



FEEDBACK ON DRAFT GPS (Consultation Draft) ON LAND TRANSPORT, MARCH 2024.

From: Northland District Council of the New Zealand Automobile Association.

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The New Zealand Automobile Association (The AA) has grown from a pioneering automobile club to an organisation that has over 1.1m personal members. The AA has 18 District Councils throughout the country that represent the interest of AA Members in their local areas.

The Northland AA District Council represents over 53,000 members. As winner of the 2023 AA District of the Year award, our council maintains a strong presence in advocating on behalf of our membership. The AA 2023 Election Calls were based on issues AA Members care deeply about. For our Northland members on whose behalf we are submitting, the highest priorities were the need to improve our roading infrastructure resilience (primarily the Brynderwyns) and lifting the safety of local roads and regional highways.

In this feedback we will comment in detail on these two priorities.

We would welcome the opportunity to present to the Ministry in support of our submission.

1. SH1 Resilience - Brynderwyns

State Highway 1 is a vital link between Northland and the rest of the country for people, tourism, and the movement of freight. Frequent closure of this route due to storm and other weather-related events alongside frequent traffic crashes has (and continues to have) a profound adverse economic, social, and environmental impact on the people and businesses of Northland.

As a key economic region within the Upper North Island, Northland has long been one of the fastest growing regions in New Zealand. Auckland's needs for raw materials and food to sustain its growth is being sourced from Northland. The continued supply and opportunities to grow are constrained by the current transport network. The Brynderwyns being a key link.

The Brynderwyns present a critical major barrier to the ongoing resilience of the network, the Region and the over 200,000 people who reside here.

This risk has been specifically recognized in the Coalition Agreement where parties committed to "*Building a four-lane highway alternative for the Brynderwyns and investigate the use of private finance to accelerate construction.*"

It is pleasing to see that Roads of National Significance feature prominently in the new Draft Government Policy Statement of Land Transport 2024/25 – 2033/34.

Appendix B specifically talks to the major transport projects earmarked for the Crown Investment Programme.

Minister Simeon Brown has reported that he expects NZTA to assess the Governments priorities with a view to having a schedule of delivery dates by August/September. We note that of eight projects National has stated they expect to begin building this term the Brynderwyns By-pass does not feature on that list, although is prioritised in Section 3 of the 2024 Draft GPS.

We are heartened however to hear Minister Brown is showing ‘flexibility’ over motorway projects with a view to bring forward work on the “Notoriously Fragile” Brynderwyn Hills. Stating *“The work being done now is only going to buy seven to ten years’ worth of resilience on that particular stretch. It’s obviously a key route to Northland and it has to be a top priority going North.”*

The Minister went on to say, *“The Government intended to address the Brynderwyns, calling it a “critically important project” and that he wanted to “get it under construction as quickly as possible, and that it would likely happen ‘much quicker’ than 10 years. My message is this (alternative route) is the number one priority going forward.”*

This submission seeks to have the GPS acknowledge (i) the immediate risk the Brynderwyns’ vulnerability places on our network and (ii) the Ministers stated intention of having the Brynderwyn by-pass elevated to the no.1 critically important project as a standalone reference in the final GPS on Land Transport.³

In support of the above there is considerable risk to maintaining the current State Highway alignment.

- The Brynderwyns are susceptible to landslip closures, increasing weather events leading to periods of prolonged exposure.
- WSP Engineers to the project, through their geotechnical investigations have advised the Minister that the Brynderwyns have a finite life span of 7-10 years left.
- Maintaining this route may involve significant future calls on Crown funds to expedite repairs.
- Lack of resilient long term viable alternative transport choice.
- The corridor has a very poor safety record. Significantly more than 50% of these crashes were head-on incidents.
- The route is predominantly either 2- or 3-star rates as per the KiwiRAP ratings systems and based on the ONRC this should be a 3 – 4-star corridor. The current form of the infrastructure is a substantive contributing factor to the current safety record.

An independent study commissioned in 2023 by Northland Inc found the impact of closing the Brynderwyns cost the economy \$1.94 million per day with wood and paper manufacturing, food manufacturing, forest and logging bearing the greatest costs.

