

**Committee Members**

Chair: Peter Ewen  
Cr Peter Haddock (WCRC)  
Cr Phil Grafton (BDC)  
Mayor Tania Gibson (GDC)

Cr Paddy Blanchfield (GDC)  
Cr Reilly Burden (EDC)  
James Caygill (NZTA)  
Wayne Costello (DOC)



**WEST COAST**  
REGIONAL COUNCIL

**CONFIDENTIAL**

**Meeting of Regional Transport Committee**  
*(Te Huinga Tu)*

**Friday, 5 July 2024**

**9:30am**

**West Coast Regional Council Chambers,**

**388 Main South Road, Greymouth**

**and**

**Live Streamed via Council's Facebook Page:**

**<https://www.facebook.com/WestCoastRegionalCouncil>**



# Regional Transport Committee Meeting

*(Te Huinga Tu)*

## AGENDA

*(Rarangī Take)*

**Pg No.**

- 1. Welcome (*Haere mai*)**
- 2. Apologies (*Ngā Pa Pouri*)**
- 3. Declaration of Interest**
- 4. Hearing on the submissions on the Regional Land Transport Plan**
  - 4.1** *Attachment 1- Amended Draft RLTP*
  - 4.2** *Attachment 2- Submissions on Draft RLTP*
  - 4.3** *Attachment 3- Staff Recommendations Report on Submissions*
  - 4.4** *Attachment 4- Abley Review of Truck Movements on SH6 – Part of TiGa Submission*
  - 4.5** *Attachment 5- Video Link – Part of Suzanne Hills Submission*

### **PUBLIC EXCLUDED BUSINESS**

- 5. Deliberations on Submissions of the Regional Transport Plan**

## **PUBLIC INCLUDED BUSINESS**

### **6. Minutes of the Regional Transport Committee of 24 January 2024**

### **7. Reports**

**7.1** DOC request for changes to DOC funding in Regional Land Transport Plan

**7.1.1** *Attachment 6- DOC letter requesting changes to DOC funding in RLTP*

**7.2** Joint submission on NZTA Emergency works policy review

**7.2.1** *Attachment 7 - Joint Submission on NZTA Emergency works policy review*

**7.3** Speed Management Rule Consultation

**7.3.1** *Attachment 8 - Submission on Land Transport Rule: Setting of Speed Limits Rules 2024*

**7.3.2** *Attachment 9 - Consultation Document on Land Transport Rule: Setting of Speed Limits Rule 2024*

### **8. General Business**

**D. Lew**  
**Chief Executive**

**Purpose of Local Government**

The reports contained in this agenda address the requirements of the Local Government Act 2002 in relation to decision making. Unless otherwise stated, the recommended option promotes the social, economic, environmental, and cultural well-being of communities in the present and for the future.

**Health and Safety Emergency Procedure**

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## REPORTS

|                        |   |
|------------------------|---|
| <b>7.1</b>             | <b>Draft Regional Land Transport Plan – Hearing and Deliberations</b> |
| <b>Author</b>          | Lillie Sadler, Senior Planner; Marianne Bimont, Planner               |
| <b>Authoriser</b>      | Max Dickens, Policy Manager   |
| <b>Public Excluded</b> | No  |

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### Report Purpose

The purpose of this report is to summarise the Draft Regional Land Transport Plan 2024-2034 (RLTP or the Plan) and the submissions received on it, assess the submissions, and make recommendations to the Regional Transport Committee (RTC or the Committee) on accepting or rejecting the submissions.

### Report Summary

The current Regional Land Transport Plan 2021 was reviewed and a new Draft version was publicly notified for submissions in February/March 2024.

Ten submissions were received on the Draft Plan, and five submitters wish to be heard.

The Hearing will be held as part of the Regional Transport Committee's meeting on 5 July 2024, and the Committee will form the Hearing Panel. Following the Hearing, the Panel will deliberate and make decisions on submissions to the Draft RLTP.

### Recommendations

***It is recommended that Council/the Committee resolve to:***

1. Receive the report.
2. Receive the attached submissions.
3. Receive and note the attached staff report and recommendations on the submissions.
4. Hear from the submitters who wish to be heard on their submissions.

5. Note the guidelines for deliberating on submissions.

## Issues and Discussion

### Background

The Land Transport Management Act 2003 requires that an interim review of a regional land transport plan is done every three years from when a plan is adopted. The current West Coast RLTP was adopted in 2021, and the interim three-year review commenced in 2023. The Land Transport Act also has statutory timeframes for developing a RLTP.

The West Coast Regional Land Transport Plan (RLTP) 2021-2031 sets out the current state of our transport network, the challenges facing the region and the priorities for future development. The Plan sets out:

- The context in which the transport system operates
- The vision and strategic objectives for the transport system
- The priorities for investment – key areas where further investment is required in order to achieve the vision and objectives
- A prioritised regional programme of transport activities.

The Regional Transport Committee (RTC), at the 24 January 2024 meeting, prioritised the Regionally Significant Projects, and finalised gaps in the Draft Plan. The Committee tentatively accepted into the Draft Plan the West Coast Regional Council and Westland District Councils' funding figures for Investment Management Planning and the Total Mobility (Subsidized Taxi Services) Plan which were still to be received at that time. These were added to the Plan prior to public consultation.

The Committee approved the Draft RLTP for public consultation, and the submission period ran from 28 February to 28 March 2024.

The West Coast Draft RLTP 2024-2034 accompanies this report as Attachment 1.

### Current situation

Ten submissions were lodged on the Draft RLTP, Attachment 2 accompanying this report is copies of all the submissions. The following five submitters wish to be heard:

- New Zealand Transport Agency (NZTA)
- Herenga ā Nuku – Outdoor Access Commission



- TiGa
- Suzanne Hills
- Marie Elder

The following minor changes have been made to update the Draft RLTP in the last month:

- Inclusion of draft GPS 2024; and
- Updated District Council and NZTA budgets, and reorganised budgets to match the new work categories. The main change here is the two maintenance and operation activity classes (pothole prevention and operations), and end-of-life bridge replacements have been moved out of maintenance and into improvements.

Note that these budgets remain the requested allocations from each RCA and have not been updated to reflect the indicative allocations released by NZTA recently.

Although these changes were not specifically requested in a submission, staff consider there is nothing substantive in the updated text that would trigger a need to consult the public on them. Overall budget numbers have not changed, only how the budgets are categorised has changed.

With respect to these updated sections of the Plan, Sections 78 and 82 of the Local Government Act (LGA) require councils to consider the views and preferences of those *"likely to be affected by, or to have an interest in, the matter"*. Staff consider that the updated budgets will not affect submitters or the public, and the changes are in line with the national GPS as it currently stands. The tests for targeted consultation in s82 of the LGA are therefore satisfied.

### **Analysis of submissions**

Council staff have assessed all the submissions on the Draft RLTP, and made recommendations to either accept, accept in part or reject each submission point. The Recommendations Report accompanies this report as Attachment 3. Submitter TiGa provided with their submission an assessment of truck movements on State Highway 6 which was done as Evidence by consultant Abley, for TiGa's resource consent applications to mine mineral sands at Barrytown. The Evidence on truck movements on State Highway 6 accompanies this report as Attachment 4. Submitter Suzanne Hills provided with her submission a video titled "Cycling on Coast Road", as part of her submission. A link to the video accompanies this report in Attachment 5.

Several submission points sought works on State Highways that are not referred to in the Draft RLTP. As these would involve additional funding from the New Zealand Transport Agency (NZTA), staff sought the Agency's view on these submission points.

### **Hearing**

The hearing for the five submitters who wish to be heard will be held on 5 July 2024 as the first item on the Regional Transport Committee's (RTC or the Committee) agenda. Voting members of the Committee will form the Hearing Panel for the Hearing and Deliberations.

A copy of this report, with the staff assessment of submissions and recommendations, will be sent to the five submitters. The Hearing process will involve each submitter presenting further evidence to the Committee in support of their submission. The Committee can ask questions of clarification after each submitter has finished presenting. When the last submitter has finished presenting and there are no further questions from the Committee, the Hearing will be closed.

### **Deliberations**

Following closing of the Hearing, deliberations will be held 'public excluded' under section 48 of the Local Government Official Information and Meetings Act. The Committee will deliberate on the submissions, hearing evidence, and the staff report recommendations, and make decisions on submissions.

## **Considerations**

### **Implications/Risks**

As this is an interim review of the 2021 RLTP, and there have been only minor changes made to the Draft RLTP 2024, the implications and potential risks are considered to be minimal. It is anticipated that there will not be major changes made to the Draft RLTP as a result of the Hearing and Deliberations.

### **Significance and Engagement Policy Assessment**

There are no issues within this report which trigger matters in this policy.

### **Tangata whenua views**

Poutini Ngāi Tahu were invited to provide input to Regional Council staff before the Plan was notified, or through the public consultation process.

### Views of affected parties

A list of parties who were consulted with in the notification of the Draft Plan is shown below. Those italicised lodged submissions on the Draft Plan.

|                                      |  |
|--------------------------------------|--|
| Te Rūnanga o Ngati Waewae            | Otago Regional Council                     |
| Te Rūnanga o Makaawhio               | Tasman District Council                    |
| <i>Grey District Council</i>         | Environment Southland                      |
| <i>Westland District Council</i>     | Environment Canterbury                     |
| <i>Buller District Council</i>       | Federated Farmers                          |
| West Coast Police                    | Westland Milk Products                     |
| Ministry of Transport                | Road Transport Association<br>New Zealand  |
| Kiwirail                             | <i>Waka Kotahi NZ Transport<br/>Agency</i> |
| Department of Conservation           | Selwyn District Council                    |
| Development West Coast               |  |
| Queenstown Lakes District<br>Council |  |

### Financial implications

#### *Current budget*

There are no other budget implications that need to be addressed in this report.

#### *Future implications*

There are no other budget implications that need to be addressed in this report.

### Legal implications

There are no legal implications in regard to the recommendations in this report.

### Attachments

Attachment 1: Draft Regional Land Transport Plan

Attachment 2: Copies of the submissions

Attachment 3: Staff Recommendations Report on submissions to the Draft Regional land Transport Plan

Attachment 4: Abley Statement of Evidence on assessment of truck movements for Resource Consent application RC 2023-0046; LUN3154/23 by TiGa Minerals and Metals Ltd. Provided as part of TiGa submission on Draft RLTP

Attachment 5: Video "Cycling the Coast Road", provided as part of Suzanne Hills' submission on Draft RLTP

**WEST COAST REGIONAL COUNCIL**

To: Chair, West Coast Resource Management Committee

I move that the public be excluded from the following parts of the proceedings of this Hearing, namely – agenda item 5 Deliberations; and that

1. Darryl Lew, Max Dickens, Lillie Sadler, Marianne Bimont and Kaya Clement be permitted to remain at the Deliberations after the public have been excluded due to their knowledge of the subjects. This knowledge will be of assistance in relation to the matters to be discussed; and

| Agenda Item No. | General Subject of each matter to be considered   |  | Reason for passing this resolution in relation to each matter  | Ground(s) under section 48 of LGOIMA for the passing of this resolution      |
|-----------------|---|--|--|--|
| 5               | Deliberations on submissions and staff report on Draft Regional Land Transport Plan – 5 July 2024 |  | The Land Transport Management Act requires that the Council have a RLTP, and that public consultation be undertaken under the Local Government Act. The Committee needs to be able to discuss in private whether they agree or disagree with the staff recommendations and submissions, and whether they want any changes to the staff | To enable the Committee to deliberate in private on its decisions s48(1)(d). |

|  |  |  |                                 |  |
|--|--|--|---------------------------------|--|
|  |  |  | recommendations<br>or the Plan. |  |
|--|--|--|---------------------------------|--|



**DRAFT**

# **West Coast Regional Land Transport Plan 2024 - 2034**







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## Foreword

As Chair of the West Coast Regional Transport Committee, we are pleased to present the 2024-2034 West Coast Regional Land Transport Plan.

This is a three-yearly interim review of the Plan and we have continued to take a strong collaborative focus with territorial authorities, NZ Transport Agency and Department of Conservation in developing the Plan for the region.

Mandated under the Land Transport Management Act 2003, this 10-year Plan is not just a statutory requirement but a blueprint for our region's transportation future. It sets out our strategic direction, priorities, and the activities proposed to achieve these priorities, guiding investment in our land transport network. The activities that are focused on are aligned with the region's needs and aspirations and will inform the National Land Transport Programme (NLTP), paving the way for funding and delivery of these critical workstreams.

The West Coast faces unique challenges and opportunities, given our geography, economic landscape, and the pressing need for resilience against climate change impacts. This Plan addresses these by focusing on:

- Enhancing the resilience of our transport infrastructure to support our communities, especially in light of increasingly frequent and impactful weather events and natural hazard risks.
- A transport network that is fit for purpose, supporting connectivity and efficiency to enhance the economic, social, and cultural needs of our communities.
- A safer transport network and system.

This Plan builds on the previous 2021-31 RLTP and is informed by key documents such as the Government Policy Statement (GPS) on Land Transport, key West Coast regional strategic documents, and importantly, the input we receive from our communities and iwi through the consultation process.

Thanks to everyone who has contributed to shaping of this Plan. Your insights, expertise, and commitment have been invaluable. As we move forward, we are confident that the 2024-2034 West Coast Regional Land Transport Plan will guide us towards a more connected, productive, and resilient future for all who call the West Coast home.

Collectively, let us together embark on this journey to transform our land transport landscape, ensuring it meets our shared aspirations and challenges head-on, for the benefit of our current and future generations.

INSERT RTC CHAIR SIGNATURE

Peter Ewen  
Chair

## South Island Regional Transport Committee Chairs Group

The transport system provides the arteries and veins that bring life to our communities, support regional prosperity and improve the overall wellbeing of the South Island. The transport system connects our communities, allowing people to travel safely and efficiently across our diverse landscapes, and enables the safe and efficient movement of freight. It is imperative to ensure the transport network is working as effectively as possible.

The South Island Regional Transport Committee Chairs Group was formed in 2016 for this purpose. The Group seeks to significantly improve transport outcomes in the South Island through better interregional collaboration and integration.

The Group is focused on ensuring the South Island stays at the forefront of Government thinking. The formation of the Group recognises that the South Island advocating with one voice is more effective than seven regions advocating independently on the same matters.

This approach seeks to ensure that the needs and aspirations of our South Island communities are recognised and understood by the Government. We want to be seen by Government as a group of 1 million people with a common aspiration for our transport system. Notwithstanding, each region in the South Island has unique characteristics, but at the same time, will share similar transport priorities and challenges.

These shared priorities form the priorities of this Group and are listed below.

### Priority areas

1. Advocacy for transportation in the South Island, including tracking how central government investment, including the National Land Transport Fund and Provincial Growth Fund, is being allocated across the country
2. Resilience of the transport network
3. Freight journeys across the South Island
4. Tourism journey improvements across the South Island
5. An enabling funding approach for innovative multi-modal (road, rail, air, sea) solutions
6. Explore opportunities for inter-regional public transport.

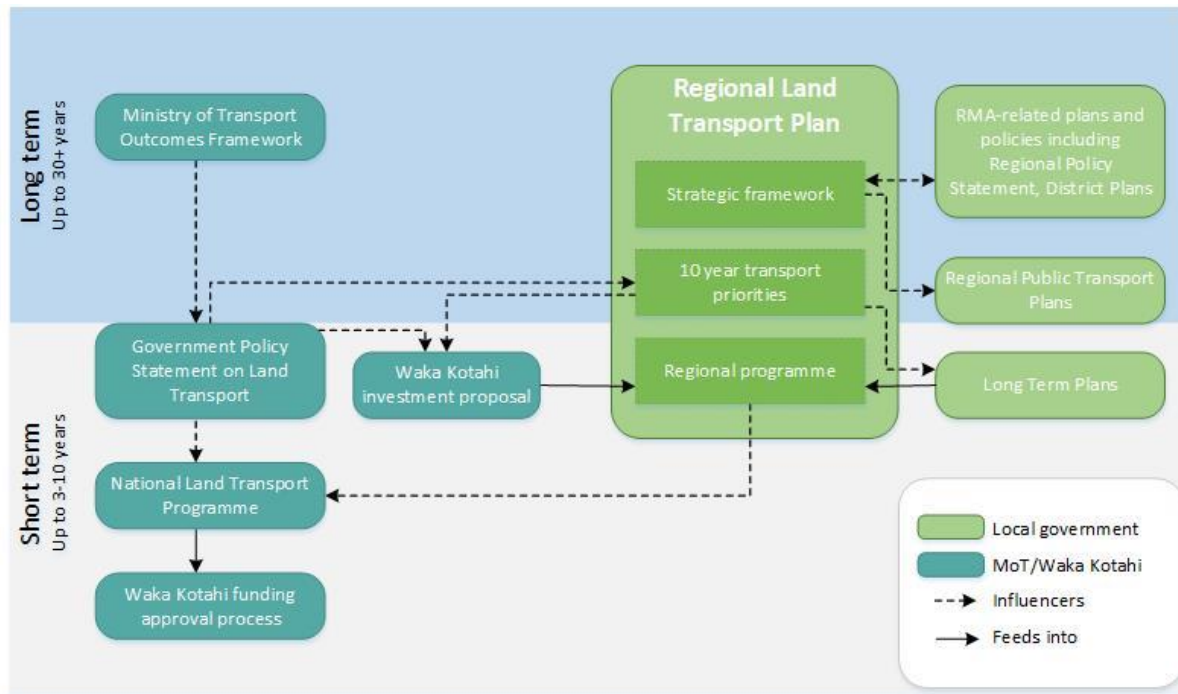
## Introduction

The West Coast Regional Land Transport Plan (RLTP) sets out the current state of our transport system, the challenges we face, and the priorities for land transport in the region over the next ten years, to achieve an effective, resilient and safe land transport system. The Plan outlines the proposed programme for 2024-34 that will deliver on the strategic direction for getting there.

The Plan sets out:

- The context in which the transport system operates
- The vision and strategic objectives for the transport system
- The priorities for investment – key areas where further investment is required in order to achieve the vision and objectives
- A prioritised regional programme of transport activities.

The RLTP incorporates the regional programmes of six approved organisations: West Coast Regional Council; Buller, Grey, and Westland District Councils; NZ Transport Agency state highways; and Department of Conservation. The aim is to agree a regional programme which contributes to the social and economic wellbeing of our communities who rely on the transport network for their very existence. With limited funds to pay for everything, addressing the key problems and opportunities in this RLTP is the focus for the next 10-years. There are a number of strategic documents that guide and inform the wider transport network. The diagram below shows the relationship between the Regional Land Transport Plan and other wider transport, land use planning and funding documents:



In developing the RLTP, the West Coast Regional Transport Committee has considered the strategic direction provided by the Government through the Ministry of Transport's Outcomes Framework and the draft Government Policy Statement on Land Transport. In addition, other key strategic local, regional, and national documents have been considered in the development of this Plan.

The previous Plan was developed during the Covid-19 pandemic, and while the pandemic is behind us this current Plan has been developed in a period of economic challenges, particularly rising costs of service delivery, and political change which creates uncertainty.

Despite these challenges, the region's vision and objectives for the land transport system are unchanged. The Regional Transport Committee will continue to advocate strongly at a national level for the region's transport network to be acknowledged and any required improvements progressed.



## Our region

### Environment / Taiao

The West Coast, a remote region with limited alternative transportation options, plays a pivotal role in safeguarding the social and economic well-being of its residents. Situated in the southern reaches of New Zealand, this sparsely populated area extends approximately 600 kilometres from north to south, situated between the Tasman Sea and the Southern Alps. Its unique natural environment and challenging topography significantly shape both its economy and transportation infrastructure.

The West Coast is known for its rugged coastline, high mountains, forests, lakes, rivers, lagoons and karst systems. The ‘untamed natural wilderness’ of the region makes it a preferred destination for visitors. Approximately one quarter of all public conservation lands in New Zealand can be found on the West Coast, making it a key asset of the region.

In addition to its geographic isolation, the West Coast is exposed to a range of natural hazards including extreme weather events, flood-prone river systems, proximity to the Alpine Fault, landslips, and exposed coastal areas. With yearly rainfall totals averaging between 2,000mm and 11,000mm, the West Coast is the wettest region in New Zealand. These hazards frequently disrupt the transportation network, which serves as a lifeline for remote communities and the multitude of New Zealanders and international visitors who flock to the region.

Approximately half of the West Coast population reside in the three main towns of Westport, Greymouth and Hokitika. The remaining population are dispersed in small towns throughout the region, connected in the majority by the State Highway. Maintaining a resilient road network remains a key priority.

### Economy / Ohanga

The West Coast is the country’s fifth largest region, but the smallest population by size with just 1.4 people per square kilometre, compared to 15 in wider New Zealand. This has created a reliance on a small number of industries- largely dependent on the region’s natural resources. The concentrated economic activity within a few sectors has meant the region is more vulnerable to adverse effects, including climate change and commodity price fluctuations.

The West Coast has seen reasonable growth in GDP over the past few years. GDP increased by 6.9% between March 2021 and March 2022, higher than the national average increase of 5.3% over the same period. GDP has continued to grow a further 2.4% to June 2023, reaching a total of \$2,430M. Tourism is now the fastest growing economy for the region and relies on safe, reliable access.

Despite having a comparative advantage in mining, the West Coast has experienced a decline in this sector since 2010. Nevertheless, the extraction of gold has witnessed significant growth. Electricity, Gas, Water and Waste Water Services made up the largest contribution to overall growth in the West Coast, the industry grew 35.1% between 2021 and 2022 and contributed 3.1 percentage points to the three districts 6.9% growth. Other growth industries include Health Care and Social Assistance and Professional, Scientific and Technical Services. Coal from the West Coast is still used for the manufacturing of steel.

The West Coast has a relatively high share of GDP from exports, with a significant contribution coming from goods-producing and primary industries. Primary industries, in particular, account for a substantial 21.2% of the region's GDP, which is considerably high compared to the national GDP of 27.2%. Exported goods are primarily transported by road and rail to neighbouring regions for further distribution nationally and overseas. The local road network is critical to connect businesses and freight hubs, rail links and the state highway network. These links feed into the ports for export, highlighting the importance of an intermodal transport network for the extractive industry. When our roading network is disrupted by emergency events, our economy is equally disrupted.

Over the past 15 years, the West Coast has experienced significant growth in domestic and international tourism markets, and in some areas has become particularly reliant on tourism. Guest nights per capita are five times the

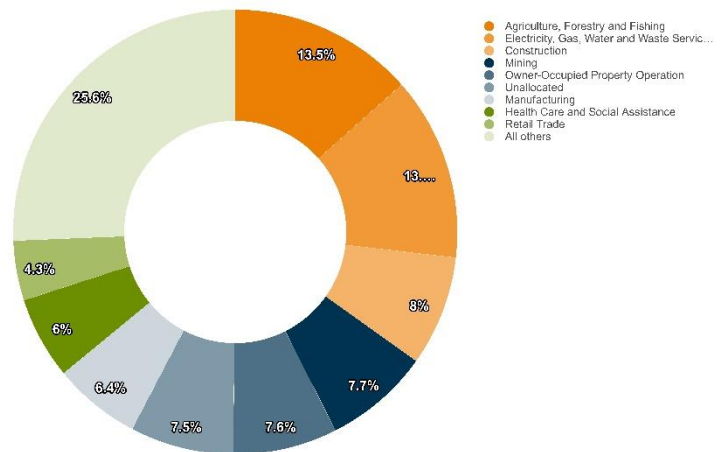


Figure 1 Proportion of West Coast GDP by industries, 2022

national average and 50% of tourism spend comes from international visitors. Overall tourism card spending data is up around 32% per annum and is now sitting 16% above pre-pandemic (2019) levels. However, this trend does not account for the higher inflation present in recent years and spending activity appears to be plateauing at these levels. Tourism is also a major contributor to employment in the region, supporting 22.5% of filled jobs. Tourism was, before Covid-19, the largest contributor to employment in the region. The region's reliance on tourism, makes it particularly vulnerable to economic shocks, as was seen with Covid-19.

The rich and diverse natural environment comprising the mountains, lakes, rivers, lagoons, coastal beaches and outlooks dotted with historic settlements are major attractions to the region. The Lonely Planet describes the drive down the West Coast from Punakaiki to Greymouth as one of the 'top ten coastal drives in the world'. Travel along the West Coast often forms part of a larger tourist journey that includes Christchurch, Arthur's Pass and Queenstown and/or Nelson, Buller Gorge, Reefton and Lewis Pass. The glaciers in Westland are the third most common reason overseas visitors give for coming to New Zealand. Along with Lake Matheson, the Glaciers host approximately 1 million visitors per annum with international visitors making up 76% of visitors. The majority of visitors to the northern West Coast visit Punakaiki, Cape Foulwind, Denniston and the Oparara Arches. Of these, the Dolomite Point walk at Punakaiki is the most popular destination with approximately 450,000 visitors per annum.

The West Coast tourism product is completely dependent on the transport network, primarily the State Highways, but also the local and Department of Conservation roads to travel the 'final mile' to access the destination. Visitors to the region travel predominantly via self-drive vehicles as opposed to buses, as they seek the 'off the beaten track' experiences and require a safe and reliable transport network as they visit the scenic wonders of the West Coast.





## Our people

The West Coast is the country's fifth largest region by land area, but the smallest by population size. According to the 2018 census data, the West Coast region had a population of 31,575. Using the Statistics New Zealand Estimated Resident Population, the region is forecast to have reached a population of 32,700 in 2022, this is down 0.6% from the 2021 forecast. West Coast is one of the few regions in New Zealand projected to have a decline in population over the next two decades with an estimated (medium scenario) 6% decline from 2018-43 to a population of 30,600.

Demographically, the West Coast's population is not dissimilar to the rest of New Zealand, although it does have a slightly smaller proportion of school age and younger children, and a slightly higher proportion of the population of retirement age.

While official projections indicate a population decline, this may be incorrect. With house prices increasing and a housing shortage throughout New Zealand, more people may consider purchasing in regions where prices are more affordable. The average current house value in the West Coast Region was \$369,005 in 2023, which was lower than the New Zealand median of \$939,146. There has been recent government and local stakeholder investment into Upskill West Coast, a plan for supporting qualifications and employment opportunities to retain people and businesses on the West Coast. Work is also underway to encourage more people to relocate to West Coast.

## Mana whenua

The West Coast lies within the takiwa (tribal area) of Ngāi Tahu, the South Islands largest iwi. Ngāi Tahu extends from White Bluffs/Te Parinui o Whiti (southeast of Blenheim), Mount Mahanga, and Kahurangi Point in the North to Stewart Island and the Subantarctic Islands in the south. Te Rūnanga o Ngāi Tahu is the mandated iwi authority for Ngāi Tahu whānui and was established by the Te Rūnanga o Ngāi Tahu Act 1996.

Ngāi Tahu comprises 18 rūnanga (governance areas) corresponding to traditional settlements. Te Rūnanga o Ngāi Tahu recognises the hapū who hold mana whenua in the West Coast, Ngāti Mahaki o Makaawhio and Ngāti Waewae.

- **Te Rūnanga o Ngāti Waewae** is the mandated representative body of Ngāti Waewae, a hapū of Ngāi Tahu. Their takiwā is centred on Arahura and Hokitika and extends from the north bank of the Pouerua River to Kahurangi and inland to the main divide. Ngāti Waewae shares the area between the Hokitika and Pouerua Rivers with Ngāti Māhaki. Te Rūnanga o Ngāti Waewae is based at Arahura Marae, where the whare tipuna (meeting house) is Tūhuru, named after a great fighting chief of Poutini Ngāi Tahu.
- **Te Rūnanga o Makaawhio** is the mandated representative body of Ngāti Māhaki ki Makaawhio, a hapū of Ngāi Tahu. Their takiwā is centred at Makaawhio (Jacobs River) and Mahitahi (Bruce Bay) and extends from the south bank of the Hokitika River to Piopiotahi and inland to the main divide. Ngāti Māhaki share the area between the Pouerua and Hokitika Rivers with Ngāti Waewae. Te Rūnanga o Makaawhio is based at Te Tauraka Waka a Māui Marae, where the whare tipuna is Kaipo, named after an ancestor of all Poutini Ngāi Tahu.

Prior to the 2010's these two hapū of the West Coast had little to no involvement in the decision-making process for local government. In 2018 the West Coast was selected as a focus region for the government's Provincial Growth Fund with \$140 million dedicated to growth projects in the area. Eligibility to this funding depended, in part, on having Treaty partnerships in place. In response to this, the Ministry of Māori Development, Te Puni Kōkiri (TPK), focused on improving relationships between Ngāti Waewae, Ngāti Māhaki ki Makaawhio, and the Council and public sector agencies in the region. The improved relationship between mana whenua and West Coast local authorities is now seen as a success story for Treaty partnerships in New Zealand.

The success of this relationship is illustrated by the signing of the Mana Whakahono ā Rohe Iwi Participation Agreement, New Zealand's first Iwi Participation Agreement. Iwi Participation Agreements are tools under the Resource Management Act, designed to assist tangata whenua and local authorities to discuss, agree and record how they work together, including how tangata whenua will be involved in resource management decisions. This relationship is relevant when planning for regional land transport because transport network investment can shape land patterns within a region. Likewise, Land use planning can have a significant influence on travel choice and transport network demand.

Ngāi Tahu are heavily involved in the development of Te Tai o Poutini Plan – the West Coast combined District Plan (TTPP). This is the combined District Plan for Buller, Grey and Westland District Councils and it replaces the Councils current individual Plans. The Proposed TTPP includes seven values, principles and practice that guide the approach to planning for the region, These are:

- **Kaitiakitanga** – Kaitiaki were the non-human guardians of the environment which, in effect, communicate the health and vitality of their respective environments. Accordingly, Section 7(a) of the RMA requires the Council to have particular regard to kaitiakitanga. The outcomes of kaitiakitanga are likely to include the management of natural resources in a way that ensures that all taonga (which includes all natural resources) are available for future generations.
- **Tino Rangatiratanga** - Tino rangatiratanga involves having the mana or authority to exercise the relationship of Poutini Ngāi Tahu and their culture and traditions with the natural world. This is expressed through the relationship between Ngāi Tahu and WCRC and Ngāi Tahu’s active involvement in TTPP.
- **Mauri** - Mauri is the life force in the physical world. In the environment, mauri can be used to describe the intrinsic values of all resources and of the total ecosystem.
- **Mahinga kai** - Mahinga kai refers to Ngāi Tahu cultural values in association with food and other natural resources and includes such resources as those used for weaving, carving, and rongoā Māori or Māori medicine. It also includes the places where such resources are gathered such as rivers and coastal waters.
- **Ki Uta Ki Tai** - reflects the holistic nature of traditional resource management, particularly the interdependent nature and function of the various elements of the environment within a catchment. This principle requires an integrated management approach across the land and water boundary, which is significant to the development of the transport network.
- **Wāhi tapu** - places of particular significance that have been imbued with an element of sacredness or restriction (tapu) following a certain event or circumstance.
- **Taonga** - Taonga include sites and resources such as wāhi tapu, tauranga waka, and mahinga mātaītai, other sites for gathering food and cultural resources, tribally significant landforms, and features.

## Our transport system

Our transport network provides the connections communities need to live day to day. This connectivity is essential for the economic, social and cultural wellbeing of the West Coast. Transport links create a vibrancy and vitality to our communities, towns, and region.

### Road network

Despite the West Coast having less than 1 percent of New Zealand’s population, state highways within the region account for 8% of the total length of the national state highway network, almost three times as high as the national average. The performance of the state highway is therefore particularly important for the West Coast.

The network of state highways and local roads, as well as a freight rail connection linking Hokitika, Greymouth and Westport to Lyttleton, is critical for the rural-based economy, moving goods to production centres and on to domestic and international markets. The geographically dispersed nature of primary sector industry (mining, agriculture and forestry) requires heavy vehicles to drive on low volume roads that are narrow, winding and often not designed with these vehicles in mind. Intermodal connections are essential to the future of the efficient movement of freight for the region. Logs are now coming into Greymouth to be transferred from road to rail. The inland port at Stillwater provides for the transfer of coal from truck to rail. River ports in Greymouth and Westport currently provide little in the way of freight transport.

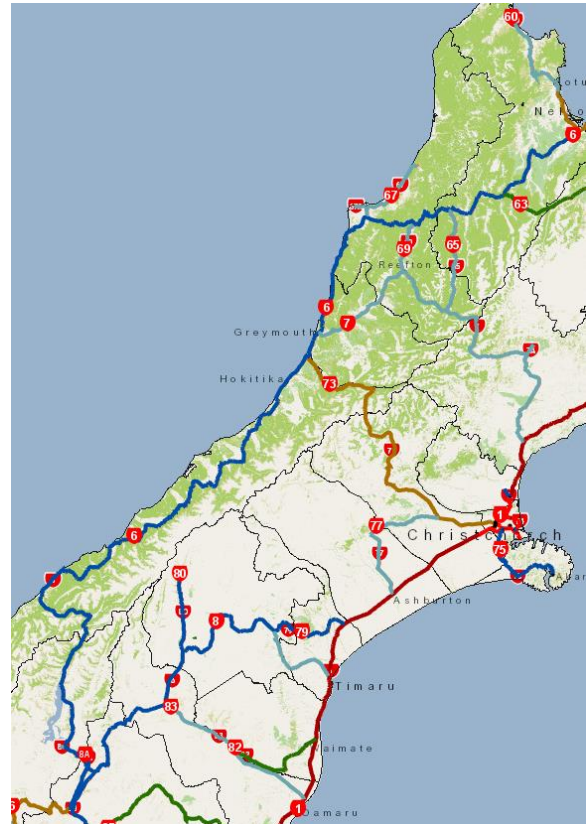
At a regional level, the roading network is heavily reliant on the one north-south route – State Highway 6, providing the main arterial road functions for the West Coast and the linkages to neighbouring regions of Tasman and Otago. The local road networks extend off this main arterial, and there are few other options for making journeys up and down the coast. State Highways 7 and 73 provide important links to Canterbury and the ports in Christchurch.

Together the three councils own and operate approximately 1,945 km of roads. In addition, Waka Kotahi operates approximately 870 km of state highway across the West Coast region.<sup>1</sup> The Department of Conservation also administer a relatively short length of roads to provide access to public conservation land; some of these connect to the local road network.

There are two Special Purpose Roads (SPR) on the West Coast:

1. Karamea Highway (including Karamea-Kohaihai Road) in the Buller District
2. Haast to Jacksons Bay Road in the Westland District

Both roads are part of the national transition of SPR roads to local road status, and subsequent change in funding from the current 100% funding assistance rate (FAR) to the normal rate of each local authority. An agreement was reached between NZ Transport Agency and Buller District Council and Westland District Council in September 2023 for the SPRs to remain for the duration of this triennium.



<sup>1</sup> <https://www.nzta.govt.nz/planning-and-investment/learning-and-resources/transport-data/data-and-tools/>

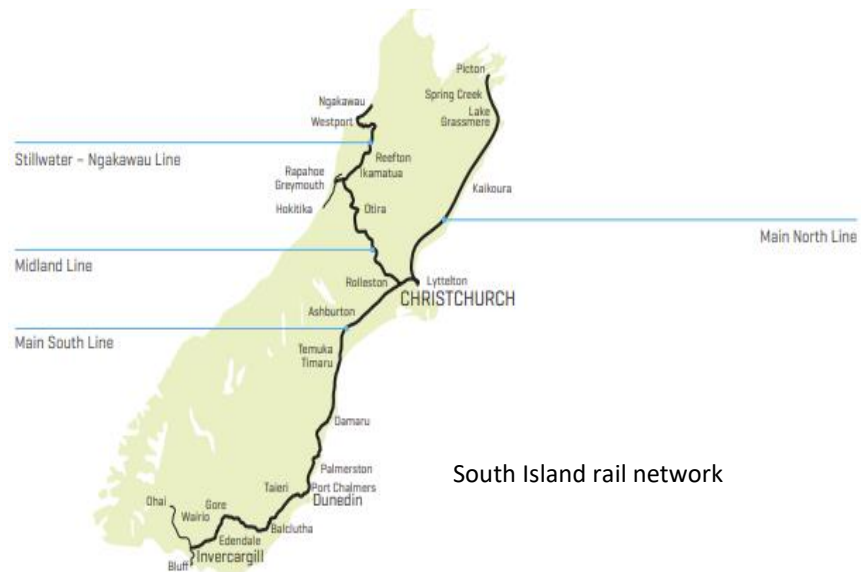
The Department of Conservation has 179 kilometres of roading within the West Coast Region, 68% of which is eligible for NZ Transport Agency funding. The roads predominantly provide access to public conservation land destinations, while approximately 80kms are restricted access roads.

Continual weather-related emergencies are affecting the resilience of Glacier-access roads, contributing to the accelerated retreat of The Franz Josef Glacier and Fox Glacier caused by climate change. This evolution in the glaciers is reshaping the visitor experience. To ensure resilience and diversity in the West Coast offerings, it will be vital to shift focus away from the heavily reliant glacier-centric experiences and introduce opportunities for visitors in more resilient lowland front country areas.

## Rail

The rail network is an asset of national and regional importance. Across the West Coast, rail transportation primarily serves the freight sector, particularly coal, forestry, and dairy. The Hokitika branch line predominantly supports Westland Milk Products by transporting raw materials to the factory and distributing finished products to various markets. The coal transportation on lines to Rapahoe, Westport, and Ngakawau has seen a decrease over the past decade. Loading points in Greymouth and Stillwater facilitate the transfer of goods from road to rail.

The TranzAlpine passenger rail service, running between Christchurch and Greymouth, is renowned as one of the world's top 10 rail journeys according to the Lonely Planet. Currently, there are no commuter rail services available on the West Coast.



South Island rail network

To assist with New Zealand's move towards a low-carbon economy, rail services is expected to grow across the country. Recognising that rail produces at least 70 percent less carbon emissions per tonne of freight carried compared with heavy road freight, rail network holds the potential to play a significant role in reducing greenhouse gas emissions and enhancing resilience and safety on interregional routes to Canterbury. Ensuring the ongoing physical and economic security of the rail link is crucial for the future of the West Coast. In the event of a further reduction or cessation of coal exports via rail, increasing capacity for other exports is provided an opportunity.

## Public transport

The West Coast has a limited public transport network, mainly due to its small and scattered population. However, some private operators offer services in response to specific demands, such as tourism and school buses. Additionally, the Councils receive subsidies for taxi services in Westport, Greymouth, and Hokitika, as well as for a regional total mobility scheme that includes wheelchair hoists.

The Council's current Regional Public Transport Plan (RPTP) from 2015 has been reviewed, and the new Draft West Coast RPTP 2023 has been out for consultation. The statutory document, developed under the Land Transport Management Act (LTMA) outlines the Council's intentions and policies regarding public transport throughout the West Coast. The plan focused on services that are funded and subsidised by the West Coast Regional Council to continue to service eligible people with impairments to access appropriate transport. This provides a level of independence, enhances community participation and enables access to services for those who are transport-disadvantaged.

While the updated RPTP continues to focus on subsidised services, key updates between the Draft RPTP 2023 and the current plan is the proposal to investigate the need for some form of on-demand transport for the region through the next Long Term Plan process.

## Walking and cycling

A West Coast Cycle Trail Review conducted by Beca in 2020 outlines the opportunity to develop a strategy to link the cycle trails together and address ongoing maintenance and operational costs. Currently, there has been significant public sector investment in tourism, in particular cycle trail establishment. Initial investment by private and public sectors has generated strong cycle tourism visitation across the region, particularly for New Zealanders, which generates wider economic benefits. However, funding the maintenance and operation of the established trails is vital to safeguarding the forecasted economic benefits for local businesses and the community, which the review estimates to be \$15.2 million to \$25.4 million of tourism spend in 20 years.

High quality cycle commuter routes and shared trails continue to be developed around urban centres, with the ambition for these tracks to form a regional network. A trail highlight, The West Coast Wilderness Trail, is divided up into four roughly equal sections between Greymouth and small old gold town of Ross. Running 120km from Kumara to Ross, the trail is popular among both families and individuals, trailing through rainforests, tumbling rivers, unspoiled lakes and beaches, backdropped by the Southern Alps.

A recently constructed trail spanning from Westport to Charleston, the Kawatiri Coastal Trail, is expected to be fully completed in early 2024. Currently, the Pūwaha, Kawau, Omau, Tauranga and Waitakere sections are fully open and being enjoyed by locals and visitors alike.

The West Coast is well known for its day and multi-day walking tracks, and more recently mountain bike tracks including Heaphy Track, Old Ghost Road and the Paparoa Track. Walking facilities were a focus of the 2022 community survey, with themes emerging around a need for improved footpath condition, and provision of better walking and cycling infrastructure in urban areas.

Buller’s recently completed Walking Action Plan is focused on encouraging ‘more walking, more cycling, more often’. This document provides an action plan that identifies a wide range of infrastructure, supporting policies and delivery actions for the next 10 years. Buller has recently received significant funding to invest in walking and cycling connections between the town centre and river in Westport, this anchor project will provide a connection between existing trails in the area and act as a catalyst for future investment in active modes in the town centre.



Figure 2: The West Coast Wilderness Trail



Figure 3: West Coast Cycle Trail Review by Beca

## Airports

Commercial flight services are available at Westport and Hokitika airports through providers like Sounds Air and Air New Zealand. Sounds Air operates daily return services between Westport and Wellington. Air New Zealand provides services between Hokitika and Christchurch. The airport at Greymouth caters to private planes and the hospital

transfer service. Located at the Greymouth aerodrome site is the helicopter search and rescue base, land search and rescue base and St Johns Ambulance – all adjacent to Grey Base Hospital.

## Ports

While independent of the local road network, the ports at Greymouth and Westport are identified as lifeline assets and important contributors to future economic growth in the region. The 2020 Ports strategy applied a Protect, Optimise and Grow framework recognising that while the ports are currently underutilised, industries such as Heavy Mineral Sands (HMS) can generate substantial economic value through shipping exports, with potential for additional sectors including Fishing. However, the strategy first and foremost recognises the importance of protecting the ports to secure their future and create commercial and climate resilience for the West Coast.

Subsequently the 2022 West Coast Transport and Logistics Strategy made recommendations for improving the performance and benefits achieved for the region from each port. This strategy considers all transport modes; shipping, rail and road, and seeks to develop a logistics model that meets the needs of industry, transport operators, ports and stakeholders. Opportunities were identified for shipping to increase the resilience and commercial opportunities for the West Coast. Key recommendations are:

- Development West Coast, West Coast Regional Council, the three local authorities, and West Coast Resilience Committee align to develop and implement a shipping strategy.
- The alliance work to articulate broader objectives for government funding application into NZ Transport Agency for the new coastal shipping activity class.
- A submission for funding has been made by Grey District Council for inclusion in the 2024-27 NLTP.

## Transport and land use integration

Population growth and land use change are two significant drivers of demand for land transport. The West Coast has a relatively stable population and is not expected to face the same level of growth experienced in other regions. Furthermore, there is limited ability to change land use on a large scale in the region due to land administered by the Department of Conservation being the primary land use.

Land use change is not purely assessed on the immediate roads or connections involved. The effects on the wider transport network are considered to identify where potential future infrastructure may be required to service any additional load. Territorial authorities are responsible for the land use through their district plans. The District Plans will soon be replaced with a combined District Plan – Te Tai o Poutini Plan. Te Tai o Poutini Plan will look at spatial planning across the region as well as considering issues such as climate change mitigation and adaption.

## Inter-regional connections

The West Coast is heavily reliant on the transport network of the entire South Island, as well as the Cook Strait ferry which provides the vital road and rail link for people and freight to the North Island. The road network currently underpins the regional economy and provides for essential goods and services. Manufactured and retail goods are typically delivered from distribution centres in Christchurch on a daily basis. A reliable and resilient road network is critical to maintaining these links.

The ‘tourist loop’ refers to; State Highway 73 from Christchurch to the West Coast, down State Highway 6 through South Westland to Southland and Central Otago, and then State Highway 1 back to Christchurch. This loop highlights the cross-boundary activity and illustrates the inter-regional connectedness when planning for tourism.

There is ongoing concern around the movement of vulnerable road users, particularly cyclists and motorcyclists, along inter-regional State Highways, particularly as they travel within a high-speed environment. For example, due to a lack of alternative routes, some State Highways have been classified as NZ Cycle Trail ‘Heartland Rides’ (State Highway 6 between Hokitika and Hawea) despite not meeting the prerequisite of being ‘quiet, back-country roads’. There are sections of these routes that are not fit for purpose for cyclists.

## Future opportunities and scenarios

There are a number of strategies that have been developed or are under development that will impact the transport network across the region.

## Securing the future of the West Coast Ports

In recent years the West Coast ports of Westport, Greymouth and Jackson Bay have been making a loss, following a decline in export cargoes. Assets of all three ports are, or have been, in declining condition reflecting their financial performance and low cargo volumes.

Development West Coast commissioned a feasibility study to determine the best way forward for the three ports. The study identified several executable strategies categorised into three components; protect, optimise, grow.

Subsequently the Provincial Growth Fund has provided funding of \$8M for new fishing jetties and berths for Westport and Greymouth including a new dredge, slipway and floating pontoons for Greymouth, and an additional \$3.1M for Westport for port infrastructure.

Furthermore, the National Land Transport Programme (NLTP) managed by NZ Transport Agency has allocated \$30 million towards coastal shipping activity to support capital investments. As a result, the Aotearoa Shipping Alliance, which is an alliance between Ngati Waewae (mana whenua of the West Coast, Te Rimu Trust, Tainui Kawhia Incorporated and Westland Mineral Sands) has received \$7 million split between to West Coast and East Cape to upgrade barge services. The funding includes procuring and upgrading vessels, upgrading ports and training crews.

Currently minerals and large exports for coastal shipping are transported out of the West Coast to Nelson Port via the Buller Gorge. However, is expected that with the barge upgrades funded by the NLTP future loads will potentially be barged out to seagoing vessels directly from Westport and Greymouth.

The future of the West Coast ports is closely linked to what happens with projects that create bulk product that requires transportation, for example mineral sand and either the export of the raw product to Christchurch for processing or processing this on the West Coast and exporting it through a West Coast port.

## South Island Freight Plan

The 2015 South Island Freight Plan describes the importance of primary production, particularly mining and agriculture including dairy, to the West Coast economy, and the role of road and rail primarily to move goods into and out of the region. All of the West Coast's freight is exported domestically, with the bulk moving east to Canterbury. The 2015 Plan forecast an increase in freight task for the West Coast of 2.7m tonnes between 2012-42, from 5.5 million to 8.2 million. This increase is equivalent to an additional 89,000 (44 tonne) truck trips per year across the West Coast by 2042. Over the same time rail freight is forecast to have a minimal increase of 0.11 tonnes, which will not impact on the West Coast's rail infrastructure.

Currently the South Island Regional Transport Committee Chairs Group has approved an update to the 2015 South Island Freight Plan as a priority project, focusing on integrated road, coastal, and rail freight. The first phase of this project is expected to provide an understanding of inter- and intra-regional freight movements and demand, existing and planned infrastructure, and opportunities and challenges.

## Franz Josef Master Plan & Waiho River Franz Josef Flood Protection Work

A formal risk assessment was undertaken in October 2023 for all key flood protection infrastructure on or near the Waiho River, in the vicinity of the Franz Josef township and State Highway. All areas were identified as having a risk rating of High or Critical for failure over the next 10 years.

Over the short-term, the avulsion into the Tatare Stream north of the Waiho River and township seriously increases risk to Havill's stop-bank and the town oxidation ponds, and moderately increases risk to the 55kph State Highway Corner and Link stop-bank.

The risk can be partially reduced by relaxing the river to the south downstream to occupy more of its floodplain (which is currently private farmland). However, substantial risk reduction is only realised once all stop-banks on the south side of the river are removed, including the NZ Transport Agency stop-banks from the SH6 Bridge to Canavan's Knob. If the river is not released to the south, the risk of a north stop-bank failure impacting the town and State Highway will increase with time.

Westland District Council will be budgeting for this development in the 2024-34 Long Term Plan and NZ Transport Agency has allocated funding to support investigations and business case development in 2024/25.

## West Coast Cycle Trails

The West Coast cycle trails present the opportunity for a better connected, integrated, and funded network of trails in the region. There is an existing network of trails which are all at various stages of maturity with projects in the planning, funding application or construction phases. The intent is to create distinct clusters of cycle trails within each of the districts to provide opportunities for streamlining current trail operations. Clustered cycling developments are attractive for tourists and present opportunities for additional bed nights and increased spending.

The local authorities have included funding for walking and cycling activities to improve connectivity and safety between local road networks and the network of off-road cycle trails. The Councils are also seeking to support ongoing maintenance of these trails, in many cases the trusts who operate them have been funded for capital works only and struggle to fully fund necessary maintenance and renewals.

## Pounamu Pathway

The Provincial Growth Fund has invested \$18 million into the Te Ara Pounamu Pathway project to support the rollout of state-of-the-art innovative digital technology to tell the West Coast's unique cultural and historical stories, for the first time, to Aotearoa New Zealand and the world. Pounamu (greenstone) is unique to the West Coast. Tourists will be able to follow the linked pathway, visiting the four new visitor experience centers in separate locations across the region, as they learn more about the history of Māori across the West Coast. This project is of significant importance to Ngāti Waewae and Ngāti Māhaki ki Makaawhio. The first tourism hub is expected to open in Greymouth in December 2023, providing an important connection between those travelling via the TranzAlpine and the township.

## Tohu Whenua

Tohu Whenua is a visitor programme that connects New Zealanders with their heritage and enhances their sense of national identity by promoting significant historical and cultural sites. The programme is in partnership with the Ministry of Culture and Heritage, Heritage New Zealand Pouhere Taonga and has the goal to establish a credible and connected network of heritage sites suitable for visitors. There are six Tohu Whenua sites on the West Coast representing Māori culture, early settlement and mining history; Waitua, Reefton, Denniston Mine, Brunner Mine Hokitika Point and Te kopikopoki o te Waka.

## Walking and Cycling

Enabling walking and cycling as alternative modes of transport, and for recreation and tourism purposes is a focus for each of the District Councils, and while Buller have developed their own walking and cycling strategy, there is a strong desire to develop a combined regional Walking and Cycling Strategy. Given the landscape of the region, there is an opportunity to build on existing work underway, increasing the reputation of the West Coast as a cycle destination, and identifying all existing and proposed cycle routes in the region.

There is an opportunity to develop and improve access to walking and cycling networks through a combined regional strategy. Developing safe and accessible walking and cycling networks within urban centres will open opportunities to increase use of active transport as a competitive mode of transport, rather than just for recreation. Increasing the share of people using active transport will aid in reducing carbon emissions (thereby meeting key objectives of this Plan) as well as resulting in improved health and wellbeing outcomes for our communities.



## Policy context

A number of statutes and policy and planning documents provide the legislative and policy context for land transport planning and investment at the national, regional and local level. These have informed the development of this Regional Land Transport Plan.

### Core statutes

#### **Land Transport Management Act 2003**

The Land Transport Management Act (LTMA) 2003 is the principal statute guiding land transport planning and funding in New Zealand. The purpose of the Act is to contribute to the aim of achieving an affordable, integrated, safe, responsive and sustainable land transport system. The LTMA sets out the core requirements of regional land transport plans and regional public transport plans for every region.

#### **Resource Management Act 1991 and reformed system**

The Resource Management Act (RMA) aims to promote the sustainable management of natural and physical resources and provides the statutory framework for land use planning and the development of regional policy statements, regional plans and district plans. Land use planning can have a significant influence on travel choice and transport network demand. Likewise, transport network investment can shape land patterns within a region.

The RMA is currently undergoing changes that may change how infrastructure is planned, consented and delivered. New legislation will require a more integrated approach to land use and infrastructure planning. It emphasises agile and future focused infrastructure that responds to environmental change, demographic and change and economic growth. Land use planning can have a significant influence on travel choice and transport network demand. Likewise, transport network investment can shape land use patterns within a region.

#### **Local Government Act 2002**

The Local Government Act (LGA) 2002 guides local government planning and the way councils carry out their functions. It includes provisions guiding the development of council long-term plans and infrastructure strategies, where the local funding share for the transport network investment is identified alongside other local investment priorities. The LGA also sets out consultation principles that are relevant for development of regional land transport plans.

#### **Climate Change Response (Zero Carbon) Amendment Act 2019**

The Climate Change Response Act 2002, amended by the Climate Change Response (Zero Carbon) Amendment Bill in 2019, provides a framework for New Zealand to develop and implement climate change policies that contribute to global efforts under the Paris Agreement to limit the global average temperature increase to 1.5 degrees Celsius above pre-industrial levels. This Act led to the development of the Emissions Reduction Plan 2022 (ERP) and National Adaptation Plan 2022 (NAP).

