

2 April 2024

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SUBMISSION TO THE MINISTRY OF TRANSPORT ON THE DRAFT GOVERNMENT POLICY STATEMENT ON LAND TRANSPORT 2024 - 2034

Thank you for the opportunity to present this submission on the draft Government Policy Statement on Land Transport 2024 - 2034 (**GPS**). Local government has significant institutional knowledge and on the ground experience addressing complex transport challenges. This experience will positively contribute to the development of the GPS in a way that can complement central government's objectives for Aotearoa New Zealand's transport network.

QLDC has a number of concerns with the draft GPS and highlights the following key messages that are expanded on in the body of the submission:

- Climate and greenhouse gas emission considerations have not been adequately taken into account.
- The GPS should better recognise the QLDs significance to the Aotearoa New Zealand economy, and make commensurate investment.
- QLDC strongly supports the identification of the 'Queenstown Package' and 'Queenstown Transport Connections' as major transport projects in Appendix B of the GPS, that will improve transport outcomes for Queenstown Lakes District (**QLD/the district**) visitors and residents.
- QLDC supports the exploration of alternative funding tools to better spread the costs of constructing and maintaining transport infrastructure, and looks forward to partnering with central government to secure long-term investment in the transport network.
- Balanced investment in different types of interventions such as public and active transport, alongside roading, is required. The GPS should not disincentivise public transport by requiring greater public transport farebox recovery, or the update of low emissions vehicles through new road user charges.
- The GPS should provide for proactive steps to improve transport infrastructure resilience, rather than multiple reactive quick fixes following unexpected shocks, such as natural hazards.
- QLDC supports proactive steps which ensure roads support safe driving behaviours as the focus of safety investment, as opposed to additional reactionary enforcement activity as proposed.

This submission has been endorsed by the Climate Reference Group, contributing significant knowledge and expertise on the strategic priorities for emissions reduction. Reference to 'Council' in this submission refers to both Council and the Climate Reference Group. QLDC would like to be heard at any hearings that result from this consultation process. QLDC would also welcome any opportunity to further discuss the points made in this submission. Due to the timeline of the process, this submission will be ratified by Council retrospectively at its next full meeting.

Thank you again for the opportunity to comment.

Yours sincerely,



Glyn Lewers
Mayor



Mike Theelen
Chief Executive

SUBMISSION THE MINISTRY OF TRANSPORT ON THE DRAFT GOVERNMENT POLICY STATEMENT ON LAND TRANSPORT 2024 - 2034

1. The Queenstown Lakes District Context

- 1.1. The QLD has an average daily population of 71,920 (visitors and residents) and a peak daily population of 114,790¹. The district is experiencing unprecedented growth with its population projected to nearly double over the next 30 years, and is also one of Aotearoa New Zealand's premier visitor destinations, drawing people from all over the world.
- 1.2. Economic activity and growth within the QLD are more in line with metro centres, with GDP growth on average outperforming the rest of Aotearoa New Zealand. The provision of adequate transport infrastructure and services to accommodate the resident and visitor growth, particularly given its alpine landscape, is a key challenge for QLDC. For the year ending June 2023, there were 3.3 million unique visitor arrivals to the district, which equates to 63 visitors per resident. Affordability constraints present ongoing difficulties for local government with significant capital work cost escalations². This backdrop in relation to services funded by ratepayers creates significant pressure on the district's transport network.
- 1.3. Because of geographical limitations due to its alpine environment, the transport network in the QLD cannot be significantly increased (i.e. via lane additions). Accordingly, the network must be utilised more efficiently to transport an increasing number of people and goods. A balanced investment in road improvements as well as encouraging alternative modes of transport, discouraging single-occupancy private motor vehicles, and encouraging commuting outside peak periods must be supported.
- 1.4. The QLDC Spatial Plan³ was developed through the Grow Well Whaiora partnership between Central Government, Kāi Tahu, QLDC and Otago Regional Council, and provides a proven framework to deliver infrastructure to enable the district to grow well.
- 1.5. The regions Regenerative Tourism Plan⁴ has been achieved through partnership between QLDC, regional tourism organisations, Kāi Tahu, the Department of Conservation and other agencies. Ensuring that transport networks preserve and enhance the visitor experience is of paramount importance.
- 1.6. QLDCs Climate and Biodiversity Plan⁵ strives to reduce emissions, prepare for climate adaptation and pursue biodiversity restoration. The plan pursues a low-emission transport network and a collaborative approach to travel behaviour change. The transportation sector is the most significant source of greenhouse gas emissions within the district⁶.