A further independent study undertaken by the New Zealand Institute of Economic Research commissioned by the Northland Corporate Group stated ‘Using a standard transport appraisal, we find that the road will have quantified monetary benefits of between \$299 million and \$562 million a year by 2050. Using a business survey to estimate the potential that could be released by addressing infrastructure constraints in the region, we find that the overall benefits could be significantly larger, If the overall productivity of all Te Tai Tokerau Northland businesses increases by 2.5%, national GDP will increase by \$1.2 billion per year by 2050, or \$23.8 billion in total from 2040 to 2060.’⁴

It has been widely accepted by all business cases investigations to date that the only feasible intervention possible is to by-pass the Brynderwyns. Of the nine initial studies the two short listed ‘possibles’ are both to the west resulting in the ‘retirement’ of the current SH1 alignment.

In summary we believe that a strong case has been made that this matter assumes an elevated mantle in the final GPS:

In summary we agree with the minister that a strong case has been made that this matter assumes the number one priority in the final GPS:

- There have been multiple failures of this portion of the network for over 20 years.
- Geotech engineering investigations have reported the route cannot be feasibly sustained beyond a ten-year horizon.
- The safety record of this portion of the network significantly exceeds the national average.
- All RON's matter to the communities immediately impacted. We would suggest that no other RON faces the critical geological and geographic challenges that Northland faces should this route catastrophically fail.

We attach links to a number of supporting documents produced including the Whangarei to Auckland Programme Business Case, Independent Re-evaluation Report and a recent NZAA Research project on Safety Benefits of New Roads.

2. Road Safety

As the region with the highest number of road fatalities per head of population, the Northland AA Council has road safety as a key advocacy priority.

This submission seeks to have increased investment in local road safety promotion.

The Safety activity class includes the purpose of investment in a nationally consistent and coordinated road safety promotion.

In the 2023-year, Northland had 38 fatalities (11% of the national total), and for the current year, as at 31 March 2024, 14 (18% of total fatalities). We support the GPS call for further investment from ACC, the call for Police to provide sufficient enforcement levels of traffic laws and the need to review financial penalties and demerit point levels.

For 2023 local road fatalities, most of our crashes are on low volume or remote roads where there is little chance of enforcement or upgrade works. The number of fatalities where restraints/helmets were not worn continues to increase, 45% had alcohol as a factor and a growing percentage were driving either without a licence or outside of their licence conditions.¹

The attached Police Report to Northland Regional Transport Committee on the 2024 fatalities includes initial data on the 14 fatalities and current enforcement levels.²

We support a national road safety framework with provision to address critical local issues such as lack of restraints.

¹

Behavioural change is critical to Northland changing the road safety statistics. There have been too many whanau impacted upon by serious and fatal road accidents including victims, communities, witnesses and first responders.

† Road Deaths Statistics

	LOCAL ROAD FATALITIES THIS YEAR	STATE HIGHWAY FATALITIES THIS YEAR	TOTAL FATALITIES THIS YEAR
FAR NORTH	6	1	7
WHANGAREI	0	5	5
KAIPARA	1	1	2
NORTHLAND	7	7	14
NATIONAL	27	37	64

References

¹ The AA Research Foundation published a study on the Safety Benefits of new roads [AA Research-Foundation Safety-benefits-of-new-roads](#)

² Northland Inc independent study [Closure of the SH1 Brynderwyn Hills economic impact.pdf](#)

³ <https://www.nzherald.co.nz/northern-advocate/news/transport-minister-simeon-brown-says-alternative-route-to-brynderwyns-within-next-10-years/XD3POUUEZFBMVDHDQ3GD7P47CU/>

⁴ NZIER Te Tai Tokerau Northland Expressway. Unlocking Economic Growth and Regional Prosperity. February 2024



Fatalities 2023 on local roads.pdf

¹ Northland DSI 2023 Analysis on local roads



For%20RTC%20Mar%202024.pptx

¹ Northland Road Policing – March 2024