Transport is a major source of emissions in New Zealand and internationally, and therefore will have a key role in contributing to achieving this target. And the direction set at a national level has informed the development of this RLTP, key actions recommended by these Plans include:

- Reduce reliance on cars and support people to walk, cycle and use public transport.
- Adopt low emissions vehicles.
- Decarbonise heavy transport and freight.
- Consider risks to the land transport system from climate hazards, including sea-level rise, flooding, and landslides.
- Adapt to climate change through design, delivery, operation and use of the land transport system.

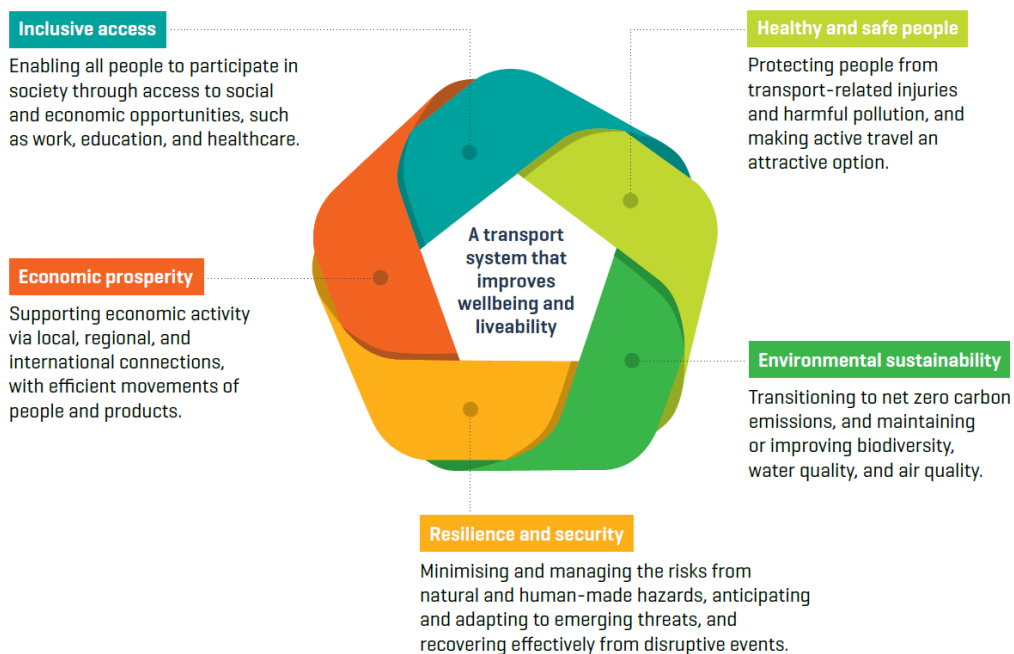
## National policy context

### Transport Outcomes Framework 2018

In 2018, the Ministry of Transport worked with other government agencies to develop a Transport Outcomes Framework for the transport system. This framework takes a strategic, long-term and integrated approach to transport and makes clear what government is aiming to achieve through the transport system in the long term. It is an enduring document meant to last beyond government of the day change. The five outcomes are:

- Inclusive access – enabling all people to participate in society through access to social and economic opportunities, such as work, education and healthcare.
- Healthy and safe people – protecting people from transport-related injuries and harmful pollution and making active travel an attractive option.
- Environmental sustainability – transitioning to net zero carbon emissions, and maintaining or improving biodiversity, water quality and air quality.
- Resilience and security – minimising and managing the risks from natural and human-made hazards, anticipating and adapting to emerging threats, and recovering effectively from disruptive events.
- Economic prosperity – encouraging economic activity via local, regional and international connections, with efficient movements of people and products.

All of these outcomes are inter-related. To make a positive contribution across the five outcomes, the transport system also needs to be integrated with land use planning, urban development and regional development strategies. In March 2020 a set of indicators for the five outcomes were developed to track the performance of each outcome.



### Government Policy Statement (GPS) on Land Transport (draft)

The GPS sets out the government’s priorities for expenditure from the National Land Transport Fund over a 10-year period, and how funding should be allocated. Regional Land Transport plans must be consistent with the GPS, and NZ Transport Agency must give effect to it with regards to land transport planning and funding.

In March 2024, the national government released the draft GPS 2024, replacing the GPS that the former government consulted on in August 2023. Following a public consultation period, the final GPS is expected to come into effect by July 2024. As a result, GPS 2021 remains the most recent version adopted into legislation at the time of writing. The draft GPS 2024 is different to GPS 2021, prioritizing economic growth and productivity, increased maintenance and resilience, safety, and value for money from transport expenditure and less explicit prioritisation of climate change, multi-modal transport options and freight connections. It also reintroduces the Roads of National Significance programme that was started under the previous National Government in 2009.

Broadly, the West Coast transport programme is well aligned with both GPS 2021 and 2024, with emphasis on increased maintenance and resilience, safety and value for money.

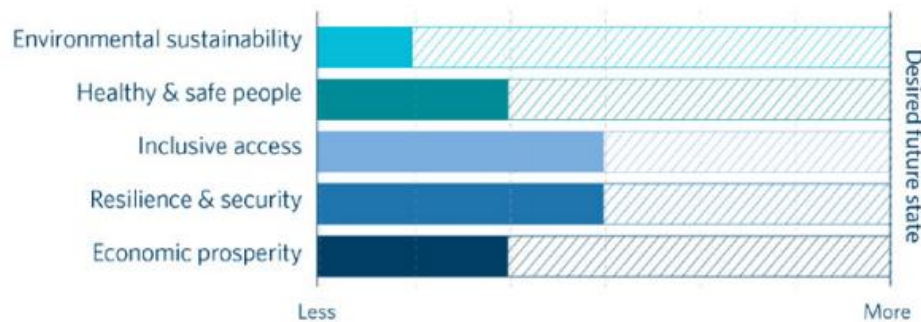
| 2021 GPS Strategic Priorities   | 2024 GPS Strategic Priorities (draft)   |
|---|---|
| <ul style="list-style-type: none"> <li>○ Safety.</li> <li>○ Better transport options.</li> <li>○ Improving freight connections.</li> <li>○ Climate change.</li> </ul> | <ul style="list-style-type: none"> <li>○</li> <li>● Economic Growth and Productivity</li> <li>● Increased Maintenance and Resilience</li> <li>● Safety</li> <li>● Value for Money.</li> </ul> |

**Arataki**

Arataki is NZ Transport Agency’s 30-year view of what is needed to deliver on the government’s current priorities and long-term objectives for the land transport system. Arataki outlines the context for change, the step changes in existing responses that it believes are needed, and the levers the Transport Agency will use, in partnership with others, to shape change. It includes national, pan-regional and regional summaries. Arataki version v1.1 was released in September 2023 to include updates to reflect the severe weather events of 2023. It includes a new climate adaption lens as well as updates to the Strategic Context and five regional directions. Key insights were identified for the West Coast and these have informed the development of this RLTP. Areas of high focus for the West Coast include:

- Ensuring the state highway network is well maintained, resilient and safe
- Addressing the regions relatively poor safety record
- Ensuring key tourism and freight routes are safe and resilient.

**Scale of effort to deliver outcomes in Te Tai o Poutini – West Coast**



**Road to Zero: NZ Road Safety Strategy 2020 – 2030**

Road safety is a critical outcome sought for local residents and visitors to the West Coast. Road to Zero, released in December 2019, sets the vision for New Zealand’s transport system where ‘no one is killed or seriously injured on our roads’. The Speed Management framework supports the delivery of the Road to Zero Action plan.

The Speed management framework sets out a new approach to speed management planning which significantly changes the way speed limits are set and ensures decisions about speed limit changes are made in the context of safety-related infrastructure improvements. The Land Transport Rule: Setting of Speed Limits 2021 outlines requirements for all road controlling authorities to develop speed management plans which outline a 10-year vision and 3-year implementation plan for a whole-of network approach to speed management. And the direction set at a national level has informed the development of this RLTP.



### New Zealand Infrastructure Strategy 2022-2052

In 2019, New Zealand’s Infrastructure Commission, Te Waihanga, was established as a Crown entity. In 2022, it released the New Zealand Infrastructure Strategy 2022-2052, seeking to revamp infrastructure planning and address issues including population growth, economic development, underinvestment, and climate change. While the Strategy does not make specific recommendations to the West Coast, it outlines key goals that have strong alignment to the objectives of this Plan: achieving net-zero emissions, supporting communities, enhancing cities, boosting resilience, and transitioning to a circular economy. This strategy aligns with ongoing Local Government reforms, emphasising a holistic infrastructure management approach.

### National Adaptation Plan

New Zealand’s first National Adaptation Plan, released by the Ministry for the Environment in 2022, aims to address climate change impacts and enhance resilience, particularly in the Transport sector. It focuses on three key objectives: reducing asset vulnerability to climate change, ensuring new infrastructure is climate-ready, and improving adaptive capacity through renewal programs.

Critical actions to support resilient infrastructure include developing risk assessment guidance, exploring resilience standards for infrastructure, integrating adaptation into Treasury decisions, and implementing the NZ Transport Agency Climate Change Adaptation Plan. To reduce inequality in outcomes, it’s essential to create system-level guidance and tools. This is especially crucial for regions like the West Coast with low populations facing increased climate change risks, emphasising the need for support in building adaptive capacity.

### Tiro Rangi – NZ Transport Agency’s Climate Adaptation Plan 2022-26

Published in December 2022, Tiro Rangi is NZ Transport Agency’s long-term plan for adapting the land transport system to climate change. The plan begins the step-change in climate adaptation, to change the way we plan, invest in, design, deliver, operate and use the land transport system. It lays a strong foundation for adaptation over two years to 2024, with actions building on existing initiatives and prioritise those that will unlock future action:

- Better understand and manage climate risks to NZ Transport Agency.
- Ensure that our strategic system planning and investment direction is enabling climate adaptation.
- Embed climate adaptation in our investment decision-making processes and delivery.
- Ensure that robust evidence underpins our work on climate adaptation.
- Embed te ao Māori worldview and build a partnership approach to climate adaptation for transport.

- Get ready to work together on climate adaptation.

### **National Resilience Programme Business Case**

NZ Transport Agency released the National Resilience Programme Business Case in June 2020 to create an evidence base of risks posed to New Zealand's transport network on a local and national level. This is used to inform decision making to support a more resilient network.

The Programme Business Case identified 21 major risks to the West Coast region, majority of which were environmental and weather concerns along the state highways. The risks were identified through the National Climate Change Risk Assessment Framework and are expected to be exacerbated by increasing climate change effects.

### **New Zealand Rail Plan**

The Ministry of Transport's draft New Zealand Rail Plan outlines the Government's long-term vision and priorities for New Zealand's national rail network, for both freight and passenger networks. The Land Transport (Rail) Legislation Bill will amend the LTMA to bring about the proposed rail policy framework for rail.

### **One Network Framework**

The One Network Framework (ONF) is a tool to establish road network function, performance measures, operating gaps and potential interventions for each road and street type. This approach builds on the previous One Network Road Classification (ONRC) and recognises that streets not only keep people and goods moving, but are also places for people to live, work, and enjoy. The ONF organises transport links by their place and movement roles into road and street types. The ONF is designed to contribute to improving road safety and build more vibrant and liveable communities.

## Local and regional policy context

### West Coast Regional Policy Statement

The West Coast Regional Policy Statement (RPS) sets the regional direction for future management of natural and physical resources, providing the foundation for the development of regional and district plans. The RPS guiding principles are People, Economy & Environment, Effectiveness, Adaptive Management and Affordability. The RPS includes policies relating to managing natural hazards and climate change.

### West Coast Combined Transport Programme Business Case & Activity Management Plan 2024-27

The Transport Programme Business Case is the third iteration of a combined approach to support the West Coast Councils initial continuous programme (maintenance, operation, and renewals) submission to NZ Transport Agency for the 2024-27 National Land Transport Programme. The joint approach recognises the degree to which many issues and opportunities are common to all three Councils and their communities, and supports a regional approach to providing a safe, productive, resilient, and cost-effective transport system.

It is a recommendation based on best available data, evidence, and knowledge to deliver the programme of work that addresses identified issues and opportunities, and maximised whole-of-life value and outcomes for the assets and Council's transport service delivery.

### Te Tai o Poutini Plan (West Coast combined District Plan)

Every district in New Zealand is required to provide a district plan that identifies community values and how to achieve them by managing where and how services are delivered, and how resources are used. Te Tai o Poutini Plan (TTPP) is the combined District Plan for the Buller, Grey and Westland District Councils. TTPP will be the first combined district plan and will replace the current individual district plans.

TTPP will include a specific section to address transport matters, as well as broader infrastructure provisions. The provisions, including rules, will cover roading, rail, airports, heliports and ports. Nationally significant infrastructure, such as the state highway and rail network, will be recognised, as well as other transport infrastructure. Designations will also be updated through this plan process. Given the critical nature of transport networks to everyday life, this Plan will have a significant influence on addressing matters associated with hazards and risks, subdivision, zones and development areas.

The plan being undertaken over a five-year period (beginning in March 2019) and is expected to be completed and operative 2024.

### West Coast Economic Development Strategy 2018-2025

The West Coast Economic Development Strategy aims to make the region a thriving place to live and work. Key strategies include attracting new businesses, adding value to existing ones, investing in tourism and infrastructure, maximising land use, improving education and training, and supporting the Māori economy while meeting the needs of an aging population. These strategies build upon previous work like the Tai Poutini West Coast Growth Study and the West Coast Economic Development Action Plan 2017, which highlighted the importance of transport links for economic growth, road resilience, visitor experiences, and regional trails for tourism. Ensuring the West Coast has resilient transport infrastructure, including routes that can cater to HPMV and 50MAX vehicles, is one of the identified building blocks to executional success.

### West Coast Regional Public Transport Plan

West Coast Regional Council develops the Regional Public Transport Plan for the West Coast, it sets out the Council's intentions and policies regarding public transport over the coming years. Currently the region does not have a comprehensive public transport network, due to its small and dispersed population base.

As there are no subsidised public transport bus services in the region, the draft 2023 Plan instead focuses on those services that are funded and subsidised by the Regional or District Councils of the West Coast, primarily the taxi services and the Total Mobility Scheme. It signals the need for investigation of potential opportunities to incorporate shared services or on-demand transport where appropriate to improve access to essential services and social and economic opportunities.

These initiatives will be led by the Regional Council, though there may be some partnership / supporting arrangements delivered by the District Councils as needed.

**West Coast Regional Walking and Cycling Strategy**

The West Coast Regional Walking and Cycling Strategy 2009 promotes the uptake of walking and cycling activities through the region. There has been a number of new walking and cycling initiatives since the development of this strategy, which has prompted the investment of an updated plan, which has been included for within this RLTP.



Ahaura Bridge replacement – State Highway 7



# Strategic framework

The Land Transport Management Act 2003 seeks an effective, efficient and safe land transport system.

## Ministry of Transport’s Outcomes Framework

THE PURPOSE OF THE TRANSPORT SYSTEM IS TO IMPROVE PEOPLE’S WELLBEING, AND THE LIVABILITY OF PLACES

### OUTCOME 1

Inclusive access

### OUTCOME 2

Healthy and safe people

### OUTCOME 3

Environmental sustainability

### OUTCOME 4

Resilience and security

### OUTCOME 5

Economic prosperity

*Regional Land Transport Plan – 30-year vision*

**A SAFE, RESILIENT AND CONNECTED MULTI-MODAL TRANSPORT NETWORK WHICH ENABLES THE WEST COAST TO THRIVE**

Strategic objectives – we will deliver our vision and targets through...

### Objective 1

RESILIENCE

A transport network that can better cope with unknown stresses, natural disasters, and the impact of climate change.

### Objective 2

ASSET CONDITION

A transport network that is fit for purpose.

### Objective 3

SAFETY

A transport system that is safe for all users.

### Objective 4

CONNECTIVITY

A multi-modal transport network that enables all users to meet their economic, social, and cultural needs.

### Objective 5

REGIONAL ADVOCACY

Improved advocacy for regional transport needs.

### Headline Targets

#### Resilience

Reduced number of closures on the strategic road network.

#### Asset Condition

Reduced assets not fit for purpose.

#### Safety

Reduction in deaths and serious injuries on West Coast roads.

#### Connectivity

Increase in active modes, more walking and cycling activity.



## The regional vision

Having a *safe, resilient and connected multi-modal transport network which enables the West Coast to thrive* is the vision set by the Regional Transport Committee, recognising the critical nature of a safe, resilient and well-functioning transport network to the economic and social wellbeing of our communities.

The key problems we need to address within the next ten years are:

- A transportation network that is increasingly vulnerable to adverse events, resulting in economic and social disruption.
- Aging and insufficient infrastructure (such as HPMV restricted bridges, unsealed roads, constrained pavement widths), combined with the changing needs of transport users over time (e.g. changes in the freight task), means there are pockets of infrastructure across the region that are no longer fit for purpose.
- The natural topography and dispersed settlement pattern contribute toward some challenging driving conditions. This combined with high proportion of visiting drivers who are unfamiliar with the local environment, drivers with poor behaviours (such as travelling at inappropriate speeds, under the influence of alcohol or drugs, or by motorcycle) contribute to crashes that cause death or serious injury.
- The main benefits of addressing these problems are:
  - Improved network reliability to better respond to the effects of natural hazards and climate change.
  - A transport network that is fit for purpose efficiently connecting users to their destinations.
  - A safer transport network and system.

To achieve this vision, the Regional Transport Committee has established long term strategic objectives, short term (10 year) investment priorities, and agreed a policy framework that will help guide and deliver this Regional Land Transport Plan.

In response to these problems and investment benefits, the West Coast's ten-year transport investment priorities are:

- Adapting our transport network to reduce the impact of adverse events.
- Investing in our transport network so it is fit for purpose.
- Implementing safer systems.
- Connecting our networks and users.

In addition to addressing these problems, four additional opportunities the Regional Transport Committee will be pursuing are:

1. Taking a South Island wide approach to transport in conjunction with the South Island Regional Transport Committee Chairs Group.
2. Advocating for better mode integration and mode shift when opportunities present themselves.
3. Supporting tourism and the regional dispersal of tourism benefits.
4. Encouraging the creation of a connected network of cycle rides, and cycling facilities, throughout and between the communities of the region.

- The benefits of realising these opportunities include:
  - Improved performance and capability of the transport network and network resilience.
  - Regional economic development, productivity and connectivity.
  - Greater value for money.

## 10-Year Objectives, policies, and priorities

Describes what the region will do to deliver the 30-year vision, and the short-to-medium term focus for investment.

Improved advocacy is not achieved through investment in transport infrastructure, but rather is a key to unlocking future benefits. So, it is not included as a separate Objective here, but is integrated into the other four recognising Council's function across all activities.

### Objective 1: Resilience – a transport network that can better cope with unknown stresses, natural disasters, and the impact of climate change

| <b>A transport network that can better cope with unknown stresses, natural disasters and the impact of climate change.</b>   |   |
|--|---|
| <b>Primary problem</b>   | <b>Primary benefits</b>   |
| Our transportation network is increasingly vulnerable to adverse events, resulting in economic and social disruption.  | Improved network resilience and travel time reliability<br>Increased productivity and reduced economic losses<br>Maintain community wellbeing |
| <b>The case for investment</b>   |   |
| <p>The West Coast, known for high rainfall, faces transport network vulnerabilities during major storms. Many towns sit by rivers, often protected from flooding. Still, severe storms cause road and rail issues, including flooding, erosion, landslides, and bridge damage. The West Coast relies on state highways and faces challenges with network closures due to limited alternative routes.</p> <p>Network disruptions impact economic, social, and cultural well-being, worsened by climate change and rising sea levels. The West Coast requires a transport network that can better cope with unknown stresses, natural disasters and the impacts of climate change.</p>   |   |
| <b>Summary of evidence</b>   |   |
| <p>In December 2022 an estimated \$3.2m of damage was caused to roading infrastructure in Westland by two significant storm events (February 2022, November 2022) where a total of 150 damaged sites were recorded through Buller's local road network.<sup>2</sup> In 2019, another storm causing high located flooding and damage to pavements and bridges had costed \$1.7m of damage to the same district.</p> <p>In 2019 the Waiho River bridge south of Franz Josef township was destroyed during a severe rain event, closing the route and causing major disruption to the entire region and economic loss, primarily related to freight and tourism.</p> <p>With the region being relatively isolated relying heavily on SH6, SH73, and the Midland Rail Line to connect communities, move freight and people, these corridors are all at high risk of damage or disruption from the effects of climate change or other natural hazards. Road closures have a significant impact on impact on the freight and tourist sectors which are critical economic drivers for the region.<sup>3</sup></p> |   |
| <b>Policies</b>  |   |
| <p>Policy 1: Ensure the transport network is designed and maintained to a level where impacts from natural hazards (e.g. climate change and severe weather events) are minimised.</p> <p>Policy 2: Enhance the resilience of critical assets and corridors to maintain essential lifelines during disruptions.</p> <p>Policy 3: Foster collaboration with West Coast councils, network providers, and neighbouring regions to enhance route security, with a particular focus on vital lifeline routes and interregional strategic corridors.</p> <p>Policy 4: Advocate for a sustained commitment to resilience projects for the West Coast transport network.</p>  |   |
| <b>Fit with strategic context</b>  |   |

<sup>2</sup> [https://bullerdc.govt.nz/your-council/key-projects/roadmap-to-recovery-for-buller-s-roads/?fbclid=IwAR1FUhtuv9VWLbEyObvuUPdc95ssQ1j6NcqWBDa50jPm21ZBy\\_tilkDVuao](https://bullerdc.govt.nz/your-council/key-projects/roadmap-to-recovery-for-buller-s-roads/?fbclid=IwAR1FUhtuv9VWLbEyObvuUPdc95ssQ1j6NcqWBDa50jPm21ZBy_tilkDVuao)

<sup>3</sup> <https://westcoastemergency.govt.nz/wp-content/uploads/2018/06/6-Transportation.pdf>

|  |   |  |                     |
|--|---|--|---------------------|
| Aligns with the GPS, Transport Outcomes Framework and other national initiatives by investing to increase network resilience to natural hazards and climate change.  |   |  |                     |
| Contributes to the Transport Outcomes Framework for economic prosperity.   |   |  |                     |
| <b>Priority investment areas</b>   |   | <b>Other priority implementation areas</b>   |                     |
| <p>The West Coast Regional Council, Westland DC, NZ Transport Agency and Department of Conservation will be developing a preferred approach at Franz Josef township to flood protection, State Highway 6 alignment and Waiho River bridge, and access to the Franz Josef Glacier.</p> <p>State Highway resilience improvements recommended by the National Resilience Programme Business Case. Haast to Hawea and Granity seawall have been included in the 10-year State Highway programme.</p> <p>Karamea Highway (landslip and erosion) and Jackson Bay Special Purpose Road (coastal erosion and flooding) resilience improvements.</p> <p>Department of Conservation will be developing a preferred approach for providing continued access to the Franz Josef Glacier.</p> |   | <p>Regional understanding of network vulnerabilities arising from climate change and natural hazards, and development of adaptation / mitigation plans for critical assets and routes.</p> <p>Investigation of additional items in the NZ Transport Agency National Resilience Programme Business Case that of major or extreme risk that require further investigation to identify a suitable response.</p> |                     |
| <b>Key investment partners</b>   | <b>Measure</b>  | <b>Long-term results</b>   | <b>Data sources</b> |
| <ul style="list-style-type: none"> <li>Local Councils</li> <li>NZ Transport Agency</li> <li>Department of Conservation</li> <li>KiwiRail</li> </ul>  | Duration and frequency of road closures on key routes | Maintain or improve current levels of service (as determined by relevant AO)   | Transport Insights  |

## Objective 2: Asset condition – a transport network that is fit for purpose

|   |   |
|---|---|
| <b>Primary problem</b>  | <b>Primary benefits</b>   |
| Aging and insufficient infrastructure (such as HPMV restricted bridges, unsealed roads, constrained pavement widths), combined with the changing needs of transport users over time (changes in the freight task), means there are pockets of infrastructure across the region that are no longer fit for purpose.  | <p>Wider economic benefit (productivity and regional economic benefit)</p> <p>Improved freight task optimisation</p> <p>Improvement in levels of service</p> <p>Reduction in asset failure risk</p> |
| <b>The case for investment</b>  |   |
| <p>The West Coast economy is heavily reliant on the export of primary products, and tourism sector, through the transport network. However, the region's roading infrastructure is aging and is inadequate for the types of vehicles using it. The Road Structures Lifecycle Management Plan has identified concerns, including deferred maintenance, poor bridge condition, and the need for replacements.</p> <p>In particular, weight restrictions on bridges are a significant network constraint resulting in transporters being unable to travel on the most direct or preferred route. In many circumstances the network is unable to adequately cater to changes in network users. Inadequate infrastructure presents an increasingly unacceptable risk to the economic and social wellbeing of our communities. Investment in our aging and insufficient infrastructure will lead to an increase in reliable travel times, gains in productivity and reduction in emissions (reduction in total freight journeys and improved travel time).</p> <p>State Highway 73 is vital for upgrading to High Productivity Motor Vehicle (HPMV) standards, but the project will take several years. Visitors are using local roads to explore new attractions, increasing traffic. Some attractions are at the end of less maintained roads, posing safety risks. Pinch points where trucks cross the centerline can lead to conflicts with tourist vehicles.</p> |   |

|  |  |  |  |
|--|--|--|--|
| <p>Across the local road network, a number of transport assets are reaching, or have reached, the end of their economic life. Bridges pose a particular problem, and with high rainfall and an extensive network of streams and rivers, communities are particularly reliant on these assets.</p>  |  |  |  |
| <p><b>Summary of evidence</b></p>  |  |  |  |
| <p>Heavier vehicles on the network are placing increasing demands on infrastructure. Many bridges are weight restricted, limiting access for HPMV and 50MAX trucks. On the local network:</p> <ul style="list-style-type: none"> <li>• Approximately 59 bridges are restricted for 50MAX and HPMV.</li> <li>• A total of 30 bridges have been identified needing improvement or replacement over the next 10-years (11 in Buller, 14 in Grey, and 5 in Westland).</li> <li>• A total of 4 bridges have been identified for improvement due to level of service deficiencies (1 in Buller, 2 in Grey and 1 in Westland).</li> </ul> <p>State Highway 7 is the dedicated HPMV route between the West Coast and Canterbury. However, HPMV vehicles are travelling with reduced capacity via State Highway 73 to reduce travel distance and time, particularly from the Grey and Westland Districts.</p> <p>Growth in visitors into new parts of the region has seen higher numbers of vehicles (including campervans) on low volume rural roads that were not designed with these users in mind. Constrained pavement widths and unsealed roads pose safety issues.</p> |  |  |  |
| <p><b>Policies</b></p>   |  |  |  |
| <p>Policy 1: Prioritise investment in maintenance, renewals, and the replacement of key assets.</p> <p>Policy 2: Ensure transport infrastructure and services meet agreed community and technical levels of service.</p> <p>Policy 3: Provide for High Productivity Motor Vehicle capability on strategic routes, including State Highway 73 and key local roads.</p>  |  |  |  |
| <p><b>Fit with strategic context</b></p>   |  |  |  |
| <p>Aligns with the GPS by investing to maintain and operate the system to improve economic growth and productivity.</p> <p>Contributes to the GPS and other national initiatives to improve resilience and reduce emissions.</p> <p>Consistent with the Transport Outcomes Framework for economic prosperity.</p>  |  |  |  |
| <p><b>Priority investment areas</b></p>  |  | <p><b>Other priority implementation areas</b></p>  |  |
| <p>End-of-life replacement of bridges and structures to modern freight and seismic standards.</p> <p>Sealed and unsealed road network maintenance and renewals meet agreed levels of service.</p>  |  | <p>Bridge improvements to meet HPMV standard.</p> <p>Drainage improvements in response to severe weather events and climate change impacts.</p>    |  |
| <p><b>Key investment partners</b></p> <ul style="list-style-type: none"> <li>• Local Councils</li> <li>• Department of Conservation</li> <li>• NZ Transport Agency</li> <li>• KiwiRail</li> </ul>  | <p><b>Measure</b></p> <p>Reduction in HPMV / 50MAX restricted bridges</p> <p>Duration and frequency of road closures on key freight and tourism routes</p> | <p><b>Long-term results</b></p> <p>Improve asset condition</p> <p>Maintain or improve current levels of service (as determined by relevant AO)</p> | <p><b>Data sources</b></p> <p>NZ Transport Agency/Council asset database</p> <p>Transport Insights</p> |

### Objective 3: Safety – a transport system that is safe for all users

|   |   |
|---|---|
| <p><b>Primary problem</b></p> <p>The natural topography and dispersed communities create demanding driving conditions. This combined with high visitor numbers unfamiliar with the local roads and those engaging in risky driving behaviours, such as speeding, motorcycles or</p> | <p><b>Primary benefits</b></p> <p>Reduced deaths and serious injuries</p> <p>Enhanced community wellbeing and reduction in the social cost of crashes</p> <p>Reduced risky behaviour by drivers</p> |
|---|---|

|  |  |   |   |
|--|--|---|---|
| driving under the influence, results in accidents that lead to fatalities or severe injuries.  |  |   |   |
| <b>The case for investment</b>   |  |   |   |
| <p>Many West Coast visitors consider travelling on local roads a part of the iconic West Coast experience. Safety is a concern, especially for tourists navigating unfamiliar, winding, and sometimes narrow roads. High visitor traffic, local residents, freight vehicles, and cyclists create additional safety issues. Pinch points, where vehicles cross the centerline, add to the risks.</p> <p>The Road to Zero Strategy is ambitious, posing challenges for the West Coast, as crash statistics are low but underreporting is high. Despite low total deaths and serious injuries, the region has the highest per capita rate in the country. Issues include vehicle run-off, head-on collisions, driver behavior (alcohol, drugs, seatbelts, and speeding), inexperienced road users, and high numbers of visiting drivers. The region's dispersed settlements and long journeys contribute to the problem, with many motorcycle accidents.</p> <p>The Communities at Risk Register assesses personal risk, a measure of crash likelihood based on road network usage, not affected by population size. The social and economic consequences of serious injuries or deaths are significant, even though West Coast figures are relatively low compared to other regions. The national goal is zero road-related incidents.</p> |  |   |   |
| <b>Summary of evidence</b>   |  |   |   |
| <p>The Te Ringa Maimoa Transports insights crash data on Safety reports the number of crashes with reported fatal and severe injuries over the past 10 years. The data reveals that the West Coast Region tracks above the national average for personal risk (risk to the individual of fatal or serious casualties per million vehicle kilometres travelled).</p> <p>Although there has been a declining trend in total number of reported crashes over the past two decades, more can be done to reduce the number of fatalities and crashes the roads in the West Coast. Further, NZ Transport Agency's Communities at Risk register 2022 shows that Buller District is of concern, ranking 17 out of 67 Territorial authorities in the personal risk category for all deaths and serious casualties.<sup>4</sup></p>  |  |   |   |
| <b>Policies</b>  |  |   |   |
| <p>Policy 1: Prioritise investment to align with the Road to Zero Road Safety Strategy.</p> <p>Policy 2: Ensure continuous improvement in regional road safety through road safety programmes and interventions that are targeted to the highest risk users and locations.</p> <p>Policy 3: Advocate for safer active travel modes such as on-road / off-road paths and trails for walking and cycling.</p>  |  |   |   |
| <b>Fit with strategic context</b>  |  |   |   |
| <p>Aligns with the GPS by investing in road safety improvements and promotion to address and influence network risk, community attitudes, and driver behaviour.</p> <p>Consistent with the Transport Outcomes Framework for health and safe communities.</p>   |  |   |   |
| <b>Priority investment areas</b>   |  | <b>Other priority implementation areas</b>  |   |
| <p>Prioritise safety improvement through maintenance and renewals.</p> <p>Road safety promotion.</p>   |  | <p>Safety improvements on key tourist routes, and rural roads where cyclists and pedestrians are present.</p> |   |
| <b>Key investment partners</b>   | <b>Measure</b>                         | <b>Long-term results</b>  | <b>Data sources</b>                       |
| Local Councils   | Deaths and serious injuries            | Reduction in the number of crashes that result in death or serious injuries                                   | NZ Transport Agency Crash Analysis System |
| Department of Conservation   |  |   |   |
| NZ Transport Agency  | Injury crashes involving motorcyclists | Reduction in the number of crashes that results in  | NZ Transport Agency Crash Analysis System |
| New Zealand Police   |  |   |   |

<sup>4</sup> <https://www.nzta.govt.nz/assets/resources/communities-at-risk-register/docs/communities-at-risk-register-2022.pdf>

|                                |  |  |   |
|--------------------------------|--|--|---|
| ACC<br>Community Public Health |  | motorcyclist deaths or serious injuries  |   |
|                                | Drivers at fault, or part fault, in injury crashes with and overseas licence | Reduction in the number of crashes that involve drivers holding an overseas license that result in death or serious injury | NZ Transport Agency Crash Analysis System |

#### Objective 4: Connectivity – multi-modal transport network that enables all users to meet their economic, social, and cultural needs

| Opportunity  | Primary benefits  |
|--|---|
| Investing in a multi-modal network will enhance the economic, social and cultural needs of our communities, as well as contributing to the Governments priority of a low emission New Zealand.   | <p>Increase use of active modes, such as walking and cycling, for shorter trips</p> <p>Increase in the numbers and use of electric and hydrogen powered vehicles</p> <p>Contribution to a reduction in transport emissions</p> <p>Revitalisation of communities and towns</p> |
| <b>The case for investment</b>   |   |
| <p>In the West Coast, where the risk of being isolated by road is realized, alternative transport routes become critical for evacuations and transport of emergency supplies. Beyond increasing resilience and security, a multi-modal suite of transport options also opens up opportunities for economic development while improving environmental sustainability in the region.</p> <p>Transitioning to a low-emission New Zealand requires addressing land transport’s substantial greenhouse gas emissions. While this transition can be a costly and time intensive exercise, promoting alternative transport options for communities and large-scale sectors can lessen the environmental footprint, while increasing economic and social well-being. This includes:</p> <ul style="list-style-type: none"> <li>• Increasing investment in footpaths and cycleways to promote walking and cycling for local commuters and tourists.</li> <li>• Enhancing bridges to accommodate high-capacity vehicles on more direct routes.</li> <li>• Investing in the future of freight transport that considers multi-modal transport including rail and ports.</li> <li>• Developing infrastructure for electric and hydrogen vehicles (cross-agency effort).</li> </ul>  |   |
| <b>Summary of evidence</b>   |   |
| <p>A 2009 Coastal Shipping and Freight Mode Choice report undertaken for NZ Transport Agency considered the externalities arising from freight movement via different modes. It revealed that on a tonne-km basis, the costs associated with externalities are significantly higher for road transport compared to rail (6 times as high) and costal shipping (12 times as high).</p> <p>Ports play a vital role as economic hubs, connecting New Zealand to international markets and facilitating substantial trade volumes, both domestically and globally. In 2020, the region received funding of \$125,000 from the Provincial Growth Fund (PGF) to conduct a feasibility study for the upgrade of the Westport and Greymouth ports. Currently, over \$17m has been invested in port projects in the region, reinforcing the government’s recognition of the critical role played by ports in enhancing the resilience, efficiency, and carbon reduction measures within freight networks.</p> <p>Personal, and light vehicle travel use is pertinent in the region as well, with 84% of work commutes being made by private vehicles. The potential for expanding public transportation is currently limited due to the dispersed nature of the relatively small population centres. However, improving and investing in a network of cycle trails would increase the uptake of commuters cycling shorter distances.</p> <p>In addition to cycling, walking facilities were a focus of the 2022 community survey, with themes emerging around a need for more dedicated pedestrian crossings, improved footpath condition, and provision of a connected walking and cycling network in urban areas.</p> |   |
| <b>Policies</b>  |   |

| <p>Policy 1: Support effective connections between different transport modes to enable multi-modal travel and movement of freight.</p> <p>Policy 2: Develop, and maintain, walking and cycling networks that are safe and well-integrated with other modes of transport to connect our communities and enhance visitor experience.</p> <p>Policy 3: Investigate opportunities to facilitate more efficient multi-modal freight movements, including potential for coastal shipping.</p> |  |  |                        |
|---|--|--|------------------------|
| <p><b>Fit with strategic context</b></p> <p>Aligns with the GPS by promoting safe transport networks.</p> <p>Supports wider government initiatives and consistent with the Transport Outcomes Framework for healthy and safe communities.</p>   |  |  |                        |
| <p><b>Priority investment areas</b></p>   |  | <p><b>Other priority implementation areas</b></p>  |                        |
| <p>Walking and cycling infrastructure improvements to deliver safer and connected active travel networks.</p> <p>Investment in planning / infrastructure to improve road, rail, and coastal shipping freight connections.</p>   |  | <p>Regional walking and cycling strategy and action plan (load roads).</p> <p>Seek opportunities for additional funding sources for new off-road walking/cycle trail projects.</p> |                        |
| Key investment partners   | Measure  | Long-term results  | Data sources           |
| <p>Local Councils</p> <p>NZ Transport Agency</p> <p>Department of Conservation</p> <p>KiwiRail</p>  | Increase use of cycle in town centres                  | Number of cycle trips counted in town centres  | Cycle counts           |
|   | Increase in provision of dedicated cycleways / trails  | Lengths (kms) of dedicated cycleways / trails provided   | Council asset database |
|   | Increase in footpath connectivity and level of service | Lengths (kms) of footpath provided   | Council asset database |
|   |  | Average condition of paving on footpaths   |                        |
| Number of electric vehicle charging points  | Increase in electric vehicle charging points           | NZ Transport Agency  |                        |



## Headline targets

| Objective       | Target  | Description  |
|-----------------|---|--|
| Resilience      | Reduction in road closures, and number of vehicles impacted by road closures, associated with natural hazards or unplanned events.              | This target is measured using data collected by the local authorities and NZ Transport Agency, and reporting in the Te Ringa Maimoa Transport Insights portal.<br><br>The baseline year will be 2023/24.   |
| Asset condition | Reduction in assets that do not meet agreed level of service or technical standards for freight loading, safety, and resilience (e.g. seismic). | This target will be measured using data collected by the local authorities and NZ Transport Agency and reported the Activity Management Plans and in the Te Ringa Maimoa Transport Insights portal.<br><br>The baseline year will be 2023/24.  |
| Safety          | Reduction in deaths and serious injuries on West Coast roads.   | This target aligns with the local authorities mandatory annual reporting measure and target for deaths and serious injuries. Measurement will be based on annual crash data collected via the NZ Transport Agency Crash Analysis System (CAS).<br><br>The baseline year will be 2023/24. |
| Connectivity    | Increasing travel in the West Coast by active (walking and cycling) transport modes.  | This target will be measured using data from the Census as well as any supporting traffic count, cycle count, public transport patronage data sourced through local authorities and West Coast Regional Council.<br><br>The baseline year will be figures from the 2023 Census.          |

## Fit with strategic context

The table below outlines how each investment objective aligns with the outcomes in the Ministry of Transport Outcomes framework, the priorities identified in the Government Policy Statement on Land Transport, and the strategic objectives of this Regional Land Transport Plan. Collectively, the priorities align with all the outcomes, priorities and objectives in these documents.

|   | MOT Outcomes     |                         |                              |                         |                     | GPS Priorities                   |  |                 |        | RLTP Objectives |                 |        |              | Regional Advocacy* |
|---|------------------|-------------------------|------------------------------|-------------------------|---------------------|----------------------------------|--|-----------------|--------|-----------------|-----------------|--------|--------------|--------------------|
|   | Inclusive access | Healthy and safe people | Environmental sustainability | Resilience and security | Economic prosperity | Economic Growth and Productivity | Increased maintenance and r resilience | Value for money | Safety | Resilience      | Asset condition | Safety | Connectivity |                    |
| Adapting our transport network to reduce the impact of adverse events | X                |                         |                              | X                       | X                   | X                                | X                                      |                 | X      | X               | X               | X      | X            |                    |
| Investing in our transport network so it is fit for purpose           | X                |                         | X                            | X                       | X                   | X                                | X                                      | X               | X      | X               | X               | X      | X            |                    |
| Safer systems implemented   | X                | X                       |                              |                         |                     |                                  |  |                 | X      |                 |                 | X      |              |                    |
| Connecting our network and users                                      | X                | X                       | X                            | X                       | X                   | X                                | X                                      |                 | X      |                 |                 | X      | X            |                    |

*\*regional advocacy is not achieved through investment in transport infrastructure, but rather is a key objective to unlock further investments.*

## Regional transport programme and funding

### Introduction

This section of the RLTP forms the regional programme of land transport activities for the West Coast region for which funding is sought from the National Land Transport Fund (NLTF) and subsequent inclusion in the NLTP.

The local authority projects and budget forecasts included here are draft for RLTP consultation purposes only, this RLTP consultation does not supersede the separate consultation via each organisation's Long-Term Plan process which will be used to approve the final 10-year programmes and budgets.

The minimum requirements for inclusion are set out in Section 16(3) of the LTMA, which requires RLTPs to contain details of programmes and projects being submitted for funding from the NLTF for the first six years of the RLTP. The front end, or strategy section, of an RLTP provides evidence of the problems, the long-term direction (objectives, policies, measures) and priorities that activities in the programme will need to contribute and respond to.



### Key outtakes from Activity Management Plans

Since 2015 the Buller, Grey, and Westland District Councils have taken a collaborative approach to development of the regional Transport Programme Business Case (PBC) and Activity Management Plans (AMP) to provide details of their proposed investment programme. In 2023 the Councils prepared the third iteration of these plans to support each Council's 2024-34 Long-Term Plans and submission to NZ Transport Agency for the 2024-27 National Land Transport Programme.

It recommends a prioritised programme of investment that has been developed in collaboration with the Council's transport teams and subject matter experts. It seeks to balance affordability with a programme of work driven by data, evidence, and knowledge that addresses identified issues and opportunities, and maximised whole-of-life value and outcomes for the assets and Council's transport service delivery. Key outtakes of the recommended investment programme are:

- An enhanced road maintenance programme that prioritises issues that have been identified through detailed investigations and are supported by an improved evidence base developed over the last three years.
- Supports a reduction, but does not fully address, a large backlog of maintenance and renewals on bridges across the region. An enhanced baseline maintenance and component replacement programme seeks to avoid further increases to this backlog and provides for condition-based renewal of end-of-life bridges.
- While there is a focus on road maintenance and addressing condition-issues, there are flow on benefits for:
  - Freight levels of service through targeted investment in bridges.
  - Road safety through traffic services, intersection design, and bridge safety improvements.

- Resilience outcomes as the risk of asset failure is reduced and structures are adequately maintained and renewed ensuring access to remote communities.
- Uplift in internal roading team asset management capability and capacity, enhanced transport collaboration between the three councils, and procurement of specialist services to continue improvement in data and evidence for asset management and strategic planning.

NZ Transport Agency State Highways Investment Proposal (SHIP) proposes an enhanced investment programme to improve maintenance and renewal outcomes, and deliver benefits for resilience, safety, and economic productivity. Key aspects of the programme include:

- Road surface, pavement and drainage renewals activity to increase the longevity of new pavements and reduce the incidence of potholes and similar faults and related repair works.
- Safety through the renewal of barriers, safety markings, and digital safety devices.
- Resilience improvements including bridge replacements, retaining structures, seawall and rockfall protection.
- Franz Josef masterplan and flood protection resilience business case.
- Resilience corridor business case for SH6 Haast to Hawea.
- Implement speed reductions near schools, kura and marae, and in townships and key urban and rural areas.

## Funding the programme

The regional programme of activities outlines maintenance, operation, renewal and improvement activities for which funding is sought through the NLTP and from the NLTF. Approved activities receive funding from the NLTF at a set Funding Assistance Rate (FAR) as co-funding to each Council's local share. For 2024-27 the current normal FAR for each organisation is:

- West Coast Regional Council 66%
- Buller District Council 75%
- Grey District Council 64%
- Westland District Council 64%
- Department of Conservation 51%

State Highways and the Special Purpose Roads (Karamea Highway and Jackson Bay Road) receive 100% NLTF funding for approved activities.

The NLTF is not limitless and will not be able to fund all activities identified in the plan, similarly the three local authorities have identified significant affordability issues to fully fund their local share via general rates. This risks under-investment in essential activities, particularly where maintenance and renewal programmes are reduced, and has potential to create poor outcomes in the medium to long term:

- Reduced levels of service.
- Deteriorating asset condition leading asset failure risk.
- Potential safety and resilience risks.
- Growing backlog of works and higher future costs.
- Loss of economic productivity.

So, other sources of funding outside the NLTF are needed to give effect to the objectives and priorities in this Plan. In recent years the local authorities have been successful in securing funding from alternate Crown sources for land transport projects, these include:

- Provincial Growth Fund (PGF) – Kānoa Regional Economic Development & Investment Unit
- Shovel Ready – Crown Infrastructure Partners
- Infrastructure Acceleration Fund (IAF) – Kainga Ora
- Better Off support funding – Department of Internal Affairs
- Roadmap to Recovery for Buller's Roads –NZ Transport Agency funding for the reinstatement of roads in the Buller District following significant weather events.

Examples for the upcoming 2024-27 period may include:

- Regional Infrastructure Fund – \$1.2B announced as part the central government coalition agreement.
- Government Resilience Fund – \$20m annually for resilience projects on local roads.
- City and Regional Deals – long-term (10-20 year) deals between local and central government to make joint funding commitments and provide a basis for local authorities to deliver a range of urban and regional initiatives.

With the NLTP taking a national view, it is the Regional Transport Committee's role to ensure we establish and advocate for a well-planned and supported programme of works. Given the similar challenges being faced across the region, extending beyond just transportation, an integrated and collaborative approach between the four West Coast Council organisations is warranted, particularly to realise opportunities such as a Regional Deal.

