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Ministry of Transport
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Attention: GPS Development Team

Introduction

Thank you for the opportunity to comment on the Government Policy Statement on Land Transport 2015/16-2024/25 Engagement Draft (GPS).

The Ashburton district is located in Mid Canterbury. Ashburton District Council (ADC) has responsibility for the fourth longest road network in New Zealand.

Land transport is critical to the economic development and prosperity in the Ashburton district and is essential for the efficient transport of primary products within the district and inter-district transport using SH 1 and local roads.

Council is committed to the maintenance and development of sustainable and integrated land transport networks and systems.

It is noted in the introduction to the GPS *"...over \$3.0 billion of New Zealanders' money is spent through the National Land Transport Fund (the Fund) each year. This investment is accompanied by a further \$1.0 billion of local government investment"*. It is essential to note:

- The investment from local government is sourced fundamentally from the same New Zealanders;
- Local Government is restricted in the mechanisms available to raise its investment share;
- The Local Government investment is facing increasing competition from other infrastructural areas for which local government is responsible (e.g. drinking water; wastewater & storm water).

ADC continues to be concerned that at a national level integration and sustainability considerations are not applied at a consistent or appropriate level and land transport in New Zealand lacks a wide strategic approach with focus continuing to be on state highway networks and individual areas of concern in and around the large metropolitan areas.

Recent studies highlight the contribution made by local road networks as the first access route to the national road network. A focus on economic growth must go hand-in-hand with increasing support for local road networks or full potential for growth will not be achieved.

In regard to local roads, it is stated "GPS 2015 (draft) continues the level of investment to allow existing levels of activity to be maintained". ADC believes that merely continuing the same level of investment will not deliver the desired objectives.

Note:- The point numbers provided below reference to the relevant paragraphs as numbered in the GPS.

Section 1

15. ADC notes that rail services and infrastructure is not bound by the same strategic guidance as provided by the GPS. This is of significant and ongoing concern.

Considering the recent change to the purpose of the Land Transport Act 2003, “To contribute to the effective, efficient, and safe land transport system in the public interest”, there clearly needs to be greater coordination of strategy between these modes of transport. A safe land transport system can only be attained if road and rail sectors have similar guidance and focus.

Sadly our district has recently borne witness to another level crossing fatality. While long desired improvements may now be made to this particular site, improvements to known dangerous network interfaces should not be reactionary.

23. It is disappointing to note that there is no intention under this GPS to investigate more sophisticated road pricing mechanisms. The implementation of these mechanisms could deliver an improved and more focussed user-pays model and reduce the reliance of local authority investment through property rating.

These mechanisms may also provide for the collection of robust load and journey information about transport activity. The benefits that could be derived through the application of current technology could be significant in terms of improved decision making; more targeted expenditure; and generally aid long-term planning processes.

Many transport companies are collecting this type of information but are reluctant to share it with road controlling authorities typically citing commercial sensitivities.

Section 2

32. ADC supports the narrative that the overall demand at a national perspective masks what is occurring at a regional / local level.

This is an important point within the context for the GPS because it emphasises the importance for the GPS to provide sufficient flexibility in its strategic direction so as not to unfairly disadvantage those localities that may be experiencing growth conditions ahead of any national trends.

35. ADC does not agree with the concept that *“personal vehicle travel will remain more muted than in previous cycles”*. This relies on an assumption that there are options available to the traveller, and for most places outside the major metropolitan areas, this is simply not the case.

Areas of provincial New Zealand experiencing significant economic growth, such as Ashburton, are likely to continue to see increases in personal vehicle travel as an outcome of that area’s growth. As noted previously, it is important that the strategic direction within the GPS does not disadvantage those localities.

49. ADC agrees that *“There are high user and societal expectations for increases in levels of service across the whole transport network”*. ADC assumes then that a GPS developed and implemented under this context will not result in reductions in levels of service.

The current thrust of changes in Land Transport funding environment is resulting in a concern that levels of service will reduce in real terms on some parts of the local network.

Section 3

52. Ashburton District Council supports the strategic direction of:
- economic growth and productivity
 - road safety
 - value for money
55. ADC supports the investment in productivity through the RoNS programme and bridge improvements. It is also pleasing to see additional general funding for improvements to regional networks. Council remains cautiously optimistic that this funding will reach down to local area level improvements.
56. ADC supports the 'Safe System' approach to road safety and reiterates the need to align rail transport to the same or similar strategic direction (refer comments under item 15).
58. The quest for "value for money" through improved effectiveness and efficiencies is supported by ADC. The underlying concern remains as to the best mechanisms to achieve this.

At present the implementation of the One Network Road Classification (ONRC) is expected to provide standardisation of maintenance activity across the New Zealand road network relevant to the road classification. Consistency is considered important, however, there may be local considerations and demands that justify deviation from the ONRC framework.

Section 4

60. ADC supports the objectives set out in the GPS.
- 68.(d) ADC supports the increased investment as signalled in relation to local roads in particular:
- *"Increased funding ranges for local road improvements..."*
 - *"an explicit commitment to regional roading infrastructure..."*

- 74.(a) The creation of a regional improvement activity class is supported by ADC **provided** access to this activity class excludes state highways. As proposed, this activity class may provide additional funding to state highways and reduce the amount delivered to regional local road initiatives in real terms.

Subject to the above consideration, it is believed that the progressive replacement of regionally allocated funding with new regional funding in non-urban areas will result in better targeted expenditure. It will provide increased funding options for key local transport links that demonstrate a contribution to the delivery of product to markets and the tourism sector.

Section 5

103. The consolidation of activity classes appears to simplify the structure of the funding framework and is supported by ADC.
118. ADC supports critical investment analysis however it is vitally important that the process requirements do not overwhelm the ability of the road controlling authority to proceed through the process.

The business case process is robust and well-structured but many RCAs may require assistance to guide them, particularly on complex projects. If this assistance is not available (or expensive to obtain) and impacts on fair consideration of their projects,

this may lead to perverse outcomes.

Section 6

128. ADC would like to reiterate concerns expressed on the first page of this submission, those being:

- The investment from local government is sourced fundamentally from the same New Zealanders that pay road user charges, and motor vehicle registration and licensing fees;
- Local Government is restricted in the mechanisms available to raise its investment share;
- The Local Government investment is facing increasing competition from other infrastructural areas for which local government is responsible (e.g. drinking water; wastewater & storm water).

129. ADC would support the investigation and implementation of more sophisticated road pricing mechanisms provided that in doing so it resulted in efficiencies and returned a fairer share of the revenue generated, back to the districts which generated the revenue.

The Ashburton district generates significantly more revenue for the National Land Transport Fund through road user charges than is returned in the form of NZTA co-investment. The local road transport sector which is the source of this revenue has justifiably high expectations in terms of levels of service. With funding decreasing in real terms, it is becoming increasingly difficult to meet these expectations.

Ashburton District Council wishes to thank you again for providing this opportunity to comment on the Government Policy Statement on Land Transport.

For points of clarification please contact:

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