

15 September 2023

Via email: GPS@transport.govt.nz

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

Thank you for the opportunity to present this submission on the draft Government Policy Statement on Land Transport 2024 (draft GPS).

The Queenstown Lakes District Council (QLDC) is supportive of the work that has been put into the development of the draft Government Policy Statement on Land Transport 2024, including an increased focus on 'maintaining and operating the system'.

However, the draft GPS as a whole does not enable the transformation that is acutely needed in this space. QLDC has key concerns, including the late timing of the release of the draft GPS and the lack of strategic investment package for Queenstown and the whole of the lower South Island.

QLDC supports the submissions made by Taituarā and Local Government NZ to the draft GPS.

QLDC would like to be heard at any hearings that result from this consultation process. It should be noted that due to the timeline of the process, this submission will be ratified by full council retrospectively at the next council meeting.

Thank you again for the opportunity to comment.

Yours sincerely,



Glyn Lewers
Mayor



Tony Avery
Acting Chief Executive

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

1.0 Context of the draft GPS on Land Transport in relation to QLDC

- 1.1 Queenstown Lakes District (QLD) is a district with an average daily population of 71,920 (visitors and residents) and a peak daily population of 114,790¹. It is one of the fastest growing populations in New Zealand Aotearoa, with 5.6% average growth per annum over the ten years to June 2022. The total population growth has been 74% over the past ten years, and Statistics NZ predicts that the district's population will grow an additional 48% by 2043.
- 1.2 At the same time, for the year ending April 2023, there were 4M guest nights spent in the QLD, which could soon be a return to the peak of 4.6M of year ending April 2019². Tourism is a foundation of the local economy, accounting for 39% of GDP and 55% of all employment in 2019³ and contributing significantly to the national GDP.
- 1.3 Rapid growth and high visitor numbers have led to significant transport issues on both local road and state highway networks and has impacted the ability of residents and visitors to travel around the district. In turn, this detrimentally affects both the wellbeing of residents and the ability to provide a positive experience to visitors.
- 1.4 QLDC is committed to working with partners to achieve the best outcomes for its community. QLDC is part of the Grow Well Whaiora partnership as an urban growth partnership between central government, Kāi Tahu, QLDC, and the Otago Regional Council that developed the QLDC Spatial Plan⁴. The purpose of the plan is to provide the long-term direction and vision for the district and moving towards a managed and sustainable approach to growth through its priority initiatives.
- 1.5 Furthermore, QLDC has a comprehensive Climate and Biodiversity Plan⁵ which strives to reduce emissions, prepare for climate adaptation and pursue biodiversity restoration. One of the three goals is mitigation, that the district reduces its greenhouse gas emissions by 44% by 2030⁶ and achieves net zero greenhouse gas emissions by 2050. One of the six key outcomes is focussed upon transport, that the district's transport system is low-emission and better connected. Through ten actions, the plan seeks to pursue 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 district's economy⁷ and is therefore of critical importance.
- 1.6 QLDC, Lake Wānaka Tourism and Destination Queenstown partnered to develop the Regenerative Tourism Plan⁸ for the region, that also included Kāi Tahu and the Department of Conservation. The Regenerative Tourism Plan is testament to the collaborative approach to destination management taken in the

¹ <https://www.qldc.govt.nz/community/population-and-demand>

² MBIE Commercial Accommodation Monitor.

³ Infometrics

⁴ <https://www.qldc.govt.nz/your-council/council-documents/queenstown-lakes-spatial-plan>

⁵ <https://www.qldc.govt.nz/your-council/climate-change-and-biodiversity>

⁶ Against a 2019 baseline an aligned with the 1.5 degrees science-based target pathway outlined in the 2020 Emissions Reduction Roadmap.