## Committed Activities

| Approved Organisation    | Activity                             | Phase                      | Total cost 24-27 | Status              |
|--------------------------|--------------------------------------|----------------------------|------------------|---------------------|
| <b>State Highways</b>    |                                      |                            |                  |                     |
| <b>NZTA (West Coast)</b> | Crown Resilience Programme LCLR WTCT | Implementation             | \$8,171,532      | Funding approved    |
| <b>NZTA (West Coast)</b> | SH6 SH69 to Charleston               | Pre-Implementation         | \$88,715         | Funding approved    |
| <b>NZTA (West Coast)</b> | SH6 Gates of Haast River Erosion     | Implementation             | \$9,052,500      | Funding approved -- |
| <b>NZTA (West Coast)</b> | SH6 WTCT Haast to Hawea RESIL IMPR   | Single Stage Business Case | \$510,665        | Funding approved    |

## Regionally Significant Activities

## RLTP Objective – Key

1. Resilience 2. Asset condition 3. Safety 4. Connectivity

| Activity  | A/C | Phase   | Description  | Cost 24/25  | Cost 25/26   | Cost 26/27  | Future Cost 2027-34 | Total cost over ten-years | Funding source | RLTP Obj. | Key Priority      | Regional Priority |
|---|-----|---------|--|-------------|--------------|-------------|---------------------|---------------------------|----------------|-----------|-------------------|-------------------|
| <b>NZ Transport Agency (West Coast)</b>                       |     |         |  |             |              |             |                     |                           |                |           |                   |                   |
| SH6 Franz Josef Resilience Masterplan                         | IM  | PBC     | Supporting transport component of town development and realignment of SH6. | \$1,199,000 | -            | -           | -                   | \$1,199,000               | NLTF           | 1         | Resilience        | 1                 |
| SH6 WTCT Haast to Hawea RESIL IMPR                            | SHI | Pre-imp | Range of potential interventions.  |             | \$599,500    | -           | -                   | \$ 19,275,000             | NLTF           | 1         | Resilience        | 1                 |
|   |     | Prop    |  |             | -            | \$636,000   | -                   |                           | NLTF           |           |                   |                   |
|   |     | Imp     |  | -           |              | \$9,156,000 | \$8,883,500         |                           | NLTF           |           |                   |                   |
| SH7 Stoney Creek Bridge                                       | SHI | Prop    | Bridge replacement with two-lanes  | \$530,000   | -            | -           | -                   | \$ 16,117,000             | NLTF           | 4         | Levels of service | 3                 |
|   |     | Pre-imp |  | \$1,199,000 | -            | -           | -                   |                           | NLTF           |           |                   |                   |
|   |     | Imp     |  | -           | \$ 7,085,000 | \$7,303,000 | -                   |                           | NLTF           |           |                   |                   |
| WEST Share VFM Safety Improvement Programme                   | SHI | Imp     | Safety Infrastructure improvements and speed management                    | \$1,516,699 | \$1,156,699  | \$367,098   | 8,096,893           | \$11,566,990              | NLTF           | 3         | Safety            | 7                 |
| SH67 Granity seawall  | SHI | Imp     | Seawall protection against storm surges.                                   | \$5,777,000 | \$5,886,000  | -           | -                   | \$ 11,663,000             | NLTF           | 1         | Resilience        | 4                 |
| SH6 EOL Coal Creek Bridge                                     | SHI | Imp     | EOL bridge replacement   | \$7,630,000 | \$11,445,000 | \$3,815,000 | -                   | \$22,890,000              | NLTF           | 2         | Levels of service |                   |
| WC Share Pre-imp 2027-30 Bridge rep                           | SHI | Pre-imp | Planning for future bridge replacement                                     | \$120,868   | \$161,157    | \$120,868   | -                   | \$402,893                 | NLTF           | 2         | Levels of service |                   |
| SH6 Kumara Junction Commercial Vehicle Regional Safety Centre | SHI | Imp     | Kumara Junction  | \$ 109,000  | \$ 218,000   | \$2,725,000 | \$3,706,000         | \$7,023,000               | NLTF           | 4         | Safety            | 9                 |
|   |     | Prop    |  | \$21,200    | \$ 243,800   | -           | -                   |                           | NLTF           |           |                   |                   |
|   |     | Pre-imp |  | -           |              |             |                     |                           | NLTF           |           |                   |                   |
|   |     | Imp     |  | -           | -            |             |                     |                           | NLTF           |           |                   |                   |
| <b>Buller District Council</b>                                |     |         |  |             |              |             |                     |                           |                |           |                   |                   |

|   |     |     |  |             |             |             |   |             |            |   |            |   |
|---|-----|-----|--|-------------|-------------|-------------|---|-------------|------------|---|------------|---|
| <b>Karamea Highway Resilience Improvements</b>    | LRI | Imp | Address drainage and asset resilience deficiencies: drainage, culverts, swales, rock/geotextile armouring, retaining, realignment.           | \$1,866,000 | \$1,933,000 | \$1,733,000 | - | \$5,532,000 | NLTF (SPR) | 1 | Resilience | 4 |
| <b>Karamea Highway Geometry Improvements</b>      | LRI | Imp | Geometry improvements at corners to improve road safety.   | -           | \$900,000   | \$900,000   | - | \$1,800,000 | NLTF (SPR) | 3 | Safety     | 4 |
| <b>Local road end-of-life bridge replacements</b> | LRI | Imp | End-of-life / condition-based replacement of bridges and structures:<br>- Chasm Creek Bridge #3<br>- Brown Grey                              | \$500,000   | \$1,145,000 | \$1,175,000 |   | \$2,500,000 | NLTP       | 1 | Resilience |   |
| <b>SPR end-of-life bridge replacements</b>        | LRI | Imp | End-of-life / condition-based replacement of bridges and structures:<br>- Tobins Creek Culvert   |             | \$800,000   |             |   | \$800,000   | NLTF (SPR) | 1 | Resilience |   |
| <b>Grey District Council</b>                      |     |     |  |             |             |             |   |             |            |   |            |   |
| <b>Local road end-of-life bridge replacements</b> | LRI | Imp | End-of-life / condition-based replacement of bridges and structures:<br>- Brandy Jacks Bridge<br>- Black Creek Bridge<br>- Ryan Creek Bridge | \$400,000   | \$640,000   | \$400,000   |   | \$1,440,000 | NLTP       | 1 | Resilience |   |
| <b>Westland District Council</b>                  |     |     |  |             |             |             |   |             |            |   |            |   |
| <b>Jackson Bay Road Resilience Improvements</b>   | LRI | Imp | Range of potential interventions to address coastal erosion and flood risk.  | \$2,000,000 | \$2,000,000 | \$2,000,000 | - | \$6,000,000 | NLTF (SPR) | 3 | Resilience | 8 |
| <b>Local road end-of-life bridge replacements</b> | LRI | Imp | End-of-life / condition-based replacement of bridges and structures:<br>- La Fontaine 2025/26  |             | \$800,000   |             |   | \$800,000   | NLTP       | 1 | Resilience |   |



## Other proposed activities

| Activity Class: Investment Management   |                |  |            |            |            |                        |                      |                |                |
|---|----------------|--|------------|------------|------------|------------------------|----------------------|----------------|----------------|
| Activity  | Phase          | Description  | Cost 24/25 | Cost 25/26 | Cost 26/27 | Future NLTP Cost 27-30 | Total Cost           | Funding Source | RLTP Objective |
| <b>West Coast Regional Council</b>  |                |  |            |            |            |                        |                      |                |                |
| Investment management planning  | Implementation | Regional Land Transport Plan and Regional Public Transport Plan planning and management.   | \$111,869  | \$80,008   | \$104,971  | \$238,923              | \$535,771            | NLTP           | All            |
| <b>Buller District Council</b>  |                |  |            |            |            |                        |                      |                |                |
| Investment management planning  | Implementation | Asset/activity management improvement and regional strategy development.   | \$183,333  | \$108,333  | \$18,333   | \$309,999              |                      | NLTP           | All            |
| Programme business case development   | Implementation | Regional programme business case and activity management plan development.   | \$5,000    | \$40,000   | \$5,000    | \$60,000               | \$90,000             | NLTP           | All            |
| <b>Grey District Council</b>  |                |  |            |            |            |                        |                      |                |                |
| Investment management planning  | Implementation | Asset/activity management improvement and regional strategy development.   | \$183,333  | \$108,333  | \$18,333   | \$309,999              |                      | NLTP           | All            |
| Programme business case development   | Implementation | Regional programme business case and activity management plan development.   | \$5,000    | \$40,000   | \$5,000    | \$60,000               | \$90,000             | NLTP           | All            |
| <b>Westland District Council</b>  |                |  |            |            |            |                        |                      |                |                |
| Investment management planning  | Implementation | Asset/activity management improvement and regional strategy development.   | \$170,833  | \$107,083  | \$18,333   |                        |                      | NLTP           | All            |
| Programme business case development   | Implementation | Regional programme business case and activity management plan development.   | \$5,000    | \$40,000   | \$5,000    | \$60,000               | \$90,000             | NLTP           | All            |
| <b>NZ Transport Agency</b>  |                |  |            |            |            |                        |                      |                |                |
| Investment management planning<br>(West Coast Environmental PBC;<br>West Coast Share Digital Engineering/BIM) | Implementation | Investigating and implementing improved activity management, including digital solutions and developing a common approach to environmental matters | \$344,722  | \$332,773  | \$224,938  | \$600,309              | \$6,434,3291,502,742 | NLTP           | All            |
| Programme business case development<br>(West Coast System Plan)   | Implementation | Refresh of forward activity plan to reflect regional and national priorities.  | \$109,000- | \$218,000  |            | -                      | \$327,000            | NLTP           | All            |

| <b>Activity Class: Local Road and State Highway Low-Cost Low-Risk Improvements</b> |                |  |                   |                   |                   |                               |                   |                       |                       |
|--|----------------|--|-------------------|-------------------|-------------------|-------------------------------|-------------------|-----------------------|-----------------------|
| <b>Activity</b>  | <b>Phase</b>   | <b>Description</b>   | <b>Cost 24/25</b> | <b>Cost 25/26</b> | <b>Cost 26/27</b> | <b>Future NLTP Cost 27-30</b> | <b>Total Cost</b> | <b>Funding Source</b> | <b>RLTP Objective</b> |
| <b>Buller District Council</b>   |                |  |                   |                   |                   |                               |                   |                       |                       |
| Local road low-cost low-risk improvements  | Implementation | Range of resilience, safety, walking and cycling improvement projects          | \$1,745,000       | \$290,000         | \$290,000         | \$3,000,000                   | \$5,325,000       | NLTP                  | All                   |
| Karamea Highway SPR low-cost low-risk improvements                                 | Implementation | See Regionally Significant Activities.   |                   |                   |                   |                               |                   |                       |                       |
| <b>Grey District Council</b>   |                |  |                   |                   |                   |                               |                   |                       |                       |
| Local road low-cost low-risk improvements  | Implementation | Range of resilience, safety, walking and cycling improvement projects          | \$420,000         | \$1,070,000       | \$750,000         | \$3,600,000                   | \$5,840,000       | NLTP                  | All                   |
| <b>Westland District Council</b>   |                |  |                   |                   |                   |                               |                   |                       |                       |
| Local road low-cost low-risk improvements  | Implementation | Range of resilience, safety, walking and cycling improvement projects          | \$1,300,000       | \$1,330,000       | \$900,000         | \$3,600,000                   | \$7,130,000       | NLTP                  | All                   |
| Jackson Bay Road SPR low-cost low-risk improvements                                | Implementation | See Regionally Significant Activities.   |                   |                   |                   |                               |                   |                       |                       |
| <b>NZTA (West Coast)</b>   |                |  |                   |                   |                   |                               |                   |                       |                       |
| State highway road improvements  | Implementation | Range of resilience, safety, efficiency and environmental improvement projects | \$2,021,667       | \$2,021,667       | 2,021,667         |                               | \$6,065,001       | NLTP                  | All                   |
| State Highway walking and cycling improvements                                     | Implementation | Range of walking and cycling improvements                                      | \$283,334         | \$283,334         | \$283,334         |                               | \$850,002         | NLTP                  | All                   |
| <b>Department of Conservation West Coast</b>                                       |                |  |                   |                   |                   |                               |                   |                       |                       |
| Local road low-cost low-risk improvements  | Implementation | Range of resilience and safety projects.                                       | \$1,320,000       | \$605,000         | -                 | \$3,322,000                   | \$5,247,000       | NLTP                  | All                   |

| <b>Activity Class: Road Safety</b> |                |                       |                   |                   |                   |                               |                   |                       |                       |
|------------------------------------|----------------|-----------------------|-------------------|-------------------|-------------------|-------------------------------|-------------------|-----------------------|-----------------------|
| <b>Activity</b>                    | <b>Phase</b>   | <b>Description</b>    | <b>Cost 24/25</b> | <b>Cost 25/26</b> | <b>Cost 26/27</b> | <b>Future NLTP Cost 27-30</b> | <b>Total Cost</b> | <b>Funding Source</b> | <b>RLTP Objective</b> |
| <b>Buller District Council</b>     |                |                       |                   |                   |                   |                               |                   |                       |                       |
| Promotion and advertising          | Implementation | Road safety promotion | \$53,333          | \$53,333          | \$53,333          | \$160,000                     | \$320,000         | NLTP                  | Safety                |
| <b>Grey District Council</b>       |                |                       |                   |                   |                   |                               |                   |                       |                       |
| Promotion and advertising          | Implementation | Road safety promotion | \$53,333          | \$53,333          | \$53,333          | \$160,000                     | \$320,000         | NLTP                  | Safety                |
| <b>Westland District Council</b>   |                |                       |                   |                   |                   |                               |                   |                       |                       |
| Promotion and advertising          | Implementation | Road safety promotion | \$53,333          | \$53,333          | \$53,333          | \$160,000                     | \$320,000         | NLTP                  | Safety                |
| <b>NZTA (West Coast)</b>           |                |                       |                   |                   |                   |                               |                   |                       |                       |
| Promotion and advertising          | Implementation | Road safety promotion | \$53,575          | \$53,575          | \$53,575          |                               | \$160,725         | NLTF                  | Safety                |

| <b>Activity Class: Public Transport Services</b> |                |  |                   |                   |                   |                               |                   |                       |                       |
|--|----------------|--|-------------------|-------------------|-------------------|-------------------------------|-------------------|-----------------------|-----------------------|
| <b>Activity</b>                                  | <b>Phase</b>   | <b>Description</b>                         | <b>Cost 24/25</b> | <b>Cost 25/26</b> | <b>Cost 26/27</b> | <b>Future NLTP Cost 27-30</b> | <b>Total Cost</b> | <b>Funding Source</b> | <b>RLTP Objective</b> |
| <b>West Coast Regional Council</b>               |                |  |                   |                   |                   |                               |                   |                       |                       |
| Total Mobility services                          | Implementation | Total mobility / subsidised taxi services. | \$412,833         | \$393,070         | \$377,904         | \$1,228,230                   | \$2,412,036       | NLTP                  | Connectivity          |
| <b>Buller District Council</b>                   |                |  |                   |                   |                   |                               |                   |                       |                       |
| Bus services                                     | Implementation | Total mobility / subsidised taxi services. | \$56,605          | \$56,605          | \$56,605          | \$169,815                     | \$339,630         | NLTP                  | Connectivity          |
| <b>Westland District Council</b>                 |                |  |                   |                   |                   |                               |                   |                       |                       |
| Bus services                                     | Implementation | Total mobility / subsidised taxi services. | \$30,000          | \$30,000          | \$30,000          | \$90,000                      | \$180,000         | NLTP                  | Connectivity          |

| <b>Local road and state highway maintenance (Continuous Programmes) – Activity Classes Pothole Prevention &amp; Operations</b> |                |   |                   |                   |                   |                               |                   |                       |                       |
|--|----------------|---|-------------------|-------------------|-------------------|-------------------------------|-------------------|-----------------------|-----------------------|
| <b>Activity</b>  | <b>Phase</b>   | <b>Description</b>  | <b>Cost 24/25</b> | <b>Cost 25/26</b> | <b>Cost 26/27</b> | <b>Future NLTP Cost 27-30</b> | <b>Total Cost</b> | <b>Funding Source</b> | <b>RLTP Objective</b> |
| <b>Buller District Council</b>   |                |   |                   |                   |                   |                               |                   |                       |                       |
| Local road MOR   | Implementation | Maintenance, operation, and renewal of local roads.                           | 6,401,969         | 7,579,801         | 7,483,175         | \$23,258,944                  | \$44,723,889      | NLTP                  | All                   |
| Karamea Highway SPR MOR  | Implementation | Maintenance, operation, and renewal of Karamea Highway Special Purpose Road.  | 2,635,100         | 2,640,309         | 2,616,862         | \$8,422,786                   | \$16,315,057      | NLTP                  | All                   |
| <b>Grey District Council</b>   |                |   |                   |                   |                   |                               |                   |                       |                       |
| Local road MOR   | Implementation | Maintenance, operation, and renewal of local roads.                           | 10,836,247        | 10,903,612        | 10,372,469        | \$32,233,461                  | \$64,345,789      | NLTP                  | All                   |
| <b>Westland District Council</b>   |                |   |                   |                   |                   |                               |                   |                       |                       |
| Local road MOR   | Implementation | Maintenance, operation, and renewal of local roads.                           | 8,317,482         | 8,109,445         | 9,227,518         | \$27,509,901                  | \$53,164,346      | NLTP                  | All                   |
| Jackson Bay Road SPR MOR   | Implementation | Maintenance, operation, and renewal of Jackson Bay Road Special Purpose Road. | 3,271,942         | 3,230,204         | 2,331,143         | \$6,046,548                   | \$14,879,836      | NLTP                  | All                   |
| <b>NZTA (West Coast)</b>   |                |   |                   |                   |                   |                               |                   |                       |                       |
| State highway MOR  | Implementation | Maintenance, operation, and renewal of state highways.                        | 39,799,363        | \$42,965,022      | \$38,484,997      | \$141,467,787                 | \$262,717,169     | NLTP                  | All                   |
| <b>Department of Conservation West Coast</b>   |                |   |                   |                   |                   |                               |                   |                       |                       |
| Local road MOR   | Implementation | Maintenance, operation, and renewal of local roads.                           | \$3,312,567       | \$1,143,927       | \$1,157,983       | \$2,306,361                   | \$7,920,838       | NLTP                  | All                   |

## West Coast region ten-year financial forecast

## Buller District Council

|  | 2024/25           | 2025/26           | 2026/27           | 2027/28           | 2028/29           | 2029/30           | 2030/31           | 2031/32           | 2032/33           | 2033/34           |
|--|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|
| <b>Subsidised Activities – Local Roads</b> |                   |                   |                   |                   |                   |                   |                   |                   |                   |                   |
| <b>Expenditure (by GPS Activity Class)</b> |                   |                   |                   |                   |                   |                   |                   |                   |                   |                   |
| Local Road Maintenance                     | 9,037,069         | 10,220,110        | 10,100,037        | 10,361,655        | 10,562,302        | 10,757,773        | 10,947,845        | 11,141,719        | 11,339,471        | 11,531,404        |
| Local Road Improvements                    | 4,944,333         | 5,101,333         | 4,931,333         | 4,697,533         | 5,011,068         | 5,043,405         | 5,120,877         | 5,264,484         | 5,349,878         | 5,450,771         |
| Walking & Cycling Improvements             | 590,000           | 750,000           | 760,000           | 747,222           | 763,661           | 779,697           | 795,291           | 811,197           | 827,421           | 843,142           |
| Public Transport Services                  | 56,605            | 56,605            | 56,605            | 60,424            | 61,753            | 63,050            | 64,311            | 65,597            | 66,909            | 68,180            |
| Road Safety                                | 31,212            | 31,212            | 31,212            | 33,318            | 34,051            | 34,766            | 35,461            | 36,170            | 36,894            | 37,595            |
| Investment Management                      | 166,667           | 106,667           | 18,333            | 103,781           | 106,064           | 108,291           | 110,457           | 112,666           | 114,920           | 117,103           |
| <b>Total Expenditure</b>                   | <b>14,825,886</b> | <b>16,265,927</b> | <b>15,897,520</b> | <b>16,003,932</b> | <b>16,538,897</b> | <b>16,786,982</b> | <b>17,074,242</b> | <b>17,431,834</b> | <b>17,735,492</b> | <b>18,048,194</b> |
| <b>Revenue for Subsidised Activities</b>   |                   |                   |                   |                   |                   |                   |                   |                   |                   |                   |
| Approved Organisation Revenue              | 2,362,446         | 2,483,155         | 2,452,435         | 2,429,352         | 2,479,687         | 2,528,791         | 2,576,539         | 2,625,241         | 2,674,918         | 2,723,055         |
| National Land Transport Fund Revenue       | 12,463,440        | 13,782,773        | 13,445,085        | 13,574,580        | 14,059,211        | 14,258,191        | 14,497,704        | 14,806,592        | 15,060,574        | 15,325,139        |
| <b>Total Revenue</b>                       | <b>14,825,886</b> | <b>16,265,927</b> | <b>15,897,520</b> | <b>16,003,932</b> | <b>16,538,897</b> | <b>16,786,982</b> | <b>17,074,242</b> | <b>17,431,834</b> | <b>17,735,492</b> | <b>18,048,194</b> |

## Grey District Council

|  | 2024/25           | 2025/26           | 2026/27           | 2027/28           | 2028/29           | 2029/30           | 2030/31           | 2031/32           | 2032/33           | 2033/34           |
|--|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|
| <b>Subsidised Activities – Local Roads</b> |                   |                   |                   |                   |                   |                   |                   |                   |                   |                   |
| <b>Expenditure (by GPS Activity Class)</b> |                   |                   |                   |                   |                   |                   |                   |                   |                   |                   |
| Local Road Maintenance                     | 11,336,247        | 11,403,612        | 10,872,469        | 11,302,105        | 11,224,359        | 11,206,997        | 10,884,856        | 11,337,883        | 11,043,892        | 11,308,339        |
| Local Road Improvements                    | 820,000           | 1,710,000         | 1,150,000         | 1,680,000         | 1,680,000         | 1,600,000         | 1,680,000         | 1,200,000         | 1,200,000         | 1,200,000         |
| Walking & Cycling Improvements             | 620,000           | 658,440           | 680,169           | 697,853           | 713,904           | 728,895           | 743,473           | 758,343           | 773,510           | 788,980           |
| Public Transport Services                  | 53,333            | 53,333            | 53,333            | 53,333            | 53,333            | 53,333            | 53,333            | 53,333            | 53,333            | 53,333            |
| Road Safety                                | 183,333           | 108,333           | 18,333            | 103,333           | 103,333           | 103,333           | 103,333           | 103,333           | 103,333           | 103,333           |
| <b>Total Expenditure</b>                   | <b>13,112,914</b> | <b>14,033,719</b> | <b>12,774,304</b> | <b>13,836,625</b> | <b>13,774,929</b> | <b>13,692,559</b> | <b>13,464,996</b> | <b>13,452,893</b> | <b>13,174,068</b> | <b>13,453,986</b> |
| <b>Revenue for Subsidised Activities</b>   |                   |                   |                   |                   |                   |                   |                   |                   |                   |                   |
| Approved Organisation Revenue              | 5,040,649         | 5,372,139         | 4,918,749         | 5,301,185         | 5,278,974         | 5,249,321         | 5,167,399         | 5,163,041         | 5,062,665         | 5,163,435         |
| National Land Transport Fund Revenue       | 8,072,265         | 8,661,580         | 7,855,555         | 8,535,440         | 8,495,954         | 8,443,238         | 8,297,598         | 8,289,851         | 8,111,404         | 8,290,551         |
| <b>Total Revenue</b>                       | <b>13,112,914</b> | <b>14,033,719</b> | <b>12,774,304</b> | <b>13,836,625</b> | <b>13,774,929</b> | <b>13,692,559</b> | <b>13,464,996</b> | <b>13,452,893</b> | <b>13,174,068</b> | <b>13,453,986</b> |
| <b>Unsubsidised Activities</b>             |                   |                   |                   |                   |                   |                   |                   |                   |                   |                   |
| <b>Expenditure</b>                         |                   |                   |                   |                   |                   |                   |                   |                   |                   |                   |
| Unsubsidised Operational Expenditure       | \$322,200         | \$322,200         | \$322,200         | \$322,200         | \$322,200         | \$322,200         | \$322,200         | \$322,200         | \$322,200         | \$322,200         |
| <b>Total Unsubsidised Expenditure</b>      |                   |                   |                   |                   |                   |                   |                   |                   |                   |                   |
| <b>Total Revenue</b>                       | <b>\$322,200</b>  | <b>\$322,200</b>  | <b>\$322,200</b>  | <b>\$322,200</b>  | <b>\$322,200</b>  | <b>\$322,200</b>  | <b>\$322,200</b>  | <b>\$322,200</b>  | <b>\$322,200</b>  | <b>\$322,200</b>  |

## Westland District Council

|  | 2024/25           | 2025/26           | 2026/27           | 2027/28           | 2028/29           | 2029/30           | 2030/31           | 2031/32           | 2032/33           | 2033/34           |
|--|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|
| <b>Subsidised Activities – Local Roads</b> |                   |                   |                   |                   |                   |                   |                   |                   |                   |                   |
| <b>Expenditure (by GPS Activity Class)</b> |                   |                   |                   |                   |                   |                   |                   |                   |                   |                   |
| Local Road Maintenance                     | 11,589,424        | 11,339,649        | 11,558,661        | 10,871,265        | 11,718,672        | 10,966,511        | 11,411,679        | 11,951,335        | 11,493,142        | 11,758,915        |
| Local Road Improvements                    | 3,300,000         | 4,130,000         | 2,900,000         | 1,200,000         | 1,200,000         | 1,200,000         | 1,200,000         | 1,200,000         | 1,200,000         | 1,200,000         |
| Walking & Cycling Improvements             | 230,000           | 212,400           | 219,409           | 225,114           | 230,291           | 235,128           | 239,830           | 244,627           | 249,519           | 254,510           |
| Public Transport Services                  | 30,000            | 30,000            | 30,000            | 30,000            | 30,000            | 30,000            | 30,000            | 30,000            | 30,000            | 30,000            |
| Road Safety                                | 53,333            | 53,333            | 53,333            | 53,333            | 53,333            | 53,333            | 53,333            | 53,333            | 53,333            | 53,333            |
| Investment Management                      | 183,333           | 108,333           | 18,333            | 103,333           | 103,333           | 103,333           | 103,333           | 103,333           | 103,333           | 103,333           |
| <b>Total Expenditure</b>                   | <b>15,386,090</b> | <b>15,873,716</b> | <b>14,779,737</b> | <b>12,483,045</b> | <b>13,335,630</b> | <b>12,588,305</b> | <b>13,038,176</b> | <b>13,582,628</b> | <b>13,129,328</b> | <b>13,400,091</b> |
| <b>Revenue for Subsidised Activities</b>   |                   |                   |                   |                   |                   |                   |                   |                   |                   |                   |
| Approved Organisation Revenue              | 3,613,793         | 3,821,914         | 3,759,844         | 3,773,704         | 4,065,625         | 3,782,527         | 3,930,761         | 3,451,308         | 3,935,204         | 3,939,947         |
| National Land Transport Fund Revenue       | 11,772,297        | 12,051,802        | 11,019,893        | 8,709,341         | 9,270,005         | 8,805,778         | 9,107,415         | 10,131,320        | 9,194,124         | 9,460,145         |
| <b>Total Revenue</b>                       | <b>15,386,090</b> | <b>15,873,716</b> | <b>14,779,737</b> | <b>12,483,045</b> | <b>13,335,630</b> | <b>12,588,305</b> | <b>13,038,176</b> | <b>13,582,628</b> | <b>13,129,328</b> | <b>13,400,091</b> |

## West Coast Regional Council

|  | 2024/25        | 2025/26        | 2026/27        | 2027/28        | 2028/29        | 2029/30        | 2030/31        | 2031/32        | 2032/33        | 2033/34        |
|--|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
| <b>Subsidised Activities</b>               |                |                |                |                |                |                |                |                |                |                |
| <b>Expenditure (by GPS Activity Class)</b> |                |                |                |                |                |                |                |                |                |                |
| Road safety promotion                      | 37,069         | 36,269         | 33,338         | 28,135         | 8,135          | 32,538         | 8,935          | 28,135         | 32,538         | 8,935          |
| Total Mobility Services                    | 412,833        | 393,070        | 377,904        | 376,337        | 400,724        | 451,169        | 454,576        | 483,809        | 539,403        | 548,279        |
| Investment Management                      | 111,869        | 80,008         | 104,971        | 66,771         | 66,874         | 105,278        | 67,085         | 67,190         | 105,597        | 67,408         |
| <b>Total Expenditure</b>                   | <b>561,771</b> | <b>509,347</b> | <b>516,214</b> | <b>471,243</b> | <b>475,732</b> | <b>588,985</b> | <b>530,596</b> | <b>579,134</b> | <b>677,539</b> | <b>624,622</b> |
| <b>Revenue for Subsidised Activities</b>   |                |                |                |                |                |                |                |                |                |                |
| Approved Organisation Revenue              | 171,174        | 149,112        | 146,345        | 128,988        | 128,303        | 164,444        | 142,063        | 155,901        | 186,511        | 165,477        |
| National Land Transport Fund Revenue       | 390,597        | 360,235        | 369,869        | 342,255        | 347,429        | 424,541        | 388,533        | 423,233        | 491,028        | 459,145        |
| <b>Total Revenue</b>                       | <b>561,771</b> | <b>509,347</b> | <b>516,214</b> | <b>471,243</b> | <b>475,732</b> | <b>588,985</b> | <b>530,596</b> | <b>579,134</b> | <b>677,539</b> | <b>624,622</b> |

## Department of Conservation West Coast

|  | 2024/25            | 2025/26            | 2026/27            | 2027/28          | 2028/29            | 2029/30            | 2030/31          | 2031/32          | 2032/33          | 2033/34          |
|--|--------------------|--------------------|--------------------|------------------|--------------------|--------------------|------------------|------------------|------------------|------------------|
| <b>Subsidised Activities – Local Roads</b> |                    |                    |                    |                  |                    |                    |                  |                  |                  |                  |
| <b>Expenditure (by GPS Activity Class)</b> |                    |                    |                    |                  |                    |                    |                  |                  |                  |                  |
| Local Road Improvements                    | \$1,320,000        | \$605,000          | -                  | -                | \$1,540,000        | \$1,782,000        | -                | -                | -                | -                |
| Local Road Maintenance                     | \$3,312,567        | \$1,143,927        | \$1,157,983        | \$734,953        | \$778,246          | \$793,162          | \$808,376        | \$823,894        | \$839,723        | \$932,046        |
| <b>Total Expenditure</b>                   | <b>\$4,632,567</b> | <b>\$1,748,927</b> | <b>\$1,157,983</b> | <b>\$734,953</b> | <b>\$2,318,246</b> | <b>\$2,575,162</b> | <b>\$808,376</b> | <b>\$823,894</b> | <b>\$839,723</b> | <b>\$932,046</b> |
| <b>Revenue for Subsidised Activities</b>   |                    |                    |                    |                  |                    |                    |                  |                  |                  |                  |
| Approved Organisation Revenue              | \$2,269,958        | \$856,974          | \$567,411          | \$360,127        | \$1,135,940        | \$1,261,829        | \$396,104        | \$403,708        | \$411,464        | \$456,703        |
| National Land Transport Fund Revenue       | \$2,362,609        | \$891,953          | \$590,571          | \$374,826        | \$1,182,305        | \$1,313,332        | \$412,272        | \$420,186        | \$428,259        | \$475,343        |
| <b>Total Revenue</b>                       | <b>\$4,632,567</b> | <b>\$1,748,927</b> | <b>\$1,157,983</b> | <b>\$734,953</b> | <b>\$2,318,246</b> | <b>\$2,575,162</b> | <b>\$808,376</b> | <b>\$823,894</b> | <b>\$839,723</b> | <b>\$932,046</b> |
| <b>Unsubsidised Activities</b>             |                    |                    |                    |                  |                    |                    |                  |                  |                  |                  |
| <b>Expenditure</b>                         |                    |                    |                    |                  |                    |                    |                  |                  |                  |                  |
| Unsubsidised Operational Expenditure       | \$8,333            | \$8,333            | \$8,333            | \$8,333          | \$8,333            | \$8,333            | \$8,333          | \$8,333          | \$8,333          | \$8,333          |
| <b>Total Unsubsidised Expenditure</b>      | <b>\$8,333</b>     | <b>\$8,333</b>     | <b>\$8,333</b>     | <b>\$8,333</b>   | <b>\$8,333</b>     | <b>\$8,333</b>     | <b>\$8,333</b>   | <b>\$8,333</b>   | <b>\$8,333</b>   | <b>\$8,333</b>   |
| <b>Total Revenue</b>                       |                    |                    |                    |                  |                    |                    |                  |                  |                  |                  |



**NZTA (West Coast)**

|  | 2024/25             | 2025/26             | 2026/27             | 2027/28             | 2028/29             | 2029/30             | 2030/31             | 2031/32             | 2032/33             | 2033/34             |
|--|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|
| <b>Subsidised Activities</b>               |                     |                     |                     |                     |                     |                     |                     |                     |                     |                     |
| <b>Expenditure (by GPS Activity Class)</b> |                     |                     |                     |                     |                     |                     |                     |                     |                     |                     |
| Walking and Cycling Improvements           | \$566,667           | \$566,667           | \$566,667           | \$623,334           | \$623,334           | \$623,334           | \$685,667           | \$685,667           | \$685,667           | \$685,667           |
| State Highway Improvements                 | \$13,233,247        | \$27,451,866        | \$21,572,765        | \$7,033,060         | \$3,225,464         | \$2,231,399         | \$11,857,354        | \$29,246,965        | \$2,821,545         | \$2,478,925         |
| State Highway Maintenance                  | \$39,799,363        | \$42,965,022        | \$38,484,997        | \$45,933,119        | \$46,375,373        | \$49,159,295        | \$49,750,232        | \$50,592,090        | \$51,339,224        | \$52,091,679        |
| Investment Management                      | \$1,452,154         | \$360,035           | \$879,037           | \$507,644           | \$4,738,010         |                     |                     |                     |                     |                     |
| <b>Total Expenditure</b>                   | <b>\$55,074,431</b> | <b>\$71,343,590</b> | <b>\$61,503,466</b> | <b>\$54,097,156</b> | <b>\$54,962,181</b> | <b>\$52,014,027</b> | <b>\$62,296,344</b> | <b>\$80,524,722</b> | <b>\$54,486,436</b> | <b>\$55,256,271</b> |

## Inter-regional significant Activities

There are initiatives undertaken across regional boundaries, or on the connections that link us to other regions, that will result in significant benefit to our communities and businesses.

### Improving freight flow to Canterbury and Otago

In 2022, \$783 million of freight was exported out of the West Coast.

Unequal incoming and outgoing freight flows on the road network reduce the efficiency of freight to the West Coast. Much of the bulk goods, such as coal, dairy product and logs, are exported from the region by rail, while many commodities come in via road. Many of these have unused capacity.

There is an opportunity to improve the efficiency of freight by upgrading bridges on State Highway 73 to cater to HPMV and 50Max trucks reducing the overall number of trips and travel time. State Highway 73 has been identified as a key route for upgrading over the next five to ten years.

### Extreme events require resilient connections out of the West Coast

SH6 is a significant arterial route, serving as the lifeline for the West Coast. It is the main route connecting West Coast to Otago in the south, and Canterbury in the North via SH73. Network closures have a significant impact on the communities involved as there are no alternative routes and detours are extremely lengthy.

NZ Transport Agency's focus will remain on improving the resilience of the network through our maintenance and renewals programme, and investment in low-cost low risk projects along the network.

Key projects NZ Transport Agency are looking to deliver over the next three years include retaining structures, rockfall protection and a remote monitoring system located at:

- SH7 Stoney Creek Bridge replacement
- SH73 Candy's Bend
- SH6 Meybille Bay
- SH6 Epitaph Slip
- River erosion at SH6 Gates of Haast to Hawea

### Activities to be varied, suspended or abandoned

There are no known activities to be varied, suspended or abandoned.

## Monitoring indicator framework

This section describes how monitoring will be undertaken to assess implementation of the Regional Land Transport Plan.

### Outcome: Inclusive access

| Measure   | Desired trend                      | Data source                    | Alignment with NZ Transport Agency Benefits Framework            |
|---|------------------------------------|--------------------------------|--|
| % of footpaths that fall within the level of service or a service standards for the condition of footpaths set out in the territorial authority's relevant document | Annual improvement / stable trend. | Local Authority Annual Reports | Benefit 10.1 (Impact on user experience of the transport system) |
| The average quality of ride on a sealed road network, measured by smooth travel exposure (STE)  | Annual improvement / stable trend. | Local Authority Annual Reports | Benefit 10.1 (Impact on user experience of the transport system) |

### Outcome: Healthy and safe people

| Measure   | Desired trend   | Data Source   | Alignment with NZ Transport Agency Benefits Framework                            |
|---|---|---|--|
| The number of deaths and serious injury crashes on the local road network.                                      | No annual change or a reduction from the previous year. | NZTA Crash Analysis System (CAS)<br>Local Authority Annual Reports      | NZ Transport Agency Benefit 1.1 (Impact on social cost and incidents of crashes) |
| Collective risk: the number of reported crashes per kilometre each year on the network.                         | No annual change or a reduction from the previous year. | NZTA Crash Analysis System (CAS)<br>Communities at risk register (CARR) | NZ Transport Agency Benefit 1.1 (Impact on social cost and incidents of crashes) |
| Personal risk: the number of reported crashes by traffic volume each year on the network.                       | No annual change or a reduction from the previous year. | NZTA Crash Analysis System (CAS)<br>Communities at risk register (CARR) | Benefit 1.1 (Impact on social cost and incidents of crashes)                     |
| Vulnerable users: the number of reported deaths and serious injuries involving vulnerable users on the network. | Annual reduction  | NZTA Crash Analysis System (CAS)<br>Te Ringa Maimoa Transport Insights  | Benefit 1.1 (Impact on social cost and incidents of crashes)                     |

### Outcome: Environmental Sustainability

| Measure   | Desired trend                     | Data source  | Alignment with NZ Transport Agency Benefits Framework |
|---|-----------------------------------|--|---|
| Greenhouse gas emissions (all vehicles)<br>Tonnes of C2 equivalent emitted. | No annual change, or a reduction. | Vehicle emissions data collected by NZ Transport Agency and calculated using their vehicle emissions mapping tool available on MapHub. | Benefit 8.1 (Benefit on greenhouse gas emissions)     |

## Outcome: Resilience and security

| Measure   | Target                            | Data source                        | Alignment with NZ Transport Agency Benefits Framework           |
|---|-----------------------------------|------------------------------------|---|
| Unplanned closures: the number of road closures with a detour provided and the number of vehicles affected by closures annually.              | No annual change, or a reduction. | Te Ringa Maimoa Transport Insights | Benefit 4.1 (Impact on system vulnerabilities and redundancies) |
| Loss of road access: the number of unplanned closures with no detour provided and the number of vehicles affected by these closures annually. | No annual change, or a reduction. | Te Ringa Maimoa Transport Insights | Benefit 4.1 (Impact on system vulnerabilities and redundancies) |

## Outcome: Economic prosperity

| Measure   | Desired trend   | Data source                              | Alignment with NZ Transport Agency Benefits Framework  |
|---|---|--|--|
| Number of vehicles*<br>average load per vehicle in tonnes   | Increase.   | MoT Freight Information Gathering System | Benefit 5.2 (Impact on network productivity and utilisation)                                     |
| Heavy vehicles:<br>proportion of the network not accessible to Class 1 Heavy Vehicles and 50MAX vehicles. | No annual change or a reduction from the previous year. | Te Ringa Maimoa Transport Insights       | Benefit 5.2 (Impact on network productivity and utilisation)                                     |
| Rail movements to, from and the West Coast Region   | Increase  | MoT Freight Information Gathering System | No direct alignment, but similar to Benefit 5.2 (Impact on network productivity and utilisation) |

## Appendix 1 - Significance policy

Section 106(2) of the Land Transport Management Act 2003 (the Act) requires the Regional Transport Committee to adopt a policy that determines significance in respect of:

- The activities that are included in the regional land transport plan under section 16 of the Act; and
- Variations made to regional land transport plans under section 18D of the Act.
- 
- The policy will be used in the following ways:
  - To determine which activities are significant for the purpose of prioritisation in the plan (section 16(3)(d) of the Act requires the Regional Transport Committee to determine the order of priority of significant activities that it includes in the plan)
  - To determine inter-regional significance (section 16(2)(d) requires the Regional Transport Committee to identify any activities that have interregional significance)
  - To identify regionally significant expenditure from other sources (section 16(2)(c) requires the plan to include all regionally significant expenditure on land transport activities to be funded from other sources)
  - To determine whether a variation to the plan is significant and therefore must be consulted on.

Section 18D requires that significant variations to the regional land transport plan undergo a public consultation process.

The land transport activities that are considered to be significant for the purposes of sections 16 and 106 of the Act are as follows:

| Significant activities                            |  |  |
|---|--|--|
| Section 16(3)(d)                                  | Significant activities – to be presented in order of priority  | <p>All new improvement activities in the region where funding from the National Land Transport Fund is required within the first three years of the Regional Land Transport Plan, excluding:</p> <ul style="list-style-type: none"> <li>• Maintenance, operations and renewal activities for state highways and local roads</li> <li>• Public transport continuous programme (existing services)</li> <li>• Low-cost low-risk activities</li> <li>• Road safety promotion activities</li> <li>• Investment management activities, including transport planning and modelling</li> <li>• Programme business case</li> </ul> |
| Significant inter-regional activities             |  |  |
| Section 16(2)(d)                                  | Activities that have inter-regional significance   | <p>Any significant activity (see above):</p> <ul style="list-style-type: none"> <li>• That has implications for connectivity with other regions; and/or</li> <li>• For which cooperation with other regions is required; or</li> <li>• Any nationally significant activity identified in the Government Policy Statement on Land Transport</li> </ul>  |
| Significant expenditure funded from other sources |  |  |
| Section 16(2)(c)                                  | Significant expenditure on land transport activities to be funded from sources other than the National Land Transport Fund | <p>Any expenditure on individual transport activities, whether the activities are included in the Regional Land Transport Plan or not, from:</p> <ul style="list-style-type: none"> <li>• Approved organisations (where there is no National Land Transport Fund share)</li> <li>• Crown appropriations</li> <li>• Other funds administered by the Crown</li> </ul>  |

## Appendix 2 - Variations to the Regional Land Transport Plan

Under section 18D(1) of the Act, the Regional Transport Committee can vary the RLTP at any time during the six years to which the programme applies. As per section 18D of the Act, consultation will be required on a variation if the variation is deemed significant.

Certain activities do not require a variation to a RLTP. These include:

- Local road maintenance;
- Local road renewals;
- Local road capital works; and
- Existing public transport services

The Regional Transport Committee has adopted the following definition to determine when a variation to the Regional Land Transport Plan is significant and must therefore undergo consultation.

All variations to the Regional Land Transport Plan, other than the following, are considered to be significant for the purposes of consultation:

- Activities that are in the urgent interest of public safety; or
- New preventative maintenance and emergency reinstatement activities; or
- The new activity has been previously consulted on and meets funding approval provisions in accordance with sections 18 and 20 of the Act; or
- A scope change that does not significantly alter the original objectives of the project – to be determined by the Regional Transport Committee; or
- Variations to timing, cash flow or total cost for improvement projects; or
- Replacement of activities within an approved programme or group with activities of the same type and duration (e.g. maintenance programme); or
- A change to the duration and/or order of priority of the activity that does not substantially change the balance of the programme.

## Appendix 3 - Assessment of the relationship of Police activities to the Regional Land Transport Plan

There are programmes that fall outside of the scope of the RLTP yet play a key role in the regional road safety effort; the most significant of which is the road-policing programme. Section 16(6) of the LTMA requires the inclusion of an assessment of the relationship of Police activities to the RLTP. Police enforcement is central to the delivery of a regional safe system response to road safety.

The Police's strategic direction is outlined in their Statement of Intent 2023- 2027. *Safe Roads* remains a strategic outcome, and states:

We want our roads to be safe for all road users. This includes drivers and passengers, commercial fleet operators, pedestrians, and those on two wheels. Our goal remains to reduce deaths and serious injuries on our roads.

We are committed to the cross-government Road to Zero strategy. We will contribute to the outcomes of the strategy by increasing Police presence and visibility on our roads to reduce excess speed on our roads, prevent crashes from impairment or distraction, reduce injuries due to lack of restraints and reduce unsafe and unlicensed driving practices; and to use education and enforcement to reduce harm to non-motorised road users.

A decrease in fatal and serious injury crashes will be the outcome measure for the safe roads strategic outcome.

Police are involved in regional road safety strategy and planning; road safety promotion and the delivery of roadside education and work collaboratively with West Coast Road Safety to address the top priority road safety issues on the West Coast. These have been identified as:

- Run-off road and head on crashes involving vulnerable road users and speeding on high-risk urban and rural roads
- Driver behaviour, especially with alcohol and drug impairment, people not wearing seatbelts and speeding
- Increasing numbers of buses, campervans and tourist drivers means more vehicles travel at slower speeds leading to frustration when they cannot be passed.

However, speed management has been identified as the highest priority for the West Coast.

## Appendix 4 - Assessment of compliance with LTMA section 1

Section (16) of the LTMA requires inclusion of an assessment of how the Plan complies with section 14 of the Act. The following outlines how this requirement has been met. An RLTP must contribute to the purpose of the LTMA which is “to contribute to an effective, efficient, and safe land transport system in the public interest” (section 3, LTMA). This purpose is reflected in the objectives of this Plan and the programme of activities that have been identified. NZ Transport Agency and approved organisations provide assessments of effectiveness and efficiency when submitting projects for funding. Safety is the core focus of Objective 3 in this Plan.

An RLTP must be consistent with the GPS which has been incorporated in the development of this Plan. There is also alignment between the Objectives in the GPS and this Plan. In developing the Plan, the Regional Transport Committee must consider alternative regional land transport objectives that would contribute to the purpose of the LTMA and the feasibility and affordability of those alternative objectives. Initial drafting provided several alternative objectives but on review these did adequately address the issues facing the region. The public notification and submission process provides further opportunity for consideration of alternative objectives.

The RLTP must take into account:

- The National Energy Efficiency and Conservation Strategy
- Relevant National Policy Statements and any relevant Regional Policy Statements or plans that are, for the time being, in force under the RMA
- Likely funding from any source.

This Plan supports the National Energy Efficiency and Conservation Strategy, and its priority of efficient and low emissions transport. Activities in this Plan align with this priority by supporting a resilient and fit for purpose network. Similarly, the relevant sections of the West Coast Regional Policy Statement and District Plan are reflected in the objectives set.

All likely substantive funding sources have been identified within this Plan.



## Appendix 5 - Legislative requirements

The following extracts from the LTMA outline the key requirements with respect to the regional land transport plans.

### Section 14 – core requirements of regional land transport plans

Before a regional transport committee submits a regional land transport plan to a regional council, the regional transport committee must-

- a) be satisfied that the regional land transport plan-
  - i. Contributes to the purposes of this Act; and
  - ii. Is consistent with the GPS on land transport; and
  - iii. is consistent with the regional spatial strategy that is in force for the region under the Spatial Planning Act 2023 to the extent that—
    - (A) the regional spatial strategy is relevant to the content of the regional land transport plan; and
    - (B) consistency with the regional spatial strategy does not prevent compliance with subparagraph (i) or (ii); and
- b) have considered—
  - i. Alternative regional land transport objectives that would contribute to the purpose of this Act
  - ii. The feasibility and affordability of those alternative objectives
- c) have taken into account any-
  - i. National energy efficiency and conservation strategy; and
  - ii. relevant national planning framework or plans in force under the Natural and Built Environment Act 2023; and
  - iii. Likely funding from any source.

### Section 16 – form and content of regional land transport plans

- (1) A regional land transport plan must set out the region’s land transport objectives, policies, and measures for at least ten financial years from the start of the regional land transport plan.
- (2) A regional land transport plan must include-
  - a. a statement of transport priorities for the region for the ten financial years from the start of the regional land transport plan
  - b. a financial forecast of anticipated revenue and expenditure on activities for the ten financial years from the start of the regional land transport plan
  - c. all regionally significant expenditure on land transport activities to be funded from sources other than the NLTF during the six financial years from the start of the regional land transport plan
  - d. an identification of those activities (if any) that have inter-regional significance.
- (3) For the purpose of seeking payment from the national land transport fund, a regional land transport plan must contain for the first six financial years to which the plan relates,-
  - a. activities proposed by approved organisations in the region relating to local road maintenance, local road renewals, local road minor capital works, and existing public transport services
  - b. (not relevant for the West Coast)
  - c. the following activities that the regional transport committee decides to include in the regional land transport plan:
    - i. Activities proposed by approved organisations in the region... other than those activities specified in paragraphs (a) and (b)
    - ii. Activities relating to state highways in the region that are proposed by the agency
    - iii. Activities, other than those relating to state highways, that the agency may propose for the region and that the agency wishes to see included in the regional land transport plan, and

- d. The order of priority of the significant activities that a regional transport committee includes in the regional land transport plan under paragraphs (a), (b) and (c)
  - e. An assessment of each activity prepared by the organisation that proposes the activity under paragraph (a), (b), or (c) that includes:
    - i. The objective or policy to which the activity will contribute
    - ii. An estimate of the total cost and the cost for each year
    - iii. The expected duration of the activity
    - iv. Any proposed sources of funding other than the NLTF (including, but not limited to, tolls, funding from approved organisations, and contributions from other parties)
    - v. Any other relevant information; and
  - f. The measures that will be used to monitor the performance of the activities
- (4) An organisation may only propose an activity for inclusion in the regional land transport plan if it or another organisation accepts financial responsibility for the activity
- (5) For the purpose of the inclusion of activities in a national land transport programme:
- a. A regional land transport plan must be in the form and contain the detail that the agency may prescribe in writing to regional transport committees
  - b. The assessment under subsection (3)(e) must be in a form and contain the detail required by the regional transport committee, taking account of any prescription made by the agency under paragraph (a)
- (6) A regional land transport plan must also include—
- c. an assessment of how the plan complies with section 14; and
  - d. an assessment of the relationship of Police activities to the regional land transport plan; and
  - e. a list of activities that have been approved under section 20 but are not yet completed; and
  - f. an explanation of the proposed action, if it is proposed that an activity be varied, suspended, or abandoned; and
  - g. a description of how monitoring will be undertaken to assess implementation of the regional land transport plan; and
  - h. a summary of the consultation carried out in the preparation of the regional land transport plan; and
  - i. a summary of the policy relating to significance adopted by the regional transport committee under section 106(2); and
- ga. in the case of the plan for Auckland, a list of any significant rail activities or combinations of rail activities proposed by KiwiRail for Auckland; and
  - gb. in the case of the plan for the Wellington region, any significant rail activities or combinations of rail activities proposed by KiwiRail for the Wellington region; and
  - gc. in the case of the plan for any other region that has a regional transport committee within the meaning of section 105A(1)(c), any significant rail activities or combinations of rail activities proposed by KiwiRail for that region; and
  - j. any other relevant matters.
- (6A) Any matter included in a regional land transport plan under subsection (6)(ga), (gb), or (gc) is for the purposes of co-ordinated planning and does not limit or affect the process by which any rail activities or combinations of rail activities may be included or excluded, as the case may be, from a rail network investment programme and its funding processes.

- (6) For the purposes of this section, **existing public transport services** means the level of public transport services in place in the financial year before the commencement of the regional land transport plan, and any minor changes to those services.

**Section 18 – consultation requirements**

- (1) When preparing a regional land transport plan, a regional transport committee:
- a. Must consult in accordance with the consultation principles specified in section 82 of the Local Government Act 2002
  - b. May use the special consultative procedure specified in section 83 of the Local Government Act 2002.

**Section 106 – functions of regional transport committees**

- (1) The functions of each regional transport committee are:
- a. To prepare a regional land transport plan, or any variation to the plan, for the approval of the relevant regional council
  - b. To provide the regional council with any advice and assistance the regional council may request in relation to its transport responsibilities
- (2) Each regional transport committee must adopt a policy that determines significance in respect of-
- a. variations made to regional land transport plans under section 18D; and
  - b. the activities that are included in the regional land transport plan under section 16.
- (3) A joint regional transport committee established under section 105(9) must—
- a. prepare the joint regional land transport plan in accordance with sections 14 and 16; and
  - b. consult in accordance with sections 18 and 18A; and
  - c. lodge the joint regional land transport plan with the relevant regional councils or Auckland Transport (as the case may be) in accordance with section 18B.
- (4) Each regional transport committee (including the regional transport committee for Auckland) must also carry out any functions conferred on a regional transport committee under any other provision of this Act (including functions conferred by regulations made under section 109(c)).

## Appendix 5 - Summary of consultation

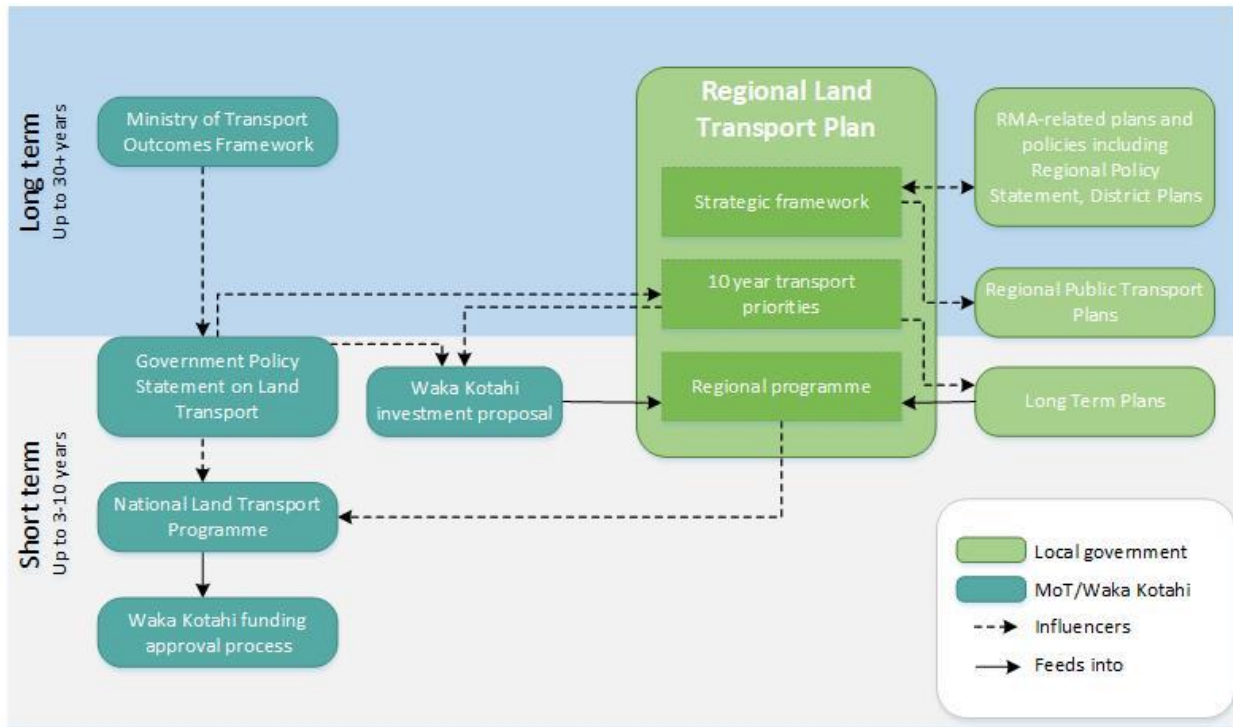
The draft Regional Land Transport Plan has been produced with input from the following:

- NZ Transport Agency
- West Coast Regional Council
- Buller, Grey and Westland District Councils
- Department of Conservation

The draft RLTP was made available for public consultation from February to March 2024. Following consultation, the Regional Transport Committee will endorse the RLTP and submit the Plan to the West Coast Regional Council for adoption.

## Appendix 6 - Regional Land Transport Plan policy relationships

Regional land transport plans are an important part of New Zealand’s system for planning and investing in transport infrastructure and services. This is shown in the diagram below:



## Glossary

|  |   |
|--|---|
| Active transport   | Transport modes that rely on human power, primarily walking and cycling.  |
| Financial Assistance Rate (FAR)                              | A percentage of costs funded by NZ Transport Agency recognising that there are national and local benefits from investment in the network.  |
| Government Policy Statement for Land Transport (GPS)         | A high-level statement of intent from the Government regarding land transport in New Zealand.   |
| Infrastructure   | All fixed components of a transportation system, including roadways and bridges, railways, ports, cycle trails and other physical elements.   |
| Investment Logic Mapping                                     | A technique to test and confirm the rationale for a proposed development.   |
| Land transport   | Means: (a) transport on land by any means, (b) the infrastructure, goods and services facilitating that transport. The definition also includes coastal shipping.   |
| Land transport system  | All infrastructure, services, mechanisms and institutions that contribute to providing for land transport.  |
| Level of service   | A qualitative measure that describes the operational conditions of a road or intersection.  |
| Local roads  | Roads operated by territorial local authorities.  |
| LTMA   | Land Transport Management Act 2003.   |
| Multi-modal  | Used to describe travel or transport of goods involving more than one transport mode.   |
| Mode   | A categorisation of transport methods, e.g. private motor vehicles, walking, cycling, rail.   |
| National Energy Efficiency and Conservation Strategy (NEECS) | A Government Strategy prepared under the Energy Efficiency and Conservation Act 2000.   |
| National Land Transport Fund                                 | The dedicated part of the Crown Bank Account into which land transport revenue, as defined in section 6 of the Land Transport Management Act 2003, is paid.   |
| NPS  | National Policy Statement issued under the Resource Management Act (RMA). National policy statements (NPS's) enable central government to prescribe objectives and policies for matters of national significance which are relevant to achieving the sustainable management purpose of the RMA. |
| Network  | Infrastructure or services that are connected to enable the transition of people and goods from one piece of infrastructure or service to another.  |
| New Zealand Upgrade Programme                                | A fund established by the Government to support the upgrade of essential roads in New Zealand.  |
| One Network Road Classification (ONRC)                       | A road classification system jointly developed by NZ Transport Agency and local government to provide a nationally consistent framework for determining road function, future levels of service, the appropriate maintenance levels, and improvement projects.                                  |
| Provincial Growth Fund                                       | A fund established by the Government aimed at lifting productivity in the provinces.  |
| RLTP   | Regional Land Transport Plan  |
| Regional Transport Committee                                 | A committee of the West Coast Regional Council required by the Land Transport Management Act 2003. The Committee is responsible for the preparation and approval of this Plan.  |

|                               |  |
|-------------------------------|--|
| Road Controlling Authority    | District Councils, NZ Transport Agency, Department of Conservation.  |
| Road to Zero                  | A strategy to reduce the road toll to zero.  |
| RPS                           | Regional Policy Statement prepared under the RMA.  |
| Special Purpose Road (SPR)    | A local road that receives a far higher funding assistance rate from NZ Transport Agency than the other local roads managed by the same territorial authority. |
| State Highway                 | A road managed by NZ Transport Agency and gazetted as state highway,   |
| Territorial local authorities | District Councils  |
| Total Mobility                | A subsidised transport service to increase the mobility of people with serious mobility constraints.   |
| NZ Transport Agency           | New Zealand Transport Agency Waka Kotahi - a Government transport agency created under section 93 of the Land Transport Management Act 2003.                   |

# REGIONAL LAND TRANSPORT PLAN SUBMISSIONS



# TiGa Submission



14 March 2024

West Coast Regional Transport Committee  
C/- West Coast Regional Council  
PO Box 66  
Greymouth 7805

**By email: [info@wcrc.govt.nz](mailto:info@wcrc.govt.nz)**

Dear Committee members

### **Submission on Draft West Coast Regional Land Transport Plan 2024 - 2034**

TiGa Minerals and Metals Limited (TiGa) is a mineral sands exploration and development company focused on developing the Barrytown Mineral Sands Project (the Barrytown Project). TiGa is awaiting a decision on their publicly notified resource consent application that was heard by the joint Grey District Council and West Coast Regional Council hearing panel in February 2024. The Barrytown Project will directly generate approximately \$33.7 million of additional GDP per year once fully operational, or around \$146.1 million over the life of the activity. Additional wider benefits will include \$27.4 million per year spending on inputs, the creation of 57 FTE jobs and creating a further 80 indirect jobs. The Barrytown Project forms a part of the wider mineral sands industry with significant potential for growth.

