



3 March 2024.

The Chairman  
Waikato Regional Transport Committee  
Private Bag 3038  
Waikato Mail Centre  
Hamilton 3240

### **NZAA Submission on the Draft Waikato Regional Land Transport Plan 2024–2054**

Dear Cr Downard

The New Zealand Automobile Association Waikato District Council (AA) thanks the Waikato Regional Transport Committee (RTC) for the opportunity to make a submission in relation to the draft Waikato Regional Land Transport Plan 2024–2054 (RLTP).

The AA has advocated for the transport interests of our members throughout our 120-year history. Today our work reflects the wide range of interests of our 1.8 million members, many of whom are public transport users, cyclists and private motorists. The AA represents approximately 68,000 AA members in the AA Waikato District.

In developing this submission, we included input from the AA national Policy and Advocacy team as well as from the members of the AA Waikato and Bay of Plenty District Councils.

The AA congratulates the RTC and staff on a well-presented and informative RLTP that ought to serve the region's transport needs well over the period of the Plan. The AA in general supports the RLTP and wishes to comment on some particular elements which are set out in this submission. Our submission provides feedback on the key matters the RTC sought and follows a similar structure to the core sections of the draft RLTP.

#### Government Policy Statement on Land Transport (GPS) Context

The AA note that the draft RLTP has been prepared under the previous Government's draft GPS. We anticipate some fundamental changes from the new Coalition Government's GPS such as a stronger focus on roads, resilience, travel times and efficiency and maintenance.

In this context this could affect the current regional transport priorities by changing the road safety focus, reducing the walking and cycling spend and introducing other areas flagged to change by the new Government.

The late delivery of the new GPS creates a problem as if there is significant change to the policy and funding investment priorities in the new GPS it could render parts of Waikato RLTP redundant or subject to large changes. Bearing in mind that under the Land Transport Management Act (LTMA), the RLTP must be consistent with the GPS and the NZ Transport Agency (NZTA) state highway programme must give effect to the GPS.

Should the GPS come out after the RLTP hearings (March) and deliberations (April) we seek clarification from the RTC on how stakeholders and the public can have further input into the final RLTP. A significant change to the GPS may trigger the RLTP significance policy and hence a variation to the RLTP.

### **AA Specific Comments on the RLTP**

#### **Section 1.4 Key Drivers (pg14)**

The AA acknowledge the importance of addressing national climate change and emission reduction policies as a key driver in the RLTP.

We support the Strategic Investment Programme of the draft GPS which identifies Cambridge to Piarere SH1 and Tauranga to Tauriko SH29 as some of the most significant sections of the transport network that requiring urgent attention. We are pleased that the draft RLTP reflects the highly strategic approach to both these projects.

#### **Section 1.5: RLTP Vision and Objectives (pg18)**

The AA supports the RLTP Vision - *'The high-level vision for land transport in the Waikato region is an integrated, safe and resilient transport system that delivers on the wellbeings of our diverse Waikato communities'*.

The AA also supports the five RLTP strategic objectives of climate change, resilience, growth and economic development, accessibility and transport choice, and safety.

#### **Section 2.1 Strategic Importance of the Waikato (Pg22).**

The AA is pleased that the RLTP recognises the highly strategic importance of the Waikato region in the Upper North Island context as well as nationally. The significant amount of freight moved by road and rail both within and through the Waikato region demonstrates the importance of the transport network in ensuring the national economy functions smoothly.

#### **Section 2.2 Key Transport Issues and Challenges (pg26)**

The AA supports the RLTP's key transport issues and challenges aligning with the five strategic objectives as mentioned above. The weighting of the urgency of these transport issues is a difficult task although the outcome of the weightings seems logical.

### Section 2.3 Key Opportunities (pg 31)

This section sets out the RLTP key opportunities including the Metro Spatial Plan, rail investment, and sustainable regional development opportunities.

What is missing in the AA's view is the key opportunities which will accrue from investment in strategic roading projects - such as the extension of the Waikato Expressway - which will bring enormous economic, safety and environmental benefits to the region.

