reflected in its comprehensive 15 September 2023 submission ([refer here](#)) to the Draft GPS document that the former Government consulted on in August 2023.
13. The Hamilton-Waikato sub-region has a long and successful history of collaborative planning and growth management in partnership with Iwi and Central Government through the Future Proof Partnership – refer <https://www.futureproof.org.nz/>
14. The Future Proof Strategy is a 30-year growth management and implementation plan specific to the Hamilton, Waipā, Waikato, and Matamata-Piako sub-region that provides a framework to manage growth in a collaborative way. It is embedded in statutory documents, including the Regional Policy Statement, and given effect to through Council’s District Plan.
15. Together with our Future Proof partners we have undertaken considerable work to identify our long-term outcomes based around an agreed settlement pattern over the next 30-50 years. This work indicates that a multi-modal approach is required to achieve our outcomes, including economic growth and productivity.
16. The following response is structured by the key headings in Draft GPS 2024.

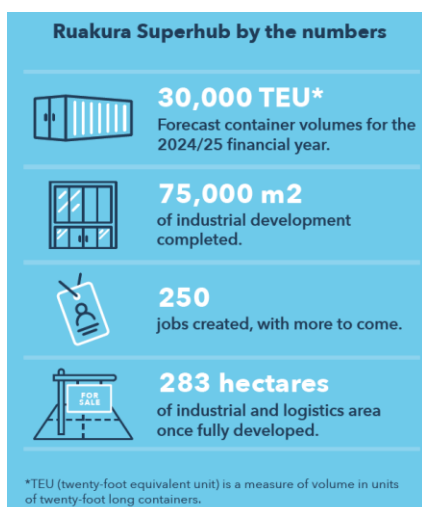
## System Reform

17. We support the establishment of a National Infrastructure Agency (NIA), and in particular the intent to develop a 30-year Plan for transport infrastructure in New Zealand:
  - A 30-year Plan for transport should be integrated with land use and housing and employment outcomes, as well as addressing important issues such as climate change. For the Hamilton-Waikato area this integration is achieved through the Metro Spatial Plan overseen by Future Proof.
  - We request that, in addition to NZTA, the NIA also work closely with Local Government who, along with NZTA, are funders of transport Infrastructure, and who also undertake growth planning and assess integrated infrastructure needs over 30 years.
18. We support advancing reforms to the National Land Transport Fund’s revenue system, including:
  - A shift away from Fuel Excise Duty, which has limitations with more efficient vehicles and the onset of Electric Vehicles (EVs). **Note:** While increasing revenue is important, so is incentivising and supporting the shift to EVs, particularly as a significant increase in EV sales is a key means of addressing emission reductions.
  - Reforming tolling legislation, including introducing time-of-use charging on the most congested parts of the road network, if this proves to be viable for use in both revenue generation and demand management when required and in collaboration with territorial local authorities.
  - Centralisation of these revenue reforms that will drive consistency of approach and allow for effective communication and engagement with the public and stakeholder groups, top down.
  - Revenue reform for Local Government which goes beyond the National Land Transport Fund revenue systems, noting that ongoing dialogue is required between Central Government and Local Government on alternative funding sources.
19. We support amending the Land Transport Management Act to require all future GPS on Land Transport to adopt a 10-year Investment Plan, noting that:

- This, together with the NIA 30-year Plan, will align better with the requirements for Local Government to have 10-Year Long Term Plans and a 30-Year Infrastructure Strategy.
  - Careful consideration is required to be given to the timing of these plans so that they can be complementary to Local Government timing requirements (including aligning the RLTP and the NLTP).
20. We request that Local Government be involved in the development of the second Emissions Reduction Plan (ERP2).
  21. Although we acknowledge the importance of the Emissions Trading Scheme (ETS) in driving emissions reduction, we see it as being most effective when it is combined with the right policy environment. This includes providing the supporting infrastructure for alternatives to high emissions transport modes, including walking, cycling and public transport.
  22. Given that ERP2 has not yet been developed, we request clarity in the final GPS 2024 on how it will respond to the ERP2, as noted on page 6 of Draft GPS 2024.
  23. As noted in the advice from the Climate Change Commission (released on 12 March 2024), *"The NZ ETS is a key tool in the Government's strategy to reduce greenhouse gas emissions and transition to a thriving, low emissions economy. The scheme operates alongside other government climate policy"* (He Pou a Rangi Climate Change Commission – Advice on NZ ETS Unit Limits and Price Control Settings for 2025 – 2029).