¹ <https://www.qldc.govt.nz/media/ygilrton/demand-projections-summary-march-2022-2023-to-2053.pdf>

² Infometrics, Analysing increases in local government costs – February 2024 *'Capital cost escalation had accelerated substantially over 2021-2023, with the overall capital goods price index peaking at 13%pa, and civil construction costs at 15%pa. In greater detail, transport capital cost escalation peaked at 19%pa (with bridges peaking at 29%pa!), and water systems peaking at 15%pa'. 'Bridges are 38% more expensive to build over the last three years, and sewerage systems are 30% more expensive. Roads and water supply systems are around 27% more expensive.'*

³ <https://www.qldc.govt.nz/your-council/council-documents/queenstown-lakes-spatial-plan/>

⁴ <https://www.queenstownnz.co.nz/regenerative-tourism-2030/>

⁵ https://www.qldc.govt.nz/media/iw3pqsy1/qldc_climate-and-biodiversity-plan_jun22-web.pdf

⁶ Carbon Zero Discussion Paper at page 6. Regenerative Tourism By 2030 ([queenstownnz.co.nz](https://www.queenstownnz.co.nz))

2. The QLD is a dominant force for Aotearoa New Zealand’s economic growth. The district’s ongoing economic growth and productivity need to be supported by a transformational, balanced approach to transport.

- 2.1. The GPS is heavily weighted towards North Island cities. Although the QLD has the population of a small city, the economic activity driven by the district’s tourism industry and its continued growth makes it more akin to a metro centre, with GDP growth on average outperforming the rest of Aotearoa New Zealand⁷. QLDC considers that the GPS should better reflect the significance of QLDs economy to the region and across the motu.
- 2.2. Growth in the QLD over the last 20 years has outpaced the ability of the transport network to cope. The consequences of this are being experienced throughout the district, and in particular on State Highway 6/6A, with significant congestion and delays to journey times affecting the economy as well as the visitor experience and quality of life for residents⁸. Overall, congestion, increases in travel time, and decreases in reliability and resilience of the QLD transport network will adversely impact the economic growth and productivity of the QLD, the wider region, and the nation. There is a strong case for supporting investment in transport infrastructure (including public and active transport modes) in the QLD.
- 2.3. As mentioned above, adding more road lanes is largely not feasible in the QLD, due to its geography. Accordingly, investment in transport needs to be balanced, and allow for consideration of innovative ways to move people and goods efficiently. The transformational investment in transport infrastructure needed is evidenced in the QLDs recently approved Travel Demand Management Single Stage Business Case. The business case seeks greater efficiency in vehicle movements through better planning and delivery, and encourages a mode shift away from private vehicles to other modes such as walking, cycling or public transport. This approach will have a range of benefits, including better visitor experience and increased tourism revenue⁹, and builds on public transport patronage that is now above pre-COVID levels at around 30%. The business case analysis demonstrates that the preferred programme is economically efficient¹⁰ and therefore consistent with the key priorities of the GPS. QLDC encourages central government to enable the exploration of innovative solutions, such as elevated cable and rail networks.
- 2.4. The GPS sets out that its investment priorities will create social and economic opportunities, including access to land for housing growth. QLDC is concerned that a focus on investing in roading at the expense of public transport and active travel is at odds with improving access to land for housing growth. Best practice land use and transport planning identifies that investment in walking, cycling or public transport will deliver better social and economic outcomes, including better access to housing. Further, it is noted that this best practice approach is more consistent with the National Policy Statement on Urban Development (**NPS UD**) and its focus on delivering well well-functioning urban environments that *‘have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport.’*¹¹
- 2.5. An example of this is the Te Putahi Ladies Mile development Masterplan, that provides for significant mode shifts to address existing capacity issues along the State Highway corridor. Project goals related to transport include improved access to and from Ladies Mile with a transport network that can deliver its functions