⁷ Carbon Zero Discussion Paper at page 6. [Regenerative Tourism By 2030 \(queenstownnz.co.nz\)](https://www.queenstownnz.co.nz/regenerative-tourism-2030/)

⁸ <https://www.queenstownnz.co.nz/regenerative-tourism-2030/>

Queenstown Lakes District. Its keystone project is aiming for zero carbon 2030 for the tourism system. This can only be achieved with a transformative approach to the transport provision in the district.

2.0 The timing of the draft GPS release is late

- 2.1 Land transport infrastructure and services are one of the largest expenditure activities for most councils, QLDC included. The GPS on Land Transport is a critical source of information that councils use to inform statutory planning processes, including the Long Term Plan. The lateness of the release of the draft GPS means that there is insufficient time to properly take it into account for planning purposes. The cascade effect of the current timing of Waka Kotahi's Investment Prioritisation Methodology places increased pressure on planning and uncertainty around affordability of programme delivery.
- 2.2 QLDC recommends that the draft GPS should be released to allow consideration as part of local government statutory Long Term Plan planning processes, to ensure councils have the opportunity to consider the information in the GPS in its planning and in time for Waka Kotahi to be able to provide a robust, well communicated and timely Investment Prioritisation Methodology.

3.0 The draft GPS needs to take a longer-term outlook

- 3.1 QLDC recommends that the draft GPS could better support longer term planning by looking to a further horizon. Local authority long-term plans have a ten year outlook, and a key component relating to infrastructure (the infrastructure strategy), has a thirty-year timespan. Regional spatial strategies required under the Spatial Planning Act 2023 also have a minimum statutory timeframe of thirty years.
- 3.2 These plans and strategies take into account the funding expected from central government towards transport objectives. In the absence of a detailed central government funding plan relating to transport that spans the period that these statutory instruments cover, comprehensive, future focused planning and investment in local transport infrastructure is not possible. QLDC recommends that future GPS Land Transport Funding have a planning horizon of at least thirty years and align with regional spatial strategies and local authority infrastructure strategies.

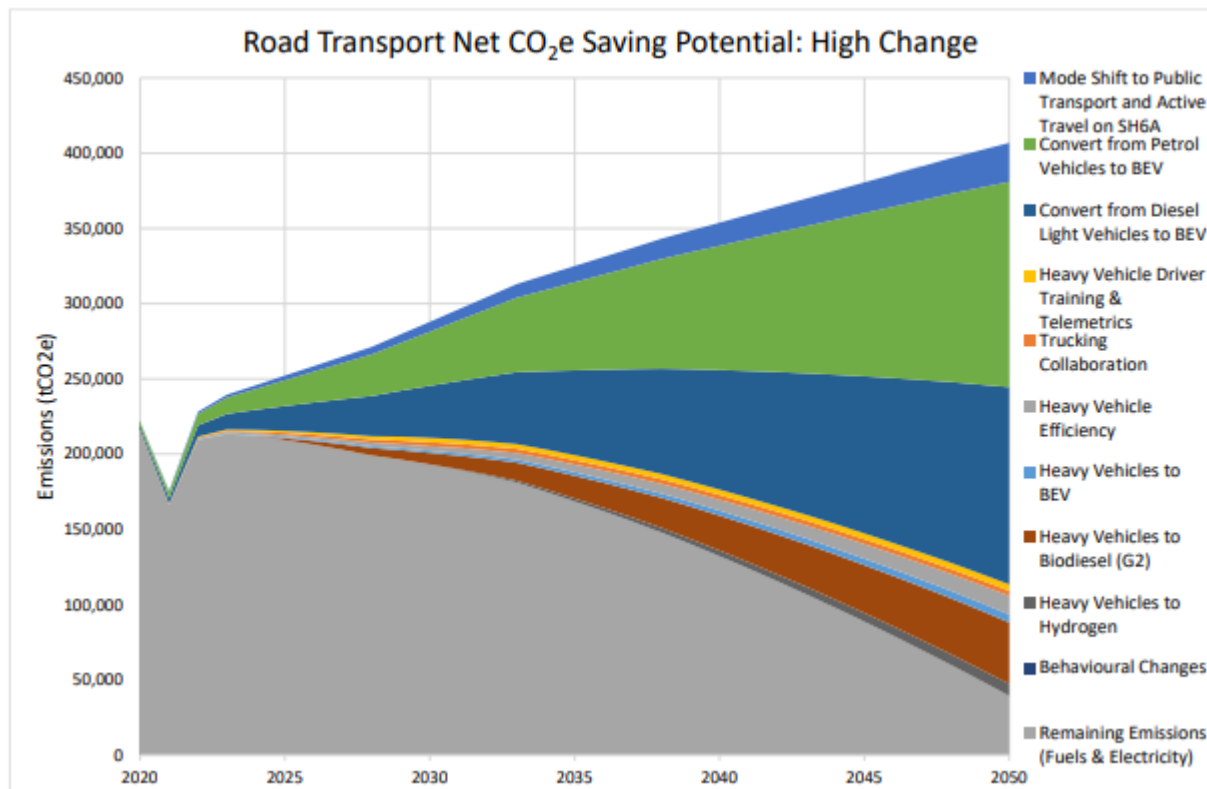
4.0 The magnitude of the issues and need to be proactive should be better reflected in the draft GPS

