

Date: Friday 15 September 2023
Time: 8.00am
via Zoom

Joint Nelson Tasman Regional Transport Committee

Komiti Te Kawenga Rohe o Nelson Tasman

ATTACHMENTS

ATTACHMENTS UNDER SEPARATE COVER

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5.1 Nelson Tasman joint submission on the Government Policy Statement for Land Transport (2024)	
1. Joint submission from Nelson City Council and Tasman District Council to the Ministry of Transport on the Government Policy Statement for Land Transport (2024)	3

Note: The reports contained within this agenda are for consideration and should not be construed as Council policy unless and until adopted.

4 September 2023
Te Manatū Waka Ministry of Transport
Wellington
gps@transport.govt.nz

Tēnā koe

Nelson-Tasman submission on the draft Government Policy Statement on Land Transport 2024

Thank you for the opportunity to submit on the draft Government Policy Statement on Land Transport 2024 (GPS). Nelson City Council and Tasman District Council largely support the draft (GPS). This is a joint submission that reflects the views of both Councils.

Overview

Nelson City Council and Tasman District Council (Nelson-Tasman) are adjacent unitary councils with a shared transport network. The two Councils recognise this shared network through a Joint Regional Transport Committee.

The Nelson-Tasman region has a combined population of 113,200. Our economy is primarily based on primary production and processing, with many of our products being exported through Port Nelson. Port Nelson is the only exporting port in New Zealand not to have a rail connection. Additionally, most of the access to Port Nelson (and, by extension, the Nelson City Centre) is from the south, which is limited to two corridors that run parallel to each other due to the geographic constraints of the mountains and the coast.

Growth is predominantly happening south of the city centre, meaning the southern corridors are key routes for economic and social opportunities. However, this is also a critical vulnerability for the entire Nelson-Tasman region. Our region relies heavily on our roading network, and ensuring that these southern corridors are resilient and fit for purpose is a key issue for us.

Strategic Investment Programme

Nelson-Tasman strongly supports the inclusion of the Hope Bypass and Rocks Road shared path in the Strategic Investment Programme. Whilst both are considered important for the region, the Hope Bypass is seen as the highest priority for the Nelson-Tasman region. This acknowledges that the Rocks Road project has significantly more consenting and design challenges than the Hope Bypass. Notwithstanding the priority of the Hope Bypass, we strongly support continuing with the Rocks Road shared path (including design and consenting). We are also concerned that the specific funding for projects in the Strategic

Investment Programme is not visible in the GPS. We recommend that the GPS explicitly confirm the funding of these projects so that there is more certainty that these projects will proceed.

Activity class expenditure upper and lower limits

Nelson-Tasman is highly supportive of the increase in local road maintenance funding. However, there is concern about the lack of transparency in how this activity class is allocated to Road Controlling Authorities by Waka Kotahi, with an inherent risk that maintenance funding will continue to be insufficient as has been the case in previous GPS iterations. Maintenance must be treated as the highest priority to protect the investment we have made in our road networks and ensure they are managed cost-effectively in whole-of-life terms.

Councils have little to no visibility on the funding process and how investment levels are assessed. Previous staff analysis using published data from Waka Kotahi indicates that Nelson-Tasman receives a low ratio of funding from the National Land Transport Fund (NLTF) in comparison to what the regions contribute. In addition, the maintenance funding we have received is well below what is considered sustainable for our assets. We recommend making the funding and bid assessment processes more visible to Councils, including confirming a 'top-down' allocation process to ensure each region's maintenance programme is adequately funded.

Nelson-Tasman supports the increase in walking and cycling funding, particularly in using Climate Emergency Response Funding (CERF) for this activity. We also support identifying these projects for funding by CERF at the same time as all other work programmes for inclusion in the Regional Land Transport Plan (RLTP). In the past, funding opportunities for walking and cycling have often been part way through the NLTP term, which does not allow appropriate time to bring our communities along with us on the journey to develop and implement these important projects.

We request that the current pipeline of projects that have completed the pre-implementation stages be continued in the NLTP, even if there is a change in government. Nelson-Tasman has invested heavily in financial and staff resources to get projects to the point of implementation and is concerned about potential wastage if central government abandons these projects.

Local Government Funding Constraints

Local government funding constraints in 2024-2027 are likely to be even worse than previous NLTPs. This means that we will be severely constrained in providing local share in order to access improvement, safety and walking & cycling funding in the GPS.

It is clear from experience in 2021-2024 that providing enhanced Financial Assistance Rates (FAR) to Local Government enables the delivery of more projects and therefore better

outcomes in line with the objectives of the GPS. We recommend that the GPS strongly signal where enhanced FARs will be available, to reduce the risk of non-delivery of improved outcomes. Further, these enhanced FARs need to be signalled early in order for delivery to be achieved within the 2024-27 period, as evidenced by national delivery challenges in the current Transport Choices Programme.

Proposed increases to FED and RUC

We are concerned about the uplift in the Fuel Excise Duty (FED) and Road User Charges (RUC) due to the impact on Tasman residents. Tasman is a rural region with lower incomes than the national average, and many of our residents have no viable alternative means of transport. We are concerned that Nelson-Tasman residents will be disproportionately affected by these increases and that there will be a net transfer of funds to other regions with more transport options and a more urbanised compact form.

We recommend that there is no increase in the FED and RUC until inflation is at acceptable levels and that the Minister hastens the implementation of a fit-for-purpose revenue system for land transport. Nelson-Tasman acknowledges that the work being undertaken by the Ministry of Transport (MOT) on sustainable funding for transport is complex and is likely to have widespread community impacts. We therefore recommend robust engagement with key stakeholders, including local government, and that this work progresses with urgency.

Conclusion

Overall, we are largely supportive of the draft GPS. Thank you for the opportunity to make a submission.

Recommendations

1. That the GPS explicitly confirms funding for projects in the Strategic Investment Programme.
2. That the Hope Bypass is advanced as the highest priority for the Nelson-Tasman region.
3. That the local road maintenance funding process and bid assessment process is made more visible and transparent, to ensure road maintenance is adequately funded as the highest priority in the GPS. This includes confirming a 'top-down' allocation process to ensure each region's maintenance programme is adequately funded.
4. That the current pipeline of projects that have completed the pre-implementation stages are continued in the NLTP even if there is a change in government.

5. That the GPS signal enhanced FARs for safety, improvements and walking and cycling projects to enable Local Government to deliver improved outcomes in their areas.
6. That the FED and RUC do not increase until inflation is at acceptable levels.
7. That the Ministry of Transport progresses its work on sustainable transport funding more quickly.

Key points we support

1. The inclusion of the Hope Bypass and Rocks Road shared path in the Strategic Investment Programme.
2. The increase in local road maintenance funding.
3. The increase in walking and cycling funding, particularly with the use of Climate Emergency Response Fund (CERF)
4. Identifying walking and cycling projects for funding by CERF at the same time as all other programmes of work for inclusion in the RLTP.

Yours sincerely,

Nelson City Council and Tasman District Council

Stuart Bryant

Chair – Joint Nelson Tasman Regional Transport Committee

Nick Smith

Mayor, Nelson City

Tim King

Mayor, Tasman District