

23 April 2018

Memo to: Mayor and Councillors

Memo from: Governance Advisers

**Subject: REGIONAL TRANSPORT COMMITTEE – 26 APRIL  
2018 – LATE ITEM**

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**6. Late Item: Submission on the Draft Government  
Policy Statement 2018 on Land Transport**

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Document R9239

A report titled Submission on the Draft Government Policy Statement 2018 on Land Transport is attached. This report was listed as item 6 on the public agenda for the Regional Transport Committee meeting on 26 April 2018 to ensure elected members were aware that it would be presented to this meeting.

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## **Submission on the Draft Government Policy Statement 2018 on Land Transport**

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### **1. Purpose of Report**

- 1.1 To approve the submission from the Regional Transport Committee (RTC) on the Draft Government Policy Statement 2018 on Land Transport (GPS) to the Ministry of Transport (MoT).

### **2. Recommendation**

***That the Regional Transport Committee***

***Receives the report Submission on the Draft Government Policy Statement 2018 on Land Transport (R9239) and its attachment (A1950026); and***

***Delegates authority to approve any minor changes to the submission on the Draft Government Policy Statement 2018 on Land Transport submission (attached as A1950026 to report R9239), based on feedback from this meeting, to Her Worship the Mayor and Deputy Chair of the Regional Transport Committee; and***

***Approves for signing, by the Mayor and Deputy Chair of the Regional Transport Committee and lodging with the Ministry of Transport, the submission on the Draft Government Policy Statement 2018 on Land Transport (attached as A1950026 to report R9239); and***

***Forwards the approved submission (attached as A1950026 to report R9239) on the Draft Government Policy Statement 2018 on Land Transport to the full Council with the purpose of giving Council the option to either endorse the submission from the Regional Transport Committee or to submit a separate submission directly to the Ministry of Transport.***

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### 3. Background

- 3.1 The Draft GPS was issued on 2 April 2018 by the MoT for formal engagement until 2 May 2018 under Clause 67(c) of the Land Transport Management Act 2003 (LTMA). The full GPS has already been circulated to all RTC members and discussed at a workshop on the 10 April 2018. The MoT is required by the LTMA to issue a GPS every three years to identify the objectives, direction and strategy for spending of over \$3 Billion through the National Land Transport Fund each year.

### 4. Discussion

- 4.1 Following the presentation of the Draft GPS, the RTC indicated support for the overarching strategies and priorities of the draft document particularly the safety and access key strategic priorities, but raised a number of issues that have been addressed in the Draft submission (see attachment 1).
- 4.2 The Draft GPS supports both Council's Draft 2018-2028 Transportation Asset Management Plan and the RTC's Draft Regional Land Transport Plan, specifically the problem statements and the strategic response in terms of connectivity, transport choice, and liveable cities.
- 4.3 The RTC has delegated authority to put in a submission on the Draft GPS to the MoT and have indicated they will be doing so, but has also indicated a preference for its submission to be given to Council to afford it the opportunity to either endorse the RTC's submission or put in a separate submission.
- 4.4 Officers have sought advice from the MoT as to whether late submissions can be received after the 2 May closing date. This is important as Council meets on 3 May. The MoT has advised that the absolute latest it will accept submissions, provided a draft has been received by 2 May, is 5pm on 4 May 2018.

### 5. Options

- 5.1 Options include approving the submission to the MoT or not to approve the submission. Officers recommend that the attached Draft submission be approved.

Option 1: Submit a submission on the Draft GPS to the MoT	
Advantages	<ul style="list-style-type: none"><li>Shows engagement with the GPS, a key Government document</li><li>Places the RTC in a strong position to participate in stage 2 of the GPS</li></ul>

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Risks and Disadvantages	<ul style="list-style-type: none"><li>• None</li></ul>
<b>Option 2: Do not submit a submission on the Draft GPS to the MoT</b>	
Advantages	<ul style="list-style-type: none"><li>• None</li></ul>
Risks and Disadvantages	<ul style="list-style-type: none"><li>• Perception that the RTC is not interested in the Draft GPS</li></ul>

Paul D'Evereux

**Senior Asset Engineer - Transport and Roading**

**Attachments**

Attachment 1: A1950026 - RTC Submission - 2018 draft GPS Land Transport - 18 April 2018 [↓](#)

