

Feedback submission on Draft Government Policy Statement on Land Transport 2024-34

This feedback submission has been prepared by Northland Transportation Alliance on behalf of Far North District Council roading and transportation.

System Reform

We endorse the proposed system reforms aimed at amending the Land Transport Management Act to incorporate a 10-year investment plan that harmonizes with Local Government procedures. Additionally, we advocate for the implementation of a 30-year strategic infrastructure plan.

However, our support comes with recognition of significant challenges. Plans lacking secure funding fail to instill confidence within the industry. Establishing a transparent and committed program of works, accompanied by guaranteed funding sources, is imperative to instigate economic growth. Moreover, this approach facilitates the development of more efficient delivery models for long-term maintenance contracts, ultimately reducing operational costs.

Another obstacle we face is the misalignment and untimely release of the Government Policy Statement (GPS), which does not synchronize with Local Government timelines—a concern we've communicated through various feedback channels. While we acknowledge the shift from the previous administration's approach, releasing the GPS so late in the local government cycle, when most long-term plans and budgets are already under consultation, necessitates additional administrative efforts to align. This contradicts the objective of reducing administration and overheads as outlined in the GPS.

Strategic Priorities

Economic Growth and Productivity

We would like to highlight a notable oversight regarding the Roads of National Significance (RoNS) program. Specifically, there seems to be a lack of acknowledgment regarding the importance of the 'Alternative to Brynderwyns' route in Northland.

It's crucial to recognize that this route plays a vital role in the economic connectivity of Northland with the rest of New Zealand. Geotechnical reports indicate that in the event of a catastrophic failure, there is a significant risk of economic isolation for the region.

Given the potential implications for regional economic growth and productivity, and resilience, we urge decision-makers to reconsider the significance of this project within the context of national transportation priorities. Addressing this issue proactively is essential to ensure the continued economic viability and stability of Northland, as well as to safeguard against potential disruptions to national supply chains and connectivity.

It's important to note that the Whangarei to Port Marsden rail project has not been included in the land transport program. This omission raises concerns regarding the potential implications for regional connectivity, economic development, and transportation efficiency.

Given the significance of rail infrastructure for both freight and passenger transportation, the exclusion of this project warrants further scrutiny. It is crucial to assess the reasons behind its absence from the land transport program and consider the potential impacts on the region's transportation network and broader socio-economic factors.

Addressing this omission may require advocacy efforts to highlight the importance of the Whangarei to Port Marsden rail project and its potential benefits for the community, industry, and overall regional development. Engaging with relevant stakeholders and decision-makers to prioritize and incorporate this project into future transportation planning initiatives is essential to ensure comprehensive and sustainable infrastructure development.

We acknowledge the government's focus on addressing congestion issues in Auckland and Wellington through proposed directions for public transport. However, we express concern that this emphasis may inadvertently overlook the needs of lower socio-economic areas, where communities heavily rely on public transportation as their primary mode of travel.

Potential closures or service reductions in these socially important areas could severely impact residents who have limited or no alternative travel options. Such measures could compel affected individuals to resort to using unregistered, unroadworthy, and unsafe private vehicles, leading to an increased risk of fatalities and serious injuries on the district's roads.

It's essential to recognize the broader social implications of transportation decisions and ensure that public transport services remain accessible and reliable for all communities, particularly those with vulnerable populations. By prioritizing equity and accessibility in public transportation planning, we can mitigate the potential adverse effects on lower socio-economic areas and promote safer, more sustainable travel options for all residents.

Increased maintenance and resilience

We endorse the GPS directions aimed at enhancing maintenance levels and bolstering resilience on our local and rural roads. However, we have reservations regarding the ring-fenced prioritized pothole funds, which are intended to ensure that our roads are maintained to a higher standard.

Clarity is essential regarding what constitutes a "higher level of service." Specifically, we seek clarification on this term.

Furthermore, the proposed contract review, which suggests an increased requirement to "fix potholes within 24 hours," raises numerous questions. These include inquiries about the definition of a pothole size, the implications of potential variations to existing contracts, and the potential claim costs associated with these changes and the ability for these to be funded. Clarification on these matters is imperative for informed decision-making and effective implementation.

We further support the use of the Road Efficiency Group (REG – Te Ringa Maimoa) in aiding industry to find efficiencies and reducing expenditure on temporary traffic management, although this may be a larger piece of work involving many government and industry stakeholders.

Safety

We support the GPS strategic priority to invest in road policing and road safety promotion to promote safer driving.

Support is also extended to the government's enactment of legislation for "roadside oral testing." The prevalence of illegal substance use among drivers in Northland has reached unacceptable levels, presenting a pressing and urgent concern that demands resolution.

Implementing roadside oral testing measures is a crucial step towards addressing this issue effectively. By enabling law enforcement agencies to quickly and accurately detect drug impairment among drivers, this legislation can help deter and prevent instances of drug-impaired driving, thereby enhancing road safety in Northland and beyond.

Given the severity of the situation, prompt action is essential to safeguard lives and prevent further harm caused by drug-impaired driving incidents. The enactment of legislation for roadside oral testing represents a proactive and necessary response to the growing threat posed by illegal substance use on our roads.

We express concerns regarding the blanket approach to reverting previously consulted and adjusted speed limits, especially around schools and urban areas. Our apprehension stems from the perceived lack of funding allocated for safety improvements. The statement suggesting that "where subsequent safety investments are made, speed limits should be restored to prior speed limits" implies that achieving higher speeds would necessitate a higher level of investment, rather than adjusting speeds accordingly.

Value for money

To ensure value for money, we advocate for a comprehensive "whole of life" perspective. This approach entails considering the entire lifecycle of projects, from conception to decommissioning, to maximize efficiency and

minimize long-term costs. Additionally, we endorse enhanced collaboration among funding entities, designers, and contractors. Such collaboration is essential for refining industry practices and achieving both value for money and improved contract outcomes. By working together closely, stakeholders can leverage their respective expertise to optimize project performance and deliver superior results.

Investment in land transport

The proposed funding gap of \$3.1 billion raises significant concerns regarding the adequacy of the proposed revenue increases to address this challenge. We believe that the current approach may not sufficiently bridge the gap, highlighting the need for a comprehensive review of the funding strategy for road infrastructure.

Given the magnitude of the shortfall, it is essential to reassess the entire funding strategy to ensure its effectiveness in meeting the infrastructure needs. This review should encompass a thorough examination of existing revenue sources, potential alternative funding mechanisms, and strategies to optimize resource allocation.

Addressing this funding gap requires a holistic and strategic approach that considers the long-term sustainability of funding mechanisms while also prioritizing the urgent infrastructure needs. It is imperative to engage stakeholders across various sectors to collaboratively develop a robust funding strategy that can adequately support the maintenance and development of our road network.

Our final commentary pertains to the allocation of funding directed towards safety initiatives. It's crucial to highlight that Northland, representing one of thirteen regions, accounts for a disproportionately high percentage of the nation's death and serious injuries (DSIs). Consequently, safety funding should be strategically focused on regions that are overrepresented by such statistics.

Given Northland's significant contribution to the national DSI figures, prioritizing safety funding in this region and within the Far North District is imperative. Allocating resources to address the specific challenges and factors contributing to the high incidence of DSIs in Northland can lead to more effective safety interventions and ultimately reduce the toll of accidents and injuries.

By targeting safety funding where it is most needed, we can work towards creating safer road environments, enhancing transportation infrastructure, and ultimately saving lives in regions like Northland that are disproportionately affected by road-related incidents.
