

22 January 2010

RLTS Feedback
Environment Waikato
Box 4010
Hamilton East 3247

Dear Sir/Madam

**SUBMISSION ON THE REGIONAL LAND TRANSPORT STRATEGY REVIEW -
REGIONAL OUTCOMES AND CHALLENGES DISCUSSION DOCUMENT**

1.0 INTRODUCTION

1.1 Hamilton City Council (HCC) welcomes the opportunity to make a submission to Environment Waikato's Regional Transport Committee on the Waikato Regional Land Transport Strategy Review - Regional Outcomes and Challenges document (referred to throughout this submission as the Discussion Document).

1.2 Summary of HCC's Key Points

- The operative 2006-16 RLTS has provided good guidance and outcomes for the region through its balanced approach to land transport planning.
- Support Environment Waikato in planning to retain the principles underpinning the base document within this review.
- Encourage Environment Waikato to continue to plan on a longer term basis (30 years) for the region's transportation issues, noting that funding may not be immediately available in the short term due to Government Policy Statement requirements.
- Overall support the vision statement and six outcome areas, but have recommended some wording adjustments.
- All constituent councils within the region need to be aware of the land transport issues facing their area and develop appropriate plans and funding requirements to meet the targets agreed to in the final 2010-40 RLTS.
- Local strategies (such as Access Hamilton and Future Proof) and emerging studies and investigations must be taken into account more and where appropriate regional priorities incorporated in the final 2010-40 RLTS.
- Interim targets and robust monitoring systems need to be established in the final 2010-40 RLTS as a 30 year end point is too long a period.
- Most targets shown in the Discussion Document are too general and do not provide enough specific detail to be meaningful.
- Given the significant role that Hamilton plays in many of the regional transport issues, the final 2010-40 RLTS should contain a specific section on Hamilton.

- The Waikato Regional Transportation Model (WRTM) will be used to provide evidence to support funding applications to central government for investments in new transport infrastructure. The growth demand forecasts and land use assumptions should therefore be aligned between the WRTM, Regional Policy Statement and the RLTS.
- Specific comments around the Discussion Document's proposed targets are outlined in Section 4.0 of this submission.

1.3 This submission is structured under the following headings:

- 1.0 Introduction
 - Summary of HCC's Key Points
- 2.0 General Comments
 - 2.1 Strategic Direction of the RLTS
 - 2.2 Local Strategies
 - 2.3 Emerging Strategies
- 3.0 Specific Comments
 - 3.1 Interim Targets
 - 3.2 Regional Picture
- 4.0 Six Outcome Areas
 - 4.1 Economic Development
 - 4.2 Safety and Personal Safety
 - 4.3 Access and Mobility
 - 4.4 Public Health
 - 4.5 Environmental Sustainability
 - 4.6 Integration
- 5.0 Concluding Comments

2.0 GENERAL COMMENTS

2.1 Strategic Direction of the RLTS

- 2.1.1 The operative 2006-16 RLTS has provided good guidance and outcomes for the region through its balanced approach to land transport planning. HCC supports Environment Waikato (EW) in planning to retain the principles underpinning the base document within this review.
- 2.1.2 While HCC acknowledges that the short term national delivery direction for land transport has changed in the last 12 months, there is no fundamental change to the longer term vision around transport in the region over the next 10 to 30 years. It is imperative that the final 2010-40 RLTS reflects this existing longer term vision.
- 2.1.3 As EW will be aware, the Government Policy Statement (GPS) on Land Transport Funding (2009/10 - 2018/19) has changed the way that funding is allocated to regional councils and the Regional Land Transport Programme is now prepared on a three year cycle. Given this new requirement funding priorities for programmes need to be clearly established and agreed to well in advance of the three year cycle.
- 2.1.4 Although the Waikato Region's strategic direction for the next 30 years currently differs from the funding allocated within the GPS, the 30 year 'Balanced Approach' long term view is fundamental to delivery of regional transportation outcomes. As part of this approach HCC encourages EW to continue to plan on a longer term strategic basis (30 years), noting that funding

may not be immediately available. This is the approach that HCC has followed in developing and implementing Access Hamilton.

- 2.1.5 HCC encourages the RTC to adopt a strategic approach towards transport planning when developing the 2010-40 RLTS (as opposed to focusing on specific projects such as the Waikato Expressway).
- 2.1.6 The vision statement and the statements for the six outcome areas (pages 21-34 of the Discussion Document) are based on the New Zealand Transport Strategy's vision and five objectives.
- 2.1.7 HCC would like to see the inclusion of 'forward thinking' in the vision statement: "*A forward thinking, affordable, integrated, safe, responsive and sustainable land transport system that enhances the environmental, economic, social and cultural wellbeing of the population.*"
- 2.1.8 HCC supports the outcome statements as they are currently worded, but would like to see the Economic Development Outcome Statement reworded to read "*An integrated transport system that supports and stimulates economic activity and provides for the efficient movement of people and goods within and through the region.*"
- 2.1.9 This wording change conveys the notion that it is often very important to lead economic development with appropriate infrastructure, rather than have it as a 'lag thought'.
- 2.1.10 It is imperative that all constituent councils within the region are aware of the land transport issues facing their area and develop appropriate plans and funding requirements to meet the targets agreed to in the final 2010-40 RLTS.