TiGa welcomes the opportunity to be involved, and contribute input, to the draft West Coast Regional Land Transport Plan 2024 (draft Plan or RLTP). The land transport network is fundamental to the wellbeing of the economic and social wellbeing of the West Coast. In particular, an efficient land transport network is critical for moving product from site to export. Mineral sands products such as ilmenite, garnet and rare-earth elements are used in manufacturing technology around the world. Getting the product to freight ships through the land transport network is the first step in selling a West Coast product to the world.

TiGa notes that this is an interim review at the 3-year mark of the 6-year planning cycle, updating the activities and funding of the approved organisations, but that this does not restrict the scope of the review. Additional context has arisen which should be included within the strategic front part of the draft Plan to provide a more holistic overview of the transport network on the West Coast, the economy and future of the region to more appropriately bid for funding from the National Land Transport Fund. TiGa believes that there are opportunities for additional infrastructure projects, particularly for resilience, to ensure that the West Coast can do its part and keep New Zealand moving

The new Coalition Government has released the draft Government Policy Statement on Land Transport (GPS) on 6 March 2024. TiGa recommends that as part of this consultation and submission process, the West Coast Regional Transport Committee revisit the draft Plan to ensure that the four key strategic priorities identified in the draft GPS, and the overall direction sought, is embodied in this strategic document for the region.

Decision sought:

1. That the Committee undertake further review of the strategic context of the draft Plan to reflect a more holistic view of the West Coast economy and future opportunities. Note that specific details are included in the following submission.
2. That the draft Plan is reviewed against the draft Government Policy Statement for Land Transport to ensure the strategic priorities are given effect to.

## **Our Region**

The draft Plan has a role to play in future proofing the land transport network and should identify future economic activity to ensure investment is directed to support and enable emerging economic opportunities. Currently, the Our Region – Economy / Ohanga section (p.12-13) is heavily focused on the role the network has in the provision of supporting tourism. As the RLTP is a future-focused document, this section should identify growth areas and provide a summary of other potential upcoming projects that are likely to have a significant impact on the region.

Mineral sands mining projects have commenced in the Buller District, are going through consenting processes in the Grey District and are being explored in the Westland District, and other mineral related exploration projects are progressing through the region. Referencing activities such as these provides a more holistic picture of the future economy of the West Coast. This is particularly important as the change in government resets policy settings for the development of such initiatives.

Decision sought:

3. Include text in the Our Region – Economy / Ohanga section on new industries in operation and other opportunities that are being investigated, apart from tourism, which rely on the land transport network to provide a more holistic summary of the economy of the region. Refer suggested text below.

*Despite having a comparative advantage in mining, the West Coast has experienced a decline in this sector since 2010. Nevertheless, the extraction of gold has witnessed significant growth.*

*Mineral sands mining of products such as ilmenite, garnet and rare-earth elements, which are used in manufacturing technology around the world, is an emerging industry on the West Coast. Projects have commenced in the Buller District, are going through consenting processes in the Grey District and are being explored in the Westland District. There are also other mineral related exploration projects being progressed throughout the region.*

## Our transport system

### Road network

Arataki, Waka Kotahi NZ Transport Agency's, shared sector view on how to plan, develop and invest in the land transport system over the next 30 years has a focus for the West Coast of ensuring the state highway network is well maintained, resilient and safe.

The West Coast, more than any other region in New Zealand, is heavily reliant on the State Highway network, and in particular State Highway 6 which extends the length of the region. This heavy reliance on the one north-south route, which links the region from Otago through to Tasman provides the main arterial functions for the West Coast with many of the local networks extending from this road.

Similarities can be drawn between the importance of State Highway 6 and State Highway 1 on the East Coast and the role they play in the transportation of freight throughout their respective regions. Arguably, State Highway 6 is more important regionally due to the extremely limited alternative routes in the case of a network outage. As such, TiGa believes that more emphasis as to the importance of State Highway 6 as a strategic route for heavy vehicles as part of economic activity on the West Coast should be included in the draft Plan.

#### Decision sought:

4. That more emphasis as to the importance of State Highway 6 as a strategic route for heavy vehicles as part of economic activity on the West Coast be included within the Road network section (p.16) of the draft RLTP. Refer suggested text:

*At a regional level, the roading network is heavily reliant on the one north-south route – State Highway 6, providing the main arterial road functions for the West Coast. Not only does State Highway 6 provide and the linkages to the neighbouring regions of Tasman and Otago, it is a strategic route for heavy vehicles as part of the regional freight task. The local road networks extend off this main arterial, and there are few ~~other~~ alternative options for making journeys up and down the Coast.*

### Rail and Ports

As New Zealand moves towards a low carbon economy rail and coastal ports will play an increasingly important role in the reduction of emissions, particularly for the transport of bulk products. It is vital that port and rail infrastructure, and their connections, continue to be maintained, and enhanced if required, to facilitate the movement of such goods. While the West Coast ports have gone through a period of decline, revitalisation is occurring, driven primarily by bulk producing businesses such as mineral sands production.

#### Decision sought:

5. That the RLTP continues to support rail and port infrastructure so it is able to facilitate the transport of bulk products including mineral products.
6. That the Committee notes TiGa's support of the protection of the ports to secure their future and create commercial and climate resilience for the West Coast.

7. That reference to mineral sands as a bulk product that could be railed is included under the Rail section (p.17) to provide a more holistic story of the current and future scenario of this transport mode. Refer suggested amendment to the first paragraph under 'Rail' at page 17:

*The rail network is an asset of national and regional importance. Across the West Coast, rail transportation primarily serves the bulk freight sector, particularly coal, forestry, and dairy products. The Hokitika branch line predominantly supports Westland Milk Products by transporting raw materials to the factory and distributing finished products to various markets. The coal transportation on lines to Rapahoe, Westport, and Ngakawau has decreased over the past decade. Loading points in Greymouth and Stillwater facilitate the transfer of goods from road to rail. The growth of mineral sands extraction brings a potential new demand for rail loadout and lines across the West Coast.*

## **Regional Vision and Objectives**

TiGa supports the Vision (*A safe, resilient and connected multi-modal transport network which enables the West Coast to thrive*) in the draft Plan but notes that for this to be achieved, adequate funding must be made available to make the safety improvements required and improve the resilience of the network from known hazards.

Preventative maintenance is generally less expensive to undertake than the rebuilding or restoration required once an event has impacted the network. Network outages impose significant cost to the economy through loss of freight connections and reduced productivity, social disruption for local communities and potential reputational risk to tourism markets – all impacts that can take many years to recover from.

Although this is a Vision statement, TiGa requests that it goes beyond “lip-service” and the outcomes sought can be realised in the future.

### Decision sought:

8. That the Regional Transport Committee ensures that the funding required to move to the future state sought in the vision is programmed and included within the RLTP.

## **Objective 1 - Resilience**

TiGa supports Objective 1 and its focus on resilience. As noted previously, network outages disrupt productivity in a number of ways including preventing employees being able to travel to work and products being exported to market.

Many investigations into network vulnerability arising from climate change and natural hazards have been undertaken over various West Coast Regional Land Transport Plans. The West Coast, particularly along State Highway 6, has extremely limited alternative routes. Mitigation and preventative works of potential at risk locations have been identified through previous investigations and should now be funded to protect the future resilience of the network and ensure that network outages are avoided or minimised to meet the set Headline Target.

### Decision sought

9. That hazard mitigation and preventative maintenance measures to address network vulnerabilities are clearly identified and funded in the RLTP.

### **Objective 2 and 3 - Asset condition and Safety**

Over the past few decades, cycle tourism has grown in prominence as well as becoming an alternative form of transport throughout New Zealand and on the West Coast. However, a number of roads throughout this region are simply not fit for purpose for cyclists as road users as they navigate these routes alongside a growing tourism market involving international drivers and campervans, mixed with local road users and freight traffic.

At the same time, tourism has been pushed as a key economic driver for New Zealand, and the West Coast. West Coast tourists travel in predominantly self-drive vehicles and are in many cases critically inexperienced to drive on the narrow and winding roads of the region. Their interaction with cyclists, residential traffic and freight vehicles poses a very real risk to all road users. As the tourism task increases there is likely to be a corresponding increase in the rate of serious incidents.

TiGa is familiar with these concerns as it has progressed the Barrytown Project resource consent application. Some submitters have raised concerns about the asset condition and safety of State Highway 6 – which the Barrytown Project will use to transport freight. In exploring these concerns, an independent transport expert from Abley peer reviewed the proposal and recommended that State Highway 6 is not safe for cycling. The peer reviewer identified inherent risks from walking and cycling on State Highway 6 as arising from limited forward visibility (due to road geometry and vegetation), limited or no hard shoulders to enable safe passing and noise from coastal surf limiting cyclists' and pedestrians' ability to hear approaching traffic. The Abley peer reviewer recommended active and static signage and road markings at eight locations on State Highway 6 that would mitigate effects on any cyclists using the State Highway. This peer review is included as **Appendix 1**. The existing roading network is not for a private applicant for resource consent to manage, and the recommendations in this review need to be given adequate consideration.

Road controlling authorities, and particularly in the case of the State Highway, Waka Kotahi NZ Transport Agency, have a responsibility to provide for the safety of all road users. While the number of serious injury and fatality crashes are low on the West Coast, they are statistically high due to the number of vehicle kilometres travelled. We recognise that securing funding for West Coast road improvements is challenging, however many of these improvements can be implemented through maintenance and renewal programmes, signage or discouraging certain activities in inappropriate locations – a “right mode right road” approach.

Investment to maintain key roads to a high level of safety and efficiency for all road users must be a priority.

Decision sought:

10. That investment to maintain key roads to a high level of safety and efficiency is undertaken through the RLTP.
11. Amend Objective 2, Policy 3 as follows:  
*Provide for High Productivity Motor Vehicle capability on strategic routes, including State Highway 6 and 73 and key local roads.*
12. That the Committee notes TiGa's support of Objective 3 Policy 3 for the advocacy of safer active transport modes such as on road / off-road paths and trails for cycling, and as a priority implementation area recognising that there are safety improvements to be made on key tourist routes where cyclists are present.

To give effect to this policy, appropriate funding from the respective approved organisation must be committed.

13. Amend the Objective 2 'Priority investment areas' as follows:  
*Road safety promotion of risks to cyclists, pedestrians and tourist drivers.*
14. Amend the Objective 2 'Other priority implementation areas' as follows:  
*Safety improvements on key tourist routes, and rural roads where cyclists and pedestrians are present, primarily through separate paths and trails for walking and cycling.*
15. That West Coast Road Controlling Authorities identify areas that are not fit for purpose for the full range of road users and invest in the network to bring these up to standard. For example, where roads provide no shoulder for cyclists to safely bike on, provide off-road cycling options.

Should the investment not be available to address the areas of the network that are not fit for purpose for cyclists, alternative safety mitigation measures (such as signage warning of cyclists on narrow corridors) or recognition that there are sections of roads across the network that are not fit for purpose for cyclists and proactively discourage cyclists from using these sections to be implemented by the respective road controlling authorities.

#### **Objective 4 – Connectivity**

The transport network is a significant enabler of economic activity, connecting products to their markets. Future population predictions for the West Coast indicate decline, but an increase in economic activity can revitalise communities and towns. Ensuring the region maintains a robust and reliable multimodal transport network is integral in supporting potential future economic opportunities and a vibrant and resilient West Coast.

Transport is a major contributor to emissions in New Zealand. There is currently no reference in the Priority investment areas to support national emission targets (including reducing freight transport emissions by 35% by 2035) and implementation of infrastructure to support an electric vehicle fleet. EV infrastructure could be used by light

vehicles and freight trucks. Investment in non-road transport infrastructure such as rail and ports could also contribute to these emissions reductions.

Decision sought:

16. That the Regional Transport Committee notes TiGa's support of the priority investment areas for investment in planning / infrastructure to improve road, rail and coastal shipping freight connections and for walking and cycling infrastructure improvements for shorter trips to deliver safer and connected active travel networks.

17. Amend Objective 4, Policy 3 as follows:

*Investigate and support opportunities to facilitate more efficient multi-modal freight movements, including ~~potential for~~ development of coastal shipping and rail connections.*

TiGa considers that these options are already under development and that the Draft Plan, being a future-focused document, should prioritise concrete action to develop these within the 2024-2034 period.

18. Add a new priority investment area under Objective 4 as follows: Investment in EV infrastructure that can be used by light vehicles and freight trucks.

### **Headline targets**

TiGa generally supports the headline targets (page 46) as drafted, but notes the Connectivity target is not consistent with the draft objectives and policies. Increasing travel by active transport modes such as walking and cycling is supported, but this should be done where appropriate (as set out in the Draft Plan). It would be a perverse and inconsistent outcome that cycling was increased in dangerous areas.

Decision sought:

Consistent with the Draft Plan objectives and policies, the 'Connectivity' headline target should be: Increasing travel in the West Coast by active (walking and cycling) transport modes in urban centres and on dedicated trails and paths.

### **Monitoring indicator framework**

TiGa supports the outcomes listed for economic prosperity (page 63) and considers that increased freight shipping as well as increased rail movements would be positive outcomes.

### **Conclusion**

The transport network is fundamental to the economic and social well-being of the West Coast. Not only does the network connect communities it is critical in supporting emerging areas of economic opportunity for the region. Investing in a robust, resilient and truly multi-modal network will support the region and achieve the Regional Transport Committee's vision of a thriving West Coast.

TiGa requests the opportunity to speak to this submission.



Thank you for the opportunity to provide feedback through this submission process on the draft Regional Land Transport Plan.

Yours sincerely



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**Appendix 1 – Abley transport peer review of the Barrytown Project**

# Suzanne Hills Submission

## Submission on Draft Regional Land Transport Plan

From: Suzanne Hills

E: [suzannedhills@gmail.com](mailto:suzannedhills@gmail.com)

Date: 26 March 2024

### Introduction

1. My submission is centred on the existing and future concerns I have regarding the viability of cycling the Coast Road between Punakaiki and Greymouth. I live on the Barrytown Flats and cycle approximately 2000km p.a. along this section of the Coast Road.
2. Cycling is central to my mental wellbeing, health and fitness, minimising my transport carbon emissions and cost of living, and living a low impact life. I cannot imagine my life without a bike in it and cycling at least every week.
3. I made a detailed submission on cycling the Coast Road at the recent TiGa hearing. I also submitted video evidence of unsafe and inconsiderate driver behaviour. I have copied and modified several of my TiGa submission points here and also attach the same video evidence as they are directly relevant to this Regional Land Transport Plan.

### Cycling the Coast Road

4. Apart from short sections of cycleway at Punakaiki, State Highway 6 is the only option for getting around by bike; no alternatives exist. Currently, SH6 is **just manageable** to cycle safely if one is a confident cyclist with quick reactions, and precautionary measures are taken. Mine include: looking in a wide angled rear view mirror at every blind corner and pinch point; using cycling sign language to encourage motorists to slow down to pass; signage at the back of bike reminding people to share the road and give 1.5m; and an arrow pole extending 0.5m perpendicular out from the back of the bike. The other main option to maintain safety is to avoid the milk tanker convoy travelling north at approximately 5-6.30pm (and at 5-7am) during milking season.



Figure 1 - my cycling safety aids for SH6

5. However, that said, there is an extremely dangerous section of SH6 to the north of the Cobden bridge. It is dangerous in both directions with steep cliffs, bluffs, no road shoulders, blind corners and narrow over-bridges. Combined with Greymouth 'rush hour' traffic, it can be very frightening. I actively avoid cycling this section during the rush hour and always ride it with ultra-high vigilance, constantly looking in my rear view mirror and signing to every approaching vehicle to slow down. It is due to this dangerous section of SH6 that my partner always says, "kiss me like it's our last" when I cycle off to Greymouth. **Something can and must be done about this dangerous 900m section of road to avoid lives being destroyed.**

6. The only designated cycleway from the Barrytown Flats to Greymouth approaches but does not include this dangerous section above. This cycleway is not physically separated from vehicle traffic and consists of a road shoulder wide enough to cycle (although half of it has eroded) with a painted bike sign. It is short of 1km long – *less than a sole kilometre of cycleway on a 30km stretch of SH6 between where I live and Greymouth.*



Figure 2 - the sole half of a cycleway

According to Land Transport rules, cycle lanes should be provided if there is *insufficient width for heavy vehicles and cyclists to share the road safely.*<sup>1</sup>

7. My average speed on my ebike is 22km/hour. It all depends on wind conditions, weight carried and if I can get my battery charged in Greymouth and are therefore able to use more power. I travel at anywhere between 20-35km/hr along the flat, up to 50km/hr downhill, and about 15km/hr uphill. On average I'm travelling 10-15km/hr faster than a regular bike. Most motorists are not familiar enough with the speed of ebikes and consequently underestimate their speed when overtaking – this can lead to being caught in a dangerous pinch point. To avoid this, when I see or know there's a pinch point ahead, I usually take proactive safety action by cycling on the meridian side of the road shoulder white line to maintain the position I need ahead which is without an adequate road shoulder – the consequence of this is that trucks need to cross the meridian line to pass me.

8. I am a considerate cyclist and cycle as near as practicable to the left side, but not so far left that it affects my safety. As much as the road shoulder allows, I ride the solid white line. When there is room to ride on the road shoulder I always take it unless it leads to

<sup>1</sup> s5.3(2)d p14. <https://www.nzta.govt.nz/assests/resources/road-traffic-standards/docs/rts-16.pdf>

the situation described above. However, the norm for Coast Road from the Barrytown flats to Greymouth is a road shoulder of less than 0.5m, often non-existent, – it is not enough to ride safely and I am normally either riding the white line or on the road meridian side of it.

9. I note the Land Transport (Road User) Rule 2004 section on Passing states: <sup>2</sup>

**2.6 General requirements about passing other vehicles**

*(1) A driver must not pass or attempt to pass another vehicle moving in the same direction unless—*

*(a) the movement can be made with safety; and*

*(b) the movement is made with due consideration for other users of the road; and*

*(c) sufficient clear road is visible to the driver for the passing movement to be completed without impeding or being likely to impede any possible opposing traffic; and*

*(d) until the passing movement is completed, the driver has a clear view of the road and any traffic on the road for at least 100 m in the direction in which the driver is travelling.*

*(2) Subclause (1)(c) and (d) does not apply if the passing vehicle and the vehicle being passed are in different lanes and are, throughout the passing movement, either on a one-way road or on the same side of the centre line.*

*(3) A driver must not, when passing another vehicle moving in the same direction, move into the line of passage of that vehicle until the manoeuvre can be made safely and without impeding the movement of that other vehicle.*

**2.9 Passing where roadway marked with no-passing line**

*(1) This clause applies if a driver is at or approaching a portion of a roadway where the road controlling authority has, in accordance with any enactment, marked a no-passing line applying to traffic moving in the direction in which the driver is moving.*

*(2) The driver must not pass or attempt to pass a motor vehicle or an animal-drawn vehicle moving in the same direction within the length of roadway on which the no-passing line is marked until the driver reaches the further end of the no-passing line, unless throughout the passing movement the driver keeps the vehicle wholly to the left of the no-passing line.*

10. While 2.9(2) states that crossing yellow no-passing lines only applies to motor vehicle or an animal-drawn vehicles, and therefore drivers may cross a no-passing line when passing a cyclist, 2.6 (1) (a), (b), (c), (d) and 2.6(3) still applies to drivers passing cyclists. A vehicle in the Land Transport (Road User) Rule 2004 has the same definition as the Land Transport Act 1998, where a bicycle clearly is one.

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<sup>2</sup>[https://www.legislation.govt.nz/regulation/public/2004/0427/55.0/DLM303048.html?search=sw\\_096be8ed815e936c\\_Passing\\_25\\_se&p=1](https://www.legislation.govt.nz/regulation/public/2004/0427/55.0/DLM303048.html?search=sw_096be8ed815e936c_Passing_25_se&p=1)

11. Cycling the Coast Road I have experienced untold dangerous or inconsiderate overtaking manoeuvres, often by trucks. I submit the video ***Cycling the Coast Road*** as evidence. I took video footage throughout 2023 and until end of January 2024 while riding the Coast Road with a sports camera installed on my handlebars. I had difficulty getting footage of trucks because to start the video required to twice-press a button on the camera, leaving me riding one-handed. To maintain control of the bike and prepare for the suction effect of passing trucks, I would need to ride with both hands on the handlebars, my safety overriding the video collection. Thus the footage is skewed to light vehicles compared to the actual incidence of overtaking by trucks. [Note: the camera had limited battery capacity and I could not leave the video running continuously].
12. Due to most of SH6 lacking a rideable road shoulder, trucks cannot safely overtake cyclists without crossing the road meridian line. They regularly overtake on yellow no-passing lines. It is rare for trucks to slow down and wait for a section of road where they can pass safely and fully comply with 2.6 (1) (a), (b), (c), (d) and 2.6(3).
13. I have witnessed several occasions where a vehicle travelling in the opposite direction has had to slow down or stop to avoid a collision with a vehicle overtaking me (one of these incidences is recorded on my video evidence ***Cycling the Coast Road***). I have also been in situations where vehicles are travelling at speed directly towards me on my side of the road as they complete an overtaking manoeuvre. Both contravene 2.6(1)(c). I believe most local motorists are taking unacceptable risks because the Coast Road currently has a relatively low traffic volume and these dangerous manoeuvres very fortunately seldom end up with consequences. This will certainly no longer be the case if SH6 is used as an industrial mine haulage route for the mineral sands mining industry.
14. Intensifying heavy trucking on the Coast Road will create significant additional risk. It is inevitable that use of SH6 as an industrial mine haulage route will result in a serious accident or fatality. ***It will cost lives.***
15. For example: from my average 2000 km per year, and average speed of 22km/hr, I cycle about 90 hours per year on the Coast Road. The TiGa proposal is for five mine haulage trucks per hour. This would expose me to an *additional* 450 truck encounters p.a. (note: trucks passing in *either direction* are a potential risk to cyclists). Over the average 6 year life of the mining, this would expose me to **2,700 additional trucks**. This is a notable increase of exposure to risk for me personally; the cumulative exposure to risk for all Coast Road cyclists would be substantial. And this is the increased risk exposure from just **one** proposed mineral sand mining operation.
16. Because of my love of cycling and my somewhat obstinate nature, I would be extremely reluctant to discontinue cycling the Coast Road. For myself, I fear it would take

a frightening near miss or suffer a moderate to serious injury before I would give up. To that end, if SH6 was used as an industrial mine haulage route, I would have to 'take the lane' as is my legal right. The road code states: *Cyclist may take the lane when road is too narrow for motor vehicles to safely pass them.* To maintain my safety, I would need to 'take the lane' when trucks approach from the rear on the numerous and lengthy sections of SH6 where there is not an adequate road shoulder and is without a 100m line of sight. This life preservation measure could cause a serious disruption to the efficient operation of SH6, particularly the 13km section between 17 Mile and Rapahoe.

17. Cycling, including ebikes, is one of the most carbon efficient means of transport – both in terms of the embedded carbon of the bike and the zero operational emissions if charging from renewable energy. Ebikes in combination with urban design have the potential to play a significant part in decarbonising our transport sector. The same can be said for the rural area of the Coast Road. If we continue to invest in safe cycling infrastructure on the West Coast, it will become commonplace for people to swap car journeys for bike journeys. But allowing SH6 to be dominated by heavy mining trucks will be a major setback for Coast Road cycling. This includes a burgeoning cycle tourism industry of both touring cyclists and those riding the “Full Paparoa loop” back to Blackball via SH6.
18. I note that carrying weight as a cyclist increases risk. With added weight in panniers or a backpack, there is a greater risk of ricocheting off a small rock or crumbling road shoulder if encountered during evasive last-seconds action to avoid dangerous overtaking. Ricocheting can result in cyclists crashing off their bikes and/or being flung into traffic.
19. Waka Kotahi released a Cycling Action Plan in 2023 *“to set out a pathway to significantly increase the safety and attractiveness of cycling in towns and cities across Aotearoa New Zealand. The vision is that in 10 years, people of all ages and abilities will be able to get to where they need to go using connected networks of safe and attractive cycleways and quiet streets. It will help inform the development of an expanded National Cycling Plan – an action within the Emissions Reduction Plan.”* **For rural areas such as the Coast Road, the bare minimum should be no increase in cycling safety risk until an equally connected network of safe and attractive cycleways are available as an alternative to SH6.** Additionally, Waka Kotahi website states: *“Committed to helping you get around by bike by investing in building connected cycling networks, as part of a wider transport system, so that getting about by bike can be an easy, safer, everyday choice for more kiwis.”*
20. I feel very fortunate to have grown up in the 70s and 80s where children could cycle unsupervised and most kids rode their bikes to school. I feel a strong sense of

intergenerational responsibility to uphold a cycling future for the Coast Road, so new generations of rangatahi have the option of cycling to their school, recreational activities, and friends and family without the extreme risk of serious injury or death. Significant upgrades to SH6 are needed to create rideable road shoulders or the creation of a separate cycleway/walkway to achieve *a safe and reliable transport network, Increasing the share of people using active transport.*

21. With my +8400km cycling the Coast Road, I have experienced differentiating behaviour amongst commercial drivers. There is no evidence to suggest that all commercial drivers comply with the road code and behave respectfully and in a safe manner towards cyclists all of the time. For example:
- I had a recent frightening experience with a Mainfreight truck at the Taylorville turnoff. Southbound, the turnoff to Taylorville is to the left with a right hand bend continuing to Greymouth. It is dual lane, requiring cyclists to move to the right lane to continue on to Greymouth. So cyclists are in a vulnerable pinch point with potential overtaking traffic on their *right and left*. At this very point, a Mainfreight truck overtook me (on my right) travelling both *at speed and too close*; so close and fast that I felt a strong suction effect and was left very shaken. All the Mainfreight driver had to do was wait behind me for less than 100m where it was safe to pass.
  - There is a high variability of driver behaviour amongst milk tanker drivers. Sometimes they slow down and follow me until they can pass safely; other times they slow down to pass and do so at a safe distance; other times they do not – passing either too fast or too close, or both. They often cross no-passing lines and while this is not illegal, the consequence is they often cut back onto the left hand side of the road (probably because they lack the required 100m forward view of 2.6(1)(d)) and often this impedes my movement (contravening 2.6(3)) – by forcing me off the road and/or having to slam on the brakes. It is likely a number of factors are at play influencing driver behaviour including: the individual driver, how they feel on the day, how much time pressure they may be under, how much other traffic is on the road, weather conditions etc.
22. The safety of cyclists on SH6 is composed of many components which interact with each other. For example, a mine haulage truck slowing down and following behind a cyclist for a lengthy period, would likely result in another driver following the truck becoming frustrated and attempting a dangerous overtaking manoeuvre.

## Conclusions



23. Cycling SH6 comes with a high risk of serious injury and death, in particular the 900m extremely high risk section north of the Cobden bridge. Something can and must be done about this road section before a cyclist is killed.
24. The 13km section between 17 Mile Bluff and just north of Rapahoe is another high risk section for cyclists given large parts of it are without rideable road shoulders and there is often limited forward visibility due to blind corners and steep hills.
25. As a bare minimum there should be no step change increase in cycling safety risk, e.g. from use of SH6 as an industrial mine haulage route, until upgrades are made to create rideable road shoulders or a separate cycleway/walkway. How else can *a safe and reliable transport network, Increasing the share of people using active transport be achieved?*
26. Our civic leadership needs to carefully consider if as a society we are willing to boost GDP and increase the personal wealth of *some* individuals (many who reside offshore) at the expense of our community wellbeing to the point of risking serious injury and death?

# Herenga a Nuku Aotearoa Submission

# **Submission on Draft West Coast Regional Land Transport Plan 2024 - 2034**

## **Introduction**

Herenga ā Nuku Aotearoa, the Outdoor Access Commission is the Crown agent responsible for providing leadership on outdoor access issues. Our role is to provide advice on free, certain, enduring, and practical access to the outdoors. We administer a national strategy on outdoor access, including tracks and trails. We map outdoor access, provide information to the public, oversee a code of responsible conduct in the outdoors, help to resolve access issues and negotiate new access. Our mandate includes all forms of public access, including by foot, bike, horse and vehicle.

Herenga ā Nuku has a team in Wellington and a network of regional field advisors. An independent board governs our work. Our governing piece of legislation is the Walking Access Act 2008.

Much of our work focuses on active transport. We support the creation, maintenance, enhancement, and promotion of walking and cycling access, for recreation, for safety, health and wellbeing, for a shift to more sustainable travel, and including for commuting to local destinations such as schools, places of work and shops.

## **Support for the draft plan**

We support the vision set by the Regional Transport Committee of “a safe, resilient and connected multi-modal transport network which enables the West Coast to thrive” and the recognition of the critical nature of a safe, resilient and well-functioning transport network to the economic and social wellbeing of West Coast communities.

We value the inclusion of and focus on walking and cycling throughout the Draft RLTP including:

- The importance of funding the maintenance and operation of cycle trails
- The use and extension of shared cycle/walking trails to provide high-quality cycle commuter routes
- Improvement in connectivity between local road networks and improvement in safety to enable more walking and cycling
- Enabling walking and cycling as alternative modes of transport – for commuting, for recreation and for tourism
- Improvement of access to walking and cycling networks to increase use of active transport
- Emphasis on ensuring safety for vulnerable road users, especially cyclists, especially in high-speed environments
- The development of a new combined Walking and Cycling Strategy
- Objectives and targets that will make walking and cycling safer and with better connectivity
- The pursuit of the creation of a connected network of cycle rides, and cycling facilities, throughout and between the communities of the region

- Advocating for safer active travel modes
- The development and maintenance of walking and cycling networks that are safe and well-integrated with other modes of transport to connect West Coast communities and enhance the experience of visitors.

### Comments and recommendations

1. Wherever possible, we encourage the creation of cycleways that move cyclists off and away from roads.
2. For our rural region, with just 1.4 people per square kilometre as the draft plan notes, we recommend an extension of the focus on cycleways from urban to rural communities for both residents and visitors. For example, cycling a few kilometres into small rural towns is largely a thing of the past as roads have become busier. Parents report cycling such routes years ago themselves but not allowing their children to do so now due to the danger from the volume and speed of traffic.
3. We note a mention of the term active transport in the section headed *Walking and Cycling* under *Future opportunities and scenarios* and in the Glossary. Active transport modes include walking, cycling, and their variants, such as skates and scooters, as well as horse riding. We recommend that the broader term 'active transport' be used more often, and in place of walking and cycling where possible.
4. To encourage more walking and cycling, active transport must be an attractive option. We recommend the inclusion of an objective and or policy to provide safe active transport connections between cycling and walking networks and within and between communities/new subdivisions. This will encourage more use of active transport modes to reach schools, workplaces, shops and other services.
5. Safety is a critical component to making active transport, and cycling in particular, safe enough to be an attractive option. At present, there are many pinch points on SH6 where there is barely room for two vehicles to pass each other let alone including a bicycle or pedestrian. We recommend that a project be included in the RLTP to identify and prioritise such pinch points, with funding for both the project and to make a start on those pinch points of most concern.
6. A new walking and cycling strategy for the region is long overdue. We recommend investment in the creation of such a strategy in this RLTP.
7. Under *The regional vision*, we recommend the inclusion of an additional key problem: "The risk of death or serious injury that prevents more people using cycles for transport."
8. We recommend the addition of a project to identify and prioritise severance issues – the division/separation of communities – with funding for both the project and to make a start on resolving key severance issues, thus improving resilience of communities. Severance issues may be easily resolved by the creation of short walking/cycling paths.
9. We recommend that an overarching priority be included such that pedestrians and cyclists are considered at every level and every stage of implementation or variation of the RLTP.

Thank you for the opportunity to provide feedback on the draft plan.



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# Marie Elder Submission

### **Introduction**

1. My main interest is around the Coast Road [from Greymouth to Westport] because I live on this section of SH6 and travel it regularly.
2. During the hearing on the TiGa Minerals and Metals Ltd [TiGa] application to mine on the Barrytown Flats, 20 March 2024, TiGa lawyer Alex Booker said they had submitted on the draft RLTP. I strongly believe no one company, especially one largely overseas owned as TiGa is, should influence New Zealand regional transport policy, so was prompted to submit.
3. I presented lay evidence on transport to the TiGa hearing. My main concerns related to potential use of the Coast Road as a mine haulage route, and most of my comments here reflect those same concerns as they relate to the Draft Regional Land Transport Plan.
4. The mining resource consent decision is being made by an independent panel; however it is worth highlighting the transport issues here, especially as TiGa managing director Robert Brand stated in the hearing that TiGa hopes to develop a Mineral Separation Plant “concurrently” with the Barrytown mine, its location “*maybe Rapahoe, maybe Stillwater.*” This has huge implications for regional transport links, as such a plant would attract other mining companies, all hauling heavy mineral concentrate [HMC] along the Coast Road. Take TiGa’s hoped-for 50 trucks, add say 50 coming down from Westland Mineral Sands [WMS] at Cape Foulwind, say 50 coming from a WMS mine at Mananui. I am up to a daily 150 already.
5. The nature of the Coast Road, its infrastructure and safety elements, and the welfare of the communities which live along it, would be adversely affected were any mining companies permitted to use it as a haulage route.
6. This is currently a huge issue for Coast Road residents, with many fearful of the effects on their lives, and the lives of the community’s children, if large numbers of mining truck and trailer units are permitted on the Coast Road for years to come.
7. I support the aims and objectives in this draft RLTP. It is their potential interpretation and implementation that is of concern to me.
8. Thank you for the opportunity to submit.

### The aim of the draft RLTP

10. *“The aim is to agree a regional programme which contributes to the social and economic wellbeing of our communities who rely on the transport network for their very existence.”* - RLTP, p9. I agree absolutely with this aim and endorse its acknowledgement of our community wellbeing and the importance of SH6 to our lives.
11. *“Social and economic wellbeing”* includes:
- the welfare of small, locally owned, nature-based businesses such as horse-wagon tours, knifemaking, beekeeping, organic horticulture, regenerative farming, Air B&Bs
  - the ability of people to commute easily and safely to work
  - the ability of customers and clients to travel the road safely and easily
  - the ability of people to use the road safely and regularly for socialising, for meetings, for predator control, for health and recreational activities
12. All these aspects of social and economic wellbeing would be compromised by the use of the Coast Road as a mine haulage route.

### Damage to road infrastructure by heavy vehicles

13. Evidence shows heavy trucks do more damage to roads than they pay for. For example, a 2020 Inside Science report indicates heavy vehicle can cause approximately 1000-2500 times the damage to the road of a sedan car.<sup>1</sup>
14. A 2022 Scoop article indicates approximately 80% of damage to NZ roads is caused by trucks, yet the trucking industry pays less than 23% of repair costs<sup>2</sup>. Therefore other road users are already subsidising the trucking industry to a significant extent, and this would only be exacerbated by increased numbers of heavy vehicles.

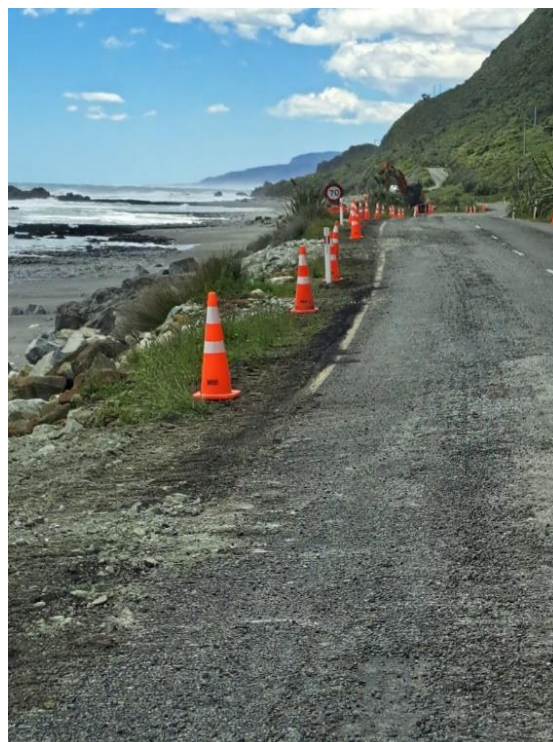


Photo 1. Recent damage to SH6 just north of 13-Mile, 24 Nov 2023

<sup>1</sup> <https://www.insidescience.org/index.php/news/how-much-damage-do-heavy-trucks-do-our-roads> 12.10.20

<sup>2</sup> <https://www.scoop.co.nz/stories/trucks-do-the-most-damage-on-our-roads-but-pay-the-least-towards-fixing-them>.

15. Yet we still hear claims, including from Waka Kotahi, that road user charges cover any potential damage<sup>3</sup>. Heath Milne, CEO of Development West Coast [DWC], went even further down the 'this would be good for us' road when he said, in February 2024 TiGa hearing, that we need more trucks on our highway to help pay for infrastructure improvements. Hardly.
16. According to a 2019 RNZ item, state highways cost more than \$20,000 per kilometre to maintain each year.<sup>4</sup> The vulnerable, high maintenance Coast Road will not be amongst the cheapest.
17. It is important the RLTP does not facilitate a major increase in heavy trucking, especially to profit overseas interests while damaging the local road our communities "rely on... for [our] very existence".<sup>5</sup>
18. Our West Coast climate, and the proximity of the sea to sections of the road, affect Coast Road durability:

*"High amounts of water under bituminous layers can cause high hydraulic pressures in the bottom of the bound layer when it is subjected to heavy traffic wheel loads. These effects act like pressure washes and break the bond between the bitumen and aggregate surfaces."*<sup>6</sup> [my emphasis]. This process is illustrated in the animation below:

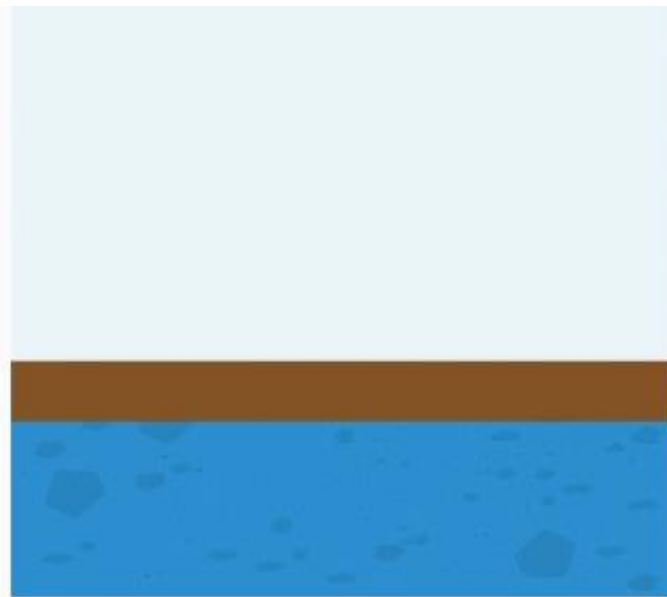


Figure 1: animation showing effect of wheels on bitumen

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<sup>3</sup> Waka Kotahi as quoted in GDC s42A report on TiGa application 166, p38

<sup>4</sup> <https://www.rnz.co.nz/news/national/405389/nzta-doubles-road-maintenance-for-this-summer> RNZ 12.12.19

<sup>5</sup> RLTP, p9

<sup>6</sup> <https://www.roadex.org/e-learning/lessons/drainage-of-low-volume-roads/water-and-mechanical-properties-of-roads/>



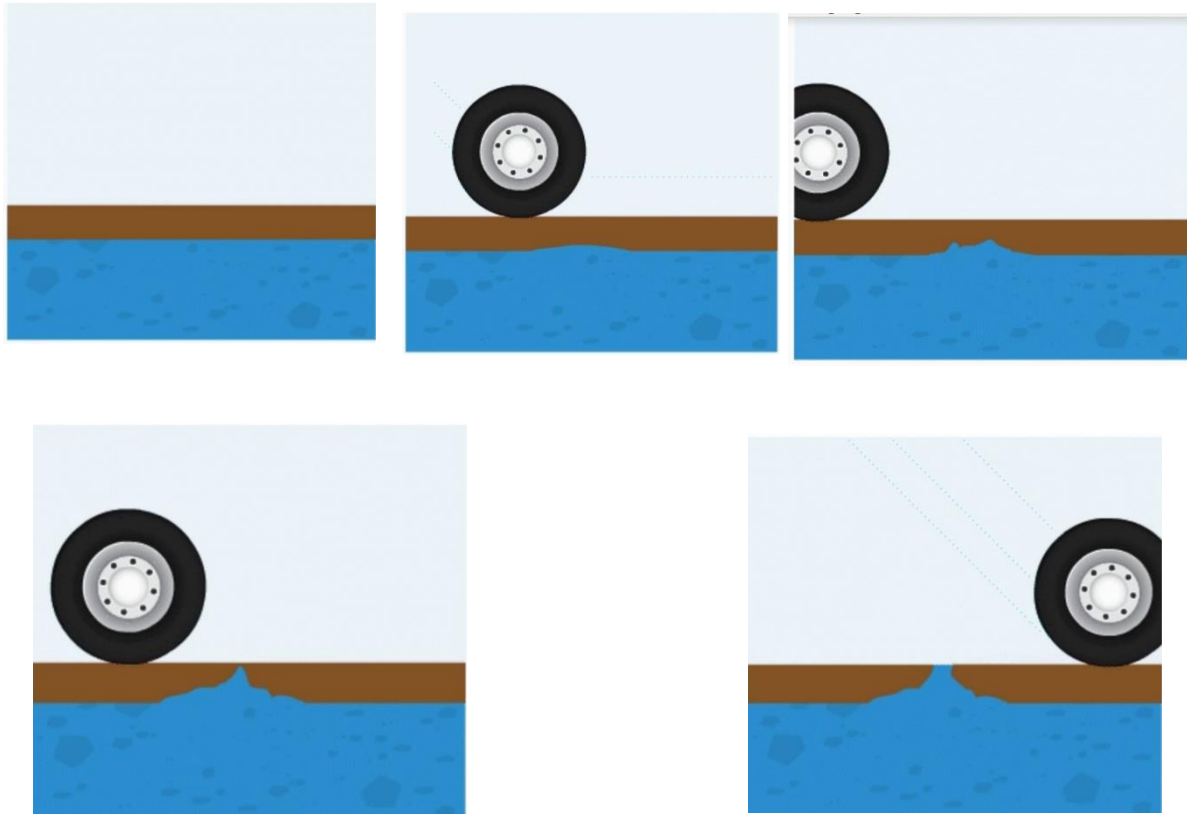


Figure 2. A series of still shots from the Roadex.org animation shows the process of stripping of water saturated road surface

19. I note legal advice received by Mark Geddes, consulting planner to GDC, [in relation to TiGa’s application] regarding an applicant’s responsibility regarding existing road infrastructure problems: *“An applicant is not required to resolve existing infrastructure problems, neither **should it not add significantly to them**”*<sup>7</sup> [my emphasis]. 50 heavy truck and trailer units per day would add significantly to existing issues, as illustrated above.

20. WCRC Chair Peter Haddock already refers to our transport network as *“not fit for purpose”*<sup>8</sup>.

### The environment and tourism

21. *“Approximately one quarter of all public conservation lands in New Zealand can be found on the West Coast making it a key asset of the region”* - RTLP p12. I agree absolutely that this conservation land is a key asset to our region. We need to continue to protect it, using the appropriate legislation.

<sup>7</sup> Mark Geddes, brief to Mat Collins of Abley, February 2024

<sup>8</sup> Peter Haddock, as quoted in: <https://www.stuff.co.nz/national/124767209/the-west-coasts-deadly-roads-onelane-bridges-narrow-roads-inexperienced-drivers> 1 May 2021

22. *“The rich and diverse natural environment comprising the mountains, lakes, rivers, lagoons, coastal beaches and outlooks dotted with historic settlements are major attractions to the region ... one of the ‘top ten coastal drives in the world’ ... The majority of visitors to the northern West Coast visit Punakaiki, Cape Foulwind, Denniston and the Oparara Arches.*

*The West Coast tourism product is completely dependent on the transport network, primarily the State Highways ... Visitors to the region ... require a safe and reliable transport network as they visit the scenic wonders of the West Coast.” – RLTP p13.*

I agree absolutely. And, with Christchurch as a major starting/finishing point, most of these visitors will travel the Coast Road at least once. It would be a big mistake to allow it to become a mining road, threatening this road-based tourism industry.

### **New residents**

23. The nature of the Coast Road is also one of the things which currently attracts new workers and residents, as seen in many of the ‘Are you cut out for the Coast?’ DWC website testimonials from well-qualified people who have moved to our region.

### **Mana Whakahono ā Rohe Iwi Participation Agreement**

24. *“The improved relationship between mana whenua and West Coast local authorities ... illustrated by the signing of the Mana Whakahono ā Rohe Iwi Participation Agreement ... designed to assist tangata whenua and local authorities to discuss, agree and record how they work together, including how tangata whenua will be involved in resource management decisions.” - RLTP p14*

I applaud this co-operation between local authorities and mana whenua; it is something for the region to be proud of.

### **Active transport**

25. *“There is an opportunity to develop and improve access to walking and cycling networks through a combined regional strategy. Developing safe and accessible walking and cycling networks within urban centres will open opportunities to increase use of active transport as a competitive mode of transport, rather than just for recreation [and this will] aid in reducing carbon emissions (thereby meeting key objectives of this Plan) as well as resulting in improved health and wellbeing outcomes for our communities.” - RLTP p24*

I agree absolutely with this positive endorsement of active transport as a ‘competitive mode of transport’. On SH6 however it could be undermined entirely by mining trucks. There is much evidence to show heavy trucks and bicycles are not a compatible mix.

## REGIONAL LAND TRANSPORT PLAN – 30-YEAR VISION:

26. *“A safe, resilient and connected multi-modal transport network which enables the West Coast to thrive.*

### **Headline targets:**

|                   |   |
|-------------------|---|
| RESILIENCE        | Reduced number of closures on the strategic road network.     |
| ASSET CONDITION   | Reduced assets not fit for purpose.                           |
| SAFETY            | Reduction in deaths and serious injuries on West Coast roads. |
| CONNECTIVITY      | Increase in active modes, more walking and cycling activity.  |
| REGIONAL ADVOCACY | Improved advocacy for regional transport needs”               |

- RLTP p34

27. These are excellent targets. A mining haulage route as our main transport link would undermine every one of them.

28. Tasman West Coast MP Maureen Pugh, when interviewed about the TiGa proposal on TVNZ, spoke enthusiastically of the touted economic benefits. When asked whether she had misgivings about road safety, her reply acknowledged an issue: *“I think it’s a trade-off”*<sup>9</sup>.

29. Any ‘trade off’ between promised profits and road safety needs interrogating. How many serious injuries and deaths are a reasonable ‘trade off’ when lined up against the money, assuming the promised profits materialise? If one more person is killed on the road, is that okay so long as the region’s GDP has gone up 0.5%? Two more people?

30. It seems somewhat callous to consider death and serious injury in dollar terms, but these statistics are relevant:

*“The average social cost is estimated at NZD\$4.916 million per fatal crash, NZD\$923,000 per reported serious crash, and NZD\$104,000 per reported minor crash.”* - [www.transport.govt.nz](http://www.transport.govt.nz)<sup>10</sup>

### **Typo?**

31. *“... drivers with poor behaviours (such as travelling at inappropriate speeds, under the influence of alcohol or drugs, **or by motorcycle**) contribute to crashes”* – RLTP p36 [my emphasis]. Surely the suggestion, that just to be on a motorcycle is to exhibit poor driving behaviour, is a typo.

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<sup>9</sup> TVNZ Q and A 12 November 2023

<sup>10</sup> <https://www.transport.govt.nz/statistics-and-insights/safety-annual-statistics/social-cost-of-road-crashes/inner>

## CONCLUSIONS

32. We cannot have it all. We cannot have a “*safe and reliable transport network*” AND support one company alone putting 50 extra trucks a day on the road. The Grey District Plan permits “20 heavy vehicle movements per day”<sup>11</sup> and a proposed 150% increase to 50 day would be an unacceptable intensity of heavy traffic to inflict on residents and all other road users.
33. We cannot encourage more “*active modes*” of transport AND open up our single arterial Coast Road as a mining haulage route, putting convoys of mining trucks onto the road with the cyclists. The two are incompatible.
34. We cannot protect the natural environment, our ‘key asset’ AND encourage mining close to wetlands, and/or in or near the habitat of sensitive species, and/or where it is visible from the scenic highway.
35. We cannot encourage new residents and ratepayers to invest in the quiet, peaceful, untamed, natural West Coast environment AND expose them to long days of noise and vibration and the safety risks of additional heavy traffic six days a week.
36. Our civic leaders need to make choices. On one side of the ledger we have promises of profits brandished – and possibly inflated - by mining companies. On the other side, we have the “*health and wellbeing outcomes for our communities*” and the protection of that *key asset of the region*, the natural environment.
37. I ask our civic leaders to always consider, foremost, all aspects of our communities and our natural environment in all decision-making.

Marie Elder  
28 March 2024

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<sup>11</sup> TiGa Application p37

# Waka Kotahi Submission

28 March 2024

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Kia ora

### **Draft Regional Land Transport Plan**

The New Zealand Transport Agency Waka Kotahi (NZTA) welcomes the opportunity to provide feedback on the Draft Regional Land Transport Plan.

The State Highway Investment Proposal is NZTA's bid for funding improvement activities on the State Highway network in response to the GPS 2024. These activities primarily relate to the State Highway network.

The State Highway Investment Proposal included in your Regional Land Transport Plan was developed in August 2023. The State Highway Investment Proposal is currently being revised in response to new Government direction and the Board is expected to sign out an updated State Highway Investment Proposal 2024 by early April.

We request the opportunity to address any changes in the updated State Highway Investment Proposal 2024 at the upcoming hearings. This will be an opportunity for NZTA staff to speak to any changes in the State Highway Investment Proposal 2024 for your Region. We will also seek inclusion, in the Regional Land Transport Plan, of any new activities identified in the updated State Highway Investment Proposal 2024.

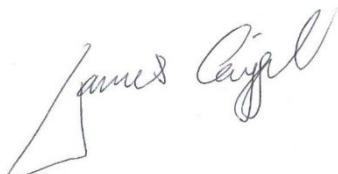
We recommend that a NZTA representative be provided the opportunity to speak to the updated State Highway Investment Proposal 2024 as it better reflects the NZTA response to the 2024 Government Policy Statement on Land Transport (GPS 2024).

We also request that the Regional Transport Committee resolve to delegate to staff the ability to make changes to the final Regional Land Transport Plan to reflect the updated State Highway Investment Proposal up until the date the Regional Land Transport Plan is approved by the Regional Council, subject to these changes being circulated to all Regional Transport Committee members and agreed to by the Chair.

It is important that NZTA be provided an opportunity to advise on the changes to the State Highway Investment Proposal 2024 that are relevant to the Regional Land Transport Plan. This will enable the Regional Transport Committee to be aware of the totality of land transport bids in its Region.

We thank you in advance for this opportunity to speak.