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<b>Important considerations for decision making</b>	
<b>1. Fit with Purpose of Local Government</b>	The Draft GPS is a requirement under the Land Transport Management Act 2003 legislation.
<b>2. Consistency with Community Outcomes and Council Policy</b>	The Draft GPS is a guiding document for Council's RLTP's and Transportation AMP's. It is a requirement that all documents give effect to the direction of the Draft GPS.
<b>3. Risk</b>	The risk of not taking into account the key priorities of the Draft GPS is that funding for projects will not be considered in the NLTF
<b>4. Financial impact</b>	The financial impact of not taking into account the key priorities of the Draft GPS is that there may be insufficient funding for projects to proceed.
<b>5. Degree of significance and level of engagement</b>	This matter is of high significance and the MoT has engaged with all Regional authorities and is seeking feedback.
<b>6. Inclusion of Māori in the decision making process</b>	Maori were not consulted on with respect to this report or the draft submission.
<b>7. Delegations</b>	<p>The Regional Transport Committee has specific delegation to:</p> <ul style="list-style-type: none"><li>• <i>To approve submissions to external bodies on policy documents likely to influence the content of the RLTP.</i></li></ul>

## Item 6: Submission on the Draft Government Policy Statement 2018 on Land Transport: Attachment 1

Ref: A1950026

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26 April 2018

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GPS Policy Team  
Ministry of Transport  
PO Box 3175  
Wellington 6140

By email: [gps2018@transport.govt.nz](mailto:gps2018@transport.govt.nz)

Dear Sir or Madam

### **NELSON REGIONAL TRANSPORT COMMITTEE - SUBMISSION ON THE DRAFT 2018 GOVERNMENT POLICY STATEMENT ON LAND TRANSPORT**

Thank you for the opportunity to provide a submission on the Draft 2018 Government Policy Statement (GPS) on Land Transport.

The Nelson Regional Transport Committee (RTC) is generally in support of the four priorities outlined in the Draft GPS, but wishes to highlight a number of matters which relate specifically to Nelson.

#### **Summary**

Overall, the RTC supports the four priorities outlined in the draft GPS and supports the technology focus of the draft 2018 GPS. The RTC also wishes to highlight its willingness to partner with the Government to test and trial new initiatives.

The RTC is heartened to see recognition of transport as an enabler for new housing opportunities, liveable cities and sustainable economic development in regional New Zealand. The RTC notes that true gains and alignment will be achieved when the small cities of New Zealand, that are the commercial heart and employee base of much of the regional economies that drive our export sector (including tourism), are afforded the same attention as large cities with respect to investment in liveability. Nelson City Council's Long Term Plan Consultation Document 2018-28 is guided by its Vision – *Nelson is a Smart Little City*. Living and building on the Vision will be Nelson City Council's (Council) objective over the next 10 years and opportunities to partner with the Government to support the Vision will be actively sought out.

The RTC's submission includes comments on some aspects of the safety and access priorities, specific requests which would assist in creating liveable cities and some general comments in relation to funding and timing.

Further Central Government assistance will be required to address the issues and the opportunities outlined in this submission.

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### 1. Strategic priorities

The RTC supports the strategic direction set out in the draft GPS which has key priorities, Safety, and Access, supported by foundation priorities, Value for Money, and Environment.

Council's Long Term Plan Consultation Document 2018-28 establishes four key priorities which align with the draft GPS - Infrastructure, Environment, CBD Development and Lifting Council Performance. The RTC's Priorities are aligned with Council's Priorities.

Council is putting essential infrastructure, including providing safe and smart transport networks, at the forefront to future-proof our city. Delivering the right infrastructure and services to the right level at the best cost is a principle that underpins the manner in which Council conducts its day to day business.

Council recognises that investing in the environment is essential for the future. A healthy environment underpins a healthy community. In urban environments, positive environmental outcomes often rely on modern and appropriate infrastructure; environmental and infrastructure outcomes are highly connected.

#### **Strategic priority: Safety**

- The RTC strongly supports the focus on improving the safety performance of the transport system in an effort to create a *'safe system, free of death and serious injury'* and welcomes a review of the way safety improvements to the transport network are assessed.

The safety priority outlined in the draft GPS is in line with both the RTC's and Council's priorities. Council's Long Term Plan Consultation Document 2018-28 details the need for a transport network that is safe, resilient, enables economic development, supports our tourism industry and provides our residents with choices on how they travel day to day.

However, issues including traffic safety, traffic speeds and increasing access issues are limiting Council's ability to both create a liveable city with a resilient road network and to meet its transport objective of *"Communities have access to a range of travel choices to meet their social, economic, health and cultural needs."*

For example, a lack of route choices is influencing investment decisions and limiting urban development options for new housing. The inadequacies of the form and function of our arterial network, including the State Highway, is highlighted by the displacement of inter-regional traffic to the local road network. Port Nelson is the region's maritime gateway, but the movement of freight to and from this key economic hub is hampered by delays due to congestion.

Congestion and access issues are also having a detrimental effect on the effective operation of the public transport system, which in turn is limiting transport choice, mobility and access. Monitoring data shows problems experienced during peak times are now extending into off-peak times; drivers trying to avoid congested arterial roads are choosing to use local network roads instead. This is increasing traffic volume and speed in suburban areas, raising safety and access concerns for residents, and it discourages modal shift, further exacerbating congestion.