2.2 Local Strategies

- 2.2.1 HCC is of the view that the aims, programmes and implications of local strategies, such as Access Hamilton and Future Proof, must be taken into account more when developing the 2010-40 RLTS. HCC would like to see greater acknowledgement of the importance of local strategies to cover detail that is not always articulated at a regional level.
- 2.2.2 HCC is keen to maintain its ongoing working relationship with EW to ensure that Hamilton's priorities are incorporated into the final 2010-40 RLTS and receive appropriate funding. It is particularly important that such discussions occur when reviews of Access Hamilton are undertaken.

2.3 Emerging Studies and Investigations

- 2.3.1 In addition to existing strategies there are a number of studies and investigations currently underway that have significant implications for long term regional land transport planning. One example is the Network Integration Plan for the Waikato Expressway.
- 2.3.2 HCC encourages EW to take account of these studies and investigations in developing the 2010-40 RLTS.

3.0 SPECIFIC COMMENTS

3.1 Interim Targets

- 3.1.1 The RLTS Discussion Document outlines a number of short and long term targets for six outcome areas, which provide targets to be achieved by the year 2040. HCC is of the view that a 30 year end point, with no interim checks, is too long a period and that a set of interim targets and associated work streams

need to be established in the final 2010-40 RLTS. The timing of interim targets will depend on the type of target being measured. In some cases five years may be appropriate, whereas in others an annual target may be required.

3.1.2 HCC also notes that in the majority of cases targets shown are too general and do not provide enough specific detail to be meaningful. Although HCC anticipates that more specific targets will be set as part of the strategic options phase of the RLTS review (to be completed by April 2010) of developing the draft 2010-40 RLTS, comments have been provided in Section 4.0 of this submission on the initial targets outlined in the Discussion Document.

3.1.3 Given that the Land Transport Management Act now requires a RLTS to be prepared every six years (formerly every three years) HCC would like to work with EW to ensure that a robust monitoring system is established to track progress towards achieving interim targets. This will enable work programmes to be reassessed if progress towards targets is not being achieved.

3.2 Regional Picture

3.2.1 HCC acknowledges the usefulness of the contextual information outlined in Section 3.0 of the Discussion Document. However, given the significant role that Hamilton plays in many of the regional transport issues (such as congestion, economic activity, public transport, cycling/walking, road safety and community programmes) HCC is of the view that a specific section on the city needs to be incorporated in the final 2010-40 RLTS.

3.2.2 This section also needs to discuss the importance of Hamilton's economy on the remainder of the region. In addition the freight hub, inland port, service industries, hospital and university are all unique to Hamilton and bring significant benefits to the region (jobs, skills, health etc). The RLTS needs to describe how the transport aspects of this will be delivered and how other regional documents will help to deliver the city's strategic direction.

3.3 Future Proof

3.3.1 HCC notes that the population projections outlined in Section 3.1 (Table 1) of the Discussion Document for New Zealand, the Waikato Region and its constituent areas are based on Statistics New Zealand Subnational Population projections. However, HCC notes that the figures for the areas comprising the Future Proof subregion (Hamilton City, Waipa District and Waikato District) are considerably lower than the projections from the University of Waikato that have been used in formulating the Future Proof strategy. These figures are now the basis of growth demand forecasts and land use assumptions for the Future Proof subregion.

3.3.2 The difference in the two sets of projections is outlined in the table below.

Area	2031 – Stats New Zealand	2031 – Future Proof	Difference
Hamilton City	177,400	198,200	20,800
Waikato District	57,700	67,400	9,700
Waipa District	51,700	62,400	10,700
Total	286,800	328,000	41,200

3.3.3 In addition, inputs for the recently developed Waikato Regional Transport Model (WRTM) are based on the Future Proof projections for Hamilton City,

Waikato District and Waipa District outlined in Sections 3.3.1 and 3.3.2 of this submission. The WRTM will enable testing of land use policy and modelling and assessment of various transport programmes.

- 3.3.4 The WRTM will be used to provide evidence to support funding applications to central government for investments in new transport infrastructure. Therefore HCC is of the view that the growth demand forecasts and land use assumptions should be aligned between the WRTM, Regional Policy Statement (RPS) and the RLTS.