Ngā mihi nui

A handwritten signature in black ink, reading "James Caygill". The signature is written in a cursive style with a large, stylized initial 'J'.

**James Caygill**

Director Regional Relationships West Coast / Canterbury / Otago / Southland

# WSM Group Submission



26 March 2024

To whom it may concern,

**Submission: Draft 2024-2034 West Coast Regional Council Land Transport Plan Consultation**

WMS Group **do not** wish to speak in support of this submission at a hearing.

WMS Group makes the following comments on the Draft 2024-2034 West Coast Regional Council Land Transport Plan (Draft RLTP):

**1) Recognition of strategic routes for heavy vehicles as part of economic activity**

The Draft RLTP recognises the importance of the roading network for economic activity. Objective 2 of the Draft RLTP notes that State Highway 7 is the dedicated High Productivity Motor Vehicle (HPMV) route from Canterbury to the West Coast, but many heavy vehicles use State Highway 73 instead and that this route is vital to upgrade to HPMV standards. Many upgrades across West Coast roads have also been identified as needing improvement.

WMS Group **agree** that it is vital that the roading network is fit for purpose for heavy vehicle use to support economic activity in the region and **submit** that State Highway 6 should be considered an important strategic route. We **request** that Objective 2: Policy 3 (p.40), relating to HPMV capability on strategic routes, is amended to specifically include State Highway 6 as well as State Highway 73 and key local roads.

**2) Prioritisation of ports and access links**

The necessity for intermodal transport, including the road and rail networks, and connections to the Greymouth and Westport ports are highlighted throughout the Draft RLTP. WMS Group **agree** that these connections are critical to the West Coast, both for economic activity and resilience in the event of severe weather and natural disaster. It is noted that should the West Coast be completely cut off due to disruption of the roading network, the ports potentially have a significant role to play in providing connectivity during disaster response and recovery. The role industries such as Heavy Mineral Sands (HMC) can play in utilizing the ports is highlighted in the Draft RLTP.

WMS Group therefore **supports** Objective 1: Resilience and notes the role of the ports and associated shipping activities through HMC industries in realizing this objective.

We also **submit** that it is crucial that the roading network connecting strategic routes to the ports is identified and maintained for heavy vehicles and other transport accessing the ports. It is **requested** that the policies under Objective 2: Asset Condition are broadened to include policies specifically

relating to the roading networks connecting strategic routes to the ports, to identify them as used for port related traffic, including heavy vehicles, and to maintain them as such.

**3) Cycleways and road safety**

Objective 3: Safety, and Objective 4: Connectivity of the Draft RLTP both cover matters relating to cycling and cycle/walking pathways. WMS Group **agree** that safety of all road users is important and **submit** that a stronger focus on the development of cycleways/walkways off road should be included in the plan, particularly in relation to State Highways.

Yours sincerely,



**Heather McKay**  
**Group GM Environment & Sustainability**  
heather@wmsnz.com

# Te Whatu Ora Submission

28 March 2024

West Coast Regional Council  
PO Box 66  
Greymouth

Tēnā koutou,

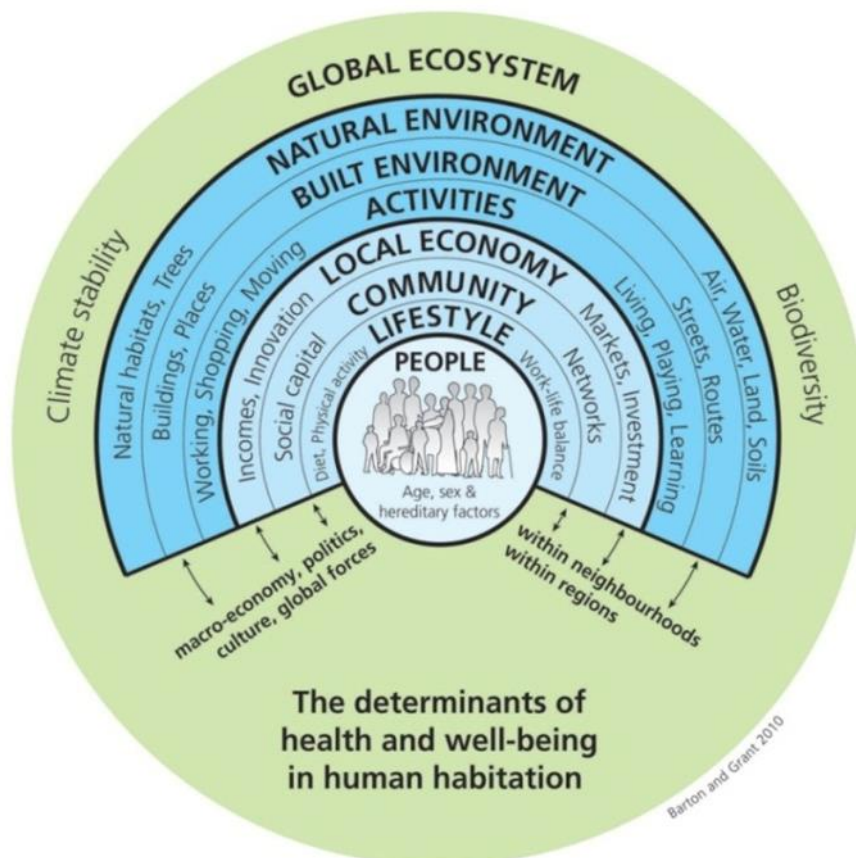
## **Submission on the Draft West Coast Regional Land Transport Plan 2024-2034**

1. Thank you for the opportunity to submit on the Draft West Coast Regional Land Transport Plan 2024-2034. This submission has been compiled on behalf of the National Public Health Service (NPHS) Te Waipounamu, Health New Zealand/Te Whatu Ora. NPHS Te Waipounamu services the South Island including the West Coast region.
2. NPHS Te Waipounamu recognises its responsibilities to improve, promote and protect the health of people and communities of Aotearoa New Zealand under the Pae Ora Act 2022 and the Health Act 1956.
3. This submission sets out particular matters of interest and concern to NPHS Te Waipounamu.

### **General Comments**

4. We welcome the opportunity to comment on the Draft West Coast Regional Land Transport Plan 2024-2034.

5. Health and wellbeing (overall quality of life) are influenced by a wide range of factors beyond the health sector. These influences can be described as the conditions in which people are born, grow, live, work and age, and are impacted by environmental, social and behavioural factors. They are often referred to as the ‘social determinants of health.’<sup>1</sup>
  
6. The diagram<sup>2</sup> below shows how the various influences on health are complex and interlinked. Initiatives to improve health outcomes and overall quality of life must involve organisations and groups beyond the health sector, such as local government if they are to have a reasonable impact<sup>3</sup>. Local government has a critical role to play in supporting the health and wellbeing of communities.



<sup>1</sup> Public Health Advisory Committee. 2004. *The Health of People and Communities. A Way Forward: Public Policy and the Economic Determinants of Health*. Public Health Advisory Committee: Wellington.

<sup>2</sup> Barton, H and Grant, M. (2006) A health map for the local human habitat. *The Journal of the Royal Society for the Promotion of Health* 126 (6), pp 252-253. <http://www.bne.uwe.ac.uk/who/healthmap/default.asp>

<sup>3</sup> McGinnis JM, Williams-Russo P, Knickman JR. 2002. The case for more active policy attention to health promotion. *Health Affairs*, 21(2): 78 - 93.

7. Transport is an important determinant of health and wellbeing. Transport provides access to places, services and opportunities that are essential for good health and wellbeing.
8. In addition to access, there are many other pathways that link transport to health outcomes including air quality, greenhouse gas emissions, physical activity and road crashes.<sup>4</sup> These pathways can lead to positive or negative health outcomes and have a significant impact on population health and wellbeing.
9. When transport and land use planning take these factors into account in strategic policy-making, there is potential to make significant gains in improving health and wellbeing and reducing inequity and healthcare costs.

## Specific Comments

10. We support the RLTP including the 30-year vision of the draft plan of ‘a safe, resilient and connected multi-modal transport network which enables the West Coast to thrive’, and the objectives and headline targets in the RLTP.
11. We have some comments on how the RLTP could be strengthened to improve health outcomes.
12. We recommend that specific numbers are allocated to the headline targets so that progress against these targets can be measured. For example, “40% reduction in deaths and serious injuries on West Coast roads”.

## Resilience

13. We support the inclusion of the strategic objective of ‘Resilience’ and the priority investment areas under this objective that will address flooding risk and coastal

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<sup>4</sup> Glazener, A., Sanchez, K., Ramani, T., Zietsman, J., Nieuwenhuijsen, M. J., Mindell, J. S., ... & Khreis, H. (2021). Fourteen pathways between urban transportation and health: A conceptual model and literature review. *Journal of transport & health*, 21, 101070.

erosion. Preparing for and adapting to climate change is important because the impacts of climate change are already being experienced on the West Coast with an increase in extreme weather events and flooding in recent years. These impacts are expected to amplify over time.

14. The damage and disruption to transport networks caused by these events has consequences for health and wellbeing. Communities can become isolated and unable to access essential services, such as food and healthcare, especially when there is a lack of alternative routes.<sup>5</sup> This disruption can have psychosocial, cultural and economic impacts.
15. Improving the resilience of the transport network is important to reduce potential disruption and severance from supplies and services and to build community resilience and connectedness. The resilience of the transport network is also essential for response and recovery situations.

### **Asset condition**

16. We support the inclusion of 'Asset condition' as one of the strategic objectives in the draft plan, because maintaining the transport network can improve safety and resilience and reduce emissions.
17. While we acknowledge the need to improve asset condition to support freight by road, we encourage the Council to prioritise transporting freight by rail and sea because of the potential to improve road safety, enhance resilience and reduce emissions. As stated in the plan, rail produces at least 70 per cent less carbon emissions (per tonne of freight carried compared with heavy road freight) and the cost externalities for freight by road are six times higher than freight by rail and twelve times higher than freight by sea.

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<sup>5</sup> Waka Kotahi NZTA. (2022). *Tiro Rangi – our climate adaptation plan 2022–2024*. Wellington: Waka Kotahi NZTA.

18. Increasing freight by rail and sea may mitigate damage caused by heavy vehicles to the roading network and alleviate the need to increase carrying capacity and install passing lanes on State Highways.
19. Diversifying freight may also improve the resilience of the transport network in extreme events by providing alternative means for accessing goods and resources.

## **Safety**

20. We support the inclusion of 'Safety' as one of the strategic objectives in the draft plan. Improving the safety of the transport system can reduce deaths and injuries and increase the uptake of walking and cycling by improving public perceptions of safety.
21. We support actions to improve safety for people walking and cycling. We encourage the Council to consider how to improve safety on urban roads in addition to tourist routes and rural areas to encourage walking and cycling. Encouraging people to walk, cycle and scoot for short trips can promote physical activity, reduce reliance on vehicles and cut transport emissions.
22. We support the implementation of speed reductions identified particularly near kura/schools, marae and key urban and rural areas, as outlined on page 49 of the draft plan. Reducing vehicle speeds can reduce deaths and serious injuries and also have other health and environmental benefits.
23. Speed of vehicles is a key influencer of whether people perceive a trip is safe to make by active transport, therefore reducing speeds may promote more walking, cycling and scooting by improving the actual or perceived safety of these modes. When implemented with meaningful community consultation, reducing speeds can create safer and more liveable and accessible environments.



24. We encourage the Council to consider how freight on the road can affect public perceptions of safety and therefore peoples' decisions to walk and cycle.

### **Connectivity**

25. We support the inclusion of 'Connectivity' as a strategic objective in the draft plan and the headline target to increase active transport modes.

26. Lack of physical activity in New Zealand is a primary causal factor of morbidity and mortality. Active transport can increase physical activity and contribute to decreased likelihood of diabetes, improved mental health and reduced risk of diseases, such as cardiovascular disease and cancer.<sup>6 7 8</sup> When more people walk and cycle, transport emissions and noise are reduced, air quality is improved, and environmental sustainability is supported.<sup>9</sup>

27. While cycle and walking trails are quickly becoming an important part of the West Coast identity and contributing to economic wellbeing, there is a need for active transport connectivity to encourage people to walk and cycle for everyday transport.

28. Improving connectivity through a multi-modal network can increase transport choices, and enable communities to meet their social, cultural and economic needs. Some people have a lack of transport options meaning that their opportunities to participate in everyday activities are limited, this is referred to as 'transport disadvantage'. People can overcome a lack of choices by paying more than they can reasonably afford for transport (typically by buying and operating a car), and this is referred to as 'transport poverty'.<sup>10</sup> Some groups are more likely to face transport

<sup>6</sup> Environmental Health Indicators. (2017) *About Transport and Health Factsheet*. Wellington: Environmental Health Indicators Programme, Massey University. Available from: <https://www.ehinz.ac.nz/assets/Factsheets/Released-2017/About-transport-and-health-factsheet.pdf> 14

<sup>7</sup> British Medical Association. (2012) *Healthy transport = Healthy lives*. Available at: <https://www.cycling-embassy.org.uk/sites/cyclingembassy.org.uk/files/documents/healthytransportthehealthylives.pdf>

<sup>8</sup> Luo M, Li H, Pan X, Fei T, Dai S, Qiu G, Zou Y, Vos H, Luo J, Jia P. (2021) *Neighbourhood speed limit and childhood obesity*. *Obesity Reviews*. 22:e13052

<sup>9</sup> Saunders LE, Green JM, Petticrew MP, Steinbach R, Roberts H. (2013) *What are the health benefits of active travel? A systematic review of trials and cohort studies*. *PLoS One*. 8(8):e69912.

<sup>10</sup> Ministry of Transport. (2020). *Equity in Auckland's Transport System: Summary Report*. Wellington: Ministry of Transport.

disadvantage including older people, Māori, children and young people and rural communities.

29. In addition to active transport, public transport improves people's transport options. We have previously submitted on the Regional Public Transport Plan and support actions to improve the availability of public transport in the region. We offer our support to the investigation into the need for some form of on-demand public transport for the region.

30. As stated above, we also support actions to increase freight by rail and sea because of the various benefits for climate, resilience, safety and the condition of the roading network.

## Conclusion

31. NPHS Te Waipounamu does not wish to be heard in support of this submission.

32. If others make a similar submission, the submitter will not consider presenting a joint case with them at the hearing.

33. Thank you for the opportunity to submit on the Draft West Coast Regional Land Transport Plan 2024-2034.

Ngā mihi,

## Vince Barry

**Regional Director Public Health Te Waipounamu**  
**National Public Health Service**

## Contact details

Hebe Gibson

For and on behalf of NPHS Te Waipounamu

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# Active West Coast Submission

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West Coast Regional Council  
P O Box 66  
GREYMOUTH 7840

Submission to the West Coast Regional Land Transport Plan 2024-2034.

### **Active West Coast**

Active West Coast (AWC) is a network of agencies and groups committed to improving the health and wellbeing of West Coasters through the promotion of healthy lifestyles and the creation of healthy social and physical environments. To support our aims, we have made submissions to relevant documents including the Land Transport (Road Safety and other Matters) Amendment Bill, the Government Policy Statement on Land Transport, the Road to Zero Strategy, the Accessible Streets Regulatory Package and to He Pou a Rangi: Climate Change Commission's draft advice for Consultation. At a more local level we have made submissions to previous Regional Land Transport Plans, local Councils' Long Term and Annual Plans, and district Speed Reviews. We recently submitted to the draft West Coast Regional Public Transport Plan. We were also involved with the development of the West Coast Regional Walking and Cycling Strategy 2009 and some members are current members of the West Coast Road Safety Committee.

While member organisations were involved in preparing this submission, the recommendations in their entirety, do not necessarily reflect the views of each individual agency.

Thank you for the opportunity to respond to the Draft West Coast Regional Land Transport Plan (the Plan). We wish to make the following comments:

We agree with the Committee's vision to have a safe, resilient and connected multi-modal transport network that enables the West Coast to thrive. Route security is critical to the on-going economic and social well-being of the West Coast region. Everyone benefits from a transport system that is resilient, safe and reliable. A

system that is also accessible and includes a range of transport choices further supports people to live independently and can assist in addressing climate change effects.

### Public Transport

We agree with the proposal to investigate the need for some form of on-demand public transport for the region. We recently submitted our support for this to be given high-priority within the Public Transport Plan. Our members are keen to assist the committee with this investigation.

### Objective 1: Resilience

*A transport network that can better cope with unknown stresses, natural disasters and the impact of climate change.*

*Headline Target: Reduced number of closures on the strategic road network*

We agree that breaks in the network can have substantial impacts on the economic, social and cultural wellbeing of communities on the West Coast. Many communities across the West Coast are beginning to appreciate how increasingly vulnerable we are to natural disasters and climate change impacts, and how the resilience of our transport network is critical to both response and recovery situations.

We have previously submitted on the need to mitigate and adapt to the impact that climate change will have on our transport networks and communities. We therefore support the identified areas for investment with respect to addressing flooding risk and coastal erosion, and to improve resilience of both the roading and rail network. We also support the need to include linkages by sea and the development of a plan to improve the ports and their role in maintaining vital lifelines connectivity (pg 54).

### Objective 2: Asset condition

*A transport network that is fit for purpose*

*Headline Target: Reduction of assets not fit for purpose*

While we support the intention to improve the network to make it fit for purpose, we remain concerned that the need to upgrade many bridges and parts of the roading network is driven by the demand from the freight industry to enable increased size and capacity of their freight vehicles.

The document predicts an increase in freight tonnage equivalent to 89,000 truck movements per year by 2042 and argues that this will require significant long-term investment to increase the capacity of the roading network to cater for HPMV vehicles, especially on State Highway 73. There is potential for this investment to be seen as prioritising vehicle transport over rail or sea freight options. There is no

discussion on how the Plan could promote rail as a viable option for freight, indeed the document predicts a very minimal increase in rail freight by 2042.

It is likely that improving capacity to increase freight by road will both discourage and delay the transition to rail and/ or sea freight. This is concerning, particularly as the Plan states that the cost externalities for freight by road is 6 times higher than freight by rail, and 12 times higher than freight by sea. It is also inconsistent with the intent expressed within the Plan for increased rail movements over the next 10 years (pg 63). As acknowledged in the Plan, *rail produces at least 70 percent less carbon emission (per tonne of freight carried compared with heavy road freight) and therefore has potential to play a significant role in reducing greenhouse gas emissions and enhancing resilience and safety on the inter-regional routes to Canterbury* (pg 17).

The fact that *'bulk goods such as coal, milk products, and logs are exported via rail while many commodities come in via road'*, and many HPMV vehicles are already *'returning with unused capacity'*, indicates that rail may already be a better inter-regional freight option. Moving more freight by rail would alleviate the need to increase carrying capacity and install passing lanes to address pinch points on the State Highway network.

Moreover, in order to achieve New Zealand's climate change targets, there is a need to transition away from high emission transport and decarbonise heavy transport and freight. While it is true that urban and more populated areas will largely help achieve this target, the West Coast can, and should, play its part. Having a vision where rail (and sea) are a more significant part of our future transport options needs to be more strongly iterated within the RLTP.

**AWC would like to see more consideration given to the promotion of rail as a viable, if not preferred, option for both outgoing and inbound freight movements to Canterbury.**

### Objective 3: Safety

*A transport network that is safe for all users.*

*Headline Target: Reduction in deaths and serious injuries on West Coast roads*

We agree with the headline target of a reduction in deaths and serious injuries. We trust this target will remain even as the Road to Zero Strategy has been withdrawn, especially as the West Coast tracks above the national average for risk of fatal or serious casualties per million vehicle kms.

We support continued investment in the Road Safety Committee as this allows a collaborative approach to addressing road safety across the West Coast. As stated above, some AWC members are current members of the West Coast Road Safety Committee. Our input to the Committee focuses on changing attitudes and behaviours and promoting the creation of social and physical environments where the healthy/ safer choice is the easy option. For example, we have supported reduction in local speed limits and the creation of pedestrian and cycling facilities across the Coast both as a safety measure and to encourage walking and cycling. AWC also works to change behaviour and attitudes to alcohol through regulation and health promotion activities. We have also supported the delivery of events targeting safer motorcycling.

We note the safety objective is for a transport system that is safe for all users. The pinch points referred to in the preamble to this section could be mitigated by limits on the size of freight vehicles using our roading network. This would improve safety and the experience of the 'increasing numbers of cyclists' and others in smaller vehicles using our roading network. This would also assist with a modal shift to more active transport options and contribute to achieving a reduction in carbon emissions.

We note priority for safety improvements for walking and cycling is targeted for key tourist routes and rural roads. However, there are several areas within more urban communities where walking and cycling facilities require safety improvement. (Please also refer to our comments under Objective 4 below.) We anticipate that the review of the Walking and Cycling Strategy will significantly engage with local communities to identify these areas and action to improve safety will follow.

**Our members are keen to be involved with the Walking and Cycling Strategy review and offer our assistance to the Committee.**

With respect to the table on page 49, we agree with the implementation of speed reductions identified particularly near kura/ schools, marae and key urban and rural areas. Reducing speed is a primary way to achieve road safety and promote more walking and cycling. Done correctly, and with sufficient community engagement, it also promotes a 'share the road culture' and assists in a shift towards roads being viewed as living spaces for a wide variety of users.

**Objective 4: Connectivity**

A multi-modal transport network that enables all users to meet their economic, social and cultural needs.

Headline Target: Increase in active modes, more walking and cycling activity



We agree that a multi-modal suite of transport options opens up opportunities for economic development while improving environmental sustainability for the region. This is why we advocate for more investment in rail, sea and walking and cycling facilities.

#### Policies to enable multi modal travel and freight, including coastal shipping

We support the policy to enable multi-modal travel and movement of freight. (See our comments under Objective 2 above.) However, while the Plan discussed significant recent investment in our ports, we note the funding budget for coastal shipping across the Plan is limited to \$200,000 to undertake an investigation of sea freight operations (pg 54). We trust this investigation will lead to further funding availability, and that the next iteration of the Plan will include activities to implement an increase in capacity for sea freight.

The anticipated increase of 2.7m tonnes of freight equivalent to an additional 89 000 (44 tonne) truck trips per year on the West Coast by 2042, along with the forecast of a minimal .11 tonnes increase in freight by rail highlights the need for rail to be incentivised across timeframe of the Plan. This would help reduce congestion, conflict and greenhouse gas emissions which will protect individuals and communities across the West Coast. We are aware that the recent draft Government Policy Statement on Land Transport indicates a lack of growth in tonnage hauled by rail, even within a six-year period of significant investment in the network, however this does not mean rail cannot be a viable option for freight.

#### Walking and cycling networks

We strongly support the policy to develop, and maintain, walking and cycling networks that are safe and well-integrated. This investment will enable active transport to be a safe and accessible choice and therefore support community and environmental wellbeing. It will also demonstrate the Committee's commitment to respond to community demand for improved walking and cycling facilities within the urban area. While cycle and walking trails are fast becoming integral to the identity and economic wellbeing of the West Coast, good active transport connectivity within our communities encourages more walking and cycling, and less reliance on vehicles for short trips for residents.

Having safe and accessible active transport infrastructure that people of all ages can use means people can choose to be more active, more often. Regular physical activity works wonders for long-term physical and mental health and has a positive effect on productivity and economic wellbeing. Moreover, communities that are healthier and better connected, cope better in times of emergency, so investment in improved active transport is also an investment in emergency preparedness.

Thank you for the opportunity to submit on the draft Regional Land Transport Plan 2024-2034. We do not wish to speak to this submission, however we may be contacted by phone on 768 1176 or by emailing [activewestcoastnetwork@gmail.com](mailto:activewestcoastnetwork@gmail.com) if required.

Rosie McGrath  
Coordinator  
Active West Coast  
March 2024

# West Coast Council - Grey District Council Submission

# West Coast Councils – RLTP Submission

## Context

1. Buller, Grey, and Westland District Council (the Councils) jointly provide the following feedback to the draft West Coast Regional Land Transport Plan (RLTP) 2024.
2. This feedback is based on the consultation document, it is provided at both a strategic level and regarding the district transport programmes of the three Councils.

## Local Authority Priorities

3. The three local authorities, Buller, Grey and Westland, prepare a joint transport programme business case and asset management plan for development of their Long-Term Plans and the National Land Transport Programme.
4. The 2024 West Coast Regional Transport Programme Business Case recommends a 10-year programme to achieve the following benefits and strategic responses sought from investment:
  - a. Improve network resilience.
    - i. Identify and mitigate or adapt to natural hazard risks and transport disruption.
    - ii. Ensure current and future infrastructure is fit for and resilient to a changing climate.
  - b. Safer travel.
    - i. Speed management to reflect the capability and function of our roads.
    - ii. Targeted safety improvements, especially for vulnerable road users.
  - c. Improved transport efficiency.
    - i. Increase trips made by walking, cycling, and lower emission modes.
    - ii. Maintain inter- and intra-regional connectivity to move people and goods.

## Feedback on draft RLTP 2024

### General feedback

5. Note that the draft RLTP was released prior to the draft Government Policy Statement on Land Transport (GPS) 2024 being released. The Council's understand this was to comply with the previous legislated timeframe for submission of the Approved RLTP to NZTA, and that this timeframe has now been extended to provide the Regional Council additional time to incorporate the updated GPS and NLTP programme as needed.
6. Note that the draft RLTP is generally consistent with the strategic priorities of draft GPS2024, however GPS2024 proposed significant changes to funding and activity classes which is likely to impact the final approved NLTP programme of the Councils, including West Coast Regional Council, and NZTA State Highways. The significance of this impact is not year clear, or if it will result in further consultation being required for RLTP 2024.

### Feedback on RLTP vision and strategic objectives strategic priorities

7. Support the retention of RLTP 2021 vision "A safe, resilient and connected multi-modal transport network which enables the West Coast to thrive" and the four RLTP 2021 strategic objectives: resilience, asset condition, safety, and connectivity.
  - a. Resilience – Given recent weather events that highlighted the West Coast's vulnerabilities to climate change, we support the RLTP's focus on enhancing network resilience. Infrastructure upgrades such as drainage and flood mitigation protection is critical for climate adaptation on the Coast.
  - b. Asset condition – We acknowledge and support the RLTP's objective to address aging infrastructure and maintenance backlogs. It is vital to ensure that funding allocations for

addressing these issues are adequate and are prioritised to meet both the levels of service and growing demands of our transport network.

- c. Safety – The RLTP's commitment to improving road safety is a shared priority. We propose that the baseline year for headline targets for DSI's be aligned with the local authorities annual reporting measures (RLTP notes the baseline year will be 2023/24).
  - d. Connectivity and Access – enhancing connectivity across our region is supported through public transport. We support the continuation of the subsidised Total Mobility Services as it promotes social benefits for vulnerable members of our community.
  - e. Regional advocacy – support the inclusion of a fifth strategic objective, regional advocacy, highlighting the role of West Coast Regional Council alongside the district councils in taking a common approach to strategy and planning, as and when practical..
8. Notes that the vision and strategic objectives are strongly aligned to the benefits and strategic responses sought from the Councils investment in land transport for the next 10-years, as identified above.

### **Feedback on the regional transport programme**

9. Support the focus on maintaining and operating the system and increasing resilience across the 10-year programmes of all Approved Organisations as included in the draft RLTP.
10. Support the following regionally significant projects which are included in the RLTP, and support the assessment of regional prioritisation by the Regional Transport Committee (RTC):
  - a. SH6 Franz Josef Masterplan – NZTA (1)
  - b. SH6 WTCT Haast to Hawea Resilience Improvements – NZTA (1)
  - c. SH7 Stoney Creek Bridge Replacement – NZTA (3)
  - d. Karamea Highway Resilience Improvements – Buller DC (4)
  - e. Karamea Highway Geometry Improvements – Buller DC (4)
  - f. SH67 Granity Seawall – NZTA (4)
  - g. Safety Infrastructure Improvements Programme 2024-27 – NZTA (7)
  - h. Jackson Bay Resilience Improvements – Westland DC (8)
  - i. SH6 Kumara Junction Commercial Vehicle Regional Safety Centre (9)
11. Support the proposed increase to Department of Conservation local road improvements and maintenance to enhance safety, asset condition, and accessibility for users at key regional tourist destinations.
12. Support the re-inclusion of co-funding for road safety promotion by West Coast Regional Council alongside the three district councils.
13. Note the draft RLTP's focus on funding and affordability constraints, the potential risk of under-investment (e.g. levels of service, asset condition, safety, resilience, economic productivity, and long-term costs), and the need for alternate sources of funding beyond ratepayers and the National Land Transport Fund. The Councils note that draft GPS2024 raises similar issues and promotes potential for a regional approach via city and regional deals, also identified as a potential opportunity in the draft RLTP.
14. Advocate for ongoing collaboration between West Coast Regional Council and the local authorities on regional transport strategy and planning to foster a strong positive regional partnership, building on the existing partnership between the local authorities, and achieve improved transport outcomes for West Coast communities and business.



DRAFT RECOMMENDATIONS REPORT  
ON SUBMISSIONS

TO

THE DRAFT WEST COAST  
REGIONAL LAND TRANSPORT PLAN 2024 - 34

The West Coast Regional Council  
May 2024

## INTRODUCTION

The Land Transport Management Act requires that an interim review of a Regional Land Transport Plan (RLTP) is done every three years from when a plan is adopted. The current West Coast RLTP was adopted in 2021, and the interim three-year review commenced in 2023.

The draft RLTP 2024 sets the strategic direction for land transport in the region and lists the activities recommended by the West Coast Regional Transport Committee for funding from the National Land Transport Fund (NLTF) administered by Waka Kotahi. This includes activities proposed by Waka Kotahi and those proposed by local authorities.

The draft RLTP is prepared for the Council for the West Coast Regional Transport Committee, which has representatives from all Councils on the West Coast, Waka Kotahi and the Department of Conservation.

Initial consultation on the preparation of the draft Plan was undertaken involving collecting preliminary feedback from partners, stakeholders, and interest groups.

Public consultation was undertaken in accordance with Section 18 of the Land Transport Management Act, and with Section 83 of the Local Government Act.

The Draft RLTP 2024-2034 was advertised for submissions on 28 February. At the close of the submission period on 28 March, a total of 9 submissions were lodged, including 5 who wish to speak in support of their submission at a hearing.



## Readers Guide

This document follows the order of the draft Regional Land Transport Plan (RLTP or the Plan) with the individual decisions requested by submitters grouped under the relevant part of the Plan.

Each decision requested by a submitter has been assigned a decision number. The decisions are numbered sequentially. For example:

- Decision O.1 is the 1<sup>st</sup> decision requested for Objective 1;
- Decision O.10 is the 10<sup>th</sup> decision requested for Objective 1.

Note: GS refers to general submissions made on the Plan.

| Explanation of codes for sections of the Plan |  |
|---|--|
| GS  | General submission                       |
| OR  | Our Region                               |
| TS  | Our transport system                     |
| FOS   | Future opportunities and scenarios       |
| PC  | Policy context                           |
| ST  | Strategic framework                      |
| V   | The regional vision                      |
| O1;O2;<br>O3; O4                              | Objectives                               |
| PF  | Regional transport programme and funding |
| MIF   | Monitoring indicator framework           |

The decisions sought by each submitter to The RLTP can be found by referring to the following table *Index of Decisions Requested: Submissions* which follows below. The number assigned shows the relevant section of the Plan Change and the number of the individual submission, as described above.

New text requested is shown as *underlined and in italics*, while text that is requested to be deleted is shown as ~~struckout~~.

## SUBMITTERS

| Submitter Number | Organisation  | Abbreviation      | Wish to be heard |
|------------------|---|-------------------|------------------|
| 1                | TiGa Minerals and Metals Limited  | TiGa              | Yes              |
| 2                | Suzanne Hills   |                   | Yes              |
| 3                | Westland Minerals Sands Group   | WMS               | No               |
| 4                | Herenga ā Nuku Aotearoa   |                   | Yes              |
| 5                | National Public Health Service Te Waipounamu                                  | NPHS              | No               |
| 6                | Active West Coast   | AWC               | No               |
| 7                | Buller District Council<br>Grey District Council<br>Westland District Council | BDC<br>GDC<br>WDC | No               |
| 8                | Marie Elder   |                   | Yes              |
| 9                | Waka Kotahi New Zealand Transport Agency                                      | NZTA              | Yes              |

## Index of Decisions Requested on the Draft Regional Land Transport Plan

| Submitter Number | Abbreviation   | Decisions requested |        |      |       |      |       |      |        |
|------------------|----------------|---------------------|--------|------|-------|------|-------|------|--------|
|                  |                | GS 1                | OR 1   | TS 1 | TS 2  | PC 1 | SF 1  | V 1  | V 2    |
| 1                | TiGa           | O1.1                | O3.1   | O4.1 | O4.2  | HT 1 | MIF 1 |      |        |
|                  |                | GS 1                | OR 1   | TS 1 | TS 2  | PC 1 | SF 1  | V 1  | V 2    |
| 2                | Suzanne Hills  | GS 2                | GS 3   | GS 4 | GS 5  |      |       |      |        |
| 3                | WMS Group      | O1.2                | O2.1   | O2.2 | O3.2  | O4.3 |       |      |        |
| 4                | Herenga ā Nuku | O4.5                | O4.6   |      |       |      |       |      |        |
|                  |                | GS 6                | GS 7   | GS 8 | FOS 1 | V 3  | V 4   | O3.3 | O4.4   |
| 5                | NPHS           | O4.8                | O4.9   | HT 2 | PF 1  |      |       |      |        |
|                  |                | TS 3                | V 5    | O1.3 | O2.3  | O3.4 | O3.5  | O3.6 | O4.7   |
| 6                | AWC            | O4.1 1              | O4.1 2 | PF 2 |       |      |       |      |        |
|                  |                | GS 9                | TS 4   | SF 3 | V 6   | O1.4 | O3.7  | O3.8 | O4.1 0 |
| 7                | BDC, GDC, WDC  | GS 10               | PC 2   | V 7  | PF 3  | PF 4 | PF 5  | PF 6 | PF 7   |
| 8                | Marie Elder    | OGS 1               | O2.4   |      |       |      |       |      |        |
|                  |                | GS 11               | GS 12  | OR 2 | OR 3  | OR 4 | FOS 2 | SF 2 | V 8    |
| 9                | NZTA           | PF 8                | PF 9   |      |       |      |       |      |        |

## GENERAL SUBMISSIONS TO THE Draft RLTP

|  |   |      |
|--|---|------|
| <b>Submission point: GS 1</b>  |   |      |
| <i>Submitter</i>   | 1 | TiGa |
| <i>Submission</i>  |   |      |
| <p>The land transport network is fundamental to the economic and social wellbeing of the West Coast ... Mineral sands products such as ilmenite, garnet and rare earth elements are used in manufacturing technology around the world. Getting the product to freight ships through the land transport network is the first step in selling a West Coast product to the world.</p> |   |      |
| <b>RECOMMENDATION</b>  |   |      |
| Noted  |   |      |
| <b>REASON</b>  |   |      |
| The submission point is acknowledged. No change is thought by the submitter here.  |   |      |

|  |   |               |
|--|---|---------------|
| <b>Submission point: GS 2</b>  |   |               |
| <i>Submitter (summarised)</i>  | 2 | Suzanne Hills |
| <i>Submission</i>  |   |               |
| <p>Currently, SH6 is <b>just manageable</b> to cycle safely if one is a confident cyclist with quick reactions, and precautionary measures are taken ... The other main option to maintain safety is to avoid the milk tanker convoy travelling north at approximately 5-6.30pm (and at 5-7am) during milking season ... However, there is an extremely dangerous section of SH6 to the north of the Cobden bridge. It is dangerous in both directions with steep cliffs, bluffs, no road shoulders, blind corners and narrow over-bridges. Combined with Greymouth 'rush hour' traffic, it can be very frightening. (...) <b>Something can and must be done about this dangerous 900m section of road to avoid lives being destroyed.</b></p> |   |               |
| <b>RECOMMENDATION</b>  |   |               |
| Reject in part   |   |               |
| <b>REASON</b>  |   |               |
| <p>Based on stakeholder engagement and public consultation, staff agree that the section of SH6 between Taylorville Rd and the Cobden Bridge is narrow and difficult for cyclists. However, NZTA completed an investigation into options to improve this corridor for people cycling in 2023. The cost of the identified solution is high, at \$12M+. A project of this scale is not supported by the draft GPS. NZTA is continuing to consider interim lower cost improvements that could make a small difference e.g. further static or active warning signs.</p>  |   |               |

|                               |   |               |
|-------------------------------|---|---------------|
| <b>Submission point: GS 3</b> |   |               |
| <i>Submitter</i>              | 2 | Suzanne Hills |
| <i>Submission</i>             |   |               |

According to Land Transport rules, cycle lanes should be provided if there is *“insufficient width for heavy vehicles and cyclists to share the road safely.”* ... However, the norm for Coast Road from the Barrytown flats to Greymouth is a road shoulder of less than 0.5m, often non-existent, – it is not enough to ride safely. Due to most of SH6 lacking a rideable road shoulder, trucks cannot safely overtake cyclists without crossing the road meridian line ... Significant upgrades to SH6 are needed to create rideable road shoulders or the creation of a separate cycleway/walkway to achieve a *“safe and reliable transport network, Increasing the share of people using active transport”*. (...)

As a bare minimum there should be no step change increase in cycling safety risk, e.g. from use of SH6 as an industrial mine haulage route, until upgrades are made to create rideable road shoulders or a separate cycleway/walkway.

#### RECOMMENDATION

Reject

#### REASON

The draft GPS indicates that the Government does not support multi-modal transport. Therefore it is unlikely for the Region to receive adequate funding to proceed with the requested intervention.

#### Submission point: GS 4

*Submitter*

2

Suzanne Hills

*Submission*

I believe most local motorists are taking unacceptable risks because the Coast Road currently has a relatively low traffic volume and these dangerous manoeuvres very fortunately seldom end up with consequences. Intensifying heavy trucking on the Coast Road will create significant additional risk. It is inevitable that use of SH6 as an industrial mine haulage route will result in a serious accident or fatality. **It will cost lives.**

#### RECOMMENDATION

Accept in part

#### REASON

Based on stakeholder engagement, staff understands that SH6, the Coast Road has a collective safety risk ranging from low to medium and is not considered to reflect an unacceptable risk for road users. A safety improvement programme considering safe system supporting treatments such as signage, road markings and other delineation treatments could be considered to manage this risk. NZTA will continue to monitor performance and consider it for investment prioritisation through the NLTP planning process.

There are opportunities through the *West Coast Share Value for Money safety improvement* activity to identify future SH6 safety improvements on the West Coast for delivery, as well as Low-Cost Low Risk programmes for small scale ongoing safety improvements as part of maintenance and renewal programmes.

#### Submission point: GS 5

*Submitter*

2

Suzanne Hills

*Submission*

|  |
|--|
| Cycling, including ebikes, is one of the most carbon efficient means of transport – both in terms of the embedded carbon of the bike and the zero operational emissions if charging from renewable energy. Ebikes in combination with urban design have the potential to play a significant part in decarbonising our transport sector. If we continue to invest in safe cycling infrastructure on the West Coast, it will become commonplace for people to swap car journeys for bike journeys. |
| <b>RECOMMENDATION</b>  |
| Accept in part   |
| <b>REASON</b>  |
| Staff agree in part with this submission part because the draft Plan recognises the role of cycling in reducing emissions. However, the submitter has not specifically asked for a change in the Plan provisions.  |

|  |   |                |
|--|---|----------------|
| <b>Submission point: GS 6</b>  |   |                |
| <i>Submitter</i>   | 4 | Herenga ā Nuku |
| <i>Submission</i>  |   |                |
| <p>We value the inclusion of and focus on walking and cycling throughout the Draft RLTP including:</p> <ul style="list-style-type: none"> <li>• The importance of funding the maintenance and operation of cycle trails</li> <li>• The use and extension of shared cycle/walking trails to provide high-quality cycle commuter routes</li> <li>• Improvement in connectivity between local road networks and improvement in safety to enable more walking and cycling</li> <li>• Enabling walking and cycling as alternative modes of transport – for commuting, for recreation and for tourism</li> <li>• Improvement of access to walking and cycling networks to increase use of active transport</li> <li>• Emphasis on ensuring safety for vulnerable road users, especially cyclists, especially in high-speed environments</li> <li>• The development of a new combined Walking and Cycling Strategy</li> <li>• Objectives and targets that will make walking and cycling safer and with better connectivity</li> <li>• The pursuit of the creation of a connected network of cycle rides, and cycling facilities, throughout and between the communities of the region</li> <li>• Advocating for safer active travel modes</li> <li>• The development and maintenance of walking and cycling networks that are safe and well-integrated with other modes of transport to connect West Coast communities and enhance the experience of visitors.</li> </ul> |   |                |
| <b>RECOMMENDATION</b>  |   |                |
| Accept   |   |                |
| <b>REASON</b>  |   |                |
| The support is acknowledged.   |   |                |

|                               |   |                |
|-------------------------------|---|----------------|
| <b>Submission point: GS 7</b> |   |                |
| <i>Submitter</i>              | 4 | Herenga ā Nuku |
| <i>Submission</i>             |   |                |

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| <p>We recommend the addition of a project to identify and prioritise severance issues – the division/separation of communities – with funding for both the project and to make a start on resolving key severance issues, thus improving resilience of communities. Severance issues may be easily resolved by the creation of short walking/cycling paths.</p> |  |  |
| <b>RECOMMENDATION</b>   |  |  |
| Accept in part  |  |  |
| <b>REASON</b>   |  |  |
| <p>Staff acknowledge the support for the Objectives, which would include Objective 4 and the priority investment and implementation areas for walking and cycling infrastructure improvements, and a strategy for walking and cycling (p44-45).</p>   |  |  |

|  |   |                |
|--|---|----------------|
| <b>Submission point: GS 8</b>  |   |                |
|  |   |                |
| <i>Submitter</i>   | 4 | Herenga ā Nuku |
| <i>Submission</i>  |   |                |
| <p>We recommend that an overarching priority be included such that pedestrians and cyclists are considered at every level and every stage of implementation or variation of the RLTP.</p>  |   |                |
| <b>RECOMMENDATION</b>  |   |                |
| Accept in part   |   |                |
| <b>REASON</b>  |   |                |
| <p>Objectives 3 and 4 of the draft Plan provide for the safety and the infrastructure improvements for pedestrians and cyclists. These are considered as Priority investment areas and already provide for the investment needed to obtain positive long-term results such as safe footpaths and cycleways. As the matter is considered to already be provided in the Draft Plan, no change is recommended.</p> <p>However, staff consider that the matter raised is relevant to the Regional Walking and Cycling Strategy which was developed in 2009. The Strategy is now out of date, and Staff recommend it be reviewed subject to funding being provided in the Council's Long-Term Plan.</p> |   |                |

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| <b>Submission point: GS 9</b>   |   |     |
|   |   |     |
| <i>Submitter</i>  | 6 | AWC |
| <i>Submission</i>   |   |     |
| <p>We support continued investment in the Road Safety Committee as this allows a collaborative approach to addressing road safety across the West Coast. Some AWC members are current members of the West Coast Road Safety Committee. Our input to the Committee focuses on changing attitudes and behaviours and promoting the creation of social and physical environments where the healthy/ safer choice is the easy option.</p> |   |     |
| <b>RECOMMENDATION</b>   |   |     |
| Accept in part  |   |     |

|   |  |  |
|---|--|--|
| <b>REASON</b>   |  |  |
| The support for the West Coast Road Safety Coordinating Committee is acknowledged. However, there is no specific reference in the Draft RLTP to funding for this Committee. Staff understand that this Committee is funded by Waka Kotahi and the four West Coast Councils. |  |  |

|  |   |               |
|--|---|---------------|
| <b>Submission point: GS 10</b>   |   |               |
| <i>Submitter</i>   | 7 | BDC, GDC, WDC |
| <i>Submission</i>  |   |               |
| Advocate for ongoing collaboration between West Coast Regional Council and the local authorities on regional transport strategy and planning to foster a strong positive regional partnership, building on the existing partnership between the local authorities, and achieve improved transport outcomes for West Coast communities and business.  |   |               |
| <b>RECOMMENDATION</b>  |   |               |
| Accept   |   |               |
| <b>REASON</b>  |   |               |
| Staff agree and highlight the key role of The Regional Transport Committee (RTC) to maintain collaboration between local authorities, but also with local government agencies. To achieve this role, the RTC is represented by 2 representatives of WCRC, one representative of each district Council as well as NZTA and Department of Conservation. Staff encourage the presence of additional staff members to the Committee meetings to provide additional feedback of key transport local issues. Additionally, the Draft Speed Management Plan is a collaborative transport Plan between the District Councils and WCRC under the Government's Land Transport Rule. No changes to the Plan are sought by the submitter here. |   |               |

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|--|---|-------------|
| <b>Submission point: GS 11</b>   |   |             |
| <i>Submitter</i>   | 8 | Marie Elder |
| <i>Submission</i>  |   |             |
| <i>"The aim is to agree a regional programme which contributes to the social and economic wellbeing of our communities who rely on the transport network for their very existence." -RLTP, p9. I agree absolutely with this aim and endorse its acknowledgement of our community wellbeing and the importance of SH6 to our lives.</i> |   |             |
| <b>RECOMMENDATION</b>  |   |             |
| Accept   |   |             |
| <b>REASON</b>  |   |             |
| The support is acknowledged.   |   |             |

|                                |  |  |
|--------------------------------|--|--|
| <b>Submission point: GS 12</b> |  |  |
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| <b>Submitter</b>  | 8 | Marie Elder |
| <b>Submission</b>   |   |             |
| <p><i>“Social and economic wellbeing”</i> includes:</p> <ul style="list-style-type: none"> <li>• the welfare of small, locally owned, nature-based businesses such as horse-wagon tours, knifemaking, beekeeping, organic horticulture, regenerative farming, Air B&amp;Bs</li> <li>• the ability of people to commute easily and safely to work</li> <li>• the ability of customers and clients to travel the road safely and easily</li> <li>• the ability of people to use the road safely and regularly for socialising, for meetings, for predator control, for health and recreational activities</li> </ul> <p>All these aspects of social and economic wellbeing would be compromised by the use of the Coast Road as a mine haulage route.</p> |   |             |
| <b>RECOMMENDATION</b>   |   |             |
| Accept in part  |   |             |
| <b>REASON</b>   |   |             |
| Staff agree in principle with the bullets points as the Plan has an Objective 3 for safety. However, it is not the purpose of the Plan to address roading issue related to a private commercial activity using the State Highway.   |   |             |

## OUR REGION

|   |   |      |
|---|---|------|
| <b>Submission point: OR 1</b>   |   |      |
| <b>Submitter</b>  | 1 | TiGa |
| <b>Submission</b>   |   |      |
| <p>The draft Plan has a role to play in future proofing the land transport network and should identify future economic activity to ensure investment is directed to support and enable emerging economic opportunities. Currently, the Our Region – Economy / Ohanga section (p.12-13) is heavily focused on the role the network has in the provision of supporting tourism. As the RLTP is a future-focused document, this section should identify growth areas and provide a summary of other potential upcoming projects that are likely to have a significant impact on the region.</p> <p><u>Decision sought:</u><br/>Include text in the Our Region – Economy / Ohanga section on new industries in operation and other opportunities that are being investigated, apart from tourism, which rely on the land transport network to provide a more holistic summary of the economy of the region:</p> <p><i>“Despite having a comparative advantage in mining, the West Coast has experienced a decline in this sector since 2010. Nevertheless, the extraction of gold has witnessed significant growth. <u>Mineral sands mining of products such as ilmenite, garnet and rare-earth elements, which are used in manufacturing technology around the world, is an emerging industry on the West Coast. Projects have commenced in the Buller District, are going through consenting processes in the Grey District and are being explored in the Westland District. There are also other mineral related exploration projects being progressed throughout the region.”</u></i></p> |   |      |

|   |  |
|---|--|
| <b>RECOMMENDATION</b>   |  |
| Accept in part  |  |
| <b>REASON</b>   |  |
| <p>Staff agree to add first sentence of the submitter’s suggested text into the Economy/Ohanga section. This reflects the role of mineral sands mining on the West Coast and the potential economic opportunities that it can bring to the Region.</p> <p>However, staff do not consider the references to specific projects are appropriate to add to the Plan as they refer to specific private industry activities, and there is uncertainty around the development of some of these activities. Additionally, it is unnecessary to add resource consents details of mining sites in this section of the Plan.</p> |  |
| <b>REVISED TEXT FOR THE PLAN</b>  |  |
| <p>“Despite having a comparative advantage in mining, the West Coast has experienced a decline in this sector since 2010. Nevertheless, the extraction of gold has witnessed significant growth. <u>Mineral sands mining of products such as ilmenite, garnet and rare-earth elements, which are used in manufacturing technology around the world, is also an emerging industry on the West Coast</u>”.</p>  |  |

|   |   |             |
|---|---|-------------|
| <b>Submission point: OR 2</b>   |   |             |
| <b>Submitter</b>  | 8 | Marie Elder |
| <b>Submission</b>   |   |             |
| <p>“Approximately one quarter of all public conservation lands in New Zealand can be found on the West Coast making it a key asset of the region” - RTLTP p12. I agree absolutely that this conservation land is a key asset to our region. We need to continue to protect it, using the appropriate legislation.</p> |   |             |
| <b>RECOMMENDATION</b>   |   |             |
| Accept  |   |             |
| <b>REASON</b>   |   |             |
| The support is acknowledged   |   |             |

|  |   |             |
|--|---|-------------|
| <b>Submission point: OR 3</b>  |   |             |
| <b>Submitter</b>   | 8 | Marie Elder |
| <b>Submission</b>  |   |             |
| <p>“The West Coast tourism product is completely dependent on the transport network, primarily the State Highways ... Visitors to the region ... require a safe and reliable transport network as they visit the scenic wonders of the West Coast.” – RLTP p13.</p> <p>I agree absolutely. And, with Christchurch as a major starting/finishing point, most of these visitors will travel the Coast Road at least once. It would be a big mistake to allow it to become a mining road, threatening this road-based tourism industry.</p> |   |             |

|  |
|--|
| <b>RECOMMENDATION</b>  |
| Accept in part   |
| <b>REASON</b>  |
| The support is acknowledged. The key role of the tourism industry in the Region is recognised. |

|  |   |             |
|--|---|-------------|
| <b>Submission point: OR 4</b>  |   |             |
| <b>Submitter</b>   | 8 | Marie Elder |
| <b>Submission</b>  |   |             |
| <p><i>"The improved relationship between mana whenua and West Coast local authorities ... illustrated by the signing of the Mana Whakahono ā Rohe Iwi Participation Agreement ... including how tangata whenua will be involved in resource management decisions." - RLTP p14</i></p> <p>I applaud this co-operation between local authorities and mana whenua; it is something for the region to be proud of.</p> |   |             |
| <b>RECOMMENDATION</b>  |   |             |
| Accept   |   |             |
| <b>REASON</b>  |   |             |
| The support is acknowledged. Council has made a commitment to implement the <i>Mana Whakahono ā Rohe Iwi Participation Agreement</i> .   |   |             |