## Strategic Priority – Economic Growth and Productivity

24. We support investment in rail focused on the busiest and most productive parts of the existing rail network to support efficient movement of freight, noting that Draft GPS 2024 highlights the significant triangle of Auckland – Hamilton – Tauranga where large volumes of goods are moved.
25. We request, in particular, that the Ruakura Inland Rail Port in Hamilton and Northgate in Horotiu/Te Rapa are acknowledged as playing vital roles in the efficient movement of freight (rail and road) in the triangle, noting that most readers would associate major ports in the triangle to be the seaports of Auckland and Tauranga.
26. The Ruakura Superhub covers an area of 283 hectares and to date has resulted in the creation of 250 jobs. Key companies in the Superhub include PBT, Kmart, Maersk, Big Chill Distribution, and Refrigafreighters.
27. When the Superhub is fully developed, rail operations will replace an estimated 65,000 long-haul truck journeys a year, improving the project's carbon footprint and reducing emissions.



28. We acknowledge that the state highway network carries most of New Zealand's inter-regional freight and links major ports, airports, and urban areas but **request** that greater acknowledgement also be given to the role that major non-state highway roads have in complementing the state highway network in this task (for example the Rukura Eastern Transport Corridor).
29. In addition to investment in metro rail networks supporting the efficient movement of people in Auckland and Wellington, we would encourage ongoing investment in Te Huia, the passenger rail service between Hamilton and Auckland, particularly as patronage has increased significantly due to expansion of the trial service.

### **Roads of National Significance**

30. We support the inclusion of both Cambridge to Piarere and Hamilton Southern Links as Roads of National Significance. These 2 projects are important components of our Future Proof transport strategy, with the timing of Southern Links being determined by land use. These 2 projects will benefit multiple regions from a freight and safety perspective.
31. We note the default position of the Roads of National Significance from being 4 lane grade separated highways, but respectfully suggest that some roads that are required to unlock housing may require a different form and function.
32. Hamilton City Council and NZTA, in partnership with both Waikato and Waipā District Councils, has recently completed a form and function review of Southern Links and this would be a useful input into the ongoing development of the project.
33. In addition, we would encourage the Ministry of Transport and NZTA to take a network planning approach to Southern Links before the final form is agreed. Hamilton City Council appreciated the Network Plan approach taken by NZTA to the Waikato Expressway and recommend that such an approach could be taken to underpin any business case work.
34. We request that the Ruakura Eastern Transport Corridor project in Hamilton be recognised as another project that should progress in the GPS 2024–34 period, given its criticality to the success of the nationally significant Ruakura Inland Port. This project presents a partnership opportunity for NZTA with Hamilton City Council and Waikato Tainui Group Holdings and delivers multiple outcomes, including more efficient supply chains for freight, improved access to markets, employment and areas that contribute to economic growth.

### **Public Transport**

35. We acknowledge the priority investments required into public transport for Auckland and Wellington, but request that a focus remains on maintaining and developing good public transport networks and services in other Tier 1 growth areas, such as the Hamilton – Waikato Metro Spatial Area. For several years we have been working collaboratively with our partners on a fit-for-purpose and right-sized rapid transit focused project that will yield significant financial and economic benefits through value capture opportunities, increased productivity, job creation and reduced congestion benefits.
36. This work has been endorsed by the NZTA Board and is consistent with the desired approach to develop housing and employment opportunities along transport corridors. We have worked actively to learn the lessons from Auckland and Wellington and have developed a right sized and viable transport programme with a longer-term rapid transit network at its core linked to growth. In the short-term, our focus is on complementing our urban bus networks with excellent infrastructure. We would like this work to be financially supported by NZTA.

## Walking and Cycling

37. We note the Draft GPS 2024 intent to only invest in walking and cycling where there is a clear benefit for increasing economic growth or for improving safety, with demonstrated volumes of pedestrians and cyclists.
38. As outlined in the Hamilton City Council's September 2023 submission to the previous Draft GPS that the former Government consulted on in August 2023, a balance is required between improving the resilience of our network and reducing emissions. There is a need to consider other benefits that active travel can have on health and reduced congestion in our city and emissions reduction.

## Strategic Priority – Increased Maintenance and Resilience

39. We support the notion of adopting a more proactive approach to maintenance, to achieve a more reliable network for individuals and businesses to be able to rely on.
40. We welcome the key focus area of the Road Efficiency Group to consider how we can reduce expenditure on temporary traffic management and would like to see a balanced approach which has both a focus on examining standards as well as on defaulting to closing entire sections of road and disregarding the business interruption and community concerns that arise. This will need to be driven by NZTA from their centralised sector leadership role.
41. We request that GPS 2024 provides some guidance on long-term maintenance outcomes for local roads that government would like to see, such as have been described for state highways being 2 percent rehabilitation and 9 percent resurfacing.

