

Submission to Waka Kotahi, Ministry of Transport

Draft Government Policy Statement (GPS) on land transport 2024/25-2033/34



15 September 2023

Introduction

The Timaru District Council (the Council) thanks Waka Kotahi, Ministry of Transport (the Ministry) for the opportunity to submit on the Draft Government Policy Statement (GPS) on land transport 2024/25-2033/34.

This submission is made by the Timaru District Council, 2 King George Place, Timaru. The submission has been endorsed by Mayor and the Infrastructure Committee Chair. The contact person for Council is Nigel Bowen, Mayor of the Timaru District, who can be contacted at Timaru District Council, phone (03) 687 7200 or PO Box 522, Timaru 7940.

The contact person regarding the submission content is Susannah Ratahi, who can be contacted via Susannah.Ratahi@timdc.govt.nz. We do not wish to speak to this submission.

We have read, provided feedback, and support the Canterbury Regional Transport Committee (RTC) and Canterbury Mayoral Forum (CMF) submission. We have read and support the Taituara submission.

Overview of Land Transport in Timaru District

The Timaru District Council (TDC) is a local authority in the South Island serving over 48,000 people in South Canterbury. The main settlement is Timaru, with other smaller settlements of Geraldine, Pleasant Point and Temuka.

The Timaru District is a sub-regional centre in Canterbury with a strong primary and industrial base that provides a significant contribution to the Canterbury and New Zealand economy. The District has its own international port, Primeport Timaru, and a regional airport with scheduled passenger services.

The South Island has braided rivers, a unique feature which requires a bespoke solution when consider how these rivers can affect bridges and roads within the Canterbury region. Funding to more effectively manage rivers across the country is required, in Timaru District, we have the Te Moana River, amongst others that do not sit within a rating district with the territorial authority, meaning that the maintenance is left to adjacent effected landowners, however, this is generally not completed and if so, it is ad hoc, the ability to maintain a resilient network is not achieved. There is wider national benefit to ensure these rivers and therefore transport network is accessible for movement of goods and people.

Our local roads and wider transport network are critical enablers of the freight sector and underpin nationally significant primary industry supply chains. We consider that our transport infrastructure is essential to the economic development of our District, and the resilience and connectedness of our community.

General comments

Overall Council supports the strategic priorities as outlined in the Draft Government Policy Statement (GPS). We support the introduction of *maintaining and operating the system* (emphasis added) as a new strategic priority in this GPS. However, Council notes that local road improvements now include R27, which will mean an overall reduction in improvement funding making speed. This unintended consequence will make reduction of speed management harder to implement.

Council recognises that severe weather events have meant that North Island roads require a greater funding percentage, however Timaru District and the South Canterbury area provides 78% of food and fibre exports, ¹ to be able to continue to deliver this percentage of exports, adequate and resilient roading is necessary.

Canterbury is the largest region in New Zealand by land area and as stated in the RTC/CMF submission, outside of Christchurch, the population is widely spread and rely heavily on road transport. Those living outside of Timaru, but within the District, need to travel significant distances to access basic services.

Only within the Timaru is there a reliable alternative transport option through MyWay by Metro, this has seen great growth since trial implementation and is up 635 passengers per week² on pre covid levels, which is contra to what is being seen across the country for public transport use. There are sparse bus services between Temuka and Timaru, with less services being offered from Geraldine and Pleasant Point, via the Community Vehicle Trust. These initiatives for public, on demand transport solutions have been driven as a response to the needs of the residents. This collaboration reflects outcomes that can be achieved when both tiers of government work together harnessing the expert knowledge of local government.

Summary of changes sought

Do you agree with the strategic priorities and direction are outlined in GPS 2024?

1. Council supports the primary objective that the existing transport system is maintained efficiently at a level that meets the current and future needs of users and strongly support resilience of a new investment priority.
2. Council is committed to the need for resilience within the environment. Adverse weather effects and risks of rising waters is well known within the region. Council

¹ [The Contribution of primary exports from Timaru and South Canterbury to New Zealand](#) Page 5, Written April 2023.

² <https://www.ecan.govt.nz/get-involved/news-and-events/2022/on-demand-public-transport-looks-to-the-future/> written 9 March 2022.

recognises the effects of climate change within the district through building resilience in Council business and adaptation of Central Government strategies, as well as Council's own strategic plans.

3. The Timaru District has braided rivers, which has unique geographical issues that appear not to be considered in the GPS. Without having resilient rivers, including braided rivers, then it is highly likely the priority to achieve resilient road works may not occur.
4. Timaru District, like most areas, have an aging population. Based on 2022 Infometrics data, Timaru had 0% regional growth. For the same period 43.4% of the population were aged 50 plus, which is an increase of 2% since 2012. The draft GPS is silent as to how funding will support accessibility for those who need support accessing transport.
5. The GPS accurately describes that roading is a co-funded programme with local and central government both seeking solutions to invest and future proof the infrastructure.
6. Local governments, however, are required through the mechanism of Annual Plans and Long-Term Plans to ensure funding is reviewed not only by auditors but also local people who use the transportation. The GPS lacks accountability to the forecasting of the funding that will be made available. A clear example of this is the draft GPS the increase of 18 percent for local road maintenance activity, does not consider the deferred work and this merely 'catches up' on this and does not support any increase in the strategic direction of resilience.

