

HURUNUI DISTRICT COUNCIL

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Ministry of Transport
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Wellington

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Hurunui District Council submission on the draft Government Policy Statement on land transport 2024

This letter and the attached response to your questions make up our submission.

Overall, we are supportive of the direction of the draft GPS and the increased focus on improving the maintenance and resilience of our local roads aligns with our top investment priorities as stated in our activity management plans and infrastructure strategy. Our expectation is that the increase of revenue generated under this GPS will ensure the funding application we have submitted for the 2024 – 2027 RLTP will be met in full.

We note general concern that the overall level of investment in the current RLTP is insufficient and the purported FAR of 52% is in reality 35% because the District's ratepayers and contributing well in excess of the RLTP. Even with that increased level of local investment, the network is degrading and this something we are provisioning for in our long term planning.

We are of the opinion that the way roading is funded in New Zealand is flawed, as the funding is focussed on operational and maintenance issues. As such it does not consider intergenerational equity in funding of assets and does not encourage depreciation of those assets to fund future replacement. It is our view that it is appropriate to debt fund long life asset investments such as bridges, and to fund depreciation of those assets to ensure future generations pay their share and are not saddled with the entire end of life replacement costs.

Our context

Hurunui District is one of the largest nationally with a population ~12,500 and a roading network of 1,500km of roads and 280 bridges. We share boundaries with eight other territorial authorities, most notably, Waimakariri district to the south and Kaikoura to the north. Large portions of SH1 and SH7 (& 7a) travel through our district, with Route 70 a permanent highway for over-dimension vehicles, unable to travel through the tunnels of Kaikoura. This road continues to serve as the alternate SH for the high risk Hundalees section of SH1.

With our location and proximity to towns and cities, there is effectively no transport choice other than private vehicle, which makes the people from this district entirely dependent local roads. The predominance of low-volume, high-value roads in Hurunui requires greater investment in ongoing maintenance and renewals to ensure our network can continue to support regional and national social and economic outcomes.

Hurunui District Council feedback on the draft Government Policy Statement on land transport 2024

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

1. We strongly support the introduction of *Increased maintenance and resilience* as a new strategic priority in this draft GPS. Maintenance is the top investment priority in our long term plans, which have good alignment with the direction of this draft GPS.
2. We strongly support the emphasis placed on resilience as a strategic priority in this draft GPS. Increasing the resilience of our transport network is critical to our remote communities. One very real example was losing a road to the high equinox tides on our eastern coastline in July 2023. This damage meant the loss of throughput for a highly productive farm and the inability for the local GP to attend their practice.
3. We agree with the minister's expectations for a focus on value for money, particularly with temporary traffic management. We have seen job costs increase up to 17% of the total works. In many of the remote low volume roads, the current model for traffic management can introduce unnecessary costs, where a pragmatic approach to safety can easily be achieved, resulting in significantly reduced TTM costs.

Do you agree with the overarching priority of economic growth and productivity outlined in the draft GPS 2024?

4. We applaud the thinking behind the RoNS but urge the inclusion of the Conway Bridge specifically. Much in the same manner as the Woodend Bypass and the Ashburton bridge. This bridge carries all over dimension traffic between Kaikoura and Christchurch and is often used as the alternative to SH1 when the vulnerable Hundalees is out of use. During the time of their existence, NCTIR understood the importance of this route (70) and prepared a business case for end of life bridge replacement. Since being handed back, this bridge, currently a SPR, has been weight restricted and will likely be further restricted for affordability reasons, removing its ability to carry this level of traffic, causing significant productivity inefficiency and economic loss, as the alternate route is via Nelson and Murchison.
5. For the 2021-24 period, Canterbury received just 5-8% of the forecasted National Land Transport Programme (NLTP) expenditure, despite our region representing approximately 12% of the New Zealand population and having over 16% of the national roading network. Canterbury continues to experience significant population and economic growth, often ahead of national averages. Economic GDP growth in the region continues to be strong with a 2022 increase of 7.2%, tracking ahead of the national average of 5.2%¹.

¹

Do you agree that the 15 Roads of National Significance, and the Roads of Regional Significance, will boost economic growth and productivity?

6. We think the Government is on the right track for the commitment made with the inclusion of the Belfast to Pegasus Motorway and Woodend Bypass project under the Roads of National Significance programme.
7. Recognition of the significance the Conway Bridge and Route 70 has on the nation's productivity should be included.

Do you have any comments on the intention to improve public transport through completing Rapid Transit Corridors set out in the draft GPS 2024?

8. Public transport is a valuable asset and will help achieve the emissions targets for densely populated areas.
9. Our district is predominantly rural and does not have any public transport connections. Therefore, we are reliant on private vehicles. While rapid transport corridors may be a viable solution for people within metros, it should not come at the expense of slowing traffic into them, which would disadvantage those travelling from outside those links.
10. Five of our communities have well run community vehicle trusts by volunteers. We would encourage the consideration in the GPS for enhancing the funding for these valuable services, where public transport is unavailable. These services provide dignified transport options for people who are unable to transport themselves in our remote locations. Impaired people see driving themselves as the only means of transport and can possibly pose a threat to themselves and other road users. Well funded community transport trusts help negate that risk and have the added benefit of keeping people living in their own homes for much longer and ensures a wider range of customers for nearby businesses.

Do you agree with the stronger focus on road maintenance outlined in the draft GPS 2024?

11. As mentioned above we strongly support the focus on road maintenance in the draft GPS, noting that increased maintenance of our network is identified as our one of the top investment priorities in our long term plan, as shown in the 2024-34 Canterbury RLTP.

Do you have any other comments on the proposed GPS funding package?

12. We note that central government is forced to debt fund a portion of the roading budget as the revenues raised by fuel excise and road user charges are no longer sufficient to fund this budget. This debt is used as general funding for operations and maintenance rather than being targeted to investment in long life roading infrastructure. It is our view that debt funding should be used to appropriately incentivise investment in long life roading assets, and not be utilised to fund operations and maintenance of existing assets.

Yours sincerely,

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