4.0 SIX OUTCOME AREAS

4.1 Economic Development

- 4.1.1 *Target - Journey time reliability and overall journey times on the inter-regional state highway and rail network are important.*
- 4.1.2 HCC would like this target to also include local arterials as the likes of the Waikato Expressway will not function efficiently and effectively unless there is good local connectivity to economic activity areas - resulting in reliable journey times. The Network Integration Plan for the Waikato Expressway will provide the key mechanism for ensuring greater connectivity between local arterials and the Waikato Expressway.
- 4.1.3 HCC would like the target outlined in 4.1.1 above reworded to read: *Journey times on the inter-regional state highway, local arterials and rail network are reliable and where possible reduced.*
- 4.1.4 *Target - Increase the mode share of transporting freight by rail.*
- 4.1.5 This issue is particularly important for the Waikato as 20% of the nation's freight passes through the region (28,000 vehicles per day on State Highway 1 of which 4,000 are heavy commercial vehicles). This heavy usage of the road network corresponds to the region accounting for the highest number of fatalities involving heavy vehicles. The amount of freight traffic passing through the Waikato is projected to double between 2006/07 and 2031¹.
- 4.1.6 HCC is supportive of having more freight transported via rail in the Waikato and would like the target shown in 4.1.1 above to be more specific with the proportion of freight intended to be moved from road to rail clearly identified with interim targets. HCC is keen to work with EW and the freight sector to encourage a modal shift of freight from road to rail.
- 4.1.7 The Ministry of Transport's (MOT) National Freight Demands Study forecasts national growth in rail freight movements to increase by 70% from 13.95 million tonnes in 2006/07 to 23.06 million tonnes in 2031.
- 4.1.8 Although the MOT does not have data available for rail freight movement at a regional level, HCC is currently in the process of obtaining this information from Kiwi Rail. This will be forwarded to EW shortly and should be of assistance in establishing firm targets around rail freight in the Waikato over the next 30 years.
- 4.1.9 *Target - There is an increase in the amount of freight carried per kilometre travelled.*
- 4.1.10 While HCC supports greater efficiencies of freight being carried by heavy vehicles, it is opposed to the introduction of extremely large vehicles (from 44

¹ National Freight Demands Study (Ministry of Transport, September 2008).

to 50 tonnes or more) onto the country's roads as advocated by the Ministry of Transport in their proposed amendment to the Road Transport Rule released in mid 2009.

- 4.1.11 HCC's 24 July 2009 submission to the MOT focussed on concerns around personal and vehicle safety as well as the negative impact that larger vehicles are likely to have on the roading network and the subsequent road maintenance likely to be required.

4.2 Safety and Personal Security

- 4.2.1 *Target - Perceptions of safety of different transport modes improve.*
- 4.2.2 HCC would like the wording of this target changed to read '*Safety perceptions of all transport modes are improved*'. As with all other targets, this needs a series of specific interim measures to enable effective monitoring and subsequent adjustments to relevant programmes.
- 4.2.3 *Target - A 50% reduction in road related fatalities by 2040, compared with the annual five year average (2004-2009) of 79 deaths. This is the equivalent of 40 less deaths per annum in 2040.*
- 4.2.4 *Target - A 25% reduction in road related serious injuries by 2040, compared with the annual five year average (2004 -2008) of 299 serious injuries. This is the equivalent of 74 less serious injuries per annum in 2040.*
- 4.2.5 As EW will be aware, each year the Waikato accounts for the highest number of road deaths across all regions in New Zealand. Of the 244 road deaths for the country recorded in 2008, 52 (21.3%) occurred on Waikato roads. The Waikato also accounts for the highest social cost from road fatalities and injuries i.e. \$578 million in 2007² (15.5% of the national total of \$3.74 billion).
- 4.2.6 These targets do not appear to be in alignment with the 'Safer System' approach advocated in EW's recently adopted 2009-2012 Regional Road Safety Strategy. This Strategy has a vision of 'Working together towards zero deaths and serious injuries on Waikato's roads' and promotes that "*No amount of human trauma caused by a road related crash is considered acceptable*".
- 4.2.7 The two targets around road safety outlined in Section 4.2.3 and 4.2.4 of this submission should therefore have an end point of 100% reduction by 2040.
- 4.2.8 This approach of the new Regional Road Safety Strategy is also in alignment with the aspiration of the Access Hamilton Transport Safety Action Plan for "*no-one to be killed or seriously injured on Hamilton's transport network*". The action plan includes targets reviewed each year that reflect Hamilton's current transport issues and are also considered from a 'Safe System Approach' perspective.