## OUR TRANSPORT SYSTEM

|  |   |      |
|--|---|------|
| <b>Submission point: TS 1</b>  |   |      |
| <b>Submitter</b>   | 1 | TiGa |
| <b>Submission</b>  |   |      |
| <p>The West Coast, more than any other region in New Zealand, is heavily reliant on the State Highway network, and in particular State Highway 6 which extends the length of the region. This heavy reliance on the one north-south route, which links the region from Otago through to Tasman provides the main arterial functions for the West Coast with many of the local networks extending from this road.</p> <p><u>Decision sought:</u><br/>That more emphasis as to the importance of State Highway 6 as a strategic route for heavy vehicles as part of economic activity on the West Coast be included within the Road network section (p.16) of the draft RLTP. Refer suggested text:</p> <p><i>At a regional level, the roading network is heavily reliant on the one north-south route –State Highway 6, providing the main arterial road functions for the West Coast. <u>Not only does State Highway 6 provide and the linkages to the neighbouring regions of Tasman and Otago, it is a strategic route for heavy vehicles as part of the regional freight task.</u> The local road networks extend off this main arterial, and there are few <del>other</del> alternative options for making journeys up and down the Coast.</i></p> |   |      |

|   |
|---|
|   |
| <b>RECOMMENDATION</b>   |
| Reject  |
|   |
| <b>REASON</b>   |
| Paragraph 2 in the Road Network section already explains how primary sector industries require heavy vehicles to travel on strategic routes. Staff does not consider any additional content as necessary. |

|   |   |      |
|---|---|------|
| <b>Submission point: TS 2</b>   |   |      |
|   |   |      |
| <b>Submitter</b>  | 1 | TiGa |
| <b>Submission</b>   |   |      |
| <p>Rail and Ports</p> <p>As New Zealand moves towards a low carbon economy rail and coastal ports will play an increasingly important role in the reduction of emissions, particularly for the transport of bulk products. It is vital that port and rail infrastructure, and their connections, continue to be maintained, and enhanced if required, to facilitate the movement of such goods. While the West Coast ports have gone through a period of decline, revitalisation is occurring, driven primarily by bulk producing businesses such as mineral sands production.</p> <p><u>Decision sought:</u></p> <ol style="list-style-type: none"> <li>1. That the RLTP continues to support rail and port infrastructure so it is able to facilitate the transport of bulk products including mineral products.</li> <li>2. That the Committee notes TiGa's support of the protection of the ports to secure their future and create commercial and climate resilience for the West Coast.</li> <li>3. That reference to mineral sands as a bulk product that could be railed is included under the Rail section (p.17) to provide a more holistic story of the current and future scenario of this transport mode. Refer suggested amendment to the first paragraph under 'Rail' at page 17:</li> </ol> <p><i>The rail network is an asset of national and regional importance. Across the West Coast, rail transportation primarily serves the bulk freight sector, particularly coal, forestry, and dairy products. The Hokitika branch line predominantly supports Westland Milk Products by transporting raw materials to the factory and distributing finished products to various markets. The coal transportation on lines to Rapahoe, Westport, and Ngakawau has decreased over the past decade. Loading points in Greymouth and Stillwater facilitate the transfer of goods from road to rail. <u>The growth of mineral sands extraction brings a potential new demand for rail loadout and lines across the West Coast.</u></i></p> |   |      |
| <b>RECOMMENDATION</b>   |   |      |
| Accept  |   |      |
| <b>REASON</b>   |   |      |
| <p>Support for the rail and shipping provisions in the Plan is acknowledged. Objective 4 of the Plan is for a "multimodal transport network that enables all users to meet their economics, social and cultural needs". Support for the maintenance and ongoing operation of the ports is also acknowledged. Staff agree to add the submitter's suggested new sentence as the potential new use of the rail network is recognised and should be mentioned.</p>  |   |      |
| <b>REVISED TEXT FOR PLAN</b>  |   |      |
| <i>Add the following sentence to the end of Paragraph 1 of the Rail section:</i>  |   |      |

*“...from road to rail. The growth of mineral extraction brings a potential new demand for rail loadout and lines across the West Coast.”*

|  |   |      |
|--|---|------|
| <b>Submission point: TS 3</b>  |   |      |
| <i>Submitter</i>   | 5 | NPHS |
| <i>Submission</i>  |   |      |
| In addition to active transport, public transport improves people’s transport options. We have previously submitted on the Regional Public Transport Plan and support actions to improve the availability of public transport in the region. We offer our support to the investigation into the need for some form of on-demand public transport for the region. |   |      |
| <b>RECOMMENDATION</b>  |   |      |
| Accept   |   |      |
| <b>REASON</b>  |   |      |
| The support is acknowledged, and the offer of support to investigate the feasibility of on-demand public transport is appreciated.   |   |      |

|   |   |     |
|---|---|-----|
| <b>Submission point: TS 4</b>   |   |     |
| <i>Submitter</i>  | 6 | AWC |
| <i>Submission</i>   |   |     |
| We agree with the proposal to investigate the need for some form of on-demand public transport for the region. We recently submitted our support for this to be given high priority within the Public Transport Plan. Our members are keen to assist the committee with this investigation. |   |     |
| <b>RECOMMENDATION</b>   |   |     |
| Accept  |   |     |
| <b>REASON</b>   |   |     |
| The support is acknowledged and the offer of support to investigate the feasibility of on-demand public transport is welcomed.  |   |     |

## FUTURE OPPORTUNITIES AND SCENARIOS

|                                |   |                |
|--------------------------------|---|----------------|
| <b>Submission point: FOS 1</b> |   |                |
| <i>Submitter</i>               | 4 | Herenga ā Nuku |
| <i>Submission</i>              |   |                |

|   |  |
|---|--|
| We note a mention of the term active transport in the section headed <i>Walking and Cycling</i> under <i>Future opportunities and scenarios</i> and in the Glossary. Active transport modes include walking, cycling, and their variants, such as skates and scooters, as well as horse riding. We recommend that the broader term 'active transport' be used more often, and in place of walking and cycling where possible. |  |
| <b>RECOMMENDATION</b>   |  |
| Accept  |  |
| <b>REASON</b>   |  |
| Staff recognise and will endeavour to use the updated terminology.  |  |

|  |   |             |
|--|---|-------------|
| <b>Submission point: FOS 2</b>   |   |             |
| <b>Submitter</b>   | 8 | Marie Elder |
| <b>Submission</b>  |   |             |
| <p><i>"There is an opportunity to develop and improve access to walking and cycling networks ... as well as resulting in improved health and wellbeing outcomes for our communities."</i> - RLTP p24</p> <p>I agree absolutely with this positive endorsement of active transport as a '<i>competitive mode of transport</i>'. On SH6 however it could be undermined entirely by mining trucks. There is much evidence to show heavy trucks and bicycles are not a compatible mix.</p> |   |             |
| <b>RECOMMENDATION</b>  |   |             |
| Accept in part   |   |             |
| <b>REASON</b>  |   |             |
| Staff recognise the support for the development of a walking and cycling network. However, the Plan aims to provide for a safe multi-modal network of infrastructure for <u>all users</u> .  |   |             |

## POLICY CONTEXT

|  |   |      |
|--|---|------|
| <b>Submission point: PC 1</b>  |   |      |
| <b>Submitter</b>   | 1 | TiGa |
| <b>Submission</b>  |   |      |
| That the draft Plan is reviewed against the draft Government Policy Statement for Land Transport to ensure the strategic priorities are given effect to. |   |      |
| <b>RECOMMENDATION</b>  |   |      |
| Accept   |   |      |
| <b>REASON</b>  |   |      |

Staff agree that the draft RLTP needs to be reviewed against the latest draft GPS 2024 as the new Government's direction is similar but different to the previous GPS.

| <b>Submission point: PC 2</b>   |   |               |
|---|---|---------------|
| <i>Submitter</i>  | 7 | BDC, GDC, WDC |
| <i>Submission</i>   |   |               |
| <p>Note that the draft RLTP was released prior to the draft Government Policy Statement on Land Transport (GPS) 2024 being released.</p> <p>Note that the draft RLTP is generally consistent with the strategic priorities of draft GPS2024, however GPS2024 proposed significant changes to funding and activity classes which is likely to impact the final approved NLTP programme of the Councils, including West Coast Regional Council, and NZTA State Highways. The significance of this impact is not yet clear, or if it will result in further consultation being required for RLTP 2024.</p> |   |               |
| <b>RECOMMENDATION</b>   |   |               |
| Accept in part  |   |               |
| <b>REASON</b>   |   |               |
| There are minimal changes to NZTA's proposed West Coast State Highway Investment Proposal bid following a review of the draft GPS. Most changes reflect an update to cost information and some changes to cashflows/timing of project phases.   |   |               |

## STRATEGIC FRAMEWORK

|  |   |      |
|--|---|------|
| <b>Submission point SF 1</b>   |   |      |
| <i>Submitter</i>   | 1 | TiGa |
| <i>Submission</i>  |   |      |
| <p>Additional context has arisen which should be included within the strategic front part of the draft Plan to provide a more holistic overview of the transport network on the West Coast, the economy and future of the region to more appropriately bid for funding from the National Land Transport Fund.</p> <p>TiGa believes that there are opportunities for additional infrastructure projects, particularly for resilience, to ensure that the West Coast can do its part and keep New Zealand moving.</p> <p><u>Decision sought:</u><br/>That the Committee undertake further review of the strategic context of the draft Plan to reflect a more holistic view of the West Coast economy and future opportunities.</p>  |   |      |
| <b>RECOMMENDATION</b>  |   |      |
| Reject   |   |      |
| <b>REASON</b>  |   |      |
| <p>The strategic framework for the RLTP needs to be consistent with the higher-level national direction in the Ministry of Transport outcomes framework. It reflects the articulation between central Government's outcomes and the RLTP strategic objectives chosen to deliver the regional vision. Therefore, the 5 objectives developed through the Plan are to be taken as a whole, with inter-connected regional targets. This means that the regional strategic objectives must reflect priority investments areas that are agreed to between NZTA and the West Coast Regional Transport Committee. The Objective 1 for Resilience in the Plan lists priority investment areas which do not include upgrading the section of State Highway which submitter has a particular interest in. Staff consider that the submitter has not provided sufficient explanation or example of how the strategic framework is not "holistic". The submitter may wish to explain this at the hearing.</p> |   |      |

|  |   |             |
|--|---|-------------|
| <b>Submission point: SF 2</b>  |   |             |
| <i>Submitter</i>   | 8 | Marie Elder |
| <i>Submission</i>  |   |             |
| <p><u>Headline targets:</u></p> <p>These are excellent targets. A mining haulage route as our main transport link would undermine every one of them.</p> <p>Tasman West Coast MP Maureen Pugh, when interviewed about the TiGa proposal on TVNZ, spoke enthusiastically of the touted economic benefits. When asked whether she had misgivings about road safety, her reply acknowledged an issue: "I think it's a trade-off". Any 'trade off' between promised profits and road safety needs interrogating. How many serious injuries and deaths are a reasonable 'trade off' when lined up against the money, assuming the promised profits materialise? If one more person is killed on the road, is that okay so long as the region's GDP has gone up 0.5%? Two more people?</p> |   |             |



|   |  |  |
|---|--|--|
| <b>RECOMMENDATION</b>   |  |  |
| Accept in part  |  |  |
| <b>REASON</b>   |  |  |
| <p>The support for the content of the headline targets is acknowledged. However, the main purpose of the RLTP is to deliver the regional key objectives to <i>all users</i>, including safety, with no differentiation made between community members and or/economic actors. These specific issues have been addressed through a resource consent application process under the Resource Management Act.</p> |  |  |

|  |     |  |
|--|-----|--|
| <b>Submission point: SF 3</b>  |     |  |
| <b>Submitter</b>   |     |  |
| 6  | AWC |  |
| <b>Submission</b>  |     |  |
| <p>We agree with the headline target of a reduction in deaths and serious injuries. We trust this target will remain even as the Road to Zero Strategy has been withdrawn, especially as the West Coast tracks above the national average for risk of fatal or serious casualties per million vehicle kms.</p> |     |  |
| <b>RECOMMENDATION</b>  |     |  |
| Accept   |     |  |
| <b>REASON</b>  |     |  |
| <p>The support for the safety headline target is acknowledged. Staff agree with the submitter that the Plan must focus on the reduction of deaths and serious injuries, and therefore retain the headline target. No change to the Plan is recommended here.</p>   |     |  |

## THE REGIONAL VISION

|  |      |  |
|--|------|--|
| <b>Submission point: V 1</b>   |      |  |
| <b>Submitter</b>   |      |  |
| 1  | TiGa |  |
| <b>Submission</b>  |      |  |
| <p>TiGa supports the Vision (A safe, resilient and connected multi-modal transport network which enables the West Coast to thrive) in the draft Plan but notes that for this to be achieved, adequate funding must be made available to make the safety improvements required and improve the resilience of the network from known hazards.</p> <p>Preventative maintenance is generally less expensive to undertake than the rebuilding or restoration required once an event has impacted the network. Network outages impose significant cost to the economy through loss of freight connections and reduced productivity, social disruption for local communities and potential reputational risk to tourism markets – all impacts that can take many years to recover from.</p> |      |  |
| <b>RECOMMENDATION</b>  |      |  |
| Noted  |      |  |
| <b>REASON</b>  |      |  |
| <p>The point made by the submitter is noted, but no specific change to the Plan is sought.</p>   |      |  |

|  |   |      |
|--|---|------|
| <b>Submission point: V 2</b>   |   |      |
| <i>Submitter</i>   | 1 | TiGa |
| <i>Submission</i>  |   |      |
| <p>Although this is a Vision statement, TiGa requests that it goes beyond “lip-service” and the outcomes sought can be realised in the future.</p> <p><u>Decision sought:</u></p> <p>That the Regional Transport Committee ensures that the funding required to move to the future state sought in the vision is programmed and included within the RLTP.</p>  |   |      |
| <b>RECOMMENDATION</b>  |   |      |
| Accept in part   |   |      |
| <b>REASON</b>  |   |      |
| <p>Staff agree that there needs to be adequate funding provided to achieve the regional Vision. However, the funding programme is covered in another section of the Plan (See <i>Programme and Funding</i>). Furthermore, staff believe that the funding programme is consistent with achieving the Vision, for the priority investment areas identified in the Plan. The submitter has their own priorities which are not listed in the Plan.</p> |   |      |

|   |   |                |
|---|---|----------------|
| <b>Submission point: V 3</b>  |   |                |
| <i>Submitter</i>  | 4 | Herenga ā Nuku |
| <i>Submission</i>   |   |                |
| <p>We support the vision set by the Regional Transport Committee of “a safe, resilient and connected multi-modal transport network which enables the West Coast to thrive” and the recognition of the critical nature of a safe, resilient and well-functioning transport network to the economic and social wellbeing of West Coast communities.</p> |   |                |
| <b>RECOMMENDATION</b>   |   |                |
| Accept  |   |                |
| <b>REASON</b>   |   |                |
| The support is acknowledged   |   |                |

|                              |   |                |
|------------------------------|---|----------------|
| <b>Submission point: V 4</b> |   |                |
| <i>Submitter</i>             | 4 | Herenga ā Nuku |
| <i>Submission</i>            |   |                |

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| Under <i>The regional vision</i> , we recommend the inclusion of an additional key problem: “ <i>The risk of death or serious injury that prevents more people using cycles for transport.</i> ”   |
| <b>RECOMMENDATION</b>  |
| Reject   |
| <b>REASON</b>  |
| Serious injuries related to cycling are considered by staff as a major issue and are being addressed in Objective 3 and 4. The Regional Vision Section is an overview of the strategic direction adopted by the Region, and serious injuries are to be presented here as a critical issue for <i>all users</i> , which includes people using cycles. Safety improvements for cyclists and pedestrians in specific are promoted in <i>Objective 3 Policy 3 and in its Other priority implementation areas, and in Objective 4 Policy 2 and its Priority investment areas.</i> |

|   |   |      |
|---|---|------|
| <b>Submission point: V 5</b>  |   |      |
| <b>Submitter</b>  | 5 | NPHS |
| <b>Submission</b>   |   |      |
| We support the RLTP including the 30-year vision of the draft plan of ‘ <i>a safe, resilient and connected multi-modal transport network which enables the West Coast to thrive</i> ’, and the objectives and headline targets in the RLTP. |   |      |
| <b>RECOMMENDATION</b>   |   |      |
| Accept  |   |      |
| <b>REASON</b>   |   |      |
| The support is acknowledged. No changes sought by the submitter.  |   |      |

|   |   |     |
|---|---|-----|
| <b>Submission point: V 6</b>  |   |     |
| <b>Submitter</b>  | 6 | AWC |
| <b>Submission</b>   |   |     |
| We agree with the Committee’s vision to have a safe, resilient and connected multi-modal transport network that enables the West Coast to thrive. Route security is critical to the on-going economic and social well-being of the West Coast region. Everyone benefits from a transport system that is resilient, safe and reliable. A system that is also accessible and includes a range of transport choices further supports people to live independently and can assist in addressing climate change effects. |   |     |
| <b>RECOMMENDATION</b>   |   |     |
| Accept  |   |     |
| <b>REASON</b>   |   |     |
| The support is acknowledged. No changes sought by the submitter.  |   |     |

|  |   |               |
|--|---|---------------|
| <b>Submission point: V 7</b>   |   |               |
| <b>Submitter</b>   | 7 | BDC, GDC, WDC |
| <b>Submission</b>  |   |               |
| <p>Support the retention of RLTP 2021 vision “A safe, resilient and connected multi-modal transport network which enables the West Coast to thrive” and the four RLTP 2021 strategic objectives: resilience, asset condition, safety, and connectivity.</p> <p>a. Resilience – Given recent weather events that highlighted the West Coast’s vulnerabilities to climate change, we support the RLTP’s focus on enhancing network resilience. Infrastructure upgrades such as drainage and flood mitigation protection is critical for climate adaptation on the Coast.</p> <p>b. Asset condition – We acknowledge and support the RLTP’s objective to address aging infrastructure and maintenance backlogs. It is vital to ensure that funding allocations for addressing these issues are adequate and are prioritised to meet both the levels of service and growing demands of our transport network.</p> <p>c. Safety – The RLTP’s commitment to improving road safety is a shared priority. We propose that the baseline year for headline targets for DSI’s be aligned with the local authorities annual reporting measures (RLTP notes the baseline year will be 2023/24).</p> <p>d. Connectivity and Access – enhancing connectivity across our region is supported through public transport. We support the continuation of the subsidised Total Mobility Services as it promotes social benefits for vulnerable members of our community.</p> <p>e. Regional advocacy – support the inclusion of a fifth strategic objective, regional advocacy, highlighting the role of West Coast Regional Council alongside the district councils in taking a common approach to strategy and planning, as and when practical.</p> <p>Notes that the vision and strategic objectives are strongly aligned to the benefits and strategic responses sought from the Councils investment in land transport for the next 10-years, as identified above.</p> |   |               |
| <b>RECOMMENDATION</b>  |   |               |
| Accept   |   |               |
| <b>REASON</b>  |   |               |
| The support is acknowledged. Regarding Clause c, staff clarified with the submitter that no change to wording for the Safety headline target is sought.  |   |               |

|   |   |             |
|---|---|-------------|
| <b>Submission point: V 8</b>  |   |             |
| <b>Submitter</b>  | 8 | Marie Elder |
| <b>Submission</b>   |   |             |
| <p>“... drivers with poor behaviours (such as travelling at inappropriate speeds, under the influence of alcohol or drugs, or by motorcycle) contribute to crashes” – RLTP p36 [my emphasis]. Surely the suggestion, that just to be on a motorcycle is to exhibit poor driving behaviour, is a typo.</p> |   |             |
| <b>RECOMMENDATION</b>   |   |             |
| Accept  |   |             |
| <b>REASON</b>   |   |             |
| This is a typo and needs to be corrected.   |   |             |
| <b>REVISED TEXT FOR PLAN</b>  |   |             |
| “...such as travelling at inappropriate speeds, <u>or</u> under the influence of alcohol or drugs, <del>or by motorcycle</del> )  |   |             |

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## 10-YEAR OBJECTIVES, POLICIES, AND PRIORITIES

|   |   |             |
|---|---|-------------|
| <b>Submission point: OGS 1</b>  |   |             |
| <i>Submitter</i>  | 8 | Marie Elder |
| <i>Submission</i>   |   |             |
| I support the aims and objectives in this draft RTLP. It is their potential interpretation and implementation that is of concern to me.   |   |             |
| <b>RECOMMENDATION</b>   |   |             |
| Accept in part  |   |             |
| <b>REASON</b>   |   |             |
| The support is acknowledged. Staff are unsure why the submitter supports the content of the Plan but not the implementation of its objectives and policies. The issue of the interpretation could be addressed but no suggestion has been made on this particular point. The submitter may wish to clarify their concerns at a hearing. |   |             |

## OBJECTIVE 1

|   |   |      |
|---|---|------|
| <b>Submission point: O1.1</b>   |   |      |
| <i>Submitter</i>  | 1 | TiGa |
| <i>Submission</i>   |   |      |
| <p>TiGa supports Objective 1 and its focus on resilience. As noted previously, network outages disrupt productivity in a number of ways including preventing employees being able to travel to work and products being exported to market.</p> <p>Many investigations into network vulnerability arising from climate change and natural hazards have been undertaken over various West Coast Regional Land Transport Plans. The West Coast, particularly along State Highway 6, has extremely limited alternative routes. Mitigation and preventative works of potential at risk locations have been identified through previous investigations and should now be funded to protect the future resilience of the network and ensure that network outages are avoided or minimised to meet the set Headline Target.</p> <p><u>Decision sought:</u><br/>That hazard mitigation and preventative maintenance measures to address network vulnerabilities are clearly identified and funded in the RLTP.</p> |   |      |
| <b>RECOMMENDATION</b>   |   |      |
| Accept in part  |   |      |
| <b>REASON</b>   |   |      |
| The support for Objective 1 is acknowledged. However, the level of details requested by the submitter to go in the Plan is more appropriate at the works programme level, that is agreed to between NZTA and the local State Highway contractors. They will know and identify in their work programmes areas that need preventive   |   |      |

maintenance. Furthermore, the National Resilience Programme Business Case identifies several areas of State Highway 6 for resilience improvements over the next 10 years.

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|--|---|-----------|
| <b>Submission Point: O1.2</b>  |   |           |
| <i>Submitter</i>   | 3 | WMS Group |
| <i>Submission</i>  |   |           |
| <p>The necessity for intermodal transport, including the road and rail networks, and connections to the Greymouth and Westport ports are highlighted throughout the Draft RLTP. WMS Group <b>agree</b> that these connections are critical to the West Coast, both for economic activity and resilience in the event of severe weather and natural disaster. It is noted that should the West Coast be completely cut off due to disruption of the roading network, the ports potentially have a significant role to play in providing connectivity during disaster response and recovery. The role industries such as Heavy Mineral Sands (HMC) can play in utilizing the ports is highlighted in the Draft RLTP.</p> <p>WMS Group therefore <b>supports</b> Objective 1: Resilience and notes the role of the ports and associated shipping activities through HMC industries in realizing this objective.</p> |   |           |
| <b>RECOMMENDATION</b>  |   |           |
| Accept.  |   |           |
| <b>REASON</b>  |   |           |
| The support is acknowledged. No change to the Plan is sought here by the submitter.  |   |           |

|  |   |      |
|--|---|------|
| <b>Submission Point: O1.3</b>  |   |      |
| <i>Submitter</i>   | 5 | NPHS |
| <i>Submission</i>  |   |      |
| <p>We support the inclusion of the strategic objective of 'Resilience' and the priority investment areas under this objective that will address flooding risk and coastal erosion. Preparing for and adapting to climate change is important because the impacts of climate change are already being experienced on the West Coast with an increase in extreme weather events and flooding in recent years. These impacts are expected to amplify over time. The damage and disruption to transport networks caused by these events has consequences for health and wellbeing. Communities can become isolated and unable to access essential services, such as food and healthcare, especially when there is a lack of alternative routes. This disruption can have psychosocial, cultural and economic impacts. Improving the resilience of the transport network is important to reduce potential disruption and severance from supplies and services and to build community resilience and connectedness. The resilience of the transport network is also essential for response and recovery situations.</p> <p>Diversifying freight may also improve the resilience of the transport network in extreme events by providing alternative means for accessing goods and resources.</p> |   |      |
| <b>RECOMMENDATION</b>  |   |      |
| Accept   |   |      |
| <b>REASON</b>  |   |      |

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| The support is acknowledged. No change to the Plan is sought here by the submitter. |
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| <b>Submission Point: O1.4</b>  |   |     |
| <i>Submitter</i>   | 6 | AWC |
| <i>Submission</i>  |   |     |
| <p>We agree that breaks in the network can have substantial impacts on the economic, social and cultural wellbeing of communities on the West Coast. Many communities across the West Coast are beginning to appreciate how increasingly vulnerable we are to natural disasters and climate change impacts, and how the resilience of our transport network is critical to both response and recovery situations. We have previously submitted on the need to mitigate and adapt to the impact that climate change will have on our transport networks and communities. We therefore support the identified areas for investment with respect to addressing flooding risk and coastal erosion, and to improve resilience of both the roading and rail network.</p> |   |     |
| <b>RECOMMENDATION</b>  |   |     |
| Accept   |   |     |
| <b>REASON</b>  |   |     |
| The support is acknowledged. No change to the Plan is sought here by the submitter.  |   |     |

## OBJECTIVE 2

|  |   |           |
|--|---|-----------|
| <b>Submission Point: O2.1</b>  |   |           |
| <i>Submitter</i>   | 3 | WMS Group |
| <i>Submission</i>  |   |           |
| <p>WMS Group agree that it is vital that the roading network is fit for purpose for heavy vehicle use to support economic activity in the region and submit that State Highway 6 should be considered an important strategic route. We request that Objective 2: Policy 3 (p.40), relating to HPMV capability on strategic routes, is amended to specifically include State Highway 6 as well as State Highway 73 and key local roads.</p> |   |           |
| <b>RECOMMENDATION</b>  |   |           |
| Reject   |   |           |
| <b>REASON</b>  |   |           |
| <p>NZTA has not sought that State Highway 6 be added to Objective 2 Policy 3. Upgrading these sections of road to that level would be an immense expense and would require a high level of ongoing maintenance.</p>  |   |           |

|  |   |           |
|--|---|-----------|
| <b>Submission Point: O2.2</b>  |   |           |
| <i>Submitter</i>   | 3 | WMS Group |
| <i>Submission</i>  |   |           |
| <p>We also submit that it is crucial that the roading network connecting strategic routes to the ports is identified and maintained for heavy vehicles and other transport accessing the ports. It is <b>requested</b> that the policies under Objective 2: Asset Condition are broadened to include policies specifically relating to the roading networks connecting strategic routes to the ports, to identify them as used for port related traffic, including heavy vehicles, and to maintain them as such.</p> |   |           |
| <b>RECOMMENDATION</b>  |   |           |
| Reject   |   |           |
| <b>REASON</b>  |   |           |
| <p>The draft RLTP is not the appropriate document to specify maintenance works on particular parts of the State Highway and local roads. The One Network Framework is the relevant document to determine levels of service and funding depending on what type of road it is classed as.</p>  |   |           |

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|--|---|------|
| <b>Submission Point: O2.3</b>  |   |      |
| <i>Submitter</i>   | 5 | NPHS |
| <i>Submission</i>  |   |      |
| <p>We support the inclusion of 'Asset condition' as one of the strategic objectives in the draft plan, because maintaining the transport network can improve safety and resilience and reduce emissions.</p> |   |      |
| <b>RECOMMENDATION</b>  |   |      |
| Accept   |   |      |
| <b>REASON</b>  |   |      |
| <p>The support is acknowledged.</p>  |   |      |

|   |   |             |
|---|---|-------------|
| <b>Submission Point: O2.4</b>   |   |             |
| <i>Submitter</i>  | 8 | Marie Elder |
| <i>Submission</i>   |   |             |
| <p>Evidence shows heavy trucks do more damage to roads than they pay for. For example, a 2020 Inside Science report indicates heavy vehicle can cause approximately 1000-2500 times the damage to the road of a sedan car. A 2022 Scoop article indicates approximately 80% of damage to NZ roads is caused by trucks, yet the trucking industry pays less than 23% of repair costs. Therefore other road users are already subsidising the trucking industry to a significant extent, and this would only be exacerbated by increased numbers of heavy vehicles.</p> |   |             |



It is important the RLTP does not facilitate a major increase in heavy trucking, especially to profit overseas interests while damaging the local road our communities “rely on... for [our] very existence”.

Our West Coast climate, and the proximity of the sea to sections of the road, affect Coast Road durability: “High amounts of water under bituminous layers can cause high hydraulic pressures in the bottom of the bound layer when it is subjected to heavy traffic wheel loads. These effects act like pressure washes and break the bond between the bitumen and aggregate surfaces.”

This process is illustrated in the animation below:

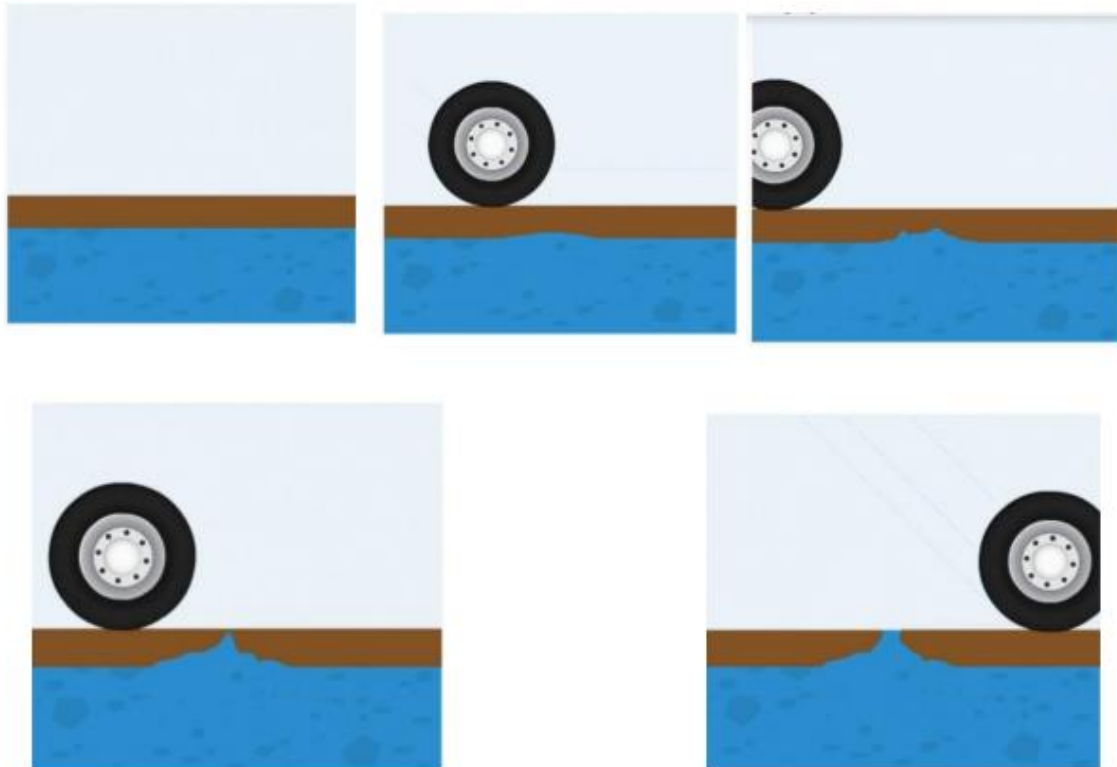


Figure 2. A series of still shots from the Roadex.org animation shows the process of stripping of water saturated road surface

**RECOMMENDATION**

Accept in part

**REASON**

The purpose of the Plan, articulated around the Vision, is to provide for a safe, resilient and connected multi-modal transport network which enables the West Coast to thrive. Some economic activities are therefore important for the Region, but safety and resilience also need to be considered. We note the evidence provided by the submitter regarding road wear. The Plan also recognises the role of rail and sea transport, which would benefit road users without impacting the local economic activity.

### OBJECTIVE 3

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| <b>Submission Point: O3.1</b>   |   |      |
| <b>Submitter</b>  | 1 | TiGa |
| <b>Submission</b>   |   |      |
| <p>Over the past few decades, cycle tourism has grown in prominence as well as becoming an alternative form of transport throughout New Zealand and on the West Coast. However, a number of roads throughout this region are simply not fit for purpose for cyclists as road users as they navigate these routes alongside a growing tourism market involving international drivers and campervans, mixed with local road users and freight traffic. At the same time, tourism has been pushed as a key economic driver for New Zealand, and the West Coast. West Coast tourists travel in predominantly self-drive vehicles and are in many cases critically inexperienced to drive on the narrow and winding roads of the region. Their interaction with cyclists, residential traffic and freight vehicles poses a very real risk to all road users. As the tourism task increases there is likely to be a corresponding increase in the rate of serious incidents.</p> <p>TiGa is familiar with these concerns as it has progressed the Barrytown Project resource consent application. Some submitters have raised concerns about the asset condition and safety of State Highway 6 – which the Barrytown Project will use to transport freight.</p> <p>In exploring these concerns, an independent transport expert from Abley peer reviewed the proposal and recommended that State Highway 6 is not safe for cycling. The peer reviewer identified inherent risks from walking and cycling on State Highway 6 as arising from limited forward visibility (due to road geometry and vegetation), limited or no hard shoulders to enable safe passing and noise from coastal surf limiting cyclists' and pedestrians' ability to hear approaching traffic. The Abley peer reviewer recommended active and static signage and road markings at eight locations on State Highway 6 that would mitigate effects on any cyclists using the State Highway.</p> <p>Road controlling authorities, and particularly in the case of the State Highway, Waka Kotahi NZ Transport Agency, have a responsibility to provide for the safety of all road users ... We recognise that securing funding for West Coast Road improvements is challenging, however many of these improvements can be implemented through maintenance and renewal programmes, signage or discouraging certain activities in inappropriate locations – a “right mode right road” approach.</p> <p>Investment to maintain key roads to a high level of safety and efficiency for all road users must be a priority.</p> <p><u>Decision sought:</u></p> <ol style="list-style-type: none"> <li>1. That investment to maintain key roads to a high level of safety and efficiency is undertaken through the RLTP.</li> <li>2. That the Committee notes TiGa’s support of Objective 3 Policy 3 for the advocacy of safer active transport modes such as on road / off-road paths and trails for cycling, and as a priority implementation area recognising that there are safety improvements to be made on key tourist routes where cyclists are present. To give effect to this policy, appropriate funding from the respective approved organisation must be committed.</li> <li>3. Amend the Objective 3 'Priority investment areas' as follows: <i>Road safety promotion of <u>risks to cyclists, pedestrians and tourist drivers.</u></i></li> <li>4. Amend the Objective 3 'Other priority implementation areas' as follows: <i>Safety improvements on key tourist routes, and rural roads where cyclists and pedestrians are present, <u>primarily through separate paths and trails for walking and cycling.</u></i></li> <li>5. That West Coast Road Controlling Authorities identify areas that are not fit for purpose for the full range of road users and invest in the network to bring these up to standard. For example, where roads provide no shoulder for cyclists to safely bike on, provide off-road cycling options.<br/>Should the investment not be available to address the areas of the network that are not fit for purpose for cyclists, alternative safety mitigation measures (such as signage warning of cyclists on narrow corridors) or recognition that there are sections of roads across the network that are not fit</li> </ol> |   |      |

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| for purpose for cyclists and proactively discourage cyclists from using these sections to be implemented by the respective road controlling authorities.  |
| <b>RECOMMENDATION</b>   |
| <ul style="list-style-type: none"> <li>1- Accept</li> <li>2- Accept</li> <li>3- Reject</li> <li>4- Reject</li> <li>5- Reject</li> </ul>   |
| <b>REASON</b>   |
| <ul style="list-style-type: none"> <li>1. The support is acknowledged</li> <li>2. The support is acknowledged</li> <li>3. Staff do not support adding the suggested text as it is already covered under the “Other Priority Implementation Area” and the road safety promotion is intended to be for all users.</li> <li>4. Staff do not agree with the suggested text as in some places along the Coastal State Highway 6, there is simply not enough room to provide for separate walking and cycling trails. For example, around rocky bluffs. The only option between Rapahoe and the Barrytown flats would be an inland track, but would need DOC approval and the costs means it is unlikely to happen in the next three years, to justify making the change sought by the submitter.</li> <li>5. This matter is relevant to the three District Councils, as they hold the function of road controlling authorities. It is also not appropriate for RCAs to discourage different road types of road uses from exercising their legal rights to travel on public roads.</li> </ul> |

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| <b>Submission point: O3.2</b>  |   |           |
| <i>Submitter</i>   | 3 | WMS group |
| <i>Submission</i>  |   |           |
| WMS Group <b>agree</b> that safety of all road users is important and submit that a stronger focus on the development of cycleways/walkways off road should be included in the plan, particularly in relation to State Highways. |   |           |
| <b>RECOMMENDATION</b>  |   |           |
| Accept in part   |   |           |
| <b>REASON</b>  |   |           |
| The support is acknowledged. However, staff do not support adding the suggested text as it is already covered under the “Other Priority Implementation Area” and the road safety promotion is intended to be for all users.      |   |           |

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| <b>Submission point: O3.3</b> |   |                |
| <i>Submitter</i>              | 4 | Herenga ā Nuku |
| <i>Submission</i>             |   |                |

Safety is a critical component to making active transport, and cycling in particular, safe enough to be an attractive option. At present, there are many pinch points on SH6 where there is barely room for two vehicles to pass each other let alone including a bicycle or pedestrian. We recommend that a project be included in the RLTP to identify and prioritise such pinch points, with funding for both the project and to make a start on those pinch points of most concern.

#### RECOMMENDATION

Accept in part

#### REASON

Staff agree with the submitter about the need for safety improvements for cyclists across the Region, especially with the presence of multiple pinch points along the road. However, staff believe the identification of specific pinch points could be addressed through a review of the West Coast Walking and Cycling Strategy rather than in the RLTP.

Furthermore, NZTA completed in 2023 an investigation into potential cycle improvements along SH6 between Ross and Haast, on sections with no alternative cycle route. This also identified some possible pedestrian improvements, particularly in Franz Josef. As a result of this investigation, we are currently implementing improved signage (to advise road users of the presence of cyclists), and we intend to continue targeted improvements to gradually improve this route over the longer term, subject to funding availability.

There are opportunities through the *Value For Money* safety improvement activity to identify future SH6 safety improvements on the West Coast for delivery, as well as Low-Cost Low Risk programmes for small scale ongoing safety improvements as part of maintenance and renewal programmes.

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| <b>Submission point: O3.4</b>  |   |      |
| <i>Submitter</i>   | 5 | NPHS |
| <i>Submission</i>  |   |      |
| <p>We support the inclusion of 'Safety' as one of the strategic objectives in the draft plan. Improving the safety of the transport system can reduce deaths and injuries and increase the uptake of walking and cycling by improving public perceptions of safety.</p> <p>We encourage the Council to consider how to improve safety on urban roads in addition to tourist routes and rural areas to encourage walking and cycling. Encouraging people to walk, cycle and scoot for short trips can promote physical activity, reduce reliance on vehicles and cut transport emissions.</p> |   |      |
| <b>RECOMMENDATION</b>  |   |      |
| Accept in part   |   |      |
| <b>REASON</b>  |   |      |
| <p>Support for the Objective 3 is acknowledged. However, staff believe that the identification of improvements to cycling and walking options could be addressed through a review of the West Coast Walking and Cycling Strategy rather than in the RLTP. Objective 4 of the Plan refers to a regional walking and cycling strategy and action plan under "Other priority investment areas".</p>   |   |      |

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| <b>Submission point: O3.5</b> |   |      |
| <i>Submitter</i>              | 5 | NPHS |
| <i>Submission</i>             |   |      |

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| We encourage the Council to consider how freight on the road can affect public perceptions of safety and therefore peoples' decisions to walk and cycle.   |  |  |
| <b>RECOMMENDATION</b>  |  |  |
| Noted  |  |  |
| <b>REASON</b>  |  |  |
| The submitter has not specifically requested a change to the Plan. Considerations of how freight can affect perceptions and real risk to safety for pedestrians and cyclists is addressed under Objectives 3 and 4. It is unclear what particular matters the submitter wants the Committee to consider. They may wish to clarify this at the hearing. |  |  |

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| <b>Submission point: O3.6</b>   |   |      |
| <i>Submitter</i>  | 5 | NPHS |
| <i>Submission</i>   |   |      |
| Speed of vehicles is a key influencer of whether people perceive a trip is safe to make by active transport, therefore reducing speeds may promote more walking, cycling and scooting by improving the actual or perceived safety of these modes. When implemented with meaningful community consultation, reducing speeds can create safer and more liveable and accessible environments.  |   |      |
| <b>RECOMMENDATION</b>   |   |      |
| Accept in part  |   |      |
| <b>REASON</b>   |   |      |
| Staff agree with the necessity to reduce speed limits on both highways and local roads to achieve the regional vision of a safe transport network. The draft Regional Speed Management Plan (SMP), along with the Waka Kotahi State Highway Speed Management Plan both provide for specific provisions on speed limits in urban and rural key areas. The Regional SMP must be consistent with the Regional Land Transport Plan but the focus on speed limits must be addressed through the West Coast Speed Management Plan as the Districts Councils have Road Controlling Authority status. No change to the draft RLTP is recommended. |   |      |

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| <b>Submission point: O3.7</b>  |   |     |
| <i>Submitter</i>   | 6 | AWC |
| <i>Submission</i>  |   |     |
| We note the safety objective is for a transport system that is safe for all users. The pinch points referred to in the preamble to this section could be mitigated by limits on the size of freight vehicles using our roading network. This would improve safety and the experience of the 'increasing numbers of cyclists' and others in smaller vehicles using our roading network. This would also assist with a modal shift to more active transport options and contribute to achieving a reduction in carbon emissions. |   |     |
| <b>RECOMMENDATION</b>  |   |     |
| Reject   |   |     |

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| <b>REASON</b>  |
| The purpose of the Plan articulated around the Vision is to provide for a safe, resilient and connected multi-modal transport network which enables the West Coast to thrive. Staff agree that the safety objective, but also the other 3 key objectives, are addressed for all users. For this reason, reducing the size of freight vehicles would be highly impracticable. |

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| <b>Submission point: O3.8</b>   |   |     |
| <b>Submitter</b>  | 6 | AWC |
| <b>Submission</b>   |   |     |
| <p>We note priority for safety improvements for walking and cycling is targeted for key tourist routes and rural roads. However, there are several areas within more urban communities where walking and cycling facilities require safety improvement. We anticipate that the review of the Walking and Cycling Strategy will significantly engage with local communities to identify these areas and action to improve safety will follow. <b>Our members are keen to be involved with the Walking and Cycling Strategy review and offer our assistance to the Committee.</b></p> |   |     |
| <b>RECOMMENDATION</b>   |   |     |
| Accept in part  |   |     |
| <b>REASON</b>   |   |     |
| The submitter's offer for support is acknowledged and appreciated. No change is recommended to the Plan.  |   |     |

#### OBJECTIVE 4

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| <b>Submission point: O4.1</b>   |   |      |
| <b>Submitter</b>  | 1 | TiGa |
| <b>Submission</b>   |   |      |
| <p>1- That the Regional Transport Committee notes TiGa's support of the priority investment areas for investment in planning / infrastructure to improve road, rail and coastal shipping freight connections and for walking and cycling infrastructure improvements for shorter trips to deliver safer and connected active travel networks.</p> <p>2- Amend Objective 4, Policy 3 as follows: <i>Investigate <u>and support</u> opportunities to facilitate more efficient multi-modal freight movements, including <del>potential for</del> <u>development of</u> coastal shipping and rail connections.</i></p> |   |      |
| <b>RECOMMENDATION</b>   |   |      |
| <p>1- Accept</p> <p>2- Accept in part</p>   |   |      |
| <b>REASON</b>   |   |      |
| 1- The support is acknowledged.   |   |      |

- 2- Staff agree with the submitter’s suggested content to add “and rail connections” to Policy 3. However, staff do not support the other changes sought by the submitter. There is some remaining uncertainty about whether there will be some central government funding to commit in the Plan to do these actions. The Draft Government Policy Statement (GPS) for Land Transport 2024 indicates that the Government does not support multi-modal transport.

**REVISED TEXT FOR THE PLAN:**

“Investigate opportunities to facilitate more efficient multi-modal freight movements, including potential for coastal shipping and rail connections.”

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| <b>Submission point: O4.2</b>   |   |      |
| <b>Submitter</b>  | 1 | TiGa |
| <b>Submission</b>   |   |      |
| <p>Transport is a major contributor to emissions in New Zealand. There is currently no reference in the Priority investment areas to support national emission targets (including reducing freight transport emissions by 35% by 2035) and implementation of infrastructure to support an electric vehicle fleet. EV infrastructure could be used by light vehicles and freight trucks. Investment in non-road transport infrastructure such as rail and ports could also contribute to these emissions reductions.</p> <p><u>Decision sought:</u><br/>Add a new priority investment area under Objective 4 as follows: <u>Investment in EV infrastructure that can be used by light vehicles and freight trucks.</u></p> |   |      |
| <b>RECOMMENDATION</b>   |   |      |
| Accept in part  |   |      |
| <b>REASON</b>   |   |      |
| The Government has highlighted the importance of Emissions Trading Scheme, enabling additional sustainable energy generation and more provision of EV charging infrastructure. However, it is still unclear how the project will be funded.   |   |      |

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| <b>Submission point: O4.3</b>   |   |           |
| <b>Submitter</b>  | 3 | WMS Group |
| <b>Submission</b>   |   |           |
| <p>WMS Group <b>agree</b> that safety of all road users is important and submit that a stronger focus on the development of cycleways/walkways off road should be included in the plan, particularly in relation to State Highways.</p> |   |           |
| <b>RECOMMENDATION</b>   |   |           |
| Accept in part  |   |           |
| <b>REASON</b>   |   |           |
| Staff agree with the point that safety of all road users is important, but believe that the identification of improvements to cycling and walking options could be addressed through a review of the West Coast Walking                 |   |           |

and Cycling Strategy rather than in the RLTP. Objective 4 of the Plan refers to a regional walking and cycling strategy and action plan under “Other priority investment areas”.

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| <b>Submission point: O4.4</b>   |   |                |
| <i>Submitter</i>  | 4 | Herenga ā Nuku |
| <i>Submission</i>   |   |                |
| <p>Wherever possible, we encourage the creation of cycleways that move cyclists off and away from roads.... we recommend an extension of the focus on cycleways from urban to rural communities for both residents and visitors.</p>  |   |                |
| <b>RECOMMENDATION</b>   |   |                |
| Reject  |   |                |
| <b>REASON</b>   |   |                |
| <p>The Plan has some provisions that already provide for what the submitter is seeking:</p> <ul style="list-style-type: none"> <li>- Objective 4 Policy 2 “Develop, and maintain, walking and cycling networks that are safe and well-integrated with other modes of transport to connect our communities and enhance visitor experience.</li> <li>- The 3 Priority Investment and implementation areas of Objective 4 are: “Walking and cycling infrastructure improvements to deliver safer and connected active travel network”, Regional walking and cycling strategy and action plan (local roads)”, and above all: “Seek opportunities for additional funding sources for new off-road walking/cycling trail projects.</li> </ul> <p>While two of the priority areas are urban-focused, the other one could be urban or rural. Staff therefore do not believe that additional content is needed to the Plan here.</p> |   |                |

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| <b>Submission point: O4.5</b>   |   |                |
| <i>Submitter</i>  | 4 | Herenga ā Nuku |
| <i>Submission</i>   |   |                |
| <p>To encourage more walking and cycling, active transport must be an attractive option. We recommend the inclusion of an objective and or policy to provide safe active transport connections between cycling and walking networks and within and between communities/new subdivisions. This will encourage more use of active transport modes to reach schools, workplaces, shops and other services.</p> |   |                |
| <b>RECOMMENDATION</b>   |   |                |
| Reject  |   |                |
| <b>REASON</b>   |   |                |
| <p>The Plan has some provisions that already provide for what the submitter is seeking:</p> <ul style="list-style-type: none"> <li>- Objective 4 Policy 2 “Develop, and maintain, walking and cycling networks that are safe and well-integrated with other modes of transport to connect our communities and enhance visitor experience.</li> </ul>  |   |                |



- The 3 Priority Investment and implementation areas of Objective 4 are: “Walking and cycling infrastructure improvements to deliver safer and connected active travel network”, Regional walking and cycling strategy and action plan (load roads)”, and above all: “Seek opportunities for additional funding sources for new off-road walking/cycling trail projects.

While two of the priority areas are urban-focused, one could be urban or rural. Staff therefore do not believe that additional content is needed to the Plan here.

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| <b>Submission point: O4.6</b>  |   |                |
| <i>Submitter</i>   | 4 | Herenga ā Nuku |
| <i>Submission</i>  |   |                |
| A new walking and cycling strategy for the region is long overdue. We recommend investment in the creation of such a strategy in this RLTP.  |   |                |
| <b>RECOMMENDATION</b>  |   |                |
| Accept in part.  |   |                |
| <b>REASON</b>  |   |                |
| The Regional Walking and Cycling Strategy was developed in 2009. The Strategy is now old, and Staff agree that it should be reviewed subject to funding being provided in the Council’s Long-Term Plan. Staff consider that no change is needed to the Plan as the matter is listed in the “Other priority implementation areas” of Objective 4. |   |                |

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| <b>Submission point: O4.7</b>   |   |      |
| <i>Submitter</i>  | 5 | NPHS |
| <i>Submission</i>   |   |      |
| While we acknowledge the need to improve asset condition to support freight by road, we encourage the Council to prioritise transporting freight by rail and sea because of the potential to improve road safety, enhance resilience and reduce emissions. As stated in the plan, rail produces at least 70 per cent less carbon emissions (per tonne of freight carried compared with heavy road freight) and the cost externalities for freight by road are six times higher than freight by rail and twelve times higher than freight by sea. Increasing freight by rail and sea may mitigate damage caused by heavy vehicles to the roading network and alleviate the need to increase carrying capacity and install passing lanes on State Highways. |   |      |
| <b>RECOMMENDATION</b>   |   |      |
| Accept in part  |   |      |
| <b>REASON</b>   |   |      |
| Staff agree with the submitter on the capacity of rail and coastal shipping to reduce carbon emissions, road wear and other externalities. This is covered by Objective 4 Policy 3 and by its Priority investment area “Investment in planning/infrastructure to improve road, rail, and coastal shipping freight connections”. However, adopting a precautionary approach based on research and planning is fundamental for these projects as it is uncertain whether the Government will provide some funding to support the Region towards   |   |      |

these changes. The Draft Government Policy Statement (GPS) for Land Transport 2024 indicates that the Government will not be supporting multi-modal transport.

