

Council Extraordinary Meeting

Tabled Documents

8 May 2020

Late Item

Draft Submission – New Zealand Rail Plan

Late Item

Draft Submission – Government Policy Statement on land transport 2021



TABLED DOCUMENT

8 May 2020

Tabled at Council - Extraordinary Meeting
on 8 May 2020

TTP0201
LMS

Ministry of Transport
PO Box 3175
WELLINGTON 6140

Attn: draft Rail Plan team

Email only to: DraftNZRailPlan@transport.govt.nz

Dear sir or madam,

DRAFT NEW ZEALAND RAIL PLAN – MANAWATU-WHANGANUI REGIONAL TRANSPORT COMMITTEE SUBMISSION

Thank you for the opportunity to provide feedback on the draft New Zealand Rail Plan (Rail Plan).

This feedback is made on behalf of the Manawātū-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

The Manawātū-Whanganui Region encompasses a broad area extending from south of Levin to north of Taumarunui and across to the east. Given the central location of the region, it is an important conduit of freight and people around the North Island. There are key transport corridors, both road and rail, within the region.

The RTC **strongly supports** the integration of rail into the land transport planning and investment framework. Rail is an integral part of the land transport network and with adequate planning and investment will be key to achieving the outcomes sought in the draft GPS.

1. General

On the whole, the RTC generally **supports** the strategic direction and intent of the draft Rail Plan and makes the following comments and observations in relation to the draft document for the Ministry's consideration.



The RTC notes that the draft Rail Plan was developed prior to the impacts of Covid-19 being fully realised. The RTC is aware that the effects and subsequent economic impacts mean that both central and local government are having to re-prioritise their programmes to drive economic recovery. Given the role movement of freight will play in economic recovery, the RTC is interested to understand whether investment in the rail network will be increased to help support development of rail and supporting infrastructure to increase freight movement by rail. The RTC see a real opportunity to fast-track freight movement by rail in our Region due to the connections with key rail freight networks to Wellington, Auckland, Gisborne and New Plymouth. Development of the proposed KiwiRail Central North Island Freight Hub and supporting road connections (Regional Freight Ring Road) will be key to achieving a secure and efficient distribution point for New Zealand, particularly in the North Island.

Regarding the structure of the draft Rail Plan, the RTC acknowledges that the Plan does not provide a definitive list of investments for rail over the next decade or provide a funding commitment for any projects that are listed. However, the RTC notes that mention of these projects and timing provides a strong signal of Government's commitment to rail and will inform future funding decisions through both the Rail National Investment Plan (RNIP) and to some extent the GPS. For this reason, the RTC considers that the draft Rail Plan should take a further step and identify the high level priorities and opportunities for every region in the Country both in the short and long term, rather than focusing on the major metropolitan areas.

2. Strategic priorities – Part A (planning and funding framework)

The RTC **supports** the strategic priorities within the draft Rail Plan and **agrees** that rail contributes significant value to New Zealand and if performing well, will deliver positive social, economic and environmental benefits. Good planning and investment into this system will also realise the GPS goals

The planning and funding framework outlined in Part A is a good start and is clearly explained. The RTC **generally supports** the proposed planning framework and makes the following notes:

- The RTC requests that all regions be given the opportunity to provide feedback on the RNIP in its draft form. The RNIP outlines KiwiRail's planned three year investment, so early engagement will be key to understanding any proposed projects within each region and therefore planning/providing for these when developing or reviewing Regional Land Transport Plans (RLTPs).
- The RTC understands the reasons behind the Government's focus on the Wellington and Auckland metropolitan rail networks and the planning framework that is proposed for these areas. However, the RTC wishes to signal our **concern** that this focus is too narrow and will mean that investment opportunities outside these regions will be missed due to lack of funding. Given the Horizons' region's connection to Wellington in particular, the RTC is **concerned** that inter-regional rail opportunities in our region will not be adequately planned or invested in under the current approach.

To re-iterate, the RTC **considers** rail is an important part of the land transport network and if planned and adequately invested, will play a key role in improving New Zealand's freight connections, passenger travel options, road safety and mitigating the effects of climate change. The key here is that this is applied across the Country and not just in major metropolitan areas, to avoid the system becoming disjointed.

3. Strategic Priorities – Part B (investment priorities for rail)

The RTC **generally supports** the strategic investment priorities outlined in the draft Rail Plan. As noted above, the RTC understands that the draft Rail Plan does not provide a complete list of investments for

rail over the life of the Plan, however there are some investment opportunities mentioned that pertain specifically to the Horizons region which we wish to make comment on.

- 3.1. **Central North Island Freight Hub:** Page 27 outlines a list of key priorities for investment over the next decade. Given the level of effort and the benefits associated with the Central North Island Freight Hub identified for Palmerston North, the RTC **requests** that this project be explicitly identified on the list of key priorities on:

- page 27, or the future opportunities listed on page 28 and 31 of the draft Rail Plan.
- the RTC is **pleased** to note the Central North Island Freight hub is specifically mentioned under the “enabling regional development and connectivity through the PGF” as an investment priority. However, reference to key regional development projects should be mentioned throughout the Plan as they will be key to the success of improving use of Rail and subsequently economic recovery throughout the country.

- 3.2. **Capital Connection Passenger Rail Service:** The RTC is pleased to see the Capital Connection passenger service between Wellington and Palmerston North identified within the “Enhanced Inter-regional services” strategic priority. The Capital Connection is a critical and well-used service which connects people in the Horizons region with Wellington and vice versa. The RTC supports the comments that the service runs close to capacity, with approximately 135,000 passenger trips per year, but currently uses older rolling stock which is nearing its end of life and needs to be either refurbished or replaced.

The RTC wishes to re-inforce that investment in this service is a high priority in order for the service to continue. At present significant work and expense has gone into securing a short term option to keep the service functioning but additional investment is going to be required to retain this important service beyond 2025.

- 3.3. **Other investment opportunities**

Whanganui to Castlecliff rail line: The RTC **supports** reference to the Whanganui to Castlecliff rail line as an investment priority. Upgrades to this line are necessary to support resilience and reliability in this area.

Dannevirke log hub: The RTC **supports** the construction of a log hub in Dannevirke as an investment priority. This will significantly improve the impacts the region sees from logging on our roads.

Levin Rail Hub: The RTC wishes to also highlight another rail investment opportunity in our region, the Levin Rail Hub and advancing a Rail Station Access Plan for the Levin Station. These projects will identify measures to improve access, integration and functionality of the Levin Station and improve connections to Palmerston North and Wellington. Given the proximity of Levin to Wellington, it would seem logical to include this as part of the consideration of the wider Wellington metropolitan rail network.

Tourism: The RTC wishes to highlight that there are areas of the region, specifically Ruapehu which rely heavily on tourism. In this area, there are established rail corridors which could easily be updated to provide a travel option for tourists and injecting money into the economy for the region.

4. Conclusion

Thank you for the opportunity to provide feedback on the draft Rail Plan. The RTC supports the overall direction the draft Rail Plan. 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, please contact Leana Shirley, Senior Transport Planner on leana.shirley@horizons.govt.nz or Rhona Hewitt, Transport Services Manager on rhona.hewitt@horizons.govt.nz

Yours sincerely,

Rachel Keedwell
CHAIR
HORIZONS REGIONAL COUNCIL

8 May 2020

TTP0201
LMS

Ministry of Transport
GPS Team

Email only to: 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 Manawātū-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 and place-making. 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 Welly 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 supporting activities such as walking and cycling, public transport and place-making. It is the RTC's concern 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 PT 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 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 miss out on funding where rail is not an option or where roading is needed to connect the two modes together. While the Horizons region has a rail line available for movement of freight, adequate road connections to enable safe and efficient movement of freight to or from the rail line is important 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 vital for efficient, save and multi-modal movement of freight around the Region, particularly as the 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 where alternatives such as rail are not an option or where 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 or Rhona Hewitt, Transport Services Manager on rhona.hewitt@horizons.govt.nz

Yours sincerely,

Rachel Keedwell
CHAIR
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