4.3 Access and Mobility

- 4.3.1 *Target - Increase use of public transport to 7% of all trips by 2040 for urban areas.*
- 4.3.2 An increase in public transport usage in Hamilton from 2% to 7% by 2040 would equate to a rise from 4.2 million trips in 2008/09 to around 16 million trips in 2040. Quadrupling passenger transport use in the city over this period must be well planned and the required funding implications understood and stated in the final 2010-40 RLTS. HCC supports the establishment of specific

² New Zealand Transport Statistics (Transport Monitoring Indicator Framework, Ministry of Transport - July 2009).

interim targets to ensure that the requirements of achieving this target are understood. For example, a target of 8 million bus passenger trips by 2020, 12 million trips by 2030 and 16 million trips by 2040. This is the approach used in the Access Hamilton Strategy.

- 4.3.3 *Target - increase walking, cycling and other active modes to 30% of total trips in urban areas by 2040.*
- 4.3.4 HCC is extremely supportive of this target given that Access Hamilton supports an integrated and multi-modal approach to transportation. HCC would like to see Hamilton promoted as a model cycling community. Again a specific set of interim targets need to be established in the final 2010-40 RLTS.
- 4.3.5 HCC is also of the view that a target should be included in the final 2010-40 RLTS that focuses on establishing and growing a rail passenger transport service.

4.4 Public Health

- 4.4.1 *Target - Continuing reduction in benzene levels, PM₁₀, carbon monoxide and nitrogen dioxide in Hamilton.*
- 4.4.2 Section 4.4 of the Discussion Document states that *"It is estimated that vehicle emissions contribute fewer than 10% of total PM₁₀ emissions in the region. In Hamilton, motor vehicles account for 68% of the CO and 91% of the NO₂ emissions. At peak times of the year (winter) in Hamilton, motor vehicles contribute approximately 11% of PM₁₀ but in summer this increases to 41%".*
- 4.4.3 As the RTC will be aware, a study undertaken by the MOT in 2002 clearly shows that air pollution from motor vehicles has a significant impact on people's health and well-being. The study notes that *"The most likely estimate of the number of people above 30 years of age who experience premature mortality in New Zealand due to exposure to emissions of PM₁₀ particulates from vehicles is 399 per year. This compares with 970 people above age 30 experiencing pre-mature mortality due to particulate pollution from all sources (including burning for home heating), and with 502 people dying from road accidents (all ages)".³*
- 4.4.4 HCC is aware that EW measures benzene, PM₁₀, carbon monoxide and nitrogen dioxide levels at one of two sites in Hamilton i.e. Peachgrove Road and Bridge Street. Given the significant negative impact that air pollution can have on people's health and well-being, HCC would like EW to consider establishing additional air quality monitoring sites in Hamilton. This would allow for a more accurate reflection of the concentration of pollutants at specific sites within the city.
- 4.4.5 This type of information would be extremely useful in assisting HCC to develop strategies for reducing congestion at key points around the city.
- 4.4.6 *Target - Increase the percentage of all trips which are carried out by walking and cycling (aged 5 and over).*
- 4.4.7 HCC notes that a similar target for cycling and walking is included in the Access and Mobility outcome area. Given that measuring the health benefits of walking and cycling is extremely difficult HCC recommends that the target shown in 4.4.6 above be removed from the Public Health outcome area.

³ Health Effects due to Motor Vehicle Air Pollution in New Zealand (Report to the Ministry of Transport, January 2002).

4.5 Environmental Sustainability

- 4.5.1 *Target - Increased use of native re-vegetation along transport corridors to create biodiversity corridors.*
- 4.5.2 While HCC supports this target in principle responsibilities around programmes and funding need to be clearly established. HCC advocates for the use of native plantings along transport corridors where appropriate.
- 4.5.3 Vegetation on transport corridors can also be of benefit to noise, air pollution and polluted stormwater run off reduction.

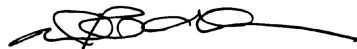
4.6 Integration

- 4.6.1 HCC acknowledges that the RTC has concerns around integration being an outcome area. However HCC supports its inclusion and stresses the importance of ensuring optimum integration of land use and transportation planning when developing programmes for the 2010-40 RLTS, particularly given the transportation efficiencies that can result from using this approach.

4.0 CONCLUDING COMMENTS

- 4.1 HCC trusts that the points made in this submission are helpful to Environment Waikato when considering all submissions to the Waikato Regional Land Transport Strategy Review - Regional Outcomes and Challenges.
- 4.2 HCC is aware that this consultation will be presented and discussed at the Regional Transport Committee in early February 2010 and would like to offer assistance to EW as the RLTS 2010-40 review process continues.
- 4.3 If you require clarification of the points raised in this submission, or additional information, please contact Philip King (HCC's Access Hamilton Co-ordinator) in the first instance on 07 838 6991 or email philip.king@hcc.govt.nz

Yours faithfully



Michael Redman
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