17 December 2010

Mr. B Laing  
Chief Executive  
Environment Waikato  
PO Box 4010  
HAMILTON EAST 3247

Dear Sir

DRAFT WAIKATO REGIONAL LAND TRANSPORT STRATEGY 2011 - 2041

1.0 INTRODUCTION

1.1 Hamilton City Council (HCC) welcomes the opportunity to make a submission to Environment Waikato (EW) on the Draft Waikato Regional Land Transport Strategy 2011-2041 (referred to as the DWRLTS throughout this submission).

1.2 This submission follows the response provided by HCC to the Regional Outcomes and Challenges Discussion Document in January 2010.

2.0 SUMMARY OF KEY POINTS

<table>
<thead>
<tr>
<th>General</th>
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<td>- Support recognition of Hamilton as a strategic transport node in the Waikato, and retention of the balanced approach for the final WRLTS (as developed for the operative 2006-16 WRLTS).</td>
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<th>Access Hamilton</th>
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<td>- Acknowledge alignment of the DWRLTS with Access Hamilton and Future Proof. Provision of transport services and infrastructure for areas to be brought within Hamilton’s boundaries is critical.</td>
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<td>- The Greater Hamilton Area corridor policies outlined in Section 8.4.2 of the DWRLTS are supported.</td>
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<td>- HCC confirms its previously stated position that the Hamilton section of the Waikato Expressway should be built ahead of the Huntly section and that more resource should be put into achieving this, including commencement of land purchase. The reasons for this view have been recorded in previous Regional Transport Committee minutes.</td>
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<td>- Inclusion of ‘safety’ as a new core element is critical due to continued high crash and injury rates across the Waikato Region. Safety requires greater emphasis.</td>
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<td>- An accurate description of regional issues and needs is required in the final WRLTS so that advocacy for changes can be clearly stated (noting that at times this may differ from the current national strategic or funding direction). Not</td>
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being immediately deliverable should not reduce the regional importance of key issues, with the final WRLTS advocating for changes to the national funding model that would enable faster delivery.

- Some national targets need further development in the final WRLTS.
- HCC has previously requested that interim targets be set prior to 2040 to permit accurate reporting of progress and to ensure that end targets are delivered. Such targets (or a robust monitoring system) do not appear to have been developed for the DWRLTS.

**Land Use Integration**

- Land use integration is a new outcome area identified in the DWRLTS. Consideration of Hamilton’s growth cells (as identified in the HCC Urban Growth Strategy and Future Proof) in the provision of transport services and infrastructure is supported. The final WRLTS needs to position itself strongly to align with similar plans being developed in the Auckland/Bay of Plenty regions.
- The final WRLTS also needs to be aligned with the policy direction of the final Regional Policy Statement for the Waikato Region

**Economy, Freight and Peak Oil**

- HCC want to work with EW over more detailed impacts that oil demand and pricing is likely to have on the city and region, including development of possible scenarios. The DWRLTS appears to take a ‘business as usual’ approach to this issue, whereas over a 30-year horizon this is not likely to be the case.

**Passenger Transport (PT)**

- EW should review HCC’s submission to the Draft Waikato Regional Land Transport Strategy 2011-2041 and the submission to the Draft Waikato Regional Public Transport Plan Discussion Document together, particularly as there are key issues common to both documents.
- The Regional PT Plan Discussion Document fails to identify or consider the role of Hamilton in the regional PT context. Similarly, the DWRLTS also undersells the range and scale of PT services, patronage and infrastructure in the city.
- There are a number of areas where the DWRLTS and Regional PT Plan Discussion Document are not aligned, meaning a clearer co-ordinated regional direction needs to be developed.
- To ensure alignment with the objectives of Future Proof, PT servicing of satellite towns into Hamilton must be considered and funded appropriately. Extending the current PT rating zone to cover such satellite areas to ensure an adequate and fairer funding mechanism is supported.
- HCC will continue to engage with Kiwi Rail, the New Zealand Transport Agency and Environment Waikato regarding planning and funding for the introduction of a viable Hamilton to Auckland commuter/passenger rail service.

### 3.0 GENERAL COMMENTS

#### 3.1

HCC supports the recognition of Hamilton as a strategic transport node in the Waikato Region.
3.2 HCC encourages EW to have consideration for the provision of transport services and infrastructure for the areas which are to be brought within the city boundaries.

3.3 HCC would like to see stronger commitments contained within the final WRLTS, particularly in regard to replacing existing words such as ‘support’ and ‘encourage’ with ‘ensure’ or ‘require’. This will become important during the regional prioritisation and national funding approval processes as requests for funding need to be justified.

4.0 SPECIFIC COMMENTS

4.1 Access Hamilton

4.1.1 HCC notes that the DWRLTS is clearly aligned with the Access Hamilton transport strategy and the Future Proof sub-regional growth strategy and that there is an awareness of shared issues.

4.1.2 This is continued into the sub-regional sections of the DWRLTS and then the identified packages within chapter 11, and supports the implementation approach HCC is following for large infrastructure projects. The approach taken will assist HCC with prioritising projects in the Regional Land Transport Programme 2012-2015 and beyond.