⁷ Infometrics, Regional Economic Profile, GDP growth 2001 - 2023

⁸ Queenstown-Lakes District Travel Demand Management Single Stage Business Case, 21 December 2023

⁹ Page 8, Queenstown-Lakes District Travel Demand Management Single Stage Business Case, 21 December 2023

¹⁰ Appendix D. Economic Appraisal Summary, Queenstown-Lakes District Travel Demand Management Single Stage Business Case, 21 December 2023

¹¹ Policy 2, National Policy Statement on Urban Development 2020.

efficiently and effectively, and supporting enhanced public transport and walking and cycling options through land use solutions. The Masterplan was approved with the understanding that addressing congestion in this location can only be achieved through a range of land-use and mode shift interventions, given the limitations around existing capacity of roads and bridges that cannot be widened, due to existing urban development and natural landscapes (i.e. airports and mountains).

Recommendations:

R.1 - QLDC submits that the rapid and ongoing growth of the QLD, and the pressure this is placing on the district's transport infrastructure be factored into the investment framework set out within the GPS to ensure the district can continue to assist in improving Aotearoa New Zealand's economic growth and productivity.

R.2 - QLDC submits that the GPS more directly recognise the need for balanced investment in transport, including the benefits derived from adequate public transport and active travel as part of overall investment in transport networks.

3.0 QLDC supports new and innovative models for funding and delivery.

- 3.1 The GPS outlines the government will be undertaking 'major reforms' to ensure transport investment will support economic growth and productivity in the economy. These reforms include the creation of a National Infrastructure Agency (NIA) to develop a 30-year plan for transport infrastructure. At a high level, QLDC supports the development of a 30-year plan for transport infrastructure but requests that further information is provided in relation to the NIA and that it has a clear and monitored obligation to collaborate with individual councils.
- 3.2 A 30 year plan must be developed in concert with a robust, realistic and agile set of shorter term implementation programmes. Any such strategy should have a strong emphasis on the integration of transport and land use planning to support the development of 'well-functioning urban environments' as set out in the NPS UD.
- 3.3 In principle, QLDC supports NLTF funding model reform, as it does not currently have sufficient funds to deliver the infrastructure needed within the district. QLDC encourages the exploration of other funding opportunities and mechanisms, that includes but is not limited to city and regional deals, as an opportunity to secure targeted funding and to integrate long-term land use planning and transport strategy. QLDC looks forward to partnering with central government to achieve shared objectives for funding to be more self-sustaining.
- 3.4 The GPS sets out a direction that Waka Kotahi NZTA explore tolling to support new roads. In principle, QLDC supports methods that spread the cost of transport investment, noting that visitors place considerable pressure on the district's transport infrastructure. However, given the high cost of living, and the low number of residents to high number of visitors ratio¹², QLDC advocates that any additional costs on the district's residents be carefully considered.
- 3.5 QLDC considers that the GPS should identify the value and build on the success of spatial plans and the associated partnerships built between local authorities and central government agencies (i.e. Grow Well Whaiora, the Way to Go Partnership and the Alliance). The GPS should explicitly support these multisector partnerships and promote ongoing collaboration.

¹² 3.3 million unique visitor arrivals to the district (year ending June 2023), 63 visitors per resident, puts pressure on services funded by ratepayers.

Recommendations

R.3 – QLDC supports the establishment of a National Infrastructure Agency for long term planning, but recommends that a 30 year plan be developed in concert with robust, realistic and agile set of shorter term implementation programmes.