- 4.1 As outlined above, QLDC follows legislative guidance to set its ten- and thirty-year planning horizons. Specifically, QLDC has been working with its transport partners, New Zealand Transport Authority (NZTA), Wāka Kotahi and Otago Regional Council (ORC), to develop an integrated system approach to its improvement programme. The main themes of active travel, public transport and Travel Demand Management are integral to achieving outcomes locally, and the draft GPS should facilitate these nationally.
- 4.2 None of these themes will achieve these outcomes independently, and even if all are funded at some stage, they will not reach the aspirational mode shift and climate action targets that are embedded in Council and central government directional strategies and plans, in isolation. They will only work if there is delivery of parts of the suite of action at pace, and in sequence with the land use growth that this district faces. This also partly driven by other government edicts such as the NPS on Urban Development. If travel demand in major subdivisions and intensification areas can be reduced then transport infrastructure and services may be provided in time, and before major behavioural change schemes are required.
- 4.3 There are a number of substantial capital projects in the QLD to be funded in the next ten years. These comprise arterial routes, public transport Interchanges, a new road bridge at Arthurs Point, active travel routes, street upgrades, intersection treatments and route protection. Similarly, Wāka Kotahi has a significant programme of work on key highways sections under the New Zealand Upgrade Programme, and ORC are currently progressing a major follow-on business case for public transport services across the

Whakatipu basin. The approximate cost of this ten-year programme is around a billion dollars. The cost of doing nothing or continuing to be reactive, both environmentally and economically, is untenable.

- 4.4 From an emissions perspective, to achieve the transition to a high change pathway for the decarbonisation of the district’s transport system outlined below (figure 1), the levels of investment in a mode shift for the District will need to be significantly increased.

Figure 1: Net CO₂e saving potential for road transport for the QLD under the High Change pathway⁹



- 4.5 The QLD programme of work is supported by approved and aligned business cases, but is held up by local and national unaffordability. The draft GPS focus on damaged parts of the country is understandable, but misses a key opportunity, in that positive visitor experiences to the QLD positively impact New Zealand’s GDP as a whole. Traffic counts indicate the district is already exceeding pre-COVID demand on key routes (such as the Southern Corridor), showing that the regional economy, for both residents and visitors is back to significant levels of growth. If the failure to proactively invest in the lower South Island in the draft GPS eventuates, environmental and economic opportunities for this region will be lost.

- 4.6 QLDC cannot support the current direction of the draft GPS, as it fails to demonstrate awareness of the magnitude of local issues and opportunities.

5.0 The draft GPS Strategic Investment Programme fails to include key priorities that have been committed to by the crown, the ORC and Kai Tahu through the Spatial Plan and Urban Growth Partnership

- 5.1 The allocation of funding in the draft GPS Strategic Investment Programme indicates material investment in some geographic areas, and correspondingly fails to recognise the needs in other activities areas and regions across the motu.