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- The RTC seeks recognition in the GPS that, in order to achieve safety outcomes, a logical hierarchy of the road network needs to be developed in a context of land use and growth patterns. The RTC seeks a road safety system similar to the Dutch traffic safety program *Duurzaam Veilig* ("Sustainable Safety"). Specifically the RTC seeks that the GPS enable the principle of road categorisation into visually distinct and clearly recognisable designs which have a safety focus reflective of the activities occurring around those roads. The Dutch system of flow roads, distributor roads and access roads provides a safety focussed model.
- The RTC supports the draft GPS statements on improving the safety of cycling and walking as viable alternatives to private car use. Council wishes to support transport choice and it is important that residents and visitors can safely enjoy connections across the city.
- The RTC supports the draft GPS recognition that safe transport options support liveability and opportunities for better economic and environmental outcomes. Nelson's waterfront has the capacity to be a world class visitor attraction, with a focus on walking and cycling recreation, but is compromised by a constrained network that mixes heavy vehicles, high volumes of traffic and inadequate walking and cycling facilities. As a result, the potential of the waterfront is not being realised and the transport safety for all users in this area is unsatisfactory.
- Touring is key part of our tourism economy with a majority of visitors being independent travellers. It is essential that the touring nature of the visitor economy in regional New Zealand is recognised in the draft GPS and that visitors can rely on a safe and logical network within and between regions.
- The RTC supports inclusion of footpath maintenance and co-investment in relation to renewal activities. The footpath network is a key part of any transport system as all journeys start and end on foot. Council is conscious of the importance of good quality, well-maintained footpaths that are free of trip hazards for all pedestrians and particularly Nelson's active older population. Council proposes that the draft GPS provides for the establishment of Model Communities for Ageing Populations and would support Nelson's participation in this programme.
- The RTC welcomes a review of the way safety improvements to the transport network are assessed. Council has in the recent past tried to gain NLTF assistance to reduce the poor safety performance of key arterial intersections on the local road network but due to the disadvantage of delays to the through road has been unable to make any safety improvement. A move towards an assessment regime that considers 'safe mobility' is welcomed.
- The RTC would like to see a review of the regulatory barriers controlling the setting of speed limits. The current process does not allow Road Controlling Authorities to amend the speed limit to a safe and appropriate speed in a timely manner.

### **Strategic priority: access**

The RTC supports a land transport system that enables access and supports connectivity; the RTC is in favour of the three under-pinning objectives identified under this priority and wishes to highlight a number of points which relate specifically to Nelson.



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Nelson's population is continuing to grow, particularly in the 65 plus age bracket, and it is vital that growth is channelled in a way that supports places where people want to live, work and establish businesses. Council will be working closely with Tasman District Council to provide for the predicted growth in the Nelson and Richmond areas. Anticipated development and an increasing population requires improved or new transport systems (as well as other infrastructure systems).

A comparison of estimated household growth and building consents for new dwellings indicates a recent under-supply of new dwellings in the Nelson-Tasman region.

According to MBIE's housing affordability measure, as at March 2016, the majority of rental households in Nelson and Tasman could not comfortably afford the cost of purchasing a house in the typical first-home price bracket. Also, two-thirds of those households could not comfortably afford typical rents in the Nelson-Tasman region.

The ability of Council and Tasman District Council to, supply significant new growth areas with the infrastructure needed, to enable developers to release supply to the market, relies heavily on significant investment in transport projects in the region.

- The draft GPS signals that growth infrastructure is an important part of the 'Access' key strategic priority. Nelson welcomes the intent behind this, but the draft GPS largely limits this result area to the few urban areas that qualify for the government's Housing Infrastructure Fund (HIF) or meet the requirements of the Provincial Growth Fund. Council also considers that the draft GPS's focus on development should not be exclusively tied to the point-in-time HIF as both the draft GPS and the National Policy Statement on Urban Development Capacity (NPS UDC) are intended to have an enduring influence on the provision of infrastructure in New Zealand. Access to funding for growth infrastructure needs to be available more widely for the following reasons:
  - The NPS UDC places very specific obligations on both medium and high growth areas to meet - and exceed - housing demand over 20 years. Transport infrastructure will be crucial to meeting these demands.
  - The HIF is limited to urban authorities deemed to be high growth under the NPS UDC. However, this does not reflect the growth pressure being experienced in many other areas including Nelson. The rationale for investing in medium or high growth areas is still sound and clearly a government priority, even if not all urban authorities qualify for the special funding treatment proposed by the HIF.
- The RTC supports a land transport system that enables transport choice and access. Council's transport objective is "*Communities have access to a range of travel choices to meet their social, economic, health and cultural needs*". In this regard, it is the intention to work towards increasing patronage of bus services and completing the primary cycle network.
- The RTC supports prioritised investment to improve resilience of the land transport network particularly routes where disruptions impose high economic and social costs. As a result of Nelson's geographical position between mountains and sea, its lifeline routes, for example Rocks Road, are at risk due to severe weather events as experienced in February 2018 (two cyclones and wave surges), and high impact events such as earthquakes.