R.4 - QLDC encourages the exploration of other funding opportunities and mechanisms including city and regional deals, among other options.

R.5 – The GPS should reference and support existing multisector partnerships such as QLDCs Grow Well Whaiora Spatial (spatial plan), the Way to Go Partnership and the Alliance, and promote their ongoing collaboration.

4.0 The GPS should provide RCAs with the ability to make transport investment decisions based on the needs of their communities.

- 4.1 The GPS references reduced funding for traffic calming measures and that RCAs are to prioritise reliable travel times in all investment decisions. QLDC considers travel times should be considered as part of a holistic approach for increased safety standards. RCAs must be empowered to choose the right treatment at the right location.
- 4.2 The GPS sets out that walking and cycling investment will only take place where there is a clear benefit for increasing economic growth or a clear benefit for improving safety where demonstrated volumes of pedestrians and cyclists already exist. Investment in cycling and walking supports and encourages the QLDs growth in visitors and residents by providing for alternative modes of transport as well as recreational activities. Many visitors to the QLD take part in cycling due to the selection and quality of the recreational trail/off-road trail network. As such, improving the opportunities to utilise this network, and linking it into commuter routes, especially to and from accommodation services and tourist attractions, will not only improve the visitor experience and by extension the tourism economy, but it will also reduce the number of visitors driving in the immediate area, reducing congestion and improving travel time reliability.
- 4.3 QLDC disagrees that a lack of people engaging in walking and cycling should be a trigger not to invest in these assets, and arguably it should promote investment. Based on community feedback, the district does not have high pedestrian and cyclist volumes in some places because of safety reasons. Recent consultation relating to speed limits provided strong feedback that QLDC should provide mode separated investment in walking and cycling, instead of reducing speeds.
- 4.4 QLDC does not support an increase to public transport farebox recovery. The reduction in bus fares to \$2 in Queenstown has led to an increase in public transport usage, fewer cars on the road, improved traffic flow and more reliable travel times. Increasing fares is likely to lead to lower usage of public transport, and therefore increased traffic congestion. Affordable public transport is a key tool to reduce vehicle congestion.
- 4.5 The public transport section of the GPS does not provide clear direction or focus for local authority investment in public transport outside of the 'major public transport projects' list. Further clarity around investment in public transport infrastructure is required. Public transport reduces congestion, creating better value for money in operations, maintenance and renewals programmes. It also creates a more efficient and productive road network, thereby promoting productivity and economic growth. QLDC considers that investment in public and active transport infrastructure should be prioritised alongside major projects.
- 4.6 QLDC does not support some of the changes to the activity classes and work outlined in the GPS. For example, funding for structure renewals is proposed to move to the improvements category. Structure renewals play a key role in the asset lifecycles. The improvements capital funding category follows a more complex approach for funding and approvals, and shifting structure renewals to this category will result in a less efficient approach.

- 4.7 The proposed reduction in funding for walking and cycling maintenance and renewal of existing footpaths is not supported. The overall band ranges proposed for footpath renewals does not reflect the level of footpath renewals investment that is required. Footpaths make up 8% of the value of QLDC's transport assets, and it is important that appropriate asset management can be undertaken.

Recommendations:

R.6 – It is recommended that travel times should be considered as part of a holistic approach for increased safety standards and not prioritised over safety, so that RCAs are able to make the right treatment choice for a given location.

R.7 - QLDC recommends that walking and cycling investment be based on the benefits it can provide to economic activity, productivity, and overall community wellbeing, and not the volumes of pedestrians and cyclists that already exist.

R.8 - QLDC objects to increases in public transport fare box recovery.

R.9 - The GPS should provide more clarity concerning RCA investment in public transport infrastructure, due to the efficiencies and productivity to be gained from well functioning public transport.

R.10 - QLDC requests that structural renewals continue to have their own Work Category under the local road improvements Activity Class.