Do you have any comments on the Strategic Investment Programme?

7. Council supports the proposed SH1 Christchurch to Ashburton as the Christchurch Northern Corridor, however Council considers that this corridor needs to be expanded down to the Port of Timaru through to Waipara. This reflects the reality of the journey of products through the Canterbury region.
8. Council holds concerns about the state of SH1 as it travels through Timaru. SH1 is the lifeline that moves through Timaru connecting transport of goods, services, and tourist throughout the South Island.
9. There are issues around the sealing of section of SH1 around the Showgrounds and the lack of clarity from Waka Kotahi in the response provided to Council.
10. Commitments from Waka Kotahi was that the corridor was going to be full re-hab and yet as of 5 September 2023, Council has been advised that the re-hab of the SH1 would only be particle.
11. There are three key bridges within this expanded corridor (Rakaia, Rangiatata and Ashburton) were built in the 1930s, and therefore their life will come at the same time. This would mean that there will need to be an increase of funding for this period to cover the cost of design and construction for the replacement of these bridges in the next 10 years.
12. Bridges spread throughout the east coast of the Canterbury region are necessary to allow access for transportation of goods and people. In 2021, the Canterbury floods

shut the area off as bridges were closed. Any alternative route is neither viable, nor cost effective.

Do you agree with the funding increases associated with the GPS 2024?

13. Increasing the GPS funding is both welcome and fully supported. Council wants to ensure that its increase in funding reflects an actual increase in funding over the life cycle of the GPS, and therefore holds concerns of the drop off of funding after the first three years.
14. As stated above, the Timaru District and the greater Canterbury area have specified needs that are different from the North Island. Braided rivers require a different solution for resilience than regular rivers.
15. Cost escalations are over 20% for most RCAs, and there doesn't appear to be any economic forecast showing that cost escalations will decrease. The draft GPS figures does not reflect those cost escalations.
16. As stated in the Taituara and RTC/CMF submissions Council requests a higher share of national expenditure returned to be spent in Canterbury. This request is based on Canterbury having 16% of the national roading network by length, 12% of the population but only receiving just 5-8% of forecast National Land Transport Programme (NLTP) expenditure.
17. The 18 percent (lower) for road maintenance only really covers the cost escalations for local road Maintenance Operations and Renewals (MOR) Maintenance has been deferred from ten years ago, however there is a need to catch up on this maintenance and more ongoing funded is required.
18. To support the strategic outcome within the GPS, Council suggests that Waka Kotah pivot away from nominal percentage increases in funding, to a funding modelling that reflects the true costs to achieve the outcomes.
19. As stated, the Canterbury region has the greatest roading network by length and the most traveled roads on the South Island for goods transport and recreation vehicles. Funding needs to reflect the need for a viable, resilient, future proofing roads is to cost the real and actual costings and then apply funds accordingly.

Do you agree with the Ministerial expectations as outlined in GPS 2024?

20. Council fully supports the statement from RTC/CMF submission stating, "At a time when Te Waihangā and government are calling for a forward pipeline of planned investment, the transport system is decarbonising and the legislation that underpins how we manage land use is also changing we need to ensure the sector is well-resourced to provide investment certainty and confidence".
21. Council supports the intention of the Ministerial expectations of "build back better". The policy however is unclear as to how the emergency works funding policy will deliver those expectations.
22. Council is unsure if this GPS will be able to build sector capacity when the available funding for investment management is proposed to decrease.

Recommendations

23. Transport solutions are the purview of both tiers of government. Supporting local government GPS Land Transport Funding should be adopted no later than 15 months before the commencement of the first year to which they relate. This will allow local government to utilise this information into their Long-Term Plans.
24. Increasing the strategic investment programme within Canterbury transport corridor to reflect the reality of the road usage within the region.
25. Funding from Central government needs to reflect the population and length of roads, rather than any other mechanism. Increase the funding allocated to Canterbury to reflect the use and contribution of roads within the national context.
26. Local government is limited in the levers able to meet the strategic outcomes or Ministerial expectations, therefore securing adequate funding in this GPS will be a major challenge but required from Central government to be successful.
27. North Island solutions will not necessarily work within the South Island due to the environmental and socio-economic differences. We recommend a GPS that is more tailored to the needs of local communities.

Conclusion

Thank you again for the opportunity to submit on the GPS. We thank the staff within MoT for preparing it, ensuring readability and clarity for local officers. Please do not hesitate to contact us via [SME's contact details] if you have any questions or wish to discuss aspects further.

Ngā mihi



Nigel Bowen
Mayor