⁹ [gldc-emissions-reduction-roadmap-final-report.pdf](#) at page 17.

- 5.2 Previous iterations of the GPS on Land Transport have placed Queenstown as a priority. It is disappointing to see that this is no longer the case in the Strategic Investment Package. The district continues to experience rapid and sustained growth that necessitates large scale investment in transport.
- 5.3 This investment is required to achieve the mode shift that is required for the district grow well, in line with the commitments in the partnership approach to the region's Spatial Plan. QLDC recommends that Queenstown is prioritised into the Strategic Investment Programme.
- 5.4 One of the primary objectives of well-functioning urban environments¹⁰ as required by the National Policy Statement on Urban Development is 'good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport'. It is known that a reliance on private vehicle transport compromises the goal of achieving well-functioning urban environments. The final GPS on Land Transport must be more aware and speak to this issue. It must be consistent and proactive with the overall goal to reduce reliance on private vehicles.
- 5.5 Both the Spatial Plan and the region's Regenerative Tourism Plan emphasise the need for public transport and active transport options that make this mode shift the overwhelmingly preferred option for residents and visitors, away from private vehicle use. In behind this is the need for high functioning roads and parking when private vehicle use is unavoidable.
- 5.6 Accordingly, QLDC recommends that the GPS on Land Transport includes more comprehensive responses towards easing congestion and moving New Zealand Aotearoa towards a lower carbon and safe transport system that enables sustainable urban development, whilst supporting emission reductions. QLDC recommends that the draft GPS be progressive and include reference to other transport modalities.
- 5.7 QLDC is also concerned that the funding model is overly reliant on hypothecated funding through fuel excise duties (FED) and road user charges (RUC) to be able to deliver the required funding within the increased activity class ranges of the draft GPS.

6.0 QLDC supports some aspects of the draft GPS

- 6.1 QLDC supports aspects of the draft GPS, including:
 - 6.1.1 The recognition and prioritisation of the importance of 'maintaining and operating the system'. Investing in and maintaining existing infrastructure assets is consistent with QLDCs approach to its current Long Term Plan process.
 - 6.1.2 The move to a broader safety context and the separation of Road to Zero initiatives from infrastructure safety improvements.
 - 6.1.3 The objectives in the draft GPS including: reducing emissions, safety, sustainable urban and regional development, and an integrated freight system.
 - 6.1.4 The commitment to inter-regional public transport. However, the draft GPS investment ranges for the various aspects of transport infrastructure do not provide certainty about the longevity of this investment, or where this would be focused.

Recommendations:

R.1. That future Ministers of Transport ensure that the GPS Land Transport Funding be adopted no later than 15 months before the commencement of the first financial year to which they relate, so that there is sufficient time to properly take

¹⁰ Policy 1 of the National Policy Statement on Urban Development 2020

it into account for planning purposes.

R.2. That future GPS Land Transport Funding have a planning horizon of at least thirty years, aligning with regional spatial strategies and local authority long term plans and infrastructure strategies.

R.3. It is recommended that the GPS better reflect the magnitude and complexity of the transport issues facing New Zealand Aotearoa, and be more urgent, pro-active towards supporting the agreed actions and objectives set.

R.4. That the draft GPS ensures that ensuring a positive visitor experience is taken into account, such that there is investment in transport where revenue can be generated, that in turn could provide a hypothecated return.

R.5. QLDC recommends that the GPS on Land Transport includes more comprehensive responses towards easing congestion and moving New Zealand Aotearoa towards a lower carbon and safe transport system that enables sustainable urban development, whilst supporting emission reductions now.

R.6. That the urgency facing Queenstown be recognised by be prioritising it into the Strategic Investment Programme.

R.7. That the draft GPS be progressive and include reference to other transport modalities.