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- The RTC notes that the draft GPS makes provision for investment to support rail and rapid transit passenger systems. The draft GPS needs to provide for support of alternative options to regions, such as Nelson, that will not be able to benefit from increased investment in rail. These options need to support alternative funding streams in the IAF NZTA. The RTC does not object to investment in rail and rapid transit passenger systems, so long as this is not to the detriment of areas or regions that do not have rail services. The RTC wishes to highlight the following points:
  - Nelson-Tasman region does not have a rail service, as this was removed in the 1950s. The result of the lack of rail transport options means the region is dependent upon “exporting” products to the rest of New Zealand using trucks, shipping and air freight. Any subsidy to rail is therefore likely to make goods provided from Nelson-Tasman less competitive compared to those elsewhere in New Zealand. This would likely reduce economic activity in the region and accordingly the region’s contribution to “New Zealand Inc”.
  - Unless other co-ordinated actions are undertaken by Central Government, redirection of existing taxes or new petrol taxes to increase subsidies to rail projects will almost certainly reduce the amount of money available for spending on goods and services in the Nelson community. This would have a negative impact on household incomes and accordingly family wellbeing. It would also increase business costs and therefore most likely reduce employment opportunities in the Nelson-Tasman region.
  - Transport costs are already high for bringing goods into the Nelson-Tasman region. An increase in rail funding, for example by using petrol taxes, would increase the cost of goods in Nelson-Tasman, including essentials such as food and grocery items. Furthermore, because the cost of goods would increase under this scenario, the amount paid by Nelson-Tasman to Central Government via GST would also increase. The regressive nature of GST would also have a detrimental effect on our communities. This is because in lower income communities, such as Nelson-Tasman, a higher proportion of family income is used to pay for basic goods and services, compared to higher income communities.
  - An example provided of the benefits of funding passenger rail services is reducing congestion. As noted above Nelson-Tasman does not have access to passenger rail services, therefore the RTC would be concerned if funding from less well-off regions were used to subsidise other regions’ passenger transport services. Council states in its Long Term Plan Consultation Document 2018-28 “*a transport network that is safe, resilient, enables economic development, supports our tourism industry and provides our residents with choices on how they travel day to day*” is required. The RTC wishes to work with Central Government on this objective.

### 2. The RTC’s suggestions

Councils have a unique and specific democratic mandate for place shaping. The importance of local views and knowledge in successfully meeting this mandate cannot be overemphasised. To ensure communities are safe, attractive and prosperous a resilient, safe transport network that offers transport choice, improves connectivity and combines both form and function is required. To assist the RTC and Council in delivering its place shaping mandate, the following is requested:

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- An increase in the Financial Assistance Rate in order to provide councils with greater access to funding particularly in the work category for road safety, travel demand management, walking and cycling projects. Levels of funding should recognise and address councils' need to increase staffing levels in order to work with Central Government agencies to achieve agreed outcomes.
- The RTC encourages the continuation of the Urban Cycle Fund.
- A streamlined process free of regulatory barriers which will enable Council to adjust speed limits. This should also allow for trial speed zone solutions in support of making cities more liveable and age-inclusive.
- Provision of national guidance on e-bikes for example, in relation to safe speeds of travel and design standards. The RTC and Council wish to assist in this and would welcome the opportunity to be a trial area for the development of guidance and standards.
- Greater opportunity to collaborate with the Ministry of Transport in relation to policy setting.
- Setting, as a default, a minimum speed limit for state highways that is less than 50km/h.
- An adjustment of Schedule 1 of the Resource Management Act in order to enable land use planning to align more efficiently with Regional Transport Plans.
- A law change to provide right of way to buses when pulling out from the kerb into traffic and an accompanying publicity campaign to raise awareness of the law change and to educate drivers.

### 3. General comments

The RTC suggests aligning the timing of the draft GPS with other significant planning and funding documents. Councils, through their long-term plans commit to projects and a level of service to be delivered to their communities. However, the timing of the draft GPS and NLTP does not align with local government processes in adopting long term plans under the Local Government Act 2002. It would be helpful if changes to the NLTP which have a direct impact on rates revenue were known prior to councils commencing their long term plan consultation processes.

Council recommends that during the second stage GPS, options for aligning timing be developed so an enabling amendment can be considered in the next appropriate legislative vehicle.

Yours sincerely

**Rachel Reese**  
Mayor of Nelson City Council

**Gaile Noonan**  
Deputy Chair - Nelson Regional Transport Committee