AA Research Foundation (AARF) research on the '*Safety Benefits of New Roads*' has recently found on average there has been a 37% reduction in deaths and serious injuries in locations where new roads or bypasses have been built, including sections of the Waikato Expressway.

We seek that the RTC review this omission and include investment in strategic roading as a key opportunity in the final RLTP.

### Section 3.3 Summary of regional transport priorities (pg41):

We support the RLTP ten-year strategic land transport priorities as set out on page 42. We offer the following comments on the regional land transport priorities:

#### Climate change

The AA supports the priorities to reduce transport emissions and transform towards an environmentally sustainable, low-carbon transport system. This is consistent with the AA's new Strategic Plan which focusses on sustainability of transport and aims to help drivers reduce their transport emissions.

#### Resilience

The AA supports the RLTP priorities for resilience by maintaining the transport system, ensuring community access and building regional resilience.

The AA submits that maintaining the current transport system is a key priority for the RLTP. Our roads carry the overwhelming proportion of travel by all modes on our land transport network and failure to maintain and operate them both effectively and efficiently can result in adverse impacts for the communities, cities and regions they connect.

Road surface quality has been the top concern of our AA members across all the transport surveys the organisation has conducted over the past five years and our members levels of dissatisfaction have continued to grow. The general public has become equally concerned about the state of our roads as the deterioration has become more visible over the past two

years. As the core problem is the decline in the quality of our road surfaces, resolving this is primarily about renewals work – re-surfacing roads and replacing road foundations.

In the AA's view, elevating road maintenance and renewals to strategic importance and providing a commensurate amount of ongoing funding for it is essential. There is a pressing and growing need to catch-up on the backlog of deferred work, to start to turnaround the unacceptable state of our road networks and respond to very strong public sentiment that this problem needs to be urgently fixed.

We consider it is not good practice to defer road maintenance costs to future generations. There needs to be a recognition of the value that good maintenance can deliver in terms of broader outcomes in particular environmental and social well-being and reducing the long term whole of life cost and safety.

We submit that maintenance of the transport network needs to be made clearer up front in the RLTP by specifying that maintaining and operating the transport system is the overarching priority for the draft RLTP 2024.

Building regional network resilience is also a crucial matter for the Waikato region. In an AA Member survey that asked about 12 potential election calls for Government action on transport a top priority was, *'Make the roading network more resilient to extreme weather events'*.

Improving the resilience of our road network needs to become an urgent ongoing priority and the AA is pleased to see this recognised as a critical priority in the RLTP.

#### Managing Growth and Economic Development

The AA supports the RLTP priorities for growth and economic development including implementing the Metro Spatial Plan Transport Business Case programme, future proofing and optimising priority strategic corridors (road and rail), resolving rail constraints and building capacity.

#### Accessibility / Transport Options

The AA support the priorities for accessibility and transport options to shape urban form toward growth and mode shift and providing transport options and secondly target intervention to recognise different transport and accessibility needs across the region .

#### Safety

The AA supports the RLTP priority for safety which is to implement the Safe System approach for the Waikato Region with a focus on speed and infrastructure, education and behaviour change for high-risk and vulnerable users, and enforcement.

As noted in the draft RLTP and the associated evidence document, the Waikato region has a very poor road safety record and we support implementation of the Safe Systems approach.

The AA notes that “Safety” remains a strategic priority under the draft GPS 2024, but its primary objective has changed from “*develop a transport system where no-one is killed or seriously injured*” under Road to Zero to “*transport is made substantially safer for all*”. The commitment to the Road To Zero target of a 40% reduction in deaths and serious injuries by 2030 also remains but the emphasis on ‘Vision Zero’ in the GPS has gone.

The AA supports the proposed change. We understand and continue to support the 2030 target but consider that Road to Zero has ended up being seen as unrealistic by New Zealanders and has become somewhat polarising. It has therefore not achieved the necessary cut-through to start making meaningful progress towards the targets.