R.11 - Investment levels for maintenance and renewal of footpaths in the GPS need to reflect the asset value that they bring to the transport portfolio and be funded close to depreciation.

5.0 Inclusion of the 'Queenstown Package' and 'Queenstown Transport Connections' as Major Transport Projects in the GPS is strongly supported.

- 5.1 QLDC strongly supports the identification of the 'Queenstown Package' and 'Queenstown Transport Connections' in Appendix B of the GPS. These projects will provide dedicated public transport infrastructure and include bus priority measures, bus lanes, improvements to public transport hubs, improvements to the SH6A/SH6 intersection and pedestrian access improvements.
- 5.2 Further detail is requested as to the scope of the Queenstown Package, in order to provide certainty as to what is included. As mentioned previously, it is critical that investment in the QLD transport network be balanced between road improvements as well as other interventions.
- 5.3 QLDC requests that further specificity be provided in Appendix B in regard to 'bridges upgrades and replacements' for the Otago/Southland area. QLD's priorities for bridges are the new Arthur's Point Bridge and the State Highway Albert Town Bridge.
- 5.4 All of these projects will support the GPS strategic priorities of economic growth, productivity and safety.

Recommendations:

R.12 – Whilst QLDC supports inclusion of the 'Queenstown Package' and 'Queenstown Transport Connections' in Appendix B of the GPS, it requests that expansion to include other critical interventions is considered.

R.13 - QLDC submits that the GPS clarify what is meant by 'bridges upgrades and replacements' for the Otago/Southland area in Appendix B.

6.0 The GPS needs to directly address the considerable pressure on the QLD transport network due to its high visitor numbers, alpine environment and the ongoing effects of climate change through increased provision for maintenance and resilience.

- 6.1. The GPS sets out that maintenance levels and improving resilience on state highways, local and rural roads is '*critically important*'. QLDC strongly agrees and supports this strategic priority.
- 6.2. The QLD exists within an alpine environment, and as a result, its roading network is located within some of Aotearoa New Zealand's most harsh and dynamic environments. This makes the district's roading network subject to considerable stress and pressure. QLDC has a number of key transport corridors that are vulnerable to weather and geotechnical events, and there are limited alternative transport routes to move around the district. This is a contributing reason for QLDC's high maintenance costs when compared to other parts of Aotearoa New Zealand.
- 6.3. The ongoing impacts of climate change will bring more frequent and more intense weather events to the district that will present additional pressures for the district's state highways, local and rural roads. It is more cost effective to undertake proactive steps to improve transport infrastructure resilience rather than undertaking multiple reactive quick fixes following shocks. Central government should consider managed retreat and relocation of transport infrastructure that is subject to significant levels of natural hazard risk. It is critically important that central government work collaboratively with local government and provides levels of investment for maintenance and resilience activities that are commensurate to the pressures that the district's transport network face.
- 6.4. Investment in roads that improve safety for the large number of overseas drivers in the QLD is also an important consideration. Safe and efficient roads will ensure that the visitor experience is maintained and enhanced.
- 6.5. The effective and efficient operation of the district's transport network is critical to the economic wellbeing of the wider region and the nation due to the high level of visitor numbers. As such, ensuring adequate investment for maintenance and resilience activities to support the district's continued strong economic performance is paramount.
- 6.6. Overall, QLDC supports the Road Efficiency Group as an important mechanism to effect change in the industry as has been seen since its establishment. However, there must be clear guidelines, support and objectives for the group to work well. Given the emphasis on resilience in the GPS and the districts' susceptibility to natural hazard shocks, an additional key focus area related to proactive resilience investment activities is proposed as part of the Road Efficiency Group remit.
- 6.7. QLDC is concerned that the GPS does not address issues associated with Cook Strait ferry operations. Without this essential link being secure, the entire South Island economy will lack resilience.

Recommendations:

R.14 - QLDC recommends that the GPS support proactive steps to improve transport infrastructure resilience rather than multiple reactive quick fixes following shocks/hazard events.