## Strategic Priority – Safety

42. We support increased direction of funding towards road policing and enforcement.
43. We believe that it is important to retain an ability to make other low-cost engineering interventions in busy metropolitan areas. Hamilton City Council notes the current commentary on traffic calming including speed bumps, but also notes that these treatments in the right place can be community driven and highly successful.
44. This type of investment can align well with the Draft GPS 2024 statement under '**Value for Money**', where it is indicated that a review of road safety investment will be undertaken to ensure investment is focused on efficient changes which make improvements to the roading network at the lowest cost.
45. Hamilton City Council's elected members have recently requested staff to develop some stronger guidelines around where certain traffic devices may be appropriate, with a strong focus on community input and support.
46. We look forward to aligning our guidelines with the work directed by Draft GPS 2024 to introduce a new set of objectives and intended actions for road safety that will focus on safer roads, safer drivers, and safer vehicles. We request that these objectives and actions target safer road users rather than just safer drivers.

## Strategic Priority – Value for Money

47. We support the focus on value for money, including the emphasis on securing a wider range of revenue sources to fund investment, making better use of existing assets, and focusing on whole-of-life costs to maximise long-run value.
48. We encourage the Ministry of Transport to consider broader opportunities for making use of existing assets beyond time of use charging and including the use of managed and shared lanes in urban centres, which is a core element of our future freight and bus network planning.

49. We request that government liaise with both Future Proof and Hamilton City Council on the timing and role of any form of charging in the development of our future transport networks. With regard to funding and financing, we agree that a variety of options need to be explored for all major transport projects to help address New Zealand's infrastructure deficit. Road Pricing/Congestion charging are longer-term interventions for the Hamilton – Waikato Metro Spatial Area but need to be considered as part of a wider transport network response aligned to a growth of both bus and active mode networks.

## Section 4 – Investment in Land Transport

### Local Road Improvements

50. Draft GPS 2024 for Local Road improvements differs from that for State Highway improvements in that it refers to a **“reduction”** of funding for traffic calming measures such as speed bumps, rather than a ban for state highways.
51. We assume that this recognises that in a busy metropolitan area there is at times a need for and support for traffic calming, with the obvious example being around schools.

### Public Transport Infrastructure

52. We are concerned by the lack of priority given to public transport investment in the Hamilton – Waikato Metro Spatial Area, as one of the fastest growth regions in the country. A great deal of work has been undertaken in recent years to align growth areas with public transport corridors in the Hamilton – Waikato Metro Spatial Area and this work needs to be afforded a similar level of priority placed on transport plans for other major urban centres.
53. Not prioritising public transport investment in our high growth region risks facing unnecessarily high costs to manage growth in the future. The opportunity is to proactively invest in public transport and corridor protection early (including for priority freight routes) to reduce long-term costs, minimise congestion, and maximise the opportunities of expected growth. This is particularly important for the Hamilton – Waikato Metro Spatial Area and connections to our rapidly growing North Waikato communities on the Hamilton to Auckland corridor.
54. We recommend that flexibility is provided for in the public transport activity classes to allow for strategic investment in public transport outside of Auckland and Wellington, focussed on high growth corridors and route protection planning for future rapid transit networks (for buses and freight).
55. We request that the final GPS 2024 provides for investment in strategic walking and cycling networks where they support urban growth, economic development, and public transport efficiency. Walking and cycling networks are important on high demand corridors in growth centres – both to support public transport patronage growth and economic and housing development along those corridors.

### Statement Of Ministerial Expectation (for NZTA)

56. We welcome the review of the business case process with the expectation of them being simple and more efficient.
57. We are concerned that any NZTA focus on value capture risks Local Government value capture opportunities and requests that engagement is undertaken with Local Government on the respective approaches of both entities.



## Further Information and Opportunity to Discuss our Submission

58. Should the Ministry of Transport require clarification of the submission from Hamilton City Council staff, or additional information, please contact **Chris Allen** (Executive Director Development – Infrastructure and Assets Group) on **021 224 7939**, or email [chris.allen@hcc.govt.nz](mailto:chris.allen@hcc.govt.nz) in the first instance.
59. 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



**Lance Vervoort**  
**CHIEF EXECUTIVE**

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