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| <b>Submission point: O4.8</b>   |   |      |
| <i>Submitter</i>  | 5 | NPHS |
| <i>Submission</i>   |   |      |
| <p>We support the inclusion of 'Connectivity' as a strategic objective in the draft plan and the headline target to increase active transport modes.</p> <p>Lack of physical activity in New Zealand is a primary causal factor of morbidity and mortality. Active transport can increase physical activity and contribute to decreased likelihood of diabetes, improved mental health and reduced risk of diseases, such as cardiovascular disease and cancer. When more people walk and cycle, transport emissions and noise are reduced, air quality is improved, and environmental sustainability is supported.</p> |   |      |
| <b>RECOMMENDATION</b>   |   |      |
| Accept  |   |      |
| <b>REASON</b>   |   |      |
| The support is acknowledged.  |   |      |

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| <b>Submission point: O4.9</b>  |   |      |
| <i>Submitter</i>   | 5 | NPHS |
| <i>Submission</i>  |   |      |
| <p>Improving connectivity through a multi-modal network can increase transport choices, and enable communities to meet their social, cultural and economic needs. Some people have a lack of transport options meaning that their opportunities to participate in everyday activities are limited, this is referred to as 'transport disadvantage'. People can overcome a lack of choices by paying more than they can reasonably afford for transport (typically by buying and operating a car), and this is referred to as 'transport poverty'. Some groups are more likely to face transport disadvantage including older people, Māori, children and young people and rural communities.</p> |   |      |
| <b>RECOMMENDATION</b>  |   |      |
| Noted  |   |      |
| <b>REASON</b>  |   |      |
| No change is sought by the submitter here.   |   |      |

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| <b>Submission point: O4.10</b> |   |     |
| <i>Submitter</i>               | 6 | AWC |

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| <b>Submission</b>  |  |  |
| <p>While we support the intention to improve the network to make it fit for purpose, we remain concerned that the need to upgrade many bridges and parts of the roading network is driven by the demand from the freight industry to enable increased size and capacity of their freight vehicles .....</p> <p>It is likely that improving capacity to increase freight by road will both discourage and delay the transition to rail and/ or sea freight. It is inconsistent with the intent expressed within the Plan for increased rail movements over the next 10 years. As acknowledged in the Plan, rail produces at least 70 percent less carbon emission ..... and therefore has potential to play a significant role in reducing greenhouse gas emissions and enhancing resilience and safety on the inter-regional routes to Canterbury.</p> <p>Moving more freight by rail would alleviate the need to increase carrying capacity and install passing lanes to address pinch points on the State Highway network.</p> <p>Moreover, in order to achieve New Zealand's climate change targets, there is a need to transition away from high emission transport and decarbonise heavy transport and freight. While it is true that urban and more populated areas will largely help achieve this target, the West Coast can, and should, play its part.</p> <p><b>AWC would like to see more consideration given to the promotion of rail as a viable, if not preferred, option for both outgoing and inbound freight movements to Canterbury.</b></p> |  |  |
| <b>RECOMMENDATION</b>  |  |  |
| Accept in part   |  |  |
| <b>REASON</b>  |  |  |
| <p>Staff agree with the submitter on the capacity of rail and coastal shipping to reduce carbon emissions. This is covered by Objective 4 Policy 3 and by its Priority investment area "Investment in planning/infrastructure to improve road, rail, and coastal shipping freight connections". However, adopting a precautionary approach based on research and planning is fundamental for these projects as it is uncertain whether the Government will provide some funding to support the Region towards these changes. The Draft Government Policy Statement (GPS) for Land Transport 2024 indicates that the Government is will not be supporting multi-modal transport.</p>  |  |  |

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| <b>Submission point: O4.11</b>  |   |     |
| <b>Submitter</b>  | 6 | AWC |
| <b>Submission</b>   |   |     |
| <p>We support the policy to enable multi-modal travel and movement of freight. (See our comments under Objective 2 above.) However, while the Plan discussed significant recent investment in our ports, we note the funding budget for coastal shipping across the Plan is limited to \$200,000 to undertake an investigation of sea freight operations (pg 54). We trust this investigation will lead to further funding availability, and that the next iteration of the Plan will include activities to implement an increase in capacity for sea freight.</p> <p>The anticipated increase of 2.7m tonnes of freight equivalent to an additional 89 000 (44 tonne) truck trips per year on the West Coast by 2042, along with the forecast of a minimal .11 tonnes increase in freight by rail highlights the need for rail to be incentivised across timeframe of the Plan. This would help reduce congestion, conflict and greenhouse gas emissions which will protect individuals and communities across the West Coast. We are aware that the recent draft Government Policy Statement on Land Transport indicates a lack of growth in tonnage hauled by rail, even within a six-year period of significant investment in the network, however this does not mean rail cannot be a viable option for freight.</p> |   |     |
| <b>RECOMMENDATION</b>   |   |     |
| Accept in part.   |   |     |

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| <b>REASON</b>  |  |
| The support for Policies 1 and 3 of Objective 4 is acknowledged. While the Region would benefit from an increase use of multi-modal transport, the funding options are still limited. As a small Region in terms of rate payers, the West Coast does rely largely on financial support from the Central Government. However, it does not appear in the Draft Government Policy Statement (GPS) for Land Transport 2024 that the Government will be supporting multi-modal transport. No changes to the Policies 1 and 3 are sought by the submitter. |  |

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| <b>Submission point: O4.12</b>  |   |     |
| <b>Submitter</b>  | 6 | AWC |
| <b>Submission</b>   |   |     |
| We strongly support the policy to develop, and maintain, walking and cycling networks that are safe and well-integrated. This investment will enable active transport to be a safe and accessible choice and therefore support community and environmental wellbeing. It will also demonstrate the Committee's commitment to respond to community demand for improved walking and cycling facilities within the urban area. While cycle and walking trails are fast becoming integral to the identity and economic wellbeing of the West Coast, good active transport connectivity within our communities encourages more walking and cycling, and less reliance on vehicles for short trips for residents ... Regular physical activity works wonders for long-term physical and mental health and has a positive effect on productivity and economic wellbeing. Moreover, communities that are healthier and better connected, cope better in times of emergency, so investment in improved active transport is also an investment in emergency preparedness. |   |     |
| <b>RECOMMENDATION</b>   |   |     |
| Noted   |   |     |
| <b>REASON</b>   |   |     |
| The support is acknowledged. No change to the Plan is sought by the submitter here.   |   |     |

## HEADLINE TARGETS

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| <b>Decision Requested: HT 1</b>   |   |      |
| <b>Submitter</b>  | 1 | TiGa |
| <b>Submission</b>   |   |      |
| TiGa generally supports the headline targets (page 46) as drafted, but notes the Connectivity target is not consistent with the draft objectives and policies. Increasing travel by active transport modes such as walking and cycling is supported, but this should be done where appropriate (as set out in the Draft Plan). It would be a perverse and inconsistent outcome that cycling was increased in dangerous areas.<br><u>Decision sought:</u><br>Consistent with the Draft Plan objectives and policies, the 'Connectivity' headline target should be: <i>Increasing travel in the West Coast by active (walking and cycling) transport modes <u>in urban centres and on dedicated trails and paths.</u></i> |   |      |

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| <b>RECOMMENDATION</b>  |  |  |
| Accept in part   |  |  |
| <b>REASON</b>  |  |  |
| Staff agree that the Connectivity headline target should be amended to be consistent with the objectives and policies of the draft Plan, but reject the submitter's suggested content. While active transport modes have a role in the vision of a multi-modal transport network, the headline target should also include other transport modes covered by the objectives and policies of the draft Plan. Staff suggest adding some reference to coastal shipping, rail freight connections and emissions reductions to the headline target. |  |  |
| <b>REVISED TEXT FOR THE PLAN:</b>  |  |  |
| Replace the headline target for Connectivity with the following:   |  |  |
| <u>“Increase use of active transport modes, and reduce emissions from transport.”</u>  |  |  |

|  |      |  |
|--|------|--|
| <b>Decision Requested: HT 2</b>  |      |  |
| <b>Submitter</b>   |      |  |
| 5  | NPHS |  |
| <b>Submission</b>  |      |  |
| We recommend that specific numbers are allocated to the headline targets so that progress against these targets can be measured. For example, “40% reduction in deaths and serious injuries on West Coast roads”.  |      |  |
| <b>RECOMMENDATION</b>  |      |  |
| Reject   |      |  |
| <b>REASON</b>  |      |  |
| There is an explanation under each of the four Headline Targets about what measures will be used to monitor achievement of the targets. The Chapter on Monitoring Indicator Framework also has measures to monitor implementation of the RLTP. Percentages are not always the most appropriate measure. No further change to the Headline Targets is recommended by staff. |      |  |

## REGIONAL TRANSPORT PROGRAMME AND FUNDING

|   |      |  |
|---|------|--|
| <b>Decision Requested: PF 1</b>   |      |  |
| <b>Submitter</b>  |      |  |
| 5   | NPHS |  |
| <b>Submission</b>   |      |  |
| We support the implementation of speed reductions identified particularly near kura/schools, marae and key urban and rural areas, as outlined on page 49 of the draft plan. Reducing vehicle speeds can reduce deaths and serious injuries and also have other health and environmental benefits. |      |  |
| <b>RECOMMENDATION</b>   |      |  |
| Accept  |      |  |
| <b>REASON</b>   |      |  |

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| The support is acknowledged. |
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|---|---|-----|
| <b>Decision Requested: PF 2</b>   |   |     |
| <i>Submitter</i>  | 6 | AWC |
| <i>Submission</i>   |   |     |
| <p>With respect to the table on page 49, we agree with the implementation of speed reductions identified particularly near kura/ schools, marae and key urban and rural areas. Reducing speed is a primary way to achieve road safety and promote more walking and cycling. Done correctly, and with sufficient community engagement, it also promotes a 'share the road culture' and assists in a shift towards roads being viewed as living spaces for a wide variety of users.</p> |   |     |
| <b>RECOMMENDATION</b>   |   |     |
| Accept  |   |     |
| <b>REASON</b>   |   |     |
| The support is acknowledged.  |   |     |

|   |   |               |
|---|---|---------------|
| <b>Decision Requested: PF 3</b>   |   |               |
| <i>Submitter</i>  | 7 | BDC, GDC, WDC |
| <i>Submission</i>   |   |               |
| <p>Support the focus on maintaining and operating the system and increasing resilience across the 10-year programmes of all Approved Organisations as included in the draft RLTP.</p> |   |               |
| <b>RECOMMENDATION</b>   |   |               |
| Accept  |   |               |
| <b>REASON</b>   |   |               |
| The support is acknowledged.  |   |               |

|   |   |               |
|---|---|---------------|
| <b>Decision Requested: PF 4</b>   |   |               |
| <i>Submitter</i>  | 7 | BDC, GDC, WDC |
| <i>Submission</i>   |   |               |
| <p>Support the following regionally significant projects which are included in the RLTP, and support the assessment of regional prioritisation by the Regional Transport Committee (RTC):</p> <ol style="list-style-type: none"> <li>a. SH6 Franz Josef Masterplan – NZTA (1)</li> <li>b. SH6 WTCT Haast to Hawea Resilience Improvements – NZTA (1)</li> </ol> |   |               |

|  |  |
|--|--|
| c. SH7 Stoney Creek Bridge Replacement – NZTA (3)                    |  |
| d. Karamea Highway Resilience Improvements – Buller DC (4)           |  |
| e. Karamea Highway Geometry Improvements – Buller DC (4)             |  |
| f. SH67 Granity Seawall – NZTA (4)                                   |  |
| g. Safety Infrastructure Improvements Programme 2024-27 – NZTA (7)   |  |
| h. Jackson Bay Resilience Improvements – Westland DC (8)             |  |
| i. SH6 Kumara Junction Commercial Vehicle Regional Safety Centre (9) |  |
| <b>RECOMMENDATION</b>  |  |
| Accept   |  |
| <b>REASON</b>  |  |
| The support is acknowledged.   |  |

|   |   |               |
|---|---|---------------|
| <b>Decision Requested: PF 5</b>   |   |               |
|   |   |               |
| <i>Submitter</i>  | 7 | BDC, GDC, WDC |
| <i>Submission</i>   |   |               |
| Support the proposed increase to Department of Conservation local road improvements and maintenance to enhance safety, asset condition, and accessibility for users at key regional tourist destinations. |   |               |
| <b>RECOMMENDATION</b>   |   |               |
| Accept  |   |               |
| <b>REASON</b>   |   |               |
| The support is acknowledged.  |   |               |

|  |   |               |
|--|---|---------------|
| <b>Decision Requested: PF 6</b>  |   |               |
|  |   |               |
| <i>Submitter</i>   | 7 | BDC, GDC, WDC |
| <i>Submission</i>  |   |               |
| Support the re-inclusion of co-funding for road safety promotion by West Coast Regional Council alongside the three district councils. |   |               |
| <b>RECOMMENDATION</b>  |   |               |
| Accept   |   |               |
| <b>REASON</b>  |   |               |
| The support is acknowledged.   |   |               |

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|---------------------------------|--|--|
| <b>Decision Requested: PF 7</b> |  |  |
|                                 |  |  |

|   |   |               |
|---|---|---------------|
| <b>Submitter</b>  | 7 | BDC, GDC, WDC |
| <b>Submission</b>   |   |               |
| <p>Note the draft RLTP's focus on funding and affordability constraints, the potential risk of under-investment (e.g. levels of service, asset condition, safety, resilience, economic productivity, and long-term costs), and the need for alternate sources of funding beyond ratepayers and the National Land Transport Fund. The Councils note that draft GPS2024 raises similar issues and promotes potential for a regional approach via city and regional deals, also identified as a potential opportunity in the draft RLTP.</p> |   |               |
| <b>RECOMMENDATION</b>   |   |               |
| Noted.  |   |               |
| <b>REASON</b>   |   |               |
| <p>The submitter does not seek a specific change to the draft Plan. Once the draft GPS 2024 is finalised, the Plan may need to be amended to make it consistent with the GPS.</p>   |   |               |

|   |   |      |
|---|---|------|
| <b>Decision Requested: PF 8</b>   |   |      |
| <b>Submitter</b>  | 9 | NZTA |
| <b>Submission</b>   |   |      |
| <p>The State Highway Investment Proposal is NZTA's bid for funding improvement activities on the State Highway network in response to the GPS 2024. These activities primarily relate to the State Highway network. The State Highway Investment Proposal included in your Regional Land Transport Plan was developed in August 2023. The State Highway Investment Proposal is currently being revised in response to new Government direction and the Board is expected to sign out an updated State Highway Investment Proposal 2024 by early April.</p> <p>We request the opportunity to address any changes in the updated State Highway Investment Proposal 2024 at the upcoming hearings. This will be an opportunity for NZTA staff to speak to any changes in the State Highway Investment Proposal 2024 for your Region. We will also seek inclusion, in the Regional Land Transport Plan, of any new activities identified in the updated State Highway Investment Proposal 2024.</p> <p>We recommend that a NZTA representative be provided the opportunity to speak to the updated State Highway Investment Proposal 2024 as it better reflects the NZTA response to the 2024 Government Policy Statement on Land Transport (GPS 2024).</p> |   |      |
| <b>RECOMMENDATION</b>   |   |      |
| Accept  |   |      |
| <b>REASON</b>   |   |      |
| <p>The submitter's presentation at the draft RLTP hearings has been scheduled in accordance with its wish to speak in favour of his submission. In pre-hearing communications, NZTA provided some changes to the figures in this Chapter of the draft Plan. These are recommended to be accepted. Further changes can be considered at the hearing.</p>   |   |      |



|   |   |      |
|---|---|------|
| <b>Decision Requested: PF 9</b>   |   |      |
|   |   |      |
| <i>Submitter</i>  | 9 | NZTA |
| <i>Submission</i>   |   |      |
| We also request that the Regional Transport Committee resolve to delegate to staff the ability to make changes to the final Regional Land Transport Plan to reflect the updated State Highway Investment Proposal up until the date the Regional Land Transport Plan is approved by the Regional Council, subject to these changes being circulated to all Regional Transport Committee members and agreed to by the Chair. |   |      |
|   |   |      |
| <b>RECOMMENDATION</b>   |   |      |
| Accept  |   |      |
|   |   |      |
| <b>REASON</b>   |   |      |
| The draft RLTP may include some changes following the Committee's deliberations.  |   |      |

## MONITORING INDICATOR FRAMEWORK

|   |   |      |
|---|---|------|
| <b>Decision Requested: MIF 1</b>  |   |      |
|   |   |      |
| <i>Submitter</i>  | 1 | TiGa |
| <i>Submission</i>   |   |      |
| TiGa supports the outcomes listed for economic prosperity (page 63) and considers that increased freight shipping as well as increased rail movements would be positive outcomes. |   |      |
| <b>RECOMMENDATION</b>   |   |      |
| Accept  |   |      |
|   |   |      |
| <b>REASON</b>   |   |      |
| The support is acknowledged.  |   |      |



## INTRODUCTION

- 1 My name is Mathew (Mat) Ross Collins.
- 2 I hold a Bachelor of Engineering (Hons) from the University of Auckland and have a post-graduate certificate in transportation and land use planning from Simon Fraser University in Vancouver, Canada.
- 3 I have been employed by Abley Ltd since September 2023, where I hold the position of Associate Transport Planner.
- 4 I have 9 years of experience as a transportation planner and engineer in public and private sector land development projects, which includes experience with strategic land use and transport planning, plan changes, Integrated Transport Assessments, development consenting, and notices of requirement.
- 5 My experience includes acting for NZ Transport Agency Waka Kotahi, Auckland Transport and Auckland Council, Kāinga Ora, Whangārei District Council, Kaipara District Council, and various private developers throughout New Zealand. This work has involved:
  - (a) Plan change applications including multiple Selwyn District Private Plan Changes, Drury East, Drury West, Warkworth North, the Whangarei District Plan Changes for Urban and Services, Mangawhai Central, Avondale Jockey Club, and Pukekohe Raceway
  - (b) Resource consent applications including large precincts: Drury South Industrial, Drury Residential, Redhills, Silverdale 3, Drury 1, Waiata Shores, and Crown Lynn Yards
  - (c) Designation, Outline Plan of Works, and resource consent applications and reviews for major infrastructure including Supporting Growth Alliance Drury Arterials NoR Package and North Auckland Package, Healthy Waters St Marys Bay Stormwater Water Quality Programme, Watercare Huia Water Treatment Plant replacement, Watercare Huia 1 Watermain replacement, and several Ministry of Education Schools.
- 6 My role concerning the resource consent applications by TiGa Minerals and Metals Ltd (the applicant) to establish and operate a mineral sands mine on State Highway 6

(SH6), Barrytown (RC-2023-0046; LUN3154/23) (the proposed activity), is as an independent expert witness to Grey District Council on traffic and transportation matters.

- 7 Although this is not an Environment Court proceeding, I have read the Environment Court's Code of Conduct and agree to comply with it. My qualifications as an expert are set out above. The matters addressed in my evidence are within my area of expertise, however where I make statements on issues that are not in my area of expertise, I will state whose evidence I have relied upon. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in my evidence.

### **SCOPE OF EVIDENCE**

- 8 I have been engaged by Grey District Council to review the pedestrian and cyclist road safety matters relating to RC-2023-0046 and LUN3154/23 (the proposed activity) at SH6 in Barrytown (the site), and methods to avoid, remedy or mitigate safety effects.
- 9 The scope of my review has been to assess these matters on SH6, between the site and Greymouth, particularly between the SH6/ Golden Sands Road intersection and Rapahoe, where the geometry of SH6 is challenging.
- 10 I have not assessed the proposed access to the site, as I understand that this has been generally agreed with Waka Kotahi NZ Transport Agency<sup>1</sup>.
- 11 In the course of undertaking that work, I have:
- (a) Reviewed the following documents:
    - (i) Submission from Waka Kotahi NZ Transport Agency, dated 12 October 2023<sup>2</sup>.
    - (ii) S42a Report, prepared by Perspective, dated 22 December 2023<sup>3</sup>.

<sup>1</sup> I have used the name Waka Kotahi NZ Transport Agency in my Evidence, reflective of the Agencies name in its submission. However, I acknowledge that since its submission, the Agency is in the process of rebranding itself as NZ Transport Agency Waka Kotahi.

<sup>2</sup> [https://www.greydc.govt.nz/repository/libraries/id:2cvtsvtyv1cxbyz1k6uz/hierarchy/sitecollectiondocuments/Your%20Home/Barrytown%20Mining/Submissions/138%20-%20Waka%20Kotahi%20NZ%20Transport%20Agency\\_Redacted.pdf](https://www.greydc.govt.nz/repository/libraries/id:2cvtsvtyv1cxbyz1k6uz/hierarchy/sitecollectiondocuments/Your%20Home/Barrytown%20Mining/Submissions/138%20-%20Waka%20Kotahi%20NZ%20Transport%20Agency_Redacted.pdf)

<sup>3</sup> <https://www.greydc.govt.nz/repository/libraries/id:2cvtsvtyv1cxbyz1k6uz/hierarchy/sitecollectiondocuments/Your%20Home/Barrytown%20Mining/S42a%20Officers%20Report/%60TIGA%20S.42A%20Officer%27s%20Report>

- (iii) Statement of evidence of Nicholas Peter Fuller, on behalf of the applicant, dated 19 January 2024<sup>4</sup>.
  - (iv) Summary Statement and Rebuttal Evidence of Nicholas Peter Fuller, dated 2 February 2024<sup>5</sup>.
  - (v) Draft conditions of consent, received from Council's Reporting Planner by email on 16 February 2024.
- (b) Undertaken a site visit on Friday 23rd February 2024 from 11am to 1pm, driving the proposed haulage route on SH6.

## SUMMARY OF MY REVIEW

12 The key points I make in my Statement of Evidence are:

- (a) I have not attempted to quantify the scale of the safety effect generated by the proposed activity. Should this be required I consider that an appropriate method would be to undertake a Safe Systems Assessment (SSA) of the heavy vehicle route between the site and Greymouth. However, I anticipate that the SSA is unlikely to show a significant change in the magnitude of the safety risk to pedestrians and cyclists as:
  - (i) There would be no increase in the numbers of pedestrians and cyclists resulting from the activity so the exposure score for crashes involving those users would not change.
  - (ii) The likelihood and severity scores for most of the route would already score at the highest end of the scale, and therefore could not increase further (even if the risk is increasing).
- (b) I recommend that amendments and additions are made to the Transport Management Plan, to improve its effectiveness and accountability.

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<https://www.greycdc.govt.nz/repository/libraries/id:2cvtsvtyv1cxbyz1k6uz/hierarchy/sitecollectiondocuments/Your%20Home/Barrytown%20Mining/Applicants%20Evidence/Statement%20of%20Evidence%20-%20Nick%20Fuller%20%28transport%29.pdf>

5

<https://www.greycdc.govt.nz/repository/libraries/id:2cvtsvtyv1cxbyz1k6uz/hierarchy/sitecollectiondocuments/Your%20Home/Barrytown%20Mining/Applicants%20Summary%20Statements%20and%20Rebuttal%20Evidence/Summary%20Statement%20and%20Rebuttal%20Evidence%20-%20Nick%20Fuller%20transport.pdf>

- (c) Road signage and markings are likely to improve the safety of cyclists and pedestrians on SH6, and the costs associated with this may be warranted by the effects generated by the proposed activity.
- (d) Locations where I consider that signage and markings should be considered are:
  - (i) Between Coal Creek rail overbridge and approximately 100m east of Bright Street.
  - (ii) Between approximately 850m travel distance north of Hollard Street and the access to the Nine Mile Mine.
  - (iii) Between approximately 650m travel distance north of Nine Mile Mine access and Nine Mile Creek bridge.
  - (iv) Between 1423 Coast Road and the start of the northbound slow vehicle bay at Ten Mile Creek.
  - (v) Between the end of the northbound slow vehicle bay at Ten Mile Creek and 1845 Coast Road.
  - (vi) Between approximately 450m travel distance south of Thirteen Mile Creek bridge and Thirteen Mile Creek bridge.
  - (vii) Between approximately 600m travel distance north of Thirteen Mile Creek bridge and 2085 Coast Road.
  - (viii) Between approximately 300m travel distance south of Fourteen Mile Creek bridge and approximately 700m travel distance north of Fourteen Mile Creek bridge.
- (e) I have not undertaken a detailed assessment of what types of signage and markings are appropriate, and matters such as safety effects, constructability, required sight lines etc will need to be considered. Further, any signage will require the approval of the Road Controlling Authority (RCA).
- (f) I recommend that a condition of consent is applied, which requires the Consent Holder to prepare and implement a signage and markings plan, in consultation with the RCA. In communications with Council's Reporting Planner, Waka Kotahi NZ Transport Agency, as the RCA for SH6, has indicated support for a condition of consent to this effect.

(g) I have provided suggested wording for conditions of consent to address the recommendations in my Evidence.

13 The proposed activity will have an overall negative effect on cyclists, as the increase the number of truck movements along the corridor will increase the likelihood for a crash to occur, given the existing constraints and pinch points along the corridor. This has been a challenging issue for me to grapple with, as the consequence of a crash between a truck and a cyclist has a high likelihood to cause a death or serious injury, and human behaviour in the transport environment is difficult to direct.

14 However, when balancing the potential safety effects of the activity against the potential mitigations, I do not consider there are grounds to decline the consent. My opinion is based on:

(a) Truck drivers are professionals and the TMP will ensure they are educated about the risks and constraints of the corridor.

(b) My recommended amendments to the TMP will increase the accountability of both the Consent Holder and truck drivers, which I hope will result in greater care and empathy for other road users, and adherence to the road rules.

(c) Warning signage and markings will improve driver and cyclist awareness at the eight key constraint locations and will be a minor improvement compared to the existing environment.

#### **BACKGROUND MATTERS THAT ARE RELEVANT TO PEDESTRIAN AND CYCLIST SAFETY**

15 Based on my assessment, and Mr Fullers' assessment, SH6 has the following road users:

(a) approximately 800 to 1,200 vehicle movements per day (2022 and 2018 counts respectively<sup>6</sup>), and around 100 vehicles in the afternoon peak hour<sup>7</sup>.

(b) Approximately 11% of total vehicle movements are heavy vehicles, which is around 90 to 130 heavy vehicle movements per day based on the 2022 and 2018 traffic counts respectively.

<sup>6</sup> Waka Kotahi NZTA Pukakaiki Telemetry Site 39, SH6 north of Canoe Creek, <https://maphub.nzta.govt.nz/public/?appid=31305d4c1c794c1188a87da0d3e85d04>

<sup>7</sup> Nick Fuller Statement of Evidence, paragraph 15

- (c) Low numbers of pedestrians along rural sections of SH6, but the actual number of pedestrians has not been quantified. I anticipate that pedestrian movements along rural sections are likely to be related to school bus pick up and drop off activities.
  - (d) Low numbers of cyclists along rural sections of SH6, but the actual number of cyclists has not been quantified. I anticipate that cyclist movements along the rural section north of Rapahoe are likely to be related to recreational/tourism-based trips, and a mix of local and recreational/tourism on the section of SH6 between Rapahoe and Greymouth.
- 16 Mr Fuller's Evidence identifies that the proposed activity is anticipated to generate the following vehicle movements on SH6:
- (a) 50 heavy vehicle movements per day.
  - (b) 140 light vehicle movements per day.
- 17 As far as I am aware Mr Fuller has not estimated how many pedestrian or cyclist movements might be generated by the proposed activity, however, in my opinion this is likely to very low due to the remote location of the Site.
- 18 I understand that there is a degree of consensus across all parties that the existing environment of SH6 creates inherent risk for pedestrians and cyclists, as:
- (a) there is limited forward visibility in some locations, due to vertical and horizontal geometry, and vegetation.
  - (b) there is limited or no sealed or gravel hard shoulder in some locations, which combined with the limited forward visibility can encourage some drivers to pass cyclists in a dangerous manner.
  - (c) noise from the surf can limit pedestrians' and cyclists' ability to hear approaching traffic.
  - (d) some submitters have experienced "near miss" encounters with vehicles when walking or cycling along SH6.

## **QUANTIFICATION OF THE SAFETY EFFECT ON PEDESTRIANS AND CYCLISTS**



- 19 I understand that the Hearing Commissioners have accepted that the proposed activity will increase the risk to pedestrians and cyclists using SH6. This is intuitive, as the proposed activity will increase the number of light and heavy vehicles using SH6, increasing the frequency of interactions between pedestrians/cyclists and vehicles.
- 20 I have not attempted to quantify the scale of the safety effects generated by the proposed activity. However, should this be required I consider that an appropriate method would be to undertake a Safe System Assessment (SSA) of the heavy vehicle route between the site and Greymouth.
- 21 Austroads publication AP-R509-16 provides guidance on how to undertake a SSA. A SSA considers the risk level of several different crash types based on scoring (on a scale of 1-4) three metrics:
- (a) exposure (number of users exposed to the crash)
  - (b) likelihood (the likelihood of a crash occurring based on the type of users and infrastructure in place)
  - (c) severity (the likely injury outcome of a crash, should one occur)
- 22 The SSA is typically used to compare project options. In this case, the option would not involve any physical works but an increase in the volume and type of users, generated by the proposed activity. Using a SSA to assess the risk for pedestrians and cyclists is unlikely to provide insight that is detailed enough to be useful on this route because:
- (a) there would be no increase in the numbers of pedestrians and cyclists resulting from the activity so the exposure score for crashes involving those users would not change.
  - (b) The likelihood and severity scores for most of the route would already score at the highest end of the scale due to the limited forward visibility, limited carriageway width, and high vehicle speeds, and therefore could not increase further (even if the risk is increasing).

#### **OBSERVATIONS FROM MY SITE VISIT**

- 23 I undertook a site visit on Friday 23 February 2024 at approximately 11am – 1pm, by driving the return route between Greymouth and the Site. During my assessment I did not observe any pedestrians or cyclists on the section of SH6 north of Rapahoe.

- 24 I assessed the corridor for locations with the highest risk from a road safety perspective. These were locations where, in my view, if a heavy vehicle encountered a cyclist or pedestrian there is a heightened risk of a crash as a result of a lack of limited forward visibility and/or lack of shoulder. I have identified the highest risk locations in Appendix A.
- 25 A crash in these locations could result from:
- (a) trucks hitting cyclists or pedestrians by not providing sufficient passing distance.
  - (b) trucks crossing the centreline at the last minute to avoid pedestrians and cyclists and coming into conflict with vehicles approaching in the opposite direction.
  - (c) trucks providing sufficient passing distance from cyclists or pedestrians, but then swerving into the cyclist or pedestrian when trying to avoid conflict with vehicles approaching in the opposite direction.
- 26 The likelihood of a crash resulting in a fatal or serious injury involving a cyclist or pedestrian along the rural section of SH6 is high. Figure 1 shows the 'Wramborg curves', which demonstrate the relationship between the collision speed in a motor vehicle crash, and the likelihood of a fatal outcome (Wramborg, 2005). This indicates that a car colliding with a pedestrian or cyclist at more than 50 km/hr has a greater than 80% chance of resulting in a fatality. This speed would be less for a heavy vehicle crash with a cyclist or pedestrian.
- 27 I consider myself to be a relatively confident cyclist, however having driven the route I would not be comfortable with cycling in this type of environment. Having said this, I acknowledge that some people do cycle in this location.

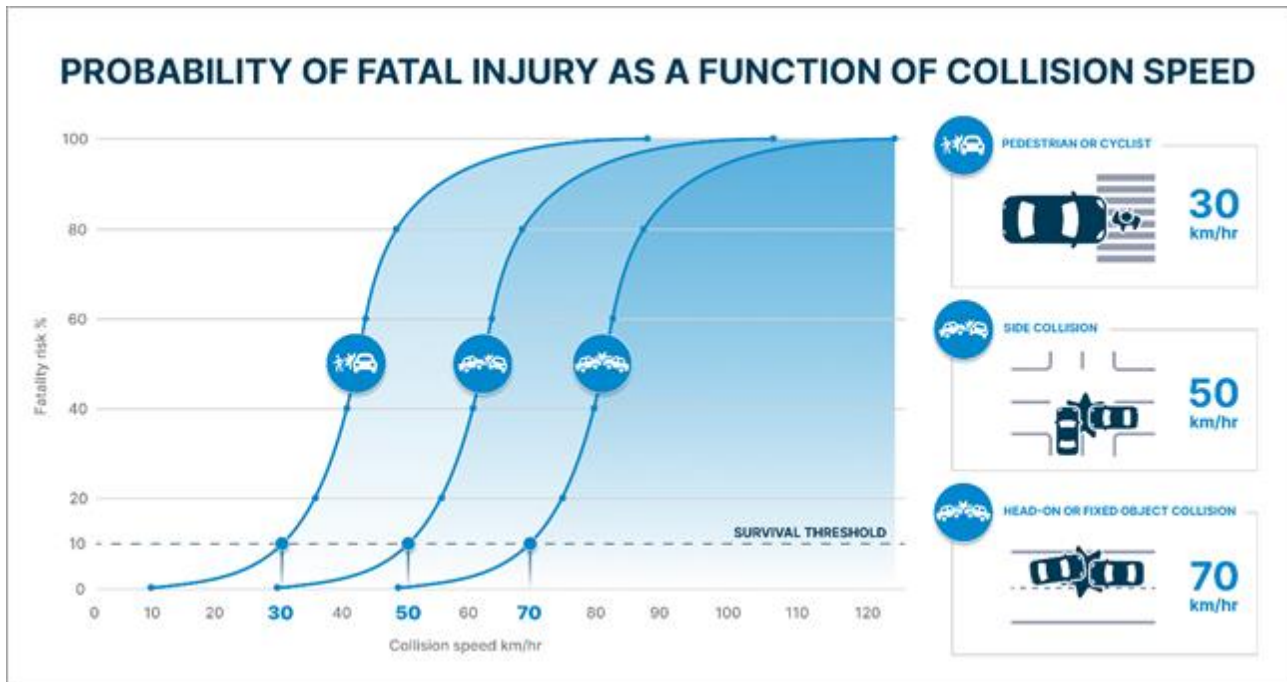


Figure 1: Probability of a fatal injury for light vehicle crashes<sup>8</sup>

### MY RECOMMENDATIONS FOR MINIMISING THE POTENTIAL SAFETY RISK

- 28 I have considered whether the mitigations proposed by Mr Fuller are appropriate and whether additional mitigations could be implemented to eliminate or minimise the safety risk to pedestrians and cyclists.
- 29 In the following sections I discuss:
- (a) Recommended amendments and additions to the TMP.
  - (b) Potential infrastructure interventions.
  - (c) Recommendations on the proposed conditions of consent.

#### Recommended amendments and additions to the TMP

- 30 In his Statement of Evidence, Mr Fuller prepared a draft Transport Management Plan (TMP) and recommended this is maintained by the Consent Holder. The draft TMP includes:

<sup>8</sup> Wramborg, P. (2005). A new approach to a safe and sustainable road structure and street design for urban areas, Paper presented at the Proceedings of the Road Safety on Four Continents Conference, Warsaw, Poland.

- (a) Setting the objective that the TMP ensures the safe and efficient operation of the road transport network.
- (b) Reporting of incidents, including near miss incidents, to the Project Manager.
- (c) Recording of reported incidents, which are to be provided to Council on request.
- (d) A requirement to update the TMP should the Consent Holder identify a trend in road safety incidents (such as three or more instances of the same incident) that indicates the existing measures are insufficient to adequately address road safety issues being reported.
- (e) A requirement for truck drivers to report observations of cyclists to the Project Manager.
- (f) Encouragement of shuttle bus travel for staff.
- (g) Instructions for truck driver behaviour.
- (h) Identification of geographic locations where additional care is required.
- (i) Reporting of pavement defects.

31 I generally support the draft TMP, however I recommend the following amendments and additions:

- (a) The TMP Objective is updated to include specific reference to ensuring that the Mine operation does not affect the safety of pedestrians and cyclists on the haulage route.
- (b) The Consent Holder should be required to report any crashes, including non-injury crashes, to the Council (all crashes) and Waka Kotahi NZ Transport Agency (for crashes on SH6). In my view it is not sufficient for incidents to be reported only to the Project Manager.
- (c) The Consent Holder should be required to record all near miss incidents and make this record available to Council on request.
- (d) The Consent Holder should be required to review the TMP after any crash or near miss incident. Where a crash has occurred, this should include input from the

Council (all crashes) and Waka Kotahi NZ Transport Agency (for crashes on SH6).

- (e) The Consent Holder should be required to review the TMP on a regular basis, which I suggest is every 12 months.
- (f) Health and Safety training to draw attention to the risks of operating heavy vehicles near cyclists and pedestrians, particularly where there is a heightened risk along section of the corridor identified in Appendix A of my Evidence.
- (g) A requirement for trucks to carry clear identification and a phone number for the Consent Holder, to enable other road users to report driver behaviour to the Consent Holder. The Consent Holder should be required to report any complaints received at a regular frequency to Council. I suggest that this be done monthly.
- (h) A requirement for all trucks to maintain a communication method between drivers (such as radio transmitters), and to report any real time observations of cyclists or pedestrians along the route to other drivers operating under the proposed activity.
- (i) That the TMP identify layover points, being safe locations where truck drivers can stop and wait if they are "on the road" at school pick-up / drop-off times.

32 I have considered whether practical induction training for truck drivers should include an exercise where truck drivers cycle near heavy vehicles, to encourage empathy for vulnerable road users.

33 Although I have no direct experience with this type of training, I understand that it can be effective. I understand that the Kate Valley Landfill has had success with its "Thumbs Up" truck safety programme for drivers and children<sup>9</sup>, which encourages school children and truck drivers to acknowledge each other with a "thumbs up". I also note that, in correspondence with Council's Reporting Planner, Waka Kotahi NZ Transport Agency staff observed that a driver training programme at Fonterra has supported safer interactions between truck drivers and cyclists.

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<sup>9</sup> The Kate Valley Landfill 10 year review has some detail on the "Thumbs Up" programme [https://transwastecanterbury.co.nz/wp-content/uploads/2019/12/160623-TWaste\\_10yr\\_LOW-RES-REVISE\\_June22\\_final.pdf](https://transwastecanterbury.co.nz/wp-content/uploads/2019/12/160623-TWaste_10yr_LOW-RES-REVISE_June22_final.pdf)

34 However, due to the potential health and safety implications of such a requirement, and that I have no direct expertise on this matter, I consider I am not able to make this recommendation.

### **Potential infrastructure interventions**

35 I have considered whether the following infrastructure solutions are an appropriate method to manage the potential safety effects generated by the proposed activity:

- (a) Separated walking/cycle facilities on SH6 or via an alternative inland route (for example through Paparoa National Park to SH7). I have not undertaken a cost assessment, but in my view the costs associated with this would not be warranted by the effects generated by the proposed activity.
- (b) Shoulder widening of SH6, to provide additional space for cyclists. I have not undertaken a cost assessment, but in my view the costs associated with this would not be warranted by the effects generated by the proposed activity.
- (c) Active and static signage and road markings. I consider that the costs associated with this could be warranted by the effects generated by the proposed activity.
  - (i) This could include static signage, such as those shown in Figure 2, and active signage as shown in Figure 3.
  - (ii) Active signage can include warning signs that activate when a cyclist is detected and apply variable speed limits<sup>10</sup>.
  - (iii) I consider that the eight locations that I identify in Appendix A of my Evidence should have further assessment undertaken to identify opportunities to install signage and road markings.
  - (iv) I have not undertaken a detailed assessment of what types of signage are appropriate, and matters such as safety effects, constructability, required sight lines etc will need to be considered. Further, any signage will require the approval of the Road Controlling Authority.

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<sup>10</sup> Further information on active signage is available on Waka Kotahi NZTA's website <https://www.nzta.govt.nz/roads-and-rail/traffic-control-devices-manual/part-5-traffic-control-devices-for-general-use-between-intersections/active-warning-signs-and-variable-lane-controls/active-warning-signs/>

- (v) I therefore suggest that a condition of consent requiring the Consent Holder to prepare and implement a signage and marking plan, in consultation with Waka Kotahi NZ Transport Agency's and to Council's satisfaction, is an appropriate method of addressing this.

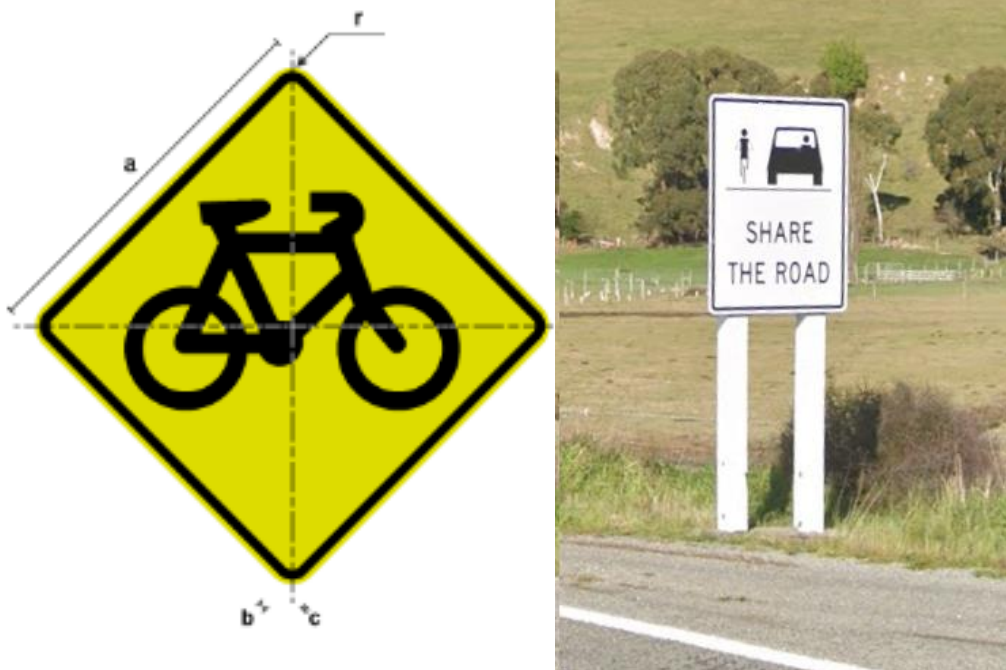


Figure 2: Examples of static signs



Figure 3: Examples of active warning signs

### Conditions of consent

36 Council's Reporting Planner has provided a text version of some of the draft conditions of consent (as of 16 February 2023). I generally support these, however, I recommend some amendments. I have shown deletions in ~~red strikethrough~~, additions in green underline, and relocations in blue.

37 I recommend that Condition 15.7 is amended to remove the reference to "heavy mineral concentrate", as this is more consistent with other proposed conditions:

*Truck movements associated with the ~~removal of heavy mineral concentrate~~ activity must not leave or arrive at the site between the hours of 0800-0900 and 14:45-1600 each school day that the Barrytown Primary School bus is operating.*

*Advice Note: For the purpose of the Transport conditions, a movement is defined as being a movement either to or from the site. A truck and trailer unit entering and leaving the site is therefore 2 movements.*

*Advice note: School term dates can be found on the Ministry of Education's website, however exact dates each school operate will vary and should be confirmed with the Barrytown School directly.*

38 I recommend that Condition 15.8 is amended to address readability as the draft condition has some grammatical errors and I understand that haulage to Port of Westport is no longer proposed:

*The consent holder must conduct transport activities in general accordance with the Transport Management Plan. The objective of the Transport Management Plan is to ensure all drivers operating vehicles associated with the mining activity demonstrate considerate and safe driver behaviour ~~of~~.*

*(i) to ~~ensure~~ contribute to the safe and efficient operation of the road transport network between the Site and either the Port of Greymouth ~~or the Port of Westport (as appropriate)~~*

*(ii) to avoid adverse effects on wildlife along the trucking route;*

*(iii) to avoid adverse effects on pedestrian and cycle safety along the trucking route.*

*Advice Note: All Management Plans are required to adhere to the requirements of Condition 6.0.*

39 I recommend that Condition 15.9 and 15.10 is amended to address recommendations in my Evidence

*The Transport Management Plan must shall include:*



- (i) A method of reporting ~~incidents (including accidents or near misses involving a cyclist or pedestrian)~~ encounters with taiko and other wildlife crashes involving a vehicle associated with the activity and any another road user, and road defects, to the Council and the relevant Road Controlling Authority (where this is not the Council).
- (ii) A method of reporting encounters with taiko and other wildlife.
- (iii) Hours of operation of various vehicle types to avoid adverse noise and traffic safety effects as dictated in the conditions of consent;
- (iv) Procedures to avoid drivers leaving or arriving at the site between the hours of 0800-0900 and 14:45-1600, including safe locations to wait on SH6 during these times, if required;
- (v) A method for trucks to carry clear identification and a phone number for the consent holder, for the purpose of enabling other road users to report driver behaviour to the Consent Holder;
- (vi) A method for the Consent Holder to record any complaints received about driver behaviour, and to provide this record to the Consent Authority when requested.
- (vii) A description of "locations of care" where drivers will need to take additional care, i.e. areas of tight road geometry, areas of greater pedestrian and cyclist concentration, areas near schools.
- (viii) Methods to minimise amenity disturbance for residents i.e. locations where use of air brakes should be avoided, including the Cargill Road intersection.
- (ix) A method of real time communication within the trucking fleet to avoid trucks passing at areas of tight geometry, and to alert other fleet drivers to the presence of a cyclist, pedestrian or other emerging safety hazards to minimise risks to other road users.
- (x) Staff induction procedures, including briefing of drivers regarding considerate and safe driving behaviour around pedestrians and cyclists, identified locations of care, and any other pertinent requirements regarding driver behaviour.
- (xi) Procedures to notify drivers when alterations are made to the TMP have occurred.

40 I recommend changes to Condition 15.12 to require the Consent Holder to report any crash, to the Consent Authority and Waka Kotahi NZ Transport Agency (for crashes on SH6).

- x. In the event ~~of a serious traffic incident (an accident involving an injury or fatality)~~, that any vehicle associated with the activity is involved in a crash, the Consent Holder

*must notify the Consent Authority and engage a suitably qualified transport engineer to review the Transport Management Plan, in consultation with the Road Controlling Authority, within 5 working days to identify any further mitigation measures that can be implemented to avoid similar incidents occurring again. The review and recommendations of the transport engineer must be provided to the Consent Authority within 10 working days of the incident occurring, and the management plan amendment process in Condition 6.0 must be followed.*

- 41 I recommend a new condition to require the Consent Holder to review the TMP on a regular basis.

*x. The Consent Holder shall review the Transport Management Plan on a 12 monthly basis and after any near miss incident, and communicate any updates to staff.*

- 42 I recommend that a new condition is included, requiring the Consent Holder Consent Holder to prepare and implement a signage and marking plan, in consultation with Waka Kotahi NZ Transport Agency and to Council's satisfaction. I have suggested wording as follows:

*At least 10 working days prior any truck movements associated with the activity occurring, the Consent Holder shall prepare an implement a signage and marking plan, in consultation with the Road Controlling Authority and in accordance with the Manual of traffic signs and markings (MOTSAM). The signage and markings must be installed in accordance with the approved plans.*

*The signage and marking plan be prepared by a suitably qualified person. It shall assess SH6 between the site and Greymouth and identify any locations where the safety of pedestrians and/or cyclists can be improved by providing static and/or active warning signage and/or road markings.*

*The consent holder shall submit to the Consenting Authority a copy of the Waka Kotahi NZ Transport Agency's approval to undertake works on the State Highway (as detailed in advice notes) and certification that the works identified in the signage and markings plan have been completed to its satisfaction.*

*Advice Notes:*

*It is a requirement of the Government Roading Powers Act 1989 that any person wanting to carry out works on a state highway first gain the approval of Waka Kotahi NZ Transport Agency for the works and that a Corridor Access Request (CAR) is applied for and subsequently a Work Access Permit issued before any works commence. A CAR will be required for the vehicle crossing from the subject site to State Highway 6. Detailed design approval will be provided though the CAR process.*

*A CAR is made online via [www.beforeudig.co.nz](http://www.beforeudig.co.nz) and/or [www.submitica.co.nz](http://www.submitica.co.nz). The CAR needs to be submitted at least 15 working days before the planned start of works. A copy should also be sent to the Waka Kotahi NZ Transport Agency environmental planning team at [environmentalplanning@nzta.govt.nz](mailto:environmentalplanning@nzta.govt.nz).*

*The Corridor Access Request will need to include:*

- (i) The detailed design for signage and marking. In developing the detailed design, the consent holder will need to consult with the Waka Kotahi NZ Transport Agency, including the Regional Safety Engineer and Network Manager appointed state highway maintenance contractor for the West Coast (Fulton Hogan) and a Waka Kotahi Safety Engineer (Jodie Enright).*
- (ii) A Construction Traffic Management Plan that has attained approval from the Waka Kotahi NZ Transport Agency Network Manager. appointed state highway maintenance contractor for the West Coast (Fulton Hogan).*
- (iii) A design safety audit which has been prepared, processed and approved in accordance with Waka Kotahi guidelines for Road Safety Audit Procedures for Projects (<https://www.nzta.govt.nz/assets/resources/road-safety-audit-procedures/docs/road-safetyaudit-procedures-tfm9.pdf>).*

## CONCLUSION

- 43 I assessed the corridor for locations with the highest risk from a road safety perspective. These were locations where, in my view, if a heavy vehicle encountered a cyclist or pedestrian there is a heightened risk of a crash as a result of a lack of limited forward visibility and/or lack of shoulder. I have identified the highest risk locations in Appendix A.
- 44 I consider that static and/or active warning signage and markings will mitigate some safety effect of the proposed activity on cyclists in these locations. I recommend that a condition of consent is applied, requiring the Consent Holder to investigate and implement signage and/or markings in these locations, in consultation with Waka Kotahi NZ Transport Agency. Waka Kotahi NZ Transport Agency has indicated its support of this approach.
- 45 I have recommended amendments and additions to the TMP, to improve its effectiveness and provide greater accountability for the Consent Holder to avoid unsafe interactions between drivers and pedestrians and cyclists.

- 46 I have recommended amendments and additions to the proposed Conditions, to reflect the recommendations in my Evidence.
- 47 The proposed activity will have an overall negative effect on cyclists, as the increase the number of truck movements along the corridor will increase the likelihood for a crash to occur, given the existing constraints and pinch points along the corridor. This has been a challenging issue for me to grapple with, as the consequence of a crash between a truck and a cyclist has a high likelihood to cause a death or serious injury, and human behaviour in the transport environment is difficult to direct.
- 48 However, when balancing the potential safety effects of the activity against the potential mitigations, I do not consider there are grounds to decline the consent. My opinion is based on:
- (a) Truck drivers are professionals and the TMP will ensure they are educated about the risks and constraints of the corridor.
  - (b) My recommended amendments to the TMP will increase the accountability of both the Consent Holder and truck drivers, which I hope will result in greater care and empathy for other road users, and adherence to the road rules.
  - (c) Warning signage and markings will improve driver and cyclist awareness at the eight key constraint locations and will be a minor improvement compared to the existing environment.



Mathew Ross Collins

29 February 2024

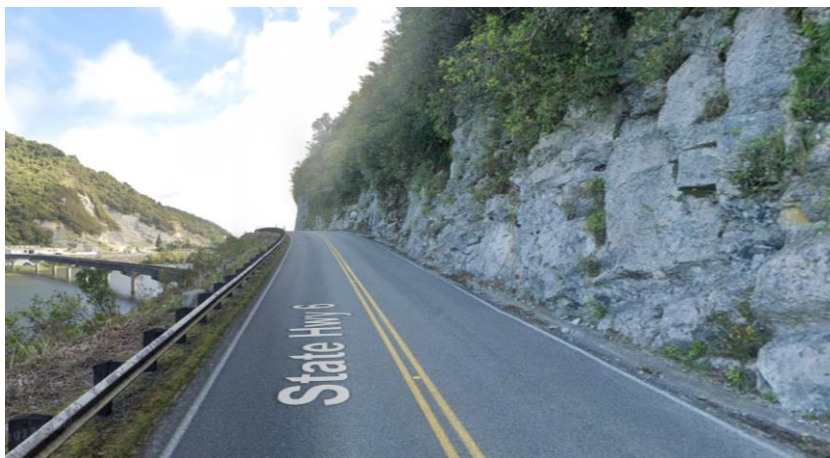
Appendix A.  
SH6 Highest risk locations

During my site visit I assessed the corridor for locations with the highest risk from a road safety perspective. These were locations where, in my view, if a heavy vehicle encountered a cyclist or pedestrian there is a heightened risk of a crash as a result of a lack of limited forward visibility and/or lack of shoulder.

I have provided an aerial image showing the extent of each section, as well as select screen captures from video I recorded while driving the route to provide examples.