We think the change in language to focus on a “substantially safer” transport system will resonate much more closely with the public. This is because it is much more in-line with most New Zealanders’ views on road safety – that reducing the number of deaths and serious injuries on our roads is an important priority but it needs to be balanced alongside other transport priorities. The new focus should make it easier to communicate about road safety and should also mean people are more likely to be receptive to this communication.

The AA understands, via the MOT website in Feb 2024, that Road to Zero will be replaced with an objectives document that sets out the National/ACT/NZ First Coalition government’s road safety priorities<sup>1</sup>. This needs to be acknowledged in the RLTP as a pending fundamental shift in Government road safety policy.

Sections 3.4 to 3.8 Strategic Policy Templates

Our comments on the strategic policy templates in sections 3.4 to 3.8 are set out below:

<p>3.4 Climate Change Template (pg43)</p>	<p>P1 – We support the policies outlined in the bullet points. NZAA advocate for more EV charging stations.  P2 - We support policy to improve efficiency of strategic freight routes.  A 6 – We support inter-regional work to improve inter-regional connections.</p>
<p>3.5 Resilience Template (pg46)</p>	<p>P6 – We support policy to improve resilience and route security of key strategic corridors and lifeline routes with the focus on SHs 1,2,25,25A and 3.  P8 we support best practice standards and the inclusion of maintenance standards.  P10 planning for anticipated effects of climate change is supported.  AA submits that a new Action be inserted to prepare a clear plan for improving the resilience of major roads most at risk in the region or where the consequences of a road</p>

<sup>1</sup> <https://www.transport.govt.nz/area-of-interest/safety/road-to-zero/>

	<p>being impassable are most significant. It also means carefully considering opportunities to improve resilience when planning road construction, renewals and maintenance work.</p> <p>AA strongly supports Investment in maintenance of our transport system as being Priority 1 under the Case for Investment in the region's investment priorities (Pg47)</p>
3.6 Growth and Economic Development template (Pg49)	<p>P15 – We support planning for future rail opportunities between Hamilton and Tauranga.</p> <p>P 20 – We strongly support policy to develop and maintain the use of SH1/29 as the primary strategic corridor between Auckland Waikato and BOP.</p> <p>A6 – We strongly support aligned infrastructure and spatial planning between Waikato and BOP regions.</p>
3.7 Accessibility/Transport Options template (pg53)	<p>P29 – We support a new funding model for public transport across the region.</p> <p>P32 We support policy that provides for urban form that support greater use of walking, cycling and public transport.</p>
3.8 Safety	<p>P40 – We note the RLTP following Road to Zero approach but note this will change in the future and the policy needs to be rewritten (refer comments above)</p> <p>P41 – We support planning and implementation of safe speed and infrastructure via the RSMP but note that speeds must be set in accordance with robust data to ensure appropriate speeds are implemented. The most effective approach is evidence-based decision-making using nationally consistent rules and taking into account the road environment and drivers behaviour.</p> <p>Actions – In general NZAA is surprised at the small list of actions in the Safety template when considering the magnitude of the safety problem in the Waikato.</p> <p>We submit that there should be a stand-alone action advocating for greater enforcement of safety in the region</p> <p>A2 – We support the Regional Road Safety Forum and the NZAA has appreciated being a long term member of this Forum.</p> <p>We suggest a new action be included to develop a Regional Road Safety Strategy which is a project listed in the regional programme of activities.</p>

Section 4 – Regional Programme of Activities (pg 62)

Prioritised significant transport activities (pg 64)

AA comments on the prioritised significant transport activities are set out below.