4.1.3 HCC supports the Greater Hamilton Area corridor policies detailed within Section 8.4.2 of the DWRLTS. HCC notes that not all packages identified within Access Hamilton have been included within the DWRLTS. HCC understands why the focus has been on packages that have a wider significance, but requests that other identified packages (for example, City Centre Access, Hamilton East and Hospital Precinct) are included in the text of the final WRLTS so that they can be prioritised within the Regional Land Transport Programme (RLTP).

4.1.4 HCC requests that the name of the Wairere Drive subregional package be amended to ‘Hamilton Ring Road’ as reflected in the funding applications approved by the NZTA.

4.1.5 HCC confirms its previously stated position that the Hamilton section of the Waikato Expressway should be built ahead of the Huntly section and that more resource should be put into achieving this including commencement of land purchase. The reasons for this view have been recorded in previous Regional Transport Committee minutes.

4.2 Safety

4.2.1 As stated in its January 2010 submission, HCC supports the retention of the balanced approach developed for the operative 2006-16 WRLTS and the inclusion of safety as a new core element due to the continued high crash and injury rates across the Waikato Region.

4.2.2 While the approach may be balanced, the consideration currently given to each element is not. HCC is of the view that safety requires greater emphasis. As safety is an issue that crosses the region (whereas elements of demand management are more focussed in urban areas), this imbalance seems at odds with the approach that is stated, and HCC questions how the elements can be analysed more equally in the final WRRLTS. Ideally, safety should have a chapter to itself, sitting between the current Chapters 8 and 9.
4.3 Longer Term Focus to 2040

4.3.1 The DWRLTS has the same time focus as the New Zealand Transport Strategy and Access Hamilton. HCC supports this long term approach.

4.3.2 HCC is of the view that of upmost importance is an accurate description of regional issues and needs so that advocacy for changes can be clearly stated, noting that at times this may differ from the current national strategic or funding direction. Short term changes to national strategy or funding should not reduce the regional importance of key issues, with the DWRLTS advocating for changes to the national funding model that would enable faster delivery.

4.3.3 However, there are some national targets which HCC is of the view that still need some development in the final WRLTS i.e.:

- One example is a national target that the number of walking, cycling and other active modes should increase to 30% of total trips in urban areas by 2040. The DWRLTS equivalent target suggests a 12% mode share.

- A second example is the national Safer Journeys vision (mirrored in the Regional Road Safety Strategy and in the Access Hamilton Transport Safety Action Plan) of ‘a safe road system increasingly free of death and serious injury’. The target in the DWRLTS is for a 50% decrease in fatalities and a 25% decrease in serious injury by 2040.

4.3.4 At the same time, HCC has previously requested that interim targets be set prior to 2040 to permit accurate reporting of progress and to ensure that end targets are delivered. It does not appear that these or a robust monitoring system have been developed for the DWRLTS.

4.4 Land Use Integration

4.4.1 One new outcome area identified in the DWRLTS is land use integration. Changes to the Land Transport Management Act in 2008 require the Regional Land Transport Strategy to take a longer term view to allow transport decisions to interact with land use decisions. This is also identified within the current review of the Resource Management Act and is a topic in documents such as the Ministry for the Environment’s ‘Building Competitive Cities: Reform of the Urban and Infrastructure Planning System.’ HCC supports the consideration of Hamilton’s growth cells as identified in the HCC Urban Growth Strategy and the Future Proof sub-regional growth strategy in the provision of transport services and infrastructure. It is HCC’s view that the final WRLTS needs to position itself strongly to align with similar plans being developed in the Auckland and Bay of Plenty regions.

4.4.2 It is a requirement that Regional Land Transport Strategies are consistent with Regional Policy Statements and regional and district plans. This assists in the integration of land use and transportation infrastructure. It is important that the Regional Council take into account changes to the Regional Policy statement that occur through the submission process, and ensure that the RLTS is aligned with the final policy direction of the RPS.

4.4.3 Map 18 (page 107 of the DWRLTS) should label the Peacocke and Rototuna growth cells and also add HCC urban limits. Map 18 also shows future residential in Rotokauri directly abutting the Te Rapa Bypass - there is also another area of employment land directly to the west of the Te Rapa Bypass which is not shown. Map 18 should accurately reflect the Hamilton Urban
Growth Strategy (HUGS) map (refer to page 13 of HUGS) and is consistent with current agreed Future Proof uptakes.

4.5 Economy, Freight and Peak Oil

4.5.1 The DWRLTS’s focus in references to the ‘Golden Triangle’, freight by road and freight by rail is focused on getting goods to ports and out of New Zealand. The DWRLTS makes little reference that 50% of the country’s population (and therefore our biggest internal market) is located only 100km to the north of Hamilton.

4.5.2 In addition, no mention is made of transporting raw materials from the farm gate, quarry or forest to the manufacturing or processing facility. This is an equally important transfer that is predominantly vehicle-based, and the region’s road network plays a key role in this movement. It is also perhaps even more vulnerable to global oil prices as it directly affects the ability to produce.