Between Coal Creek rail overbridge and approximately 100m east of Bright Street<sup>11</sup>

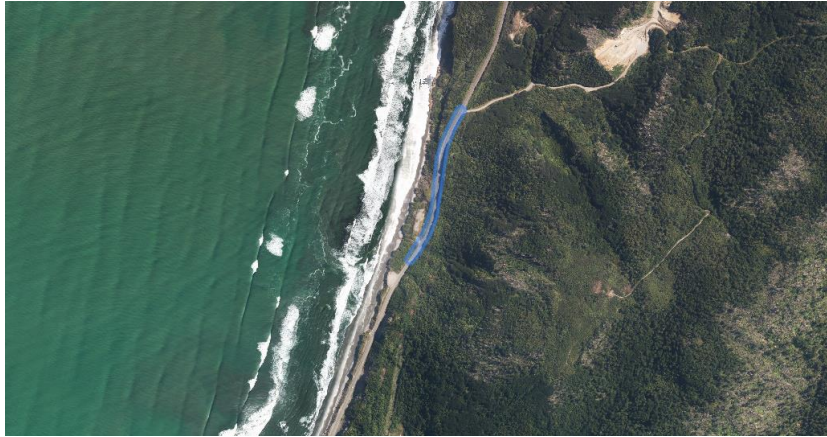
Extent and example views



<sup>11</sup> Street views sourced from Google Maps

Between approximately 850m travel distance north of Hollard Street and the access to the Nine Mile Mine

Extent and example views





Between approximately 650m travel distance north of Nine Mile Mine access and Nine Mile Creek bridge

Extent and example views



**Between 1423 Coast Road and the start of the northbound slow vehicle bay at Ten Mile Creek**

**Extent and example views**



**Between the end of the northbound slow vehicle bay at Ten Mile Creek and 1845 Coast Road**

**Extent and example views**



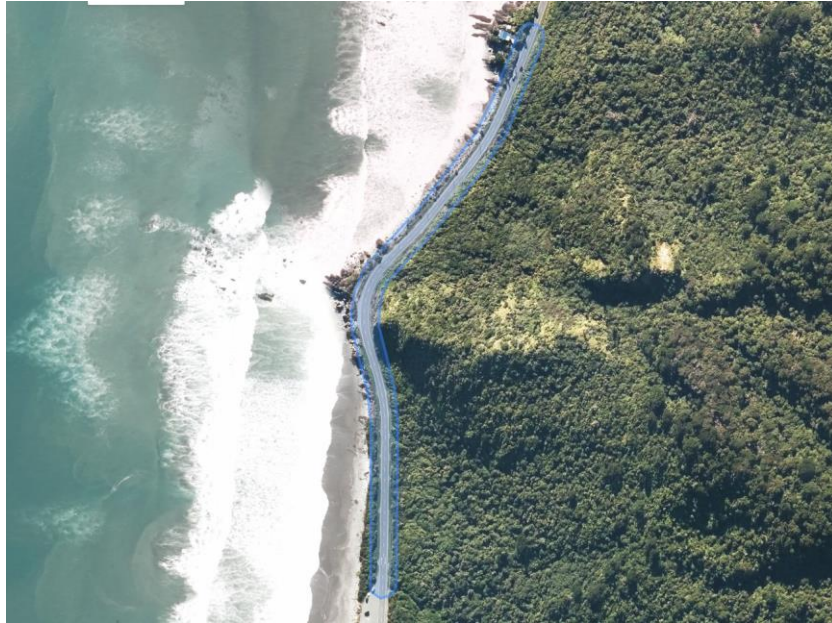
Between approximately 450m travel distance south of Thirteen Mile Creek bridge and Thirteen Mile Creek bridge

Extent and example views



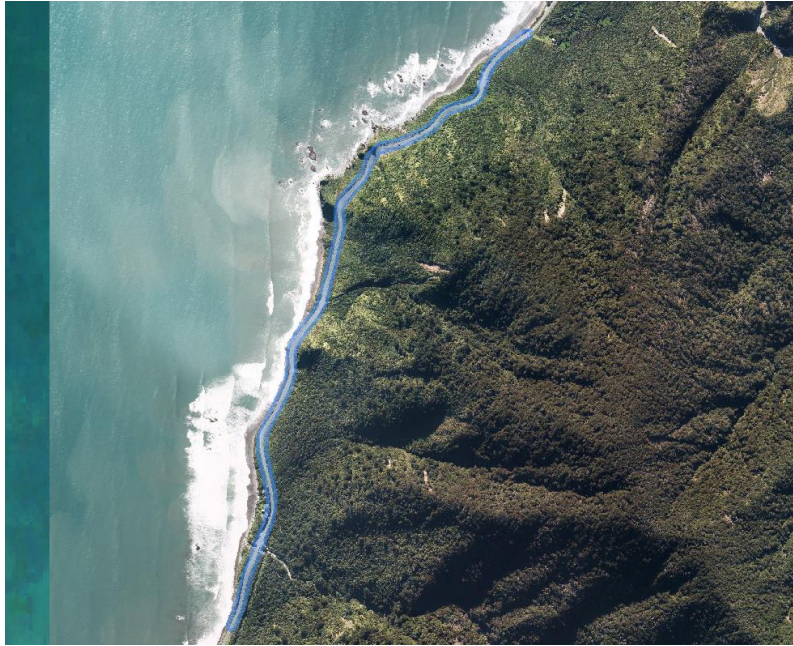
Between approximately 600m travel distance north of Thirteen Mile Creek bridge and 2085 Coast Road

Extent and example views



Between approximately 300m travel distance south of Fourteen Mile Creek bridge and 2364 Coast Road

Extent and example views





Attachment 5: Link to video “Cycling the Coast Road”, which is part of Suzanne Hills’ submission on the draft RLTP

<https://www.dropbox.com/scl/fi/vso5npkaimdxeukl9qct0/Suzanne-Hills-Cycling-the-Coast-Road.mp4?rlkey=iigeo3fdxytx96phr9gu1w7m8&dl=0>



## REPORTS

### 7.1 DOC request for changes to DOC funding in RLTP

|                        |                               |
|------------------------|-------------------------------|
| <b>Author</b>          | Lillie Sadler, Senior Planner |
| <b>Authoriser</b>      | Max Dickens, Policy Manager   |
| <b>Public Excluded</b> | No                            |

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#### Report Purpose

The purpose of this report is to outline the request from the Department of Conservation (DOC) to amend the DOC funding and work programme in the Draft RLTP, and seek the Regional Transport Committee's (RTC) approval to make these minor changes.

#### Recommendations

*It is recommended that the Committee resolve to:*

1. Receive the report.
2. Approve the changes sought by the Department of Conservation to their funding programme in the Draft Regional Land Transport Plan 2024, as outlined in their letter in Attachment 6 of this report.

#### Issues and Discussion

##### Current situation

The Department of Conservation (DOC) wrote to the Regional Transport Committee (RTC or the Committee) on 24 June 2024 requesting some changes be made to the Department's 10-year financial forecast in the Draft Regional Land Transport Plan (RLTP). DOC did not make a submission on the Draft RLTP seeking these changes, so this request is separate to the Draft

RLTP Hearing and Deliberations process, and can be considered by the Committee. The letter accompanies this report as Attachment 6.

Staff consider there is nothing substantive in updating the DOC financial information in the Draft RLTP that would trigger a need to consult the public on it. The changes do not have significant consequences for the Plan, and can be made as minor updates.

Sections 78 and 82 of the Local Government Act (LGA) require councils to consider the views and preferences of those "likely to be affected by, or to have an interest in, the matter". Staff consider that NZTA would be the only party who has an interest in these sections of the Plan. The letter was forwarded to NZTA for their response. The tests for targeted consultation in s82 of the LGA are therefore satisfied.

## **Considerations**

### **Implications/Risks**

There are no implications or risks arising from items in this report.

### **Significance and Engagement Policy Assessment**

There are no issues within this report which trigger matters in this policy.

### **Tangata whenua views**

No views were recorded on the matters covered in this report.

### **Views of affected parties**

No parties will be affected by the subject matter of this report.

### **Financial implications**

#### *Current budget*

There are no other budget implications that need to be addressed in this report.

#### *Future implications*

There are no other budget implications that need to be addressed in this report.

### **Legal implications**

There are no legal implications in regard to the recommendations in this report.

**Attachments**

Attachment 6: Letter from Department of Conservation seeking changes to DOC financials in Draft RLTP 2024



Department of  
Conservation  
*Te Papa Atawhai*

doc-7673315

24 June 2024

The Chairperson  
West Coast Regional Transport Committee  
West Coast Regional Council  
Email: [kaya.clement@wrc.govt.nz](mailto:kaya.clement@wrc.govt.nz) / max [dickens@wrc.govt.nz](mailto:dickens@wrc.govt.nz)

Dear Sir

### **Amendment to West Coast Regional Land Transport Plan**

The RLTP presently provides for expenditure of \$1.32m within work category 341 low-cost low risk in 2024/25. This is for the strengthening of the rock protection alongside the Franz Josef Road in South Westland.

I seek amendment of the RLTP to

- increase the low-cost low risk work category provision in 2024/25 for the strengthening work to \$1.85m (an increase of by \$530,000).
- reduce the provision in the RLTP for the renewal of the rock protection (work category 215) by \$400,000 in 2025/26, and \$130,000 in 2026/27 (an overall reduction of \$530,000).

The effect of the amendment being sought is to bring forward expenditure programmed for the Franz Josef rock protection. The proposed change is cost neutral over the three-year national land transport programme period.

My request reflects the ongoing work underway on the strategic design for the strengthening of the rock protection alongside the Franz Josef Glacier Access Road.

We believe that the work we can deliver through the increase in category 341 funding will negate the need for the structures renewals work in the 2024-27 period, although provision should be made for this to start again in 2027/28.

The primary benefits of the changes are as follows:

- a) Better management of risk of rock protection failure. This is accomplished in two ways:
  - First the structural integrity of the rock protection will meet design standard by the end of 2024/25 rather than the end of 2026/27.
  - Second, the likelihood of re-work due to structure failure between the annual physical works programmes is eliminated.
- b) Reduced exposure to cost escalations over physical works period. NZTA Waka Kotahi indices point to significant recent escalations in road maintenance costs and there is every likelihood that these trends will continue.

- c) The establishment costs of the 2025/26 and 2026/27 annual programmes are avoided.
- d) Because the work is confined to one year, disruption/degradation of experience will be felt by less visitors.
- e) The changes will be cost neutral for both DOC and NZTA Waka Kotahi. Rather than seeking to reduce funding, the avoidance of the costs listed in b) and c), will mean that more can be delivered with the available funding.

I understand that in terms of the significance policy within the RLTP (Appendix 1), public consultation is not required because

- the amendment relates to local road capital works.
- the work was a part of the draft RLTP that was consulted on earlier this year.
- The amendment relates to a variation to the total cost of an improvement project.

Our Operations Manager for South Westland, Wayne Costello, will attend your Committee's meeting on 5 July 2024 and will be able to speak in support of this request.

Naku noa, na



Owen Kilgour  
Director Regional Operations  
Western South Island Region  
[okilgour@doc.govt.nz](mailto:okilgour@doc.govt.nz)

## REPORTS

### 7.2 **Joint submission on NZTA Emergency works policy review**

|                        |                               |
|------------------------|-------------------------------|
| <b>Author</b>          | Lillie Sadler, Senior Planner |
| <b>Authoriser</b>      | Max Dickens, Policy Manager   |
| <b>Public Excluded</b> | No                            |

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#### Report Purpose

The purpose of this report is to outline the main points in the joint West Coast Council's submission on the New Zealand Transport Agency's (NZTA) Emergency works policy review.

#### Recommendations

***It is recommended that the Committee resolve to:***

1. Receive the report.

#### Report Summary

The joint West Coast Council's (excepting Westland District Council) submission on the NZTA Emergency works policy review was lodged on 19 June. The Westland District Council lodged their own submission due to a timing matter.

The main points in the joint submission are:

Several concerns with proposed policy changes which have the effect of reducing funding to local Road Controlling Authorities. These include:

- The change in qualifying return period for an emergency event to a minimum frequency 1-in-20-year event;
- Changes to bespoke FAR provisions which removes the NZTA Board's ability to consider the impact of extreme events on local communities' ability to recover and restore appropriate levels of service;

- The potential for increased local share for emergency works will likely be at the expense of our maintenance, operation, and renewal programmes.

The submission seeks the following actions by NZTA:

- Consider cumulative non-qualifying event impacts and how these are funded in the Emergency Works Policy Review.
- Engage with local communities, iwi, businesses, Civil Defence and other stakeholders to consider which parts of the network are prioritised to restore levels of service, and which parts may require consideration of a different level of service / alternative to recovery.
- Allow the Agency's well-established systems and processes, and experienced Investment Advisors to work with RCAs on the response to major events
- Increase funding for Resilience Improvements to build resilience in advance of an event and reduce the need for emergency works.

The submission accompanies this report as Attachment 7.

## **Considerations**

### **Implications/Risks**

The likely consequence of the proposed Policy changes, in conjunction with forecast intensity and frequency of future weather events, is a reduction in level of service to our communities and businesses, potential for longer term or permanent road closures, loss of access, and unintended negative social and economic consequences.

### **Significance and Engagement Policy Assessment**

There are no issues within this report which trigger matters in this policy.

### **Tangata whenua views**

No views were recorded on the matters covered in this report.

### **Views of affected parties**

No parties will be affected by the subject matter of this report.

### **Financial implications**

#### *Current budget*

There are no other budget implications that need to be addressed in this report.

*Future implications*

There is a real risk that cutting the amount of national funding available to Road Controlling Authorities for emergency roading repairs means District Councils' will have to use their own funds to undertake emergency work. More frequent and intense storm events resulting in flooding of roads and instability of adjoining land have highlighted the vulnerability of the West Coast roading network. The Region's small rating base makes the cost of carrying out emergency works a serious matter.

**Legal implications**

There are no legal implications in regard to the recommendations in this report.

**Attachments**

Attachment 7: Final Joint West Coast Council's submission on NZTA Emergency works policy review





# West Coast Councils – NZTA Emergency Works Policies Review Submission

## Our details

|                                |  |
|--------------------------------|--|
| <b>Name</b>                    | Simon Pickford<br>Paul Pretorius<br>Scott Baxendale<br>Darryl Lew  |
| <b>Email address</b>           | c/o: <a href="mailto:cbowie@rationale.co.nz">cbowie@rationale.co.nz</a>                                      |
| <b>Submitting on behalf of</b> | Westland District Council<br>Grey District Council<br>Buller District Council<br>West Coast Regional Council |

1. Buller, Grey, Westland District Councils and West Coast Regional Council (West Coast Councils) jointly provide the following feedback to the NZTA Emergency Works Policies – review and consultation.

### Summary Comments:

2. The Councils acknowledge the shared challenge that both NZTA and local Road Controlling Authorities (RCA) are experiencing to sustainably fund our response to the increasing scale and intensity of weather-related events.
3. While helping NZTA to address NLTF funding pressure, the proposed changes to the eligibility criteria and funding assistance rates will transfer considerable costs and risk to (local) Road Controlling Authorities (RCA) who are themselves under extreme pressure on their local share to fund core maintenance, operation, and renewal activities.
4. More frequent and intense storm events resulting in flooding of roads and instability of adjoining land have highlighted the vulnerabilities of the West Coast network, and how this creates disruptions and at times, displacement for our communities. Examples of the impact of such network disruptions include stranded tourists, no ability to move fast moving consumer goods and freight, impact on primary industries such as extraction industry, mining and farming, impact on Westland Milk Products and milk tankers, loss of access to Department of Conservation activities, pest control, estate management and the various Great Walks.
5. The likely consequence of the proposed Policy changes, in conjunction with forecast intensity and frequency of future weather events, is a reduction in level of service to our communities and businesses, potential for longer term or permanent road closures, loss of access, and unintended negative social and economic consequences.

## Feedback on Proposed Changes:

6. **Note with concern** the change in qualifying return period for an emergency event to a minimum frequency 1-in-20-year event. This is a significant event size increase, and as event return periods are changed as climate models are updated it is likely that a qualifying 1-in-20-year event today could soon be a non-qualifying 1-in-15-year event. Further, NIWA forecasts for weather-related events through to 2040, under the RCP 4.5 projection, predict increased intensity of (ex)tropical cyclones, short duration (1 hour) extreme rainfalls +13.6% per 1°C increase, and long duration (1-in-2-year, 120-hour duration) rainfall events +4.8% for every 1°C increase. A further note is that some routes can be impacted and closed by any event with any return period and a more robust trigger on road reinstatement support from Central Government may in fact be based on the road's importance level in the ONF.
7. **Note with concern** the change in enhanced FAR from +20% to +10% for events exceeding 10% of annual maintenance spend. This change is compounded by the significant increases in maintenance costs the RCAs are experiencing so the dollar trigger is much higher than it is for the 2021-24 approved NLTP programme. The impact of this is the % increase in cost to RCAs increases at a higher rate than the % savings to the NLTF.
8. **Note with concern** the change to bespoke FAR provisions proposing removal of NZTA's role as funder of local share when an Approved Organisation (AO) cannot afford its local share, and that this would only apply if matched by Crown top-up to NLTF. This is a significant change to the status quo and removes NZTA Board's ability to consider the impact of extreme events on local communities' ability to recover and restore appropriate levels of service. Buller District Council is now completing emergency works from devastating 2021 and 2022 storm events with capital works in the order of \$16.5m. This was delivered with a 95% bespoke FAR, for which Council is very grateful to NZTA, and without this support the community of Buller (low density population and high deprivation) would not have been able to deliver this return to service for our communities. Without such funding, it is likely Council would have had to reallocate expenditure from its core maintenance and renewals programme resulting in poor road maintenance outcomes.
9. **Recommend** NZTA consider cumulative non-qualifying event impacts and how these are funded in the Emergency Works Policy Review. The West Coast regularly experiences highly localised and relatively short duration rainfall events which fall below the current 1-in-10-year and 10% annual maintenance spend triggers per event. However, given the regular frequency of these which have a 1-in-2-year return period the cumulative effect of these events and annual cost to respond is significant. It is a bit like the straw that breaks the camel's back, lots of small events can lead to a significant failure and loss of service.
10. **Recommend** NZTA collaborate with RCAs in the Network Outcome Contract regions to take a cohesive approach to planning and investment that will mitigate / minimise the impact of future events, and to engage with local communities, iwi, businesses, and other stakeholders that consider which parts of the network are prioritised to restore levels of service, and to consider which parts may require consideration of a different level of service / alternative to recovery. Given the inter-dependency between local roads and the state highway network, particularly on the West Coast, we believe a multi-agency approach is vital.
11. **Recommend** our Civil Defence / Emergency Management colleagues to be included in discussions about appropriate response to emergency events, including engagement with the community on reduced levels of service or alternate approaches to recovery as proposed.
12. **Note with concern** the potential to deal with multiple Crown agencies where a bespoke FAR is agreed. Our experience with this process is that it often requires government Ministers sign-offs, it is particularly inflexible, inefficient, and does not always lead to the best outcomes from a recovery or asset management perspective, including inability to make change as recovery unfolds.

13. **Request** use of NZTA's well established systems and processes, and experienced Investment Advisors to work with RCAs on the response to major events as the primary point of collaboration between RCAs and external Crown agencies and Minister's offices.
14. **Note with concern** the timeline for implementation which may require increased funding during the upcoming NLTP period. The Council's are well progressed in their Enhanced Annual Plan process and the West Coast Regional Land Transport Plan has already been consulted on. Development of these documents has required substantial prioritisation of budgets within a constrained funding envelope, the potential for increased local share for emergency works will likely be at the expense of our maintenance, operation, and renewal programmes.
15. **Recommend** funding for WC140: Minor Events is increased to accommodate the increased demand for funding likely to result from more events qualifying under this funding category due to the proposed 1-in-20-year event change.
16. **Recommend** increased funding for WC357: Resilience Improvements to build resilience in advance of an event and reduce the need for emergency works.
17. **Support** the updated definitions of like for like to ensure it is modern enough to officially include some level of resilience improvement.
18. **Recommend** the updated definition of 'current design standards' provide clarity on what 'improvements of a minor nature to restore level of service' and 'meeting engineering requirements to manage the risk and consequence of hazards' means in practice given that 'improvement in resilience' is excluded. What is the threshold where meeting engineering requirements becomes an improvement?  
  
As an example, if a drainage facility or retaining wall is currently not sufficient to manage the risk and consequence of hazards and subsequently fails, presumably an improvement in resilience is needed to restore levels of service and manage this known risk. Does this meet the definition of current design standards or is this considered a resilience improvement and does not qualify under WC140 or WC141. There would need to be clear direction and clarity on such matters.
19. **Support** the proposal to make it easier to apply for resilience improvements after an event.
20. **Recommend** NZTA prioritise funding for improvement works to be carried out at the same time as emergency works, this may be in the form of an unallocated fund for resilience improvements to be approved after an event.
21. **Recommend** NZTA provide support via WC003: Investment Management for the AMP improvements needed to identify potentially uneconomic roads and to carry out the proposed condition of an enhanced FAR where the "AMP has considered, in advance, which parts of the network are prioritised to restore LOS, and which parts may require consideration of a different LOS / alternative to recovery".

**Undersigned:**

Simon Pickford  
CEO, Buller District Council



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Paul Pretorius  
CEO (acting), Grey District Council



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Scott Baxendale  
CEO (acting), Westland District Council

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Darryl Lew  
CEO, West Coast Regional Council



**7.3 Report on Speed Management Rule Consultation****Author** Max Dickens, Policy Manager**Authoriser** Jocelyne Allen, Group Manager**Public** No**Excluded****Report Purpose**

This report seeks the Committee's agreement to submit the attached consultation on the draft Setting of Speed Limits Rule 2024 (the Rule).

**Report Summary**

The Government is proposing an amendment to the Rule that outlines how councils set limits on local roads. This Rule requires that councils have variable speed limits in front of schools at pickup and drop off times, but requires that all other speed changes that were decided under the prior Rule, and potentially beyond that, be reversed.

The draft submission highlights that this new Rule does not account for whether the proposed limits received local support, the significant costs associated with undoing work that is already underway, and the unnecessary burden the new Rule places on councils. It also notes that councils control local roads and this level of overreach by central government is a very bad precedent to set.

**Recommendations**

***It is recommended that the Committee resolve to:***

1. *Receive this report.*
2. *Approve Attachment 8 for submission to the Ministry of Transport.*

**Issues and Discussion****Background**

The initial setting of the Speed Limits Rule was signed in 2022 and required all RCAs to set variable speed limits outside of all schools by 2027, and review all 70km/h limits. Some Road Controlling Authorities (RCAs) chose to reduce limits further based on best-practice safety information, NZTA's Safe and Appropriate Speed (SaaS) guidance, and public feedback.

The four Councils on the West Coast decided to administer a single, regional Speed Management Plan for the sake of efficiency. This Plan was relatively conservative in its approach, mainly adhering to the minimum requirements to lower limits around schools. However, it also included some small, fixed speed zones around schools, a handful of roads that are regularly raised by local residents as a cause for concern, or were more appropriate at a lower speed.

In the spirit of the Regional Speed Management Plan (the Plan) that was developed for the sake of efficiency and consistency, West Coast Regional Council officials have coordinated with the three District Councils to review the Rule and place a combined submission on behalf of the West Coast. The District Councils may also provide individual submissions that address more localised concerns.

### **Current situation**

The Government has released a new Rule for consultation, closing on 11 July 2024. The Rule effectively takes away the ability for councils to change the limits on the roads that they control as RCAs. It does this by placing an extremely unreasonable and disproportionate amount of requirements in the way of councils to set new limits. *Proposal 4* of the consultation document also appears to suggest that all setting of speed limits will effectively come under Ministerial control, which is extremely concerning.

The new Rule will require Councils to undertake a bespoke cost-benefit analysis for every road that is considered for a speed change, followed by 4 weeks of extensive consultation. This is an unreasonable amount of work to place on councils, particularly smaller ones, for a relatively minor change to the roads that they control. It also dictates the way in which cost-benefits can be assessed, and severely limits the information that officials are able to utilise.

This Rule has notable implications on our District Councils as it may force them to roll back safety improvements that are already implemented and received public support. It will also have significant impacts on our ability to review speed limits in the future. It is extremely wasteful for councils that elected to go further than the minimum requirements with their Plans, overrides the will of local residents, and their elected officials.

Many schools on the West Coast have already expressed high levels of support, and now expect improved safety for their students. Some of this work has already commenced. This means that RCAs will now have to spend more money on getting worse safety outcomes. The new Rule will not significantly improve for children travelling to school as it mandates that councils cannot choose the distance of limit

changes from the school gates, and because of other changes to the requirements around signage.

### **Options Analysis**

Option 1: Approve the draft submission in Attachment 8 as written for submitting to the Ministry of Transport.

Option 2: Approve the draft submission in Attachment 8 with amendments for submitting to the Ministry of Transport.

Option 3: Do not provide a submission on the proposed Rule.

### **Costs and Benefits**

The social costs of road crashes on the West Coast in 2023 was \$169m.<sup>1</sup> The future costs of any proposed speed changes will be enormous given the increased requirements on RCAs.

Providing a submission on the proposed Rule does not cost anything and may result in positive changes to the Rule that benefit the Councils that are responsible for local roads.

## **Considerations**

### **Implications/Risks**

The largest risks are Councils effectively losing the ability to control the roads that they have authority over, and our roads continuing to have poor safety outcomes. As well as the immediate social and economic cost, perceptions of safety also limit the freedom of people to travel by different modes. For example, the ability of children to cycle to school.

### **Significance and Engagement Policy Assessment**

This proposal triggers multiple aspects of the Significance and Engagement Assessment:

- Community interest is relatively high and the likely consequences are controversial.

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<sup>1</sup> <https://www.transport.govt.nz/area-of-interest/safety/social-cost-of-road-crashes-and-injuries>

- Affects the level of service West Coast District Councils are able to provide their ratepayers, as it will be significantly more difficult and expensive to implement safety improvements in the future.
- The proposal will affect a large portion of the community.
- Speed changes have already been consulted on. This policy overrides that, even if the proposal received high levels of public support.

### **Attachments**

Attachment 8: West Coast combined submission on the draft Speed Limit Rule.

Attachment 9: Setting of Speed Limits 2024 Consultation Document





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11 July 2024

**Ministry of Transport**

3 Queens Wharf,  
Wellington Central,  
Wellington 6011

Email address: [speedrule@transport.govt.nz](mailto:speedrule@transport.govt.nz)

Dear Sir/Madam

**Submission on Land Transport Rule: Setting of Speed Limits Rule 2024**

Thank you for the opportunity to submit on the Government's draft Land Transport Rule: Setting of Speed Limits 2024. The combined submission from Buller, Grey and Westland District Councils, and West Coast Regional Council is below.

Our contact details for service are:

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Yours faithfully

Darryl Lew  
**Chief Executive**

# West Coast Regional Council Submission on the draft Setting of Speed Limits Rule 2024

The West Coast Regional Council (WCRC or the Council) appreciates the opportunity to submit on the Government's draft Rule. In the spirit of the Regional Speed Management Plan (Plan) that was developed for the sake of efficiency and consistency, West Coast Regional Council officials have coordinated with the three District Councils to review the Rule and place a combined submission on behalf of the West Coast.

This submission addresses the technical aspects of the new Rule and has been approved by the West Coast Regional Transport Committee. The Committee has representatives from Buller, Westland, and Grey District Councils, WCRC and NZTA. DOC also sits on the Committee in an advisory, non-voting capacity. This submission is addressing the Rule at a higher, regional level. The District Councils will also potentially provide their own submissions to address more particular issues in their areas.

## Submission

### *Proposal 1 – require cost benefit analysis for speed limit changes*

1. Requiring a cost-benefit analysis (CBA) for each change is placing an unreasonable administrative load on Councils for what is a relatively minor change to the roads that we, not central government, have authority over.
2. Even a simple CBA based on fixed speed limits and the NZTA cost-benefit guidebook is a significant amount of work. This is well beyond the capacity and capabilities of all but the largest Councils.
  - a. Most Councils will be forced to engage with external contractors to develop CBAs. This is not an efficient use of ratepayer money.
3. It is likely that this will deter most Councils from making safety improvements on their roads, even if there is overwhelming public support.
4. Low levels of safety on our transport network already places significant strain on public finances.
  - a. Beyond deaths and serious injuries, reducing safety on our roads has other hidden effects such as parents not being able to allow children to cycle to school.
5. The new Rule removes the capacity to account for these hidden effects when developing a CBA. This is inconsistent with the NZTA cost-benefit manual, and all prior information on CBA development.

### *Proposal 2 – strengthen consultation requirements*

6. Breaking down the requirement to consult road by road, and making the requirement 4 weeks is neither efficient nor effective.
  - a. Again, it should be noted that local councils are RCAs and the limits in question fall within our purview.

7. It is extremely wasteful for Councils that elected to go further than the bare minimum requirements with their Plans. It overrides the will of local residents, their elected officials, costs more, wastes huge amounts of time spent on this by officials, and will have worse safety outcomes.

*Proposal 3 – require variable speed limits outside school gates*

8. The proposal does not account for the safety of children that walk or cycle to school once they are beyond 300m away from the school gates.
9. Schools do not necessarily abide by the hours stated in the new Rule.
10. Many schools on the West Coast have already expressed high levels of support, and now expect (or are enjoying) improved safety for their students.
  - a. Some of this work has already commenced. This means that Councils will now have to spend more money on getting worse safety outcomes.
11. Changing the Traffic Control Devices Rule to allow for static signs will save money but have poor safety outcomes.
  - a. Studies have already shown that flashing signs are the most effective means of slowing traffic other than traffic calming. A fixed sign with extremely small text will have little to no impact on mean speeds, and only serve to enable police enforcement.

*Proposal 4 – introduce a Ministerial Speed Objective*

12. Given the level of central-government overreach that this Rule already provides, *Proposal 4* seems to suggest full Ministerial control of all national speed limits. This is unconstitutional.

*Proposal 5 – changes to speed limit classifications*

13. These changes are contrary to all available data and international best-practice.
14. Deaths and serious injuries on our road network are high per-km compared to other countries. This proposal will not improve safety.

*Proposal 6 – update the Director's criteria for assessing speed management plans for certification*

15. The breadth and depth of requirements being placed on Councils to undertake relatively minor changes are disproportionate and unreasonable.

*Proposal 7 – reverse recent speed limit reductions*

16. This Rule will have a huge impact on other Councils who proposed further reaching speed reductions, and will have substantial impacts on our ability to review speed limits in the future.
17. This Plan was relatively conservative in its approach, mainly adhering to the minimum requirements to lower limits around schools.
  - a. These are a mixture of fixed and variable speed zones, dependent on their location and use.

18. However, it also included a handful of roads that are regularly raised by local residents as a cause for concern, were more appropriate at a lower speed, or have high levels of near misses /crashes.
19. The timeframes to reverse current work may also be too short for operations teams.

*Other comments*

20. We propose returning to the original Setting of Speed Limits Rule, or the legislation it replaced, as both allowed for Councils to decide and set the speed limits that are most appropriate for their local area.

This ends our submission.

## INTRODUCTION

This document explains the purpose and intent of the draft *Land Transport Rule: Setting of Speed Limits 2024* (the draft Rule) that, once finalised, will replace the *Land Transport Rule: Setting of Speed Limits 2022* (the 2022 Rule).

Consultation gives the people and organisations affected by the changes an opportunity to present their views and will help ensure the new Rule is sound, robust and implementable.

We welcome your comments on the proposed changes set out in these documents. Please use the consultation questions to guide your feedback. In particular, we welcome your thoughts on:

- implementation or compliance issues that should be considered;
- costs associated with implementing the proposals;
- any unintended impacts that could arise.

### **Sending your submission**

You can fill out the online survey included in this page or you can email your submission to [speedrule@transport.govt.nz](mailto:speedrule@transport.govt.nz).

### **Your submission may be shared with the New Zealand Transport Agency**

The Ministry of Transport may share your submission and identifying information with the New Zealand Transport Agency (NZTA) for submissions analysis purposes.

### **We may use an artificial intelligence tool to help us analyse submissions**

We may use an AI tool to help us analyse submissions. We will take steps to avoid inputting personal information into any AI tool that is outside our network.

### **Your submission is public information**

Please note your submission may become publicly available. The Ministry of Transport may publish any information you submit and may identify you as the submitter should it publish your submission. Therefore, **please clearly indicate if your comments are commercially sensitive or should not be disclosed for another reason, or the reason why you should not be identified as the submitter**. Any request for non-disclosure will be considered under the Official Information Act 1982.

# PROCESS FOR MAKING RULE CHANGES

Land Transport rules are secondary legislation made under the *Land Transport Act 1998* (the Act).

The Act provides the Minister of Transport the power to make ordinary rules covering a range of land transport issues. The Minister may make rules to achieve a range of outcomes, including, but not limited to:

- Assisting economic development
- Safeguarding and improving land transport safety and security
- Improving access and mobility
- Protecting and promoting public health.

The Act also enables land transport rules to set, or provide for the setting of, speed limits for roads. Rules can empower or require road controlling authorities (RCAs) to set speed limits, and set out the criteria, requirements and procedures to be complied with by an RCA when doing so.

Compliance with rules is required because they form part of New Zealand transport law.

The Ministry is undertaking this consultation on behalf of the Minister and will analyse submissions received before making recommendations to the Minister on the final version of the Rule. The Ministry may involve NZTA in analysing submissions and making final recommendations to the Minister. The Minister will then sign the new Rule.

## **Matters the Minister must have regard to when making rules**

The Act sets out the matters the Minister must have regard to when making a rule (in section 164(2)). In summary, these are:

- Nature of the proposed activity or service for which the rule is being established
- The level of risk existing to land transport safety in general in New Zealand
- The need to maintain and improve land transport safety and security
- Appropriate management of infrastructure, including (but not limited to):
  - the impact of vehicles on infrastructure
  - whether the costs of the use of the infrastructure are greater than the economic value of the infrastructure
- Whether a proposed rule:
  - assists economic development
  - improves access and mobility
  - protects and promotes public health
  - ensures environmental sustainability
- Costs of implementing the proposed changes
- New Zealand's international obligations concerning land transport safety

## **Having regard to those matters for the proposed Land Transport Rule.**

### *Proposed activity or service*

The draft Rule sets out criteria, requirements and procedures to be followed by RCAs when reviewing and setting speed limits for roads within their respective jurisdictions.

### *Risks to land transport safety*

Under the draft Rule, speed limit reductions introduced since 1 January 2020 on local streets will be reversed. These will be replaced with variable 30 km/h speed limits outside school gates during drop-off and pick-up times to slow down traffic as children enter or leave school. Speed limit reductions made since that date on arterial roads will be reversed. Speed limit reductions on rural State highways since that date will also be reversed, unless there is demonstrated public support to keep the lower speed.

Reversing certain types of reduced speed limits may result in higher average operating speeds. The level of impact on land transport safety that could result from increased operating speeds is difficult to quantify due to uncertainty about which roads will have speed limits increased and what impact those speed limit increases will have on operating speeds. Operating speeds are dictated by a range of factors, including the posted speed limit, congestion and engineering of the road.

The proposal to require variable speed limits outside school gates is intended to improve safety outcomes for young New Zealanders by reducing operating speeds when children are arriving at or leaving school. The impact on land transport safety outside schools is difficult to quantify.

### *Appropriate management of infrastructure*

The draft Rule will impact on the management of infrastructure. At a minimum, speed limit changes will require changes to signage. The draft Rule and subsequent speed limit changes may also result in wider engineering changes to accommodate new speed limits (either higher or lower) depending on decisions taken by RCAs.

### *Assists economic development*

The draft Rule may lead to some economic benefits in reducing travel times.<sup>1</sup>

The draft Rule may result in decreased vehicle operating costs on some stretches of road.

### *Improves access and mobility*

Increasing speed limits may impact people's transport choice and access.

Increasing speed limits may improve access where it results in increased operating speeds and reduced travel times. As noted above, whether operating speeds increase is dependent on a number of factors. The exact impacts are difficult to quantify.

### *Protects and promotes public health*

Where speed limits are increased, operating speeds may increase (depending on congestion and other factors). Increased operating speed may increase noise pollution. The exact impacts are difficult to quantify.

The proposal to require variable speed limits outside school gates is intended to improve safety outcomes for young New Zealanders by reducing operating speeds when children are arriving at or leaving school. The impact on public health from this proposal is difficult to quantify.

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<sup>1</sup> See, for example, Rowland and McLeod (2017), Time and fuel effects of different travel speeds, available at <https://www.nzta.govt.nz/assets/resources/research/reports/582/RR-582-Time-and-fuel-effects-of-different-travel-speeds.pdf>

### *Ensures environmental sustainability*

The New Zealand Emissions Trading Scheme (ETS) is the Government's key tool to reduce emissions. All emissions from the transport sector must be offset through the purchase of emissions units in the ETS.

### *Costs of implementing the proposed changes*

There will be implementation costs to RCAs, for example, in undertaking cost benefit analysis and implementing speed limit changes. Funding decisions to cover the costs of implementation or part of the costs will be taken by NZTA as part of the National Land Transport Programme processes. Any remaining costs will fall on local RCAs.

### *International considerations*

The new Rule will have no direct impact on our international circumstances or obligations in respect of land transport safety.



# OVERVIEW OF THE DRAFT RULE

## The draft Rule gives effect to the Government's objectives

The draft Rule implements the next step in delivering on the Government's commitment to stop and reverse the previous government's blanket speed limit reductions by replacing the *Land Transport Rule: Setting of Speed Limits 2022* (the 2022 Rule).

The Minister of Transport has signalled the Government's vision for a land transport system that boosts productivity and economic growth and allows New Zealanders to get to where they want to go, quickly and safely. The draft Rule proposes a more balanced approach to setting speed limits to ensure economic impacts and the views of local communities and road users are considered alongside safety. It enables a targeted approach to reducing speed limits that focuses on high crash areas and public acceptability. The draft Rule also proposes to require reduced variable speed limits outside all school gates during drop-off and pick-up times, and will enable speed limits on expressways to be set at 110km/h more easily.

## The draft Rule retains aspects of the existing framework

### **Speed management plans are retained but with some amendments.**

RCAs may develop speed management plans for speed limit changes in line with the requirements of the draft Rule. Plans can also include information about safety infrastructure treatments and speed cameras.

Speed management plans provide a mechanism for identifying and consulting on proposed speed limit changes as a package rather than making ad hoc proposals on an ongoing basis. This improves efficiency and provides more predictability for planning and funding purposes. However, the draft Rule does not require RCAs to include a 10-year vision or take a whole-of-network approach as required under the 2022 Rule. Rather, it proposes that analysis of speed limit changes will need to be undertaken road by road. It also moves away from mandating the production of speed management plans on a regular cycle, and makes plans voluntary for RCAs.

The draft Rule retains the alternative method for setting speed limits outside the speed management plan process with the Director of Land Transport's (the Director) approval. RCAs can use the alternative method to set speed limits on new roads or to respond to changes on the network (such as the installation of a roundabout) that cannot wait until the next speed management plan, or if the RCA does not have a speed management plan. RCAs using the alternative method will need to meet some new requirements. In particular, RCAs must undertake a cost-benefit analysis of the proposed new speed limit, and set the speed limit using the new speed limit classifications. The process for setting temporary speed limits is retained.

The draft Rule retains the process for non territorial authority RCAs (for example, an airport authority or the Department of Conservation) to set speed limits. These RCAs will follow the same process as set out in Section 6 of the 2022 Rule.

The process for entering speed limits into the Register of Land Transport Records is proposed to stay the same. The Register will continue to give effect to all permanent, variable, emergency and seasonal speed limits.

### **The process for certifying speed management plans remains largely unchanged.**

Speed management plans will continue to be certified by the Director. If an RCA chooses to develop a speed management plan, when submitting it for certification, it will be required to confirm that the relevant requirements of the Rule have been met. If the Director is satisfied the plan meets the requirements set out in the Rule, they must certify the plan. If the Director is not satisfied, they

must refer it back to the RCA with reasons for the plan not meeting the requirements. There are proposed updates to the information RCAs must provide to the Director when submitting plans for certification (see proposal 6).

**The draft Rule retains the definitions and process for determining school categories 1 and 2**

Most schools will be category 1 and be required to implement variable 30km/h zones outside their gates (see proposal 3). RCAs can designate a school as category 2 in their speed management plans or through the alternative method. Category 2 schools can have a variable speed limit of between 40km/h and 60km/h.

# DRAFT SETTING OF SPEED LIMITS RULE

## Proposal 1 – require cost benefit analysis for speed limit changes

**The draft Rule requires RCAs to undertake cost benefit analysis (CBA) when consulting on proposed speed limit changes.**

The proposed changes will ensure economic impacts are considered alongside safety and road user and local community views when changing speed limits.

CBA helps ensure that decision-makers are well informed about how decisions impact on people and supports good evidence-based decision-making. A CBA is primarily about organising available information in a logical and methodical way to evaluate the economic impacts. Under the draft Rule, the CBA forms part of the evidence base RCAs use to make decisions on proposed speed limit changes.

The draft Rule proposes that RCAs must undertake CBA for each road and consider the following impacts:

- Safety (including changes in the number and severity of crashes); and
- Travel time (including changes in mean operating speed); and
- Implementation costs (including planning, road signs and markings, installation costs, overheads, consultation and administration costs).

Benefits include any positive impacts attributable to the proposed speed limit changes (for example, reduced travel times and reduced number and severity of crashes). Costs include any negative impacts attributable to the change (for example, increased travel times and increased number and severity of crashes) and implementation costs. To calculate the benefit cost ratio, benefits are divided by the costs. The approach *would not* enable negative impacts like increased travel times to be treated as a disbenefit for the purposes of calculating any benefit cost ratio.

To simplify the approach for RCAs, the CBA requirements focus on the more limited range of impacts outlined above.

NZTA guidance will provide more information on how to undertake CBA.

CBA will be required when proposing future speed limit changes (see proposal 4). It will not be required when setting variable speed limits outside school gates (see proposal 3).

The Ministry and NZTA are continuing to test the way CBA requirements are applied through sensitivity analysis. This will be considered alongside submission feedback to provide final recommendations on the Rule.

## Questions

*Do you have any comments on the above proposals?*

## Proposal 2 – strengthen consultation requirements

### **The draft Rule ensures RCAs undertake genuine consultation and increases transparency of decisions in response to feedback received.**

The 2022 Rule requires RCAs that are territorial authorities (city and district councils) to follow the consultation principles set out in the *Local Government Act 2002*. NZTA (RCA for the State highways) is required to publish the draft State highway speed management plan on its website and give at least four weeks for interested parties to make written submissions.

The intent of *Local Government Act 2002* consultation requirements is retained in the draft Rule, with some additions. To ensure NZTA follows the same process for proposed changes on State highways, the draft Rule extends the requirements to NZTA.

The draft Rule proposes that all RCAs follow the same consultation requirements, that is, they must:

- Use reasonable efforts to consult with persons that use the road for which a speed limit change is proposed, freight users, local communities, businesses and schools surrounding the impacted area, and local government (for example, neighbouring RCAs).
- Publish the draft speed management plan and cost benefit analysis on a website and give at least four weeks for any interested party to make a submission.
- Following consultation, publish a summary of submissions and include an explanation of how feedback was taken into account in the final speed limit changes.

Proposed speed limit changes on each road must be presented separately in consultation to allow for consultation feedback on each road that is changing.

Strengthening the current consultation requirements will increase transparency by requiring RCAs to explain how they considered feedback.

## Questions

*Do you have any comments on the above proposals?*

## Proposal 3 – require variable speed limits outside school gates

### **The draft Rule requires variable speed limits outside school gates during school travel periods.**

The draft Rule defines *outside a school gate* as a stretch of road immediately adjacent to a gate or other access used by students to enter or leave the school, measuring:

- 300 metres for category 1 schools
- 600 metres for category 2 schools.

RCAs will work with schools to identify eligible school gates. Schools will have many different examples of gates or access points, and not all will need to be treated. However, if the gate is adjacent to a road and is used by children entering and leaving school, it should be included.

The proposed lengths are based on the minimum road length for speed limits outlined in the schedule and are total length (not 300 metres either side of a gate). These lengths will not work for every road outside a school gate and the Rule allows for variation to meet specific circumstances.

The draft Rule defines school travel periods as 8-9.30am and 2.30-4pm on school days.

During these times, the speed limit will be 30km/h for category 1 schools and between 40km/h and 60km/h for category 2 schools. At all other times the speed limit will be the posted limit.

Variable speed limits already implemented around schools, even if they do not meet the new definition of *outside the school gate*, can remain. However, permanent speed limit reductions already implemented around schools will need to meet the new requirements. This is discussed further in proposal 7.

The proposed deadline for all roads to meet the new variable speed limits outside school gates requirement is 31 December 2027.

The *Land Transport Rule: Traffic Control Devices 2004* (TCD Rule) describes the requirements for road signage and markings. When implementing variable speed limits, the TCD Rule requires electronic variable speed limit signs to be installed on the main road. The current static variable speed limit signs can only be used on give way- or stop sign-controlled side roads adjacent to the main road. This is due to the size of the font on the static sign and legibility requirements.

Electronic variable signs cost more than static signs and incur ongoing maintenance costs. To enable a more cost-effective solution, we are seeking feedback on amending the TCD Rule and the *Land Transport (Road User) Rule 2004* to allow static variable speed limit signs on main roads during default school travel times.

The proposed amendment to the TCD Rule would allow static variable speed limit signs on main roads. We propose the existing sign could be used in urban areas and larger static signs would be required in rural areas with higher speeds. Electronic signs would continue to be an option in all environments.

We are also proposing to amend the Road User Rule to introduce default variable speed limit times. The default school travel periods would be reflected in the Road Code and drivers would be expected to be familiar with them and know to slow down around schools during travel periods.

Once finalised, the new Rule will be widely communicated by NZTA to increase public awareness and understanding of the requirements, including the default variable speed limit times.

The requirement in clause 5.3(3) of the 2022 Rule to review speed limits for category 2 schools in the next speed management plan is proposed to be revoked – if a road outside a category 2 school has a variable speed limit this can remain.

## Questions

*Do you have any comments on the above proposals?*

## Proposal 4 – introduce a Ministerial Speed Objective

**The Objective will set out the Government’s expectations for speed management.**

The draft Rule proposes to introduce a Ministerial Speed Objective as a tool which allows the Minister of Transport to set out the Government’s expectations for speed management. Through the Objective, the Minister can signal the pace, scale and focus of change they expect RCAs to work to. The Objective could include types of roads, percentage of the roading network, or other criteria RCAs should focus on.

RCAs must have regard to the Objective when proposing any speed limit changes and include an explanation in their speed management plan as to how the RCA has had regard to the Objective in developing the speed management plan.

## Questions

*Do you have any comments on the above proposals?*

## Proposal 5 – changes to speed limits classifications

**The draft Rule proposes a schedule of speed limits classifications for each road type.**

The draft Rule proposes to introduce a binding schedule of speed limit classifications that specify speed limits available for each road type. When making speed limit changes, RCAs will need to align the proposed speed limit with the schedule of classifications. There will be limited exceptions to this. NZTA guidance will include information on exceptions and criteria for choosing a speed limit from within any range in the classification.

The schedule moves back to more standardised speed limits in urban areas (50 km/h) and interregional connectors (100 km/h). The exceptions enable variation in certain instances to improve road safety outcomes.

The intent of the draft Rule is to make it easier to set 110km/h speed limits by removing the Director’s approval process on roads that are built and maintained to support that speed limit.

### Table of speed limit classifications

| Urban streets | Class of road    | Description   | Current guidance | Proposed speed limit |
|---------------|------------------|---|------------------|----------------------|
|               | Urban streets    | Residential and neighbourhood streets, and streets that provide access to and support businesses, shops, on-street activity and services. | 30 – 40 km/h     | 50 km/h              |
|               | Civic spaces     | Streets mainly intended for localised on-street activity with little or no through movement.  | 10 – 20 km/h     | 10 – 20 km/h         |
|               | Urban connectors | Streets that provide for the movement of people and goods between different parts of urban areas, with low levels of interaction          | 40 – 60km/h      | 50 – 80 km/h         |

|                    |                          |  |               |               |
|--------------------|--------------------------|--|---------------|---------------|
|                    |                          | between the adjacent land use and the street.  |               |               |
|                    | Urban transit corridors  | Urban motorways and corridors that provide for movement of people and goods within an urban environment.   | 80 – 100 km/h | 80 – 100 km/h |
| <b>Rural roads</b> | Peri-urban roads         | Roads that primarily provide access from residential property on the urban fringe, where the predominant adjacent land use is residential, but usually at a lower density than in urban residential areas. | 50 – 80 km/h  | 50 – 80 km/h  |
|                    | Stopping places          | Rural destinations that increase activity on the roadside and directly uses the road for access  | 40 – 80 km/h  | 50 – 80 km/h  |
|                    | Rural roads              | Roads that primarily provide access to rural land for people who live there and support the land-use activity being undertaken.  | 60 – 80 km/h  | 80 – 100 km/h |
|                    | Rural connectors         | Roads providing a link between rural roads and interregional connectors.   | 60 – 100 km/h | 80 – 100 km/h |
|                    | Interregional connectors | Roads that provide for movement of people and goods between regions and strategic centres in a rural context.  | 60 – 110 km/h | 100 km/h      |
|                    | Expressways              | State highways that are median divided, with two or more traffic lanes in each direction, grade separated intersections, access controlled, with a straight or curved alignment                            | N/A           | 100-110 km/h  |

### Exceptions to the table of classifications

| Class of road   | Description   | Proposed speed limit |
|---|---|----------------------|
| Beaches   | Beaches to which the public have access   | 10 – 60 km/h         |
| Unconventional, low-volume or low speed road types                          | Parking areas, beach access points, riverbeds, cultural and recreational reserve or similar.                      | 10 – 30 km/h         |
| Unsealed roads  | Roads that are unsealed   | 60 – 80 km/h         |
| Urban streets with significant levels of pedestrian and/or cycling activity | Main streets, residential and neighbourhood streets with significant levels of pedestrian and/or cycling activity | 40 km/h              |
| Urban intersection speed zone   | Can be variable or permanent speed limit to address high risk crash types at an intersection                      | 30 – 40 km/h         |
| Rural intersection speed zone   | Can be variable or permanent speed limit to address high risk crash types at an intersection                      | 60 – 70 km/h         |
| Mountainous or hill corridors   | Roads where the alignment is tortuous   | 60 – 80 km/h         |

## Questions

*Do you have any comments on the above proposals?*

### Proposal 6 - update the Director's criteria for assessing speed management plans for certification

**The draft Rule proposes to update the criteria RCAs must meet when submitting speed management plans for certification.**

Under the draft Rule, RCAs submit their plans to the Director and must confirm they have met the following:

- consultation requirements (including publishing a summary of submissions and how that feedback was taken into account)
- cost benefit analysis requirements
- speed limits have been set in accordance with the speed limit classifications
- speed limit requirements outside schools in accordance with the new Rule
- has regard to any Ministerial Speed Objective.

If the Director is satisfied the RCA has met the requirements, they must certify the plan. If they are not satisfied, they must refer the plan to the RCA with recommendations for how to meet the requirements. The RCA must have regard to those recommendations before resubmitting the plan.

The Director will check the RCA has confirmed it has completed all steps required by the Rule, but will not have a role to re-evaluate decisions of the RCA.

## Questions

*Do you have any comments on the above proposals?*

### Proposal 7 – reverse recent speed limit reductions

**The draft Rule proposes that certain speed limits reduced since 1 January 2020 will be reversed by 1 July 2025**

The draft Rule proposes to require speed limits reduced since 1 January 2020 to be reversed on the following roads:

- local streets with widespread 30km/h speed limits surrounding a school
- arterial roads (urban connectors)
- Rural State highways (interregional connectors)

#### *30km/h zones surrounding schools*

The 2022 Rule allows permanent 30km/h speed limits around schools. This has resulted in some cases of whole areas reduced to 30km/h because there is a school in the area. The draft Rule removes the ability for permanent speed limit reductions around schools and RCAs will need to meet the proposed requirements of variable speed limits outside school gates (see proposal 3).

The streets surrounding the school will need to reverse to their previous speed limit, and introduce variable speed limits on the stretch of road outside school gates, by 1 July 2025.



### Arterial roads

Arterial roads or urban connectors are primarily designed for the efficient movement of people and goods between different parts of urban areas, with little interaction between the adjacent land use and the street.

The draft Rule proposes to reverse speed limits reduced on arterial roads since 1 January 2020.

### Rural State highways

The draft rule proposes to reverse speed limits reduced on rural State highways since 1 January 2020 unless NZTA (as RCA) can demonstrate public support for the lower speed limit on all or part of the route. If NZTA can demonstrate public support for lower speed limits on part of the State highway (for example, windy, hilly sections), the lower speed limit can be retained for that section. NZTA must undertake new consultation in line with the requirements in proposal 2. As part of this process, NZTA can present economic and safety analysis to inform the public's feedback, but this is not mandatory.

By 1 July 2025, all relevant reduced speed limits must be either recertified or reversed to what they were on 31 December 2019, and updated in the National Speed Limit Register.

### Timeline for reversing speed limits

| Step  | Who                        | Due by                 |
|---|----------------------------|------------------------|
| Identify all roads in scope of reversal   | All RCAs                   | As soon as practicable |
| Submit list of roads to be reversed to the Director   | All local RCAs             | 3 March 2025           |
| NZTA as RCA submits to the Director a list of State highways to retain lower speed limit, including confirmation of public support for the lower limit. | NZTA as RCA                | 3 March 2025           |
| Director certifies the reversed (new) or retained speed limits for all roads in scope.  | Director of Land Transport | 1 May 2025             |
| New speed limits uploaded into the National Speed Limit Register and new signs in the ground.   | All RCAs                   | 1 July 2025.           |

### Questions

*Do you have any comments on the above proposals?*

## WE SEEK YOUR FEEDBACK ON OTHER MATTERS

We are interested in your views on other potential changes outlined below. We have not proposed any specific changes in the draft Rule on these matters, but are seeking feedback on them.

### Speed Management Committee

The Speed Management Committee (the Committee) was established under the 2022 Rule to provide independent oversight of NZTA and ensure a clear separation of its roles as regulator and RCA. The Committee's roles are to review the State highway speed management plan and provide

oversight to its guidance on speed management. To date, the Committee has provided feedback on the interim State highway speed management plan.

The Committee consists of up to nine members, with a mix of experience in road safety, local government, specific road users (eg freight), or other skills and knowledge that enable the Committee to fulfil its functions and duties. Members are paid a daily rate to take part in training to enable them to fulfil their role, and to prepare for and attend Committee meetings.

We welcome your thoughts on the value of the Committee. If it were to be disestablished, we would need to consider whether alternative oversight is needed and if so, through which mechanism.

## Regional speed management plans

Regional speed management plans are intended to support a whole-of-network approach and ensure regional consistency of speed limits. Under the 2022 Rule, territorial authorities would provide information to the Regional Transport Committee which would develop, consult on, and finalise a regional speed management plan. Any territorial speed management plan that was in place would become redundant once a relevant regional speed management plan was published.

So far only one regional speed management plan has been submitted to the Director for certification. We understand some regions have attempted to coordinate plans but progress was slow due to resourcing and alignment issues.

## Higher speed limits on certain roads

The draft Rule enables some roads to have a speed limit set at 110km/h. We are interested in your thoughts on enabling speed limits of up to 120km/h on roads that are built and maintained, and will be managed, to safely accommodate that speed.

## Questions

*Do you have any comments on the other matters outlined above?*