4.3.1 Regionally Significant activities (pg 64)	We support the Top 10 priority activities. Priority 4 activity – Cambridge to Piarere long-term improvements are strongly supported by the AA and is the AA highest priority project in our District. We encourage the RTC to continue to strongly advocate for funding for the implementation of this project. We also suggest that the RTC advocate for the Expressway to be ultimately extended to Tirau where it would join with SH27 and SH5.
Contribution of Road Policing Activity (Pg 66)	We support the key priorities for NZ Police of restraints, impairment (both alcohol and drugs), distractions (cellphones) and speed. Saliva-based roadside drug testing devices need to be introduced as soon as possible by Police and alcohol testing numbers need to return to their previous high levels.
4.4 Inter-regionally significant activities (Pg68)	The inclusion of the SH1/29 inter-regional corridor between Waikato and BOP as an inter-regionally significant activity is supported by the AA. The corridor is not fit for purpose with the light and heavy traffic volumes currently being experienced and expected to grow significantly as population and freight growth increases.

## Chapter 5 Funding the RLTP

The AA notes that the RLTP has been prepared in a very constrained funding environment and in the absence of the new GPS all the signals are the funding envelope across all activity classes will be very restricted.

In light of the breadth and depth of the funding constraints compared to previous RLTPs this reinforces our AA submission which seeks prioritised funding for maintenance firstly and clear support of the RLTP priority activities, particularly the Cambridge to Piarere Expressway extension.

We expect to see new funding and financing tools introduced by the new Government to allow more large transport projects to happen faster. These may include tolling, electronic road user charges, public private partnerships (PPPs) and congestion charging.

The potential changes to funding is recognised in this Chapter and it is acknowledged in the RLTP with the statement that the RLTP may need to be varied if significant changes to the programme are made through the new GPS.

Appendices (Pg 94)

Appendix G Transport Activity Tables (pg 102)

Table 1 Maintenance and Renewals for State Highways	NZAA supports investment in maintenance and renewals on SHs and hopes this investment level is appropriate for current needs.
Table 2 Maintenance and Renewals of Local Roads	NZAA supports investment in maintenance and renewals on local roads.
Table 3 New and improved infrastructure for State Highways – Funding Committed	NZAA support the committed SH projects.
Table 5 New and improved Infrastructure for State Highways	NZAA supports the table of new and improved SH projects. We are pleased to see specific funding allocated for the implementation of Cambridge to Piarere Expressway extension. NZAA would have liked to have seen funding for Southern Links SH projects in this table. This is another high priority for the AA. We also note that Southern Links implementation for SHs is not included in NZTA’s SH Investment Programme (SHIP).
Table 7 Road Safety	We support the commitment to road safety by the NZTA and local authorities as outlined in Table 7.
Table 8 Investment Management	We support investment for the PBC for SH29 Piarere to Tauranga. We support the Regional Road Safety Strategy project.

Appendix H: Significant Transport Activities – Priorities List (Pg 125)

AA in general supports the Prioritised list of transport activities outlined in Appendix H.

Priority 4	We support SH1 Cambridge to Piarere as the No 4 priority on the list confirming this project as a very high priority for the Waikato Region.
Priority 2	We support the Coromandel, Hauraki resilience rebuild as being priority No 2 following the cyclone events of 2023.
Priority 37	We submit that the PBC for SH29 Piarere to Tauranga should be lifted in the priority order. The low priority order of this project does not reflect the higher priority given to this inter-regionally significant corridor in the wider RLTP.
Missing	We note that the Southern Links state highway implementation projects are not included in the priority list. This is a gap.



## Conclusion

In conclusion we again thank the RTC for the opportunity for the AA to submit on the Draft 2024 RLTP.

We congratulate the RTC and staff for preparing a robust RLTP in the face of changing Government priorities and the lack of a new Coalition Government GPS on Land Transport.

We look forward to seeing the finalised RLTP following the release of the new GPS with hopefully increased funding for maintenance and renewals as well as confirmation of regionally significant transport activities such as the SH 1 Cambridge to Piarere Expressway extension and Southern Links implementation amongst others.

We wish to present this submission to the RTC in the Hearings. If the GPS comes out before we appear before the RTC, our presentation may take into account any changes in that document so may differ in parts from our submission.

Yours sincerely

Bill McMaster  
Chairman

The New Zealand Automobile Association Incorporated Waikato District Council  
313 Barton Street, PO Box 9032, Hamilton 3204