R.15 - QLDC submits that an additional key focus area related to proactive resilience investment activities should be included as part of the Road Efficiency Group's remit.

R.16 – It is recommended that the GPS address issues in relation to the Cook Strait ferry operations to ensure resilient transport links between the North and South Islands.

7.0 Road safety activities are best implemented proactively through education and promotion, rather than reactively through enforcement.

- 7.1 This GPS directs investment towards road policing and enforcement. In principle, QLDC supports additional policing and enforcement within the QLD. The district's roads present additional complexities for drivers given the challenging terrain and winter conditions. Further, there are many visitors to the district that are unfamiliar with the roads and difficult driving conditions.
- 7.2 However, while Police do important work in keeping roads safe, QLDC considers that the GPS focus on reactionary measures needs to be more balanced with proactive measures. Given the size of the district and its associated roading network, a significant increase in the number of Police would be needed to materially deter poor driving choices. For districts such as the QLD, it is more effective and efficient to support proactive safe driving behaviour in concert with Police enforcement. This should continue to be delivered locally through road safety and promotion activities. QLDC requests that the road safety and promotion programme is strengthened in the GPS and appropriate levels of funding provided for implementation. Councils have strong relationships with the community and need to be supported to carry out this important function.
- 7.3
- 7.4 QLDC supports the increased safety standards proposed. While the GPS gives some specificity on what is expected from the strategic safety priority, e.g. the installation of road safety barriers and the delivery of lower cost safety intervention, there is insufficient clarity on what will be supported as part of the 'Minor Improvement/LCLR 24-27' programme. A productive and safe network relies upon the implementation of measures such as intersection improvements and crossings.
- 7.5 QLDC does not support the GPS statement that the local road operations activity class will not be available for traffic calming measures such as raised pedestrian crossings, raised platforms, speed bumps, and in-lane bus stops on state highways and local roads. QLDC considers that these types of interventions are important options in creating safer roads.
- 7.6 The GPS sets out a reduction in expenditure on temporary traffic management (TTM). While TTM is costly, QLDC considers it important that the safety of road users and those who undertake works is protected by ensuring that appropriate measures are in place. QLDC supports a risk-based approach to appropriate level of TTM, as well as development and improvements of national guidelines and standards.

Recommendations:

R.17 – The emphasis in the GPS on reactive safety investment should be balanced to reflect the importance of proactive measures such as road safety promotion and education programmes.

R.18 – QLDC requests that further clarity be provided on what will be supported as part of the 'Minor Improvement/LCLR 24-27' programme.

R.19 – QLDC requests that the local road operations activity class continue to be available for traffic calming measures such as raised pedestrian crossings, raised platforms, speed bumps, and in-lane bus stops on state highways and local roads.

8.0 The transition to a low emissions transport network should be supported in the GPS.

- 8.1 The GPS signals that the National Land Transport Fund's (NLTF) will require light electric vehicles to pay road user charges from April 2024. QLDC considers that incentivising the uptake of low emissions vehicles is critical to reduce Aotearoa New Zealand's greenhouse gas emissions (GHG). QLDC opposes any actions that are likely to disincentivise the uptake of low emissions vehicles and/or tip the balance towards further investment in traditional combustion engine vehicles, including for use in public transport.

- 8.2 The GPS also identifies the Emissions Trading Scheme (ETS) as being subject to reform. QLDC considers that ETS reform in isolation will not drive down emissions. Removing climate and GHG emission considerations from the strategic priorities of the GPS means that decision makers will not be required to consider emissions in investment decisions. QLDC considers that climate and GHG emission considerations should form an integral part of the GPS and factor into investment decisions.

Recommendations:

R.20 – QLDC does not support reform to the NLTF that are likely to disincentivise the uptake of low emissions vehicles and/or tip the balance towards further investment in traditional combustion engine vehicles.

R.21 - Climate and GHG emission considerations should form an integral part of the GPS and be factored into investment decisions.