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Ministry of Transport
P O Box 3175
Wellington 6140

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Dear Sir/Madam

Draft GPS for land transport 2024

Thank you for the opportunity to submit on the latest Draft Government Policy Statement for land transport 2024 (GPS). The four West Coast Councils are submitting the same submission on the Draft GPS. The West Coast Regional Council's (WCRC or the Council) submission is attached.

Our contact details for service are:

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We would be grateful for acknowledgement of receipt of our submission.

The Council consents to their submission being released to the public under the Official Information Act 1982.

Yours faithfully

Darryl Lew
Chief Executive

West Coast Councils – GPS 2024 Submission

Context

1. Buller, Grey, and Westland District Councils and West Coast Regional Council (West Coast Councils) jointly provide the following feedback to the draft Government Policy Statement on Land Transport (GPS) 2024.
2. This feedback is based on the consultation document, it is provided at both a strategic level and regarding the regional and district transport programmes of the four Councils.

West Coast Priorities

3. The draft West Coast Regional Land Transport Plan (RLTP) 2024 presents the 30-year vision of “A safe, resilient and connected multi-modal transport network which enables the West Coast to thrive.”
4. The RLTP vision is delivered through the following strategic objectives:
 - a. Resilience – a transport network that can better cope with unknown stresses, natural disasters, and the impact of climate change.
 - b. Asset condition – a transport network that is fit for purpose.
 - c. Safety – a transport system that is safe for all users.
 - d. Connectivity – a multi-modal transport network that enables all users to meet their economic, social, and cultural needs.
 - e. Regional advocacy – improved regional advocacy.
5. The three local authorities, Buller, Grey and Westland, prepare a joint transport programme business case and asset management plan for development of their Long-Term Plans and the National Land Transport Programme.
6. The 2024 West Coast Regional Transport Programme Business Case recommends a 10-year programme to achieve the following benefits and strategic responses sought from investment:
 - a. Improve network resilience.
 - i. Identify and mitigate or adapt to natural hazard risks and transport disruption.
 - ii. Ensure current and future infrastructure is fit for and resilient to a changing climate.
 - b. Safer travel.
 - i. Speed management to reflect the capability and function of our roads.
 - ii. Targeted safety improvements, especially for vulnerable road users.
 - c. Improved transport efficiency.
 - i. Increase trips made by walking, cycling, and lower emission modes.
 - ii. Maintain inter- and intra-regional connectivity to move people and goods.

Feedback on draft Government Policy Statement on Land Transport 2024

Feedback on GPS strategic priorities

7. **Support** focus on Economic Growth and Productivity, and the role of freight in supporting economic growth.
8. **Support** the key shift from the previous GPS2021 to promote Increased Maintenance and Resilience.
9. **Support** the inclusion of Value for Money to support more efficient and effective delivery on behalf of ratepayers and taxpayers.

10. **Request** inclusion of climate change related risk within the discussion of future resilience, with the expectation that more frequent and severe weather events impacting the transport network will require long-term planning and financing of improvements. The West Coast is heavily reliant on the one north-south route, State Highway 6, providing the main arterial road functions for communities across the region. Continual weather-related emergencies have highlighted the vulnerabilities of the network, and how this creates disruptions and at times, displacement for our communities. The Ministry for Environment projections (2018) indicate 'It is very likely that for winter and spring there will be an increase in rainfall for the west of both the North and South Islands, with drier conditions in the east and north. This is a robust prediction both in 2040 and 2090, caused by the westerly winds over New Zealand increasing during these seasons.'
11. **Request** inclusion and stronger focus on the safety of vulnerable users of the transport system, particularly walking, cycling and other active modes. There is evidence that shows the wider social, economic and health benefits to be gained through cycle commuter routes and shared trails. There is no mention of these users under the Safety Strategic Priority with the emphasis solely on safety for vehicle and motorbike modes. The West Coast region has generated economic benefit through cycle tourism visitation and aims to safeguard the forecasted benefits for local businesses and the community. Near urban centres these cycle commuter routes also benefit local users, for example providing off carriageway access for school children.