4.5.3 The DWRLTS acknowledges the issue around the continued increase in the cost of New Zealand importing oil. As noted in the October 2010 Parliamentary Research Paper entitled ‘The Next Oil Shock’, “While the world will not run out of oil reserves for decades to come, it cannot indefinitely continue to produce oil at an increasing rate from the remaining reserves. Forecasts indicate that world oil production capacity will not grow or fall in the next five years while demand will continue to rise…..another supply crunch is likely to occur soon after 2012 due to rising demand and insufficient production capacity.”

4.5.4 HCC would like to undertake further work with EW over more detailed impacts that oil demand and pricing is likely to have on both the city and region, including the development of possible scenarios. Similar work has previously been undertaken by organisations such as the Auckland Regional Transport Authority in order to develop a longer term view. At times the DWRLTS appears to consider this issue as ‘business as usual’, when over a 30-year horizon that is not likely to be the case.

4.5.5 For example, as the price of oil continues to escalate, people who moved further away from jobs and schools for quality of life reasons may choose to move closer to reduce travel costs. This transport issue may have impacts on land use planning but the connection is not stated in the DWRLTS.

4.5.6 The government has identified ‘housing affordability’ as a key consideration for RMA reform. It is therefore critical that ‘affordability’ be seen in the wider context to include the cost of transport to individual households as well as the wider city in terms of infrastructure and service provision. This point is well articulated in the NZTA report Managing Transport Challenges: When Oil Prices Rise (2008), and was also raised in HCC’s recent submission to the Ministry for the Environment’s Competitive Cities report after it received insufficient attention.

4.5.7 In addition, the country’s population aged 65 and over is expected to increase from 12 percent in 2001, to 20 percent in 2026 and to 26 percent by 2051. This ‘demographic transition’ brings with it major policy implications for housing location, housing types and personal mobility, emphasising the importance of an urban form that supports a variety of efficient and equitable transport choices.
Finally, the Crawford Street Inland Port is named differently across the DWRLTS. The term ‘Crawford Street inland port’ should be used in all instances to describe the facility throughout the document.

**4.6 Passenger Transport (PT)**

4.6.1 HCC has also made a submission to the Regional PT Plan Discussion Document. It is therefore suggested that EW review this and HCC’s submission to the DWRLTS together.

4.6.2 In the same way that the Regional PT Plan Discussion Document fails to identify or consider the role of Hamilton in the regional PT context, the DWRLTS undersells the range and scale of services and patronage in the city. A good example is contained in Section 2.2.4 (page 15) of the DWRLTS, where the 4.5 million annual passenger trips, the 27 routes which operate 7 days per week and routes such as the Orbiter (which carries nearly 100,000 passengers a month) are entirely contained within the words ‘Urban services operating in Hamilton’. However, all other regional services are listed by name and individually identified even though they may only carry 30 passengers a month, and are then shown on a full page colour map (no map is provided showing Hamilton services). This is unbalanced and does not reflect investment in or the importance of the Hamilton PT network, and needs to be rectified in the final WRLTS.

4.6.3 As there are currently a number of areas where the DWRLTS and Regional PT Plan Discussion Document are not aligned, HCC requests that a clear coordinated regional direction is developed. This needs to include the three issues raised within HCC submission to the Regional PT Plan Discussion Document, which are:

- Lack of appreciation for the role and scale of Hamilton in the regional PT context.
- PT patronage growth targets.
- Investment in infrastructure.

4.6.4 The Access Hamilton Strategy and Passenger Transport Action Plan are also important as 94% of regional PT patronage is recorded in the Hamilton urban area.

4.6.5 Access Hamilton views passenger transport services predominantly as a congestion-relief tool. As such, it has economic benefits. This is noted on page 26 of the DWRLTS, but all targets are related to the Access and Mobility outcome area. HCC recommends that targets are also considered for the Economic Development outcome area. More detail could also be added to Chapter 9 (Demand Management measures).

4.6.6 Page 148 of the DWRLTS does identify a funding shortfall related to how the 7% mode share and annual targets would be delivered (currently missing from the DWRPTP).

4.6.7 To ensure alignment with the objectives of Future Proof, servicing of satellite towns into Hamilton must be considered and funded appropriately. HCC would support extending the current PT rating zone to cover such satellite areas with the aim of ensuring an adequate and fairer funding mechanism.
4.6.8 HCC will continue to engage with Kiwi Rail, the New Zealand Transport Agency and Environment Waikato regarding planning and funding for the introduction of a viable Hamilton to Auckland commuter/passenger rail service.

5.0 CONCLUDING COMMENTS

5.1 HCC trusts that the points made in this submission are helpful to Environment Waikato when considering all submissions to the Draft Waikato Regional Land Transport Strategy 2011-41.

5.2 HCC does wish to be heard in support of this submission if hearings are to be held for this part of the process.

5.3 If you require clarification of the points raised in this submission, or additional information, please contact Philip King, Council’s Access Hamilton Coordinator (phone 07 838 6991, email Philip.king@hcc.govt.nz).

Yours faithfully

Blair Bowcott
ACTING CHIEF EXECUTIVE