

11 May 2020

TTP0201  
LMS

Ministry of Transport  
GPS Team

Email only to: [gps@transport.govt.nz](mailto:gps@transport.govt.nz)

Dear «Name»,

## **DRAFT GPS (TRANSPORT) 2021 – MANAWATU-WHANGANUI REGIONAL TRANSPORT COMMITTEE SUBMISSION**

Thank you for the opportunity to provide feedback on the draft Government Policy Statement on land transport, 2021 (GPS).

This feedback is made on behalf of the Manawatū-Whanganui Regional Transport Committee (RTC) which consists of representatives from:

- Horizons Regional Council;
- Horowhenua District Council;
- Manawatu District Council;
- Palmerston North City Council;
- Rangitikei District Council;
- Ruapehu District Council;
- Tararua District Council;
- Whanganui District Council; and
- The New Zealand Transport Agency

On the whole the RTC supports the strategic direction and context of the draft GPS and makes the following comments and observations in relation to the draft document for the Ministry's consideration.

### **1. General**

The draft GPS makes for easy reading due to its clear and logical layout. We wish to thank the Ministry for this as it makes understanding the document and its impact at a regional level easier.

The RTC **supports** bringing Rail into the planning and funding system under the Land Transport Management Act. We would like to highlight our **view** that this should be fully integrated into the LTMA framework with the NZ Transport Agency making decisions (rather than the Minister) and for rail investment projects to be prioritised through the Regional Land Transport Plan (RLTP) process. If rail was fully integrated into the land transport planning framework (as roading activities are), it would enable regions to understand proposed investment and adequately plan for it in our RLTP's.

The RTC **notes** that the draft GPS is aspirational in its intent to increase the focus on alternative modes of travel and freight movement and reduce the reliance on the road network. The RTC **supports** these aspirations, however considers that in some cases, the document, particularly the funding streams is still focused on supporting roading based activities rather than place-making, active transport or public transport. The Committee would like to see the aspirations realised through increased funding and support for active transport, public transport, place-making and measures to incite behaviour change. This is discussed further under Section 2.3 of this submission.

The RTC **seeks** clarification and guidance from government on how the economic fall-out from Covid-19 will be managed in relation to the transport system. The RTC notes that this will likely have some short-term impacts on projects due to reduced revenue which will limit work programmes over the next few years. Further, we note that districts that are heavily reliant on tourism will be significantly affected by this and may take some time to recover. The RTC **suggests** that higher funding assistance rates for Councils may be required in the short-term to address this as many regions and districts are unlikely to be able to meet their local share. A short term increase in the Funding Assistance Rate (FAR) would ensure Councils are able to continue projects without increasing the local rate burden. The RTC is happy to provide additional information on what an appropriate FAR increase might be if necessary.

## 2. Strategic direction / strategic priorities

The RTC generally **supports** the strategic direction and priorities in the draft GPS. These flow on from the GPS, 2018 and have been refined in a way that make the priorities easier to understand and follow. However, there are some areas we feel have been overlooked or not covered in sufficient detail which could leave a gap in the funding framework and overall transport outcomes for certain regions.

The RTC seeks **clarification** on how resilience and security in the roading network will be managed. GPS, 2018 outlined resilience and security as important transport outcomes within the 2018 framework. The draft GPS's focus in relation to resilience is in the freight priority and by ensuring more transport options are available. It is the RTC's concern that the draft GPS does not adequately provide for resilience as it does not capture the critical/lifeline access function, where in some cases the only option is new roading or significant upgrades to the existing road network. An example of this is sections of the SH 1 corridor between Wellington and Palmerston North which has significant resilience issues and no viable or 'fit for purpose' alternatives.

The RTC **requests** that resilience be provided for within the strategic priorities of the GPS. It is our suggestion that resilience should be weaved through each of the four priorities as it has a role to play in the success of each priority. It would then be expected that funding opportunities be available within the activity class funding streams.

### 2.1. Road Safety

The RTC **strongly supports** the Road Safety strategic priority and the delivery of this through Road to Zero. We hold the same view that any DSI on our network is one too many. The RTC wishes to highlight the critical role local government will play in ensuring this priority is achieved and **seeks clarification** that ongoing support and guidance from Central

Government will be provided through the Road to Zero Action Plan and other tools to ensure engagement and commitment across the sector.

The RTC notes the new Road to Zero Activity Funding Class and changes to others mean that a mixture of activities (some of which previously had their own activity class) will be funded under this umbrella. The RTC is concerned that due to the wide list of activities falling within this activity class, some critical, but more difficult to measure activities such as road safety coordination and promotion and local road improvements will miss out on funding due to competition with other activities that have more measurable benefits.

The RTC notes the drop in the local road improvements and State Highway improvements activity classes (compared to GPS, 2018). We understand that a portion of local road improvements will now be funded through the new Road to Zero activity class. Given the make-up of the Horizons region with a larger rural area comprising of small (and in some cases quite isolated) townships and comparatively smaller urban centres to other regions, ensuring availability of sufficient funding for local road improvements is important. The RTC notes the potential for competing activities to result in some smaller but critical activities not being able to secure adequate funding and **suggests** 'ring-fencing' funding within the activity class to ensure adequate funds are available for each activity. The RTC **requests** that the funding bucket under Road to Zero be carefully considered and structured to ensure there is not only enough funding available but also fair allocation of funding across all activities falling within this activity class.

## 2.2. Climate Change

The RTC **supports** the focus of the draft GPS on reducing climate change. However, the RTC wishes to highlight **concerns** that the priority is too narrow, as it appears to only focus on greenhouse gas emissions and does not address some of the wider impacts of transport on the environment such as effects on water quality, erosion, loss of biodiversity etc.

The RTC **requests** that the climate change priority also take into consideration minimisation of other environmental effects from transport.

## 2.3. Better Travel Options

The RTC **supports** the Better Travel Options strategic priority to provide people better access to social and economic opportunities. Enabling transport choice through different transport modes that are accessible and work together is an important part of ensuring a healthy and prosperous region. The RTC is therefore motivated by the opportunities for innovation in relation to walking and cycling, public transport as well as other alternative travel modes that will arise from this strategic priority.

While the RTC supports this priority, we wish to highlight three **concerns** that, in our view, create potential inequity across the country.

1. The RTC notes the draft GPS highlights a group of key projects to achieve this priority, in particular, Lets Get Wellington Moving (LGWM) and Auckland Transport Alignment Project (ATAP). It is the RTC's concern that this will divert funding away from other parts of the system and/or country with equal or greater need of funding to achieve this priority. The RTC **requests** that reference to LGWM and ATAP be removed from the draft GPS as measures to deliver the outcomes of this priority and

measures of progress. Alternatively, the RTC **requests** that a more complete list of activities and projects be included under this priority to ensure other key projects or activities are not unfairly disadvantaged.

2. The RTC is concerned that the splitting of Passenger Transport Activity classes into two separate classes may see the bulk of funding being absorbed by larger programmes in Auckland and Wellington, meaning other parts of the country miss out. The RTC **seeks** clarification on how public transport projects will be allocated funding when outside the larger centres (e.g. Wellington, Auckland and Christchurch).
3. As noted in the introductory section of this submission, the RTC notes the aspirational intent of the GPS to shift focus from road based activities to alternatives. The aspirations and intended direction are well established in the text of the document. However, it is the RTC's **view** that this does not flow into the funding allocation for activities such as walking and cycling, public transport, place-making and behaviour change programmes to improve uptake of these modes of travel. The RTC is concerned that the expectations created by the strategic direction of the GPS will not be able to be realised at a local level, particularly in less populous regions or those with smaller urban centres due to the limited funding proposed in some activity classes. We refer, specifically, to the walking and cycling activity class which has a comparatively low level of funding available in years 1-3 and then drops further in following years. This is likely to limit investment and opportunities in this space and also does not recognise the ongoing maintenance costs associated with infrastructure.

The RTC **requests** that funding allocation and structure in the Public Transport and Walking and Cycling activity classes be considered further and additional funding allocated if possible.

#### 2.4. Improving Freight Connections

The RTC **supports** the Improving Freight Connections strategic priority. This will help support economic development in our region and across the country as a whole. This will be particularly important as part of the recovery phase following Covid-19.

The central location of the Horizons region plays an important role in movement of freight around the North Island and equally movement of freight through our region unlocks opportunities for economic development. The RTC is therefore pleased to see this priority has been reframed and clarified from the GPS, 2018 and that it also includes rail and coastal shipping as a freight option. We see some real opportunities arising for our region in the use of rail and coastal shipping as a freight option.

While the RTC **supports** the use of Rail for movement of freight, we **seek clarification** that funding for freight movement via roads is not going to be disadvantaged where rail is not an option or where new or upgraded roading is needed to connect the two modes together. While the Horizons region has rail lines available for movement of freight, adequate road connections are important to enable safe and efficient movement of freight to or from the rail line and will be vital to the success of this strategic priority. An example of this within the Horizons Region, is the proposed Palmerston North Integrated Transport Improvements,

specifically the Regional Freight Ring Road which will be key to efficient, safe and multi-modal movement of freight around the Region, particularly as the KiwiRail Regional Freight Rail Hub project gets underway.

The RTC **seeks** greater emphasis be applied to the use of rural roads and local roads for movement of freight in the scenario where alternatives such as rail are not an option or where investment in roading is needed to complete the freight journey (i.e. to or from another mode such as rail or coastal shipping).

### 3. Conclusion

Thank you for the opportunity to provide feedback on the draft GPS. The RTC supports the overall direction and outcomes of the draft GPS. We look forward to seeing the outcomes from this consultation phase and any changes that may be made in response.

We do not wish to be heard in respect of this feedback but welcome any questions of clarification.

If there are any questions in relation to this feedback, please contact Leana Shirley, Senior Transport Planner on [leana.shirley@horizons.govt.nz](mailto:leana.shirley@horizons.govt.nz) or Rhona Hewitt, Transport Services Manager on [rhona.hewitt@horizons.govt.nz](mailto:rhona.hewitt@horizons.govt.nz)

Yours sincerely,



Rachel Keedwell  
**CHAIR**  
**HORIZONS REGIONAL COUNCIL**