Feedback on activity classes

12. **Support** focus on sealed and unsealed road maintenance, renewal, and rehabilitation through the Local Road Pothole Prevention Activity Class.
13. **Note** with concern WC216 Bridge and structures renewals is proposed to be included under Local Road Improvements, instead of the previous Local Road Maintenance activity class. The streamlined process for approval of like-for-like replacement of end-of-life bridges and structures substantially improved the efficiency of demonstrating when investment in replacement of a bridge should take place, without the need for a more extensive Business Case. Having bridges capable of carrying 50Max and HPMV loads is critical for the West Coast as geographically there is no alternative to getting goods to processing facilities. Heavy earthmoving machinery needed for reinstating access also needs bridges to be upgraded or replaced to modern bridge standards.
14. **Note** with concern the exclusion multi-modal improvements and reduction in funding for traffic calming and multi-modal measures from the Local Road Improvements activity class. The Councils consider this a risk to provision of a safe multi-modal transport network, particularly in urban areas where multiple modes utilise the same public space.
15. **Note** with concern that investment under the Walking and Cycling activity class will be made "where there is clear benefit for increasing economic growth, or clear benefit for improving safety where demonstrated volumes of pedestrians and cyclists already exist." The Council's experience is that safe infrastructure encourages higher demand for walking and cycling, and in many locations existing demand is not present due to a lack of infrastructure. The major increase in cycle activity through the growing network of separated cycle trails on the West Coast provides evidence of this, these trails have been a key source of economic benefit with the region becoming a tourist destination for cycling.
16. **Note** with concern the substantial reduction in funding for the Walking and Cycling activity class which now includes maintenance and renewal work categories. The Council's are concerned that a substantial amount of unsubsidised local funding will be required to retain status quo levels of service on our footpaths if NLTF co-funding is not made available. This may be unachievable given competing priorities for funding across transportation and other activities we deliver. Engagement with our communities routinely highlights the importance of footpath condition.

17. **Note** with concern the potential risk to full realisation of potential investment benefits, particularly wider economic and social benefits, and efficiency of project delivery if a multi-modal approach to planning and funding is not supported. There is a risk that due to differing funding sources and requirements increased effort will be needed to plan and deliver multi-modal projects, or that these will not be delivered in an integrated manner, increasing project overheads and total cost.
18. **Note** with concern the reduction in GPS funding range for Public Transport Services activity class, and expectation of greater farebox recovery. The West Coast lacks a comprehensive public transport system, instead relying on total mobility services via taxis. This is a critical service to ensure our geographically isolated communities maintain access to essential services, the region also has a high and increasing population aged 65+ and a low median household income relative to wider New Zealand. A reduction in subsidy for total mobility services risks reduced access to essential services, particularly health care and/or an increased financial burden on those who are unable to drive, walk, or cycle to these services.
19. **Note** with concern the removal of the newly included Coastal Shipping activity class. Investigation to support planning for investment to improve economic productivity via integrated land and sea freight opportunities has been identified as a significant opportunity for the West Coast. The West Coast has resources such as minerals, gravel and rock that can be shipped to other regions of NZ where some of these resources are not so plentiful.

General feedback

20. **Support** the GPS to adopt a 10-year investment plan aligned with local government Long-Term Plans to improve strategy and planning across the transport system. The Councils advocate NZTA provide guidance to local authorities well in advance of 2027 NLTP submissions for how local government will integrate with any new NZTA systems and processes to achieve this.
21. **Support** consideration of how city and regional deals between central and local government can provide an opportunity across the transport system. The Councils advocate that this integrates with other Council activities, particularly 3-waters.
22. **Support** focus on reporting and reducing expenditure on temporary traffic management. The Councils advocate that health and safety of workers and transport network users is not compromised by cost savings.
23. **Note** the omission of major transport projects noted for the West Coast. While the region's proposed state highway projects may not be significant in the context of national expenditure, they are significant to our local communities. This includes moving the state highway at Franz Josef as part of